

February 21, 2013

FCC Requests for Environmental Review
Attn: Ramon Williams
445 12th Street SW
Washington, DC 20554

**SUBJECT: REQUEST FOR ENVIRONMENTAL REVIEW - OPPOSITION
NORVADO PROPOSED TOWER
NAMAKAGON
CABLE, BAYFIELD COUNTY, WISCONSIN**

Dear Mr. Williams:

This letter is being submitted in response to the Request for Environmental Review submitted by Mr. Harry M. Wirth in a letter dated December 28, 2012, in reference to File A0812667.

SECTION 1: PROJECT DESCRIPTION

Entity Submitting Request: Norvado
Property Address: Namakagon Dump Road Cable, WI 54821
T-R-S: SW ¼ of the SW ¼ of Section 18, T43N, R05W
Lat/Long: 46° - 11' - 55.74" / 91° - 02' - 57.94"

Further Description:

The proposed project will consist of the construction of a 400-foot (410 feet overall, including appurtenances) guyed telecommunications tower within a wooded area on the subject property. The site is located north of Namakagon Dump Road, less than 1000 feet northeast of a landfill, in Cable (Town of Namakagon), Bayfield County, Wisconsin. Proposed equipment will be located within a fenced, graveled compound to be constructed near the base of the tower. Access will be provided by a proposed gravel access drive, connecting the site with Namakagon Dump Road to the southeast. The surrounding landscape is primarily wooded, with the exception of the landfill to the south.

SECTION 2: ENVIRONMENTAL REVIEW REQUEST OPPOSITION

In Mr. Wirth's letter, he identified three effects the tower may have: light pollution, overall visibility in the area, and effects the tower may have on sacred land, Namakagon Lake, and the Namakagon River.

Light Pollution: The proposed tower will utilize FAA Lighting Style E, Medium-Intensity, Dual-Obstruction Lighting Standards. Lighting Style E uses medium-intensity L-865, white, flashing strobe lights for day and twilight protection and both red flashing L-864 and steady-burning L-810s for night protection. At night, three steady burning red lights will be visible at 100 and 300 feet above ground level (agl), and two red beacon (slow flashing) lights will be visible at 200 feet agl and one at 400 feet agl. This lighting style is what is standard, and as required by FAA regulations. The

addition of these red lights during the night does not constitute an addition of excessive artificial light, and will not prevent people from seeing the night sky clearly, per the definition of light pollution. White blinking lights at 200 and 400 feet agl during the day will also not inhibit views of the land or sky. Therefore, the proposed lighting on the tower will not result in light pollution. Lighting is required for this tower, and cannot be omitted.

Highly Visible: The proposed 400-foot guyed tower will be visible from multiple areas throughout the nearby vicinity, especially those with open, uninterrupted expanses of little to no vegetation (lakes). Conversely, the tower will not be visible from within any wooded areas, or areas with mature vegetation in the immediate foreground. Additionally, the ground elevation at the proposed tower center is 1493 feet above mean sea level (amsl); the nearest water body, Garden Lake, is 1396 feet amsl, a difference of 97 feet.

Based on aerial images, the majority of the shoreline of Garden Lake is wooded, limiting visibility to openings along the northern and western shorelines of these lakes, and from within the lakes themselves. Namakagon Lake is located greater than one mile northwest of the proposed tower site. At this distance, views of the tower will not dominate the viewshed, as evidenced by a representative photograph of an existing 400-foot tower at 6000 feet distance (attached). Power poles, similar to what is present throughout the Namakagon Lake area, are more visually dominant than the tower in the distance.

Effects on Sacred Land/Protected & Namakagon Lake/River: The "sacred land that should be protected land" is the area identified that may be affected by the visual impact and presence of the proposed tower. This area's historical and cultural significance was evaluated to determine if this feature could be considered eligible for listing on the NRHP, and could thus be adversely affected.

The National Park Service, for the purposes of the National Register, define a Rural Historic Landscape as "a geographical area that historically has been used by people or shaped or modified by human activity, occupancy, or intervention, and that possess a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features." This area was inhabited by Chief Namakagon, reportedly the sole resident, from the early 1830's through 1886. Since then, Namakagon has been reshaped with resorts along the lakes, roads, bridges, and utility lines. The continuity of use has been previously altered since Chief Namakagon inhabited the area. Additionally, the significance of Chief Namakagon having resided in this area will not be affected by the construction of a tower.

The Town Planning Committee had previously approved the proposed tower installation. In addition, Bayfield County has approved the proposed tower project. The town committee concluded that the proposed project is the best site to serve the needs of the population. The interested party (Mr. Harry Wirth) supplied a letter relating to the history of the area. This letter indicates the area will be affected, but it does not show the "aesthetic qualities" of the area as eligible for listing on the NRHP that the proposed tower project will affect.

Finally, the Namakagon River is located approximately four (4) miles from the project site, along which are residential properties near Namakagon Lake, nearest the project site. The St. Croix River joins the Namakagon River near Solon Springs, approximately 36 miles from the project site. It is not anticipated that the proposed tower site will have an adverse effect on the 144 miles of

the St. Croix River that are designated as part of the National Scenic Riverway, nor the 101 miles of the Namakagon River designated as a Wild River.

SECTION 3: CONCLUSIONS

No sites identified as listed or eligible for listing on the National Register were identified within the area of potential effects for direct or visual effects. The Chief for whom the area was named after does not provide ample justification to qualify this town as a Historic Site. The landscape has been changed by residential developments along the lakes; roads have been developed throughout the area, bridges cross the lakes and rivers at various points. A golf course is present on the south side of Namakagon Lake and a landfill is present just south of the proposed tower site. Overhead utilities are present throughout the landscape along the roads, extending to homes along lakeshores. From the Namakagon River (located approximately four (4) miles from the proposed tower site), the proposed tower, where visible, will not dominate the landscape. Also, the proposed lighting on the tower will follow that required by the FAA, as supported in Title 47, §17.21.

Edge Consulting maintains a determination of NO EFFECT for this project.

Respectfully,



Tracy L. Drunasky
Environmental Scientist
Edge Consulting Engineers, Inc.

CC: Harry M. Wirth

300-foot Guyed
Tower at 7250'
Distance



NO TRESPASSING
HUNTING OR FISHING
VIOLATOR IS PROSECUTED
UNDER PENALTY OF LAW



400-foot Guyed
Tower at 6000'
Distance

