



September 13, 2012

Candi Miller, Real Estate Specialist  
Verizon Wireless  
9656 South Prosperity Road  
West Jordan, UT 84081

Subject: Verizon Wireless  
SAL Peery Camp  
85-foot Stealth Tower  
Ogden Canyon Highway, Ogden, Weber County, Utah

Dear Ms. Miller:

Tetra Tech, Inc. (Tetra Tech) accepted an order on December 20, 2011 to complete a National Environmental Policy Act (NEPA) review on behalf of Cellco Partnership and its controlled affiliates doing business as Verizon Wireless (Verizon Wireless) for the proposed SAL Peery Camp 85-foot stealth “monopine” monopole telecommunications tower site located on Ogden Canyon Road near Ogden, Utah (the Project) on property owned by the Ogden Chamber of Commerce.

As part of this review, Tetra Tech contracted with Sagebrush Consultants, LLC (Sagebrush) to complete a cultural resources survey of the Project site to identify any archaeological, cultural or historic sites or properties that may be affected by the Project. Sagebrush is an experienced cultural resources service provider permitted to do work in the state of Utah.

In April 2012, Sagebrush completed an intensive cultural resources inventory of the Project area, and one cultural resource site was recorded during this inventory. The site consists of two historic lime kilns with associated roads and quarry areas. The remains of the two kilns were observed built into the southern canyon walls with a level platform above likely used to load limestone into the kilns. It is this level area where Verizon Wireless proposed to construct a telecommunications tower. The site also includes quarry areas to the south and southwest of the kilns and loading platform, a level area below the kilns likely used to unload the finished lime product into wagons, and a road leading from the current Ogden Canyon Highway to the loading platform and quarry areas.

Sagebrush recommended that the kiln site is eligible for listing on the National Register of Historic Places (NRHP) under Criterion A, B, C and D due to the site’s unusual example of the entire process of lime production activity, association with significant historical persons, quality of the remaining structures, and potential to yield additional valuable information related to the history of the region. Based on the findings of the cultural resources inventory of the SAL Peery Camp site, Sagebrush recommended that the Project would result in an adverse effect to historic properties due to direct effects (damage and/or destruction) on the kiln site that would result from construction of the Project.

Only the State Historic Preservation Office (SHPO) can make the final determination regarding eligibility and effects. In a telephone conversation with Lori Hunsaker, Deputy SHPO for the Utah State Historical Society, Tetra Tech discussed the proposed Project and findings of the cultural resources inventory. Ms. Hunsaker indicated that based on the information provided over the phone, she believed that the site

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would be considered eligible for listing on the NRHP and that the Project as proposed would result in an adverse effect to the eligible site. Ms. Hunsaker advised that per the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission* (FCC 04-222), in order to proceed with the Project, Verizon Wireless would need to prepare a mitigation plan in coordination with the SHPO and enter into a Memorandum of Agreement (MOA) regarding adverse effects to historic properties. Ms. Hunsaker was not able to discuss potential mitigative options or MOA terms without a more thorough review of the Project and cultural resources inventory report. It should also be noted that there is a possibility that a mitigation plan acceptable to both parties may not be found.

The finding of adverse effect would also require the completion of an Environmental Assessment (EA), which is a more thorough evaluation of NEPA review items than the Categorical Exclusion review that would be required if the Project did not result in an adverse effect to historic properties. The purpose of the EA is to evaluate the potential environmental impact of a Project and must include an evaluation of alternatives considered and demonstrate that the selected alternative results in the smallest environmental impact or is the only viable alternative.

In response to these findings and as part of the evaluation of alternatives that would be required in the EA, Verizon Wireless is pursuing an alternative location for the proposed tower on the Ogden Chamber of Commerce property. The alternative location is located to the east of the initially proposed location near the parking lot for the trailhead. Sagebrush has indicated that this location would result in no adverse effect to historic properties.

It is our pleasure to assist Verizon Wireless with this project, if you have any questions regarding historic properties or the ongoing NEPA review for this project, please feel free to contact me.

Sincerely,



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