



Environmental Assessment

Department of
Commerce

National
Telecommunications
and Information
Administration

November 2024

US-TX-6056 (DA02178) – Proposed 310-Foot Tall Self-Supporting Lattice Telecommunications Structure

Off FM 779
Alba, Wood County, Texas
Latitude: N 32° 44' 11.1" Longitude: W 95° 36' 0.6"

For Information Contact: Ms. Suzanne Derrick
1401 Constitution Avenue, NW
Washington, D.C. 20230
202.834.3123
www.ntia.gov

Table of Contents

1.0	Executive Summary	1
2.0	Purpose and Need.....	1
3.0	Description of Proposed Action and Alternatives	4
3.1	Introduction	4
3.2	Proposed Action	4
3.3	No Action Alternative	6
3.4	Alternatives.....	6
3.5	Alternatives Considered but Eliminated from Further Discussion.....	6
4.0	Description of the Affected Environment	6
4.1	Noise.....	6
4.2	Air Quality.....	6
4.3	Geology and Soils.....	7
4.4	Water Resources	7
4.5	Biological Resources	8
4.6	Historic and Cultural Resources	10
4.7	Aesthetic and Visual Resources	10
4.8	Land Use.....	11
4.9	Infrastructure	11
4.10	Socioeconomics and Environmental Justice.....	11
4.11	Human Health and Safety.....	11
5.0	Analysis of Environmental Impacts	11
5.1	Noise.....	11
5.2	Air Quality	12
5.3	Geology and Soils.....	12
5.4	Water Resources	13
5.5	Biological Resources	13
5.6	Historic and Cultural Resources	18
5.7	Aesthetic and Visual Resources	19
5.8	Land Use.....	19
5.9	Infrastructure	19
5.10	Socioeconomics and Environmental Justice.....	19
5.11	Human Health and Safety.....	20
6.0	Cumulative Impacts	20
7.0	Applicable Environmental Permits and Regulatory Requirements.....	21
8.0	Consultations	22
9.0	References.....	23

List of Tables

Table 4-1: Non-Aquatic Federally and State Endangered or Threatened Species.....	8
Table 5-1: Federally Endangered or Threatened Species Findings Summary.....	15
Table 7-1: Potential Applicable Statutory, Regulatory, and Other Requirements.....	21
Table 8-1: Agency Consultations.....	22

APPENDIX A - Site Maps and Photographs

APPENDIX B - Air Quality and EPA Programs

APPENDIX C - Geology and Soils

APPENDIX D - Water Resources

APPENDIX E - Biological Resources

APPENDIX F - Historic and Cultural Resources

APPENDIX G - List of Preparers

1.0 Executive Summary

Vertical Bridge BTS II, LLC, (VB BTS II) is utilizing Middle Mile Grant Program funding, provided by the National Telecommunications and Information Administration (NTIA), for the construction of a proposed 310-foot tall overall height self-supporting lattice telecommunications structure within Wood County, Texas. The Proposed Action is being completed as part of a larger initiative to improve communications infrastructure within the State of Texas.

The Proposed Action would improve access to reliable and modern wireless communications capabilities for rural areas of Wood County, Texas in the vicinity of the Proposed Action site. Benefits to the population would include, but are not limited to, improved communications infrastructure, increased educational and economic opportunities, and better access to healthcare services, including telehealth services.

The Proposed Action includes a proposed 100-foot by 100-foot lease area which would be accessible by a proposed approximate 57-foot long by 30-foot wide access/utility easement and would include a proposed approximate 70-foot long by 10-foot wide utility easement. Throughout the planning process, special care was taken to select site locations that were deemed to have a low likelihood to result in adverse impacts to the natural or human environment.

The Proposed Action is subject to the National Environmental Policy Act (NEPA) codified at 42 U.S.C. 4321, et seq; this Environmental Assessment is prepared in accordance with NEPA.

2.0 Purpose and Need

Purpose

The purpose of the Proposed Action is to provide reliable wireless voice and data communications to rural areas of Wood County, Texas and populations in areas surrounding the Proposed Action site. The enhanced capabilities and reliability of voice and data communications resulting from the proposed action would provide additional economic and educational opportunities and access to previously inaccessible telehealth care services for the surrounding communities.

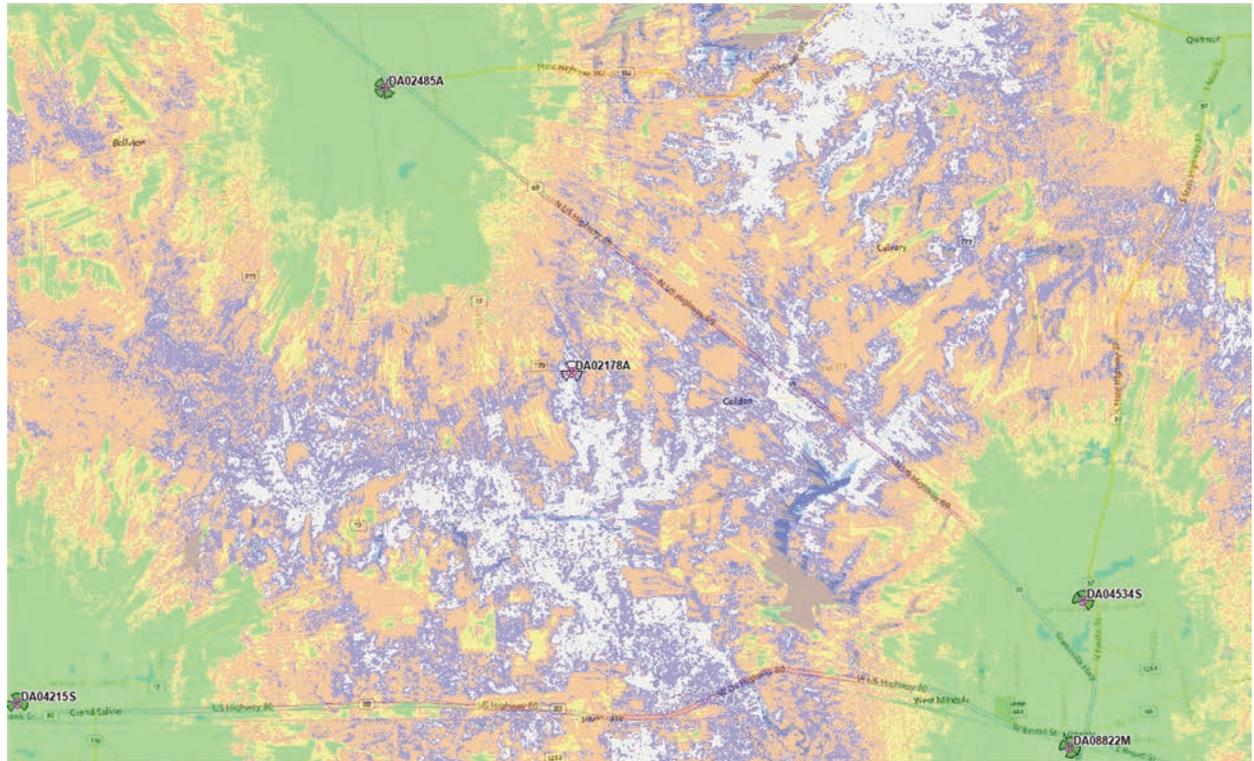
Need

Rural areas are consistently underserved communities as it relates to access to fiber and broadband communications infrastructure, which at one time was considered a luxury, but is now a basic utility for households and businesses. While improvements to communications technologies continue to evolve and improve, rural communities are geographically isolated with low population density, resulting in a lack of the necessary investment in communications infrastructure. Further, the use of alternative means of such communication (such as satellite internet access) are prohibitively expensive for members of these communities. The lack of investment in such infrastructure results in disparities in education, economic opportunities, health, and overall quality of life for current and future members of these communities.

The heat maps included below show the lack of existing coverage for the surrounding community and the improved coverage that would be provided by the proposed action.

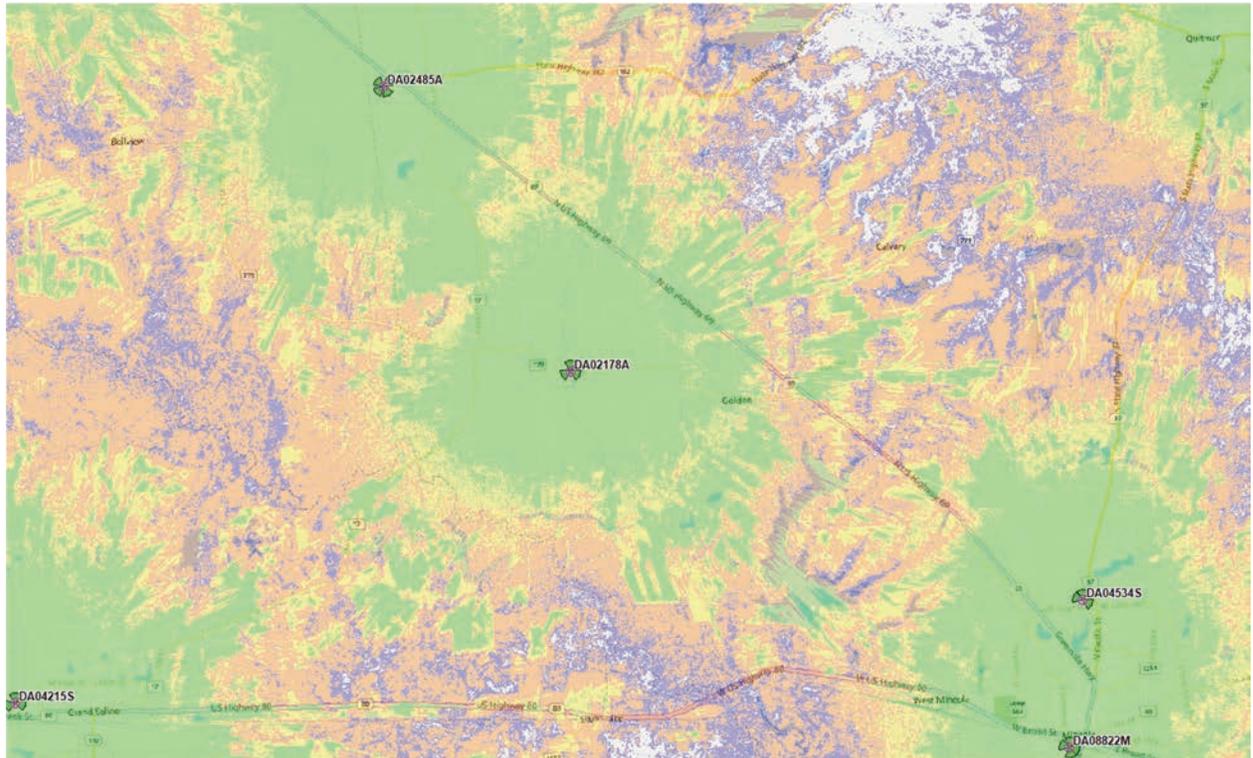
N600 Without DA02178 - Current Coverage + Future Site DA02485

	Min	Max	Legend
	-88	0	Indoor Commercial
	-93	-88	Indoor Residential
	-101	-93	In-Vehicle
	-108	-101	Unreliable



N600 With DA02178 @ 295' Rad Center

	Min	Max	Legend
	-88	0	Indoor Commercial
	-93	-88	Indoor Residential
	-101	-93	In-Vehicle
	-108	-101	Unreliable



3.0 Description of Proposed Action and Alternatives

3.1 Introduction

NEPA requires that the NTIA evaluate both the Proposed Action as well as reasonable alternatives that would also accomplish the purpose and need of the Proposed Action. At minimum, a No Action Alternative must be considered as part of the Alternatives Analysis.

3.2 Proposed Action

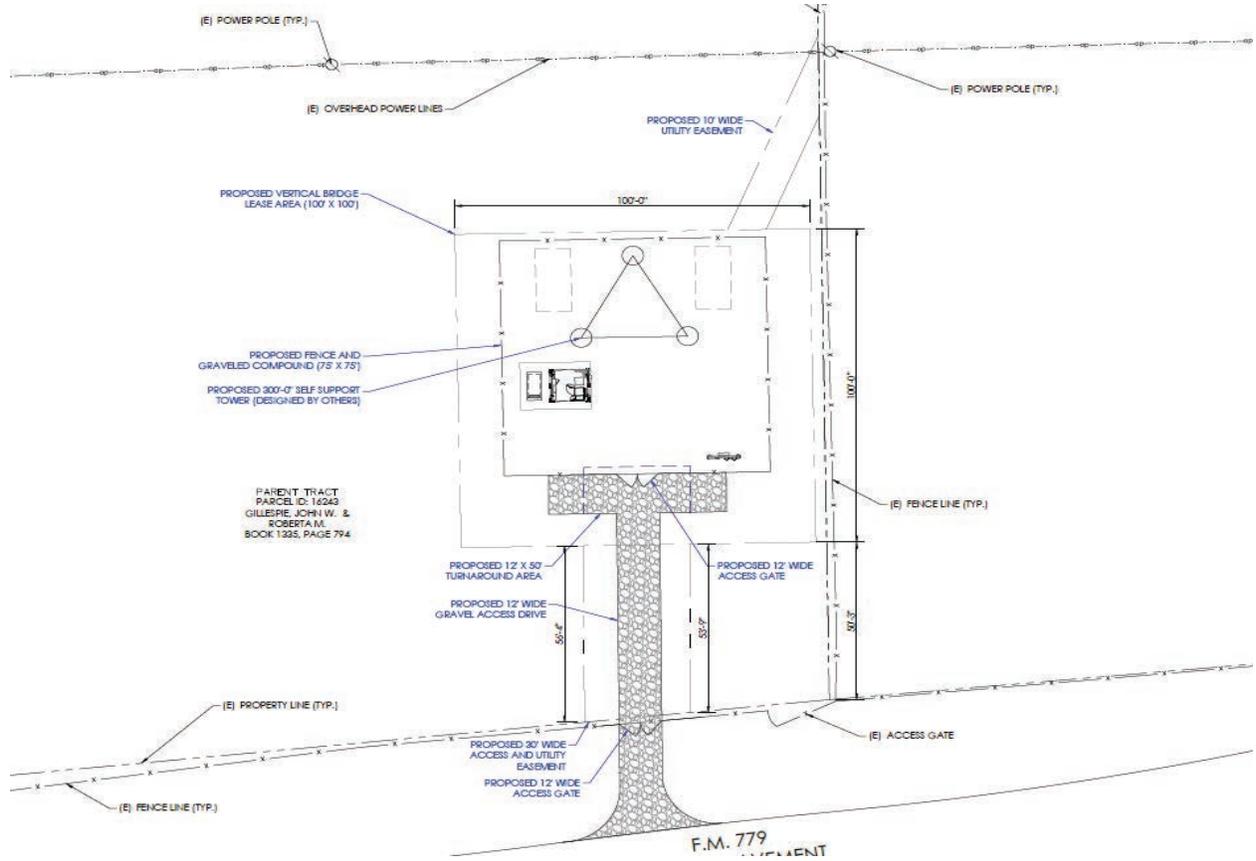
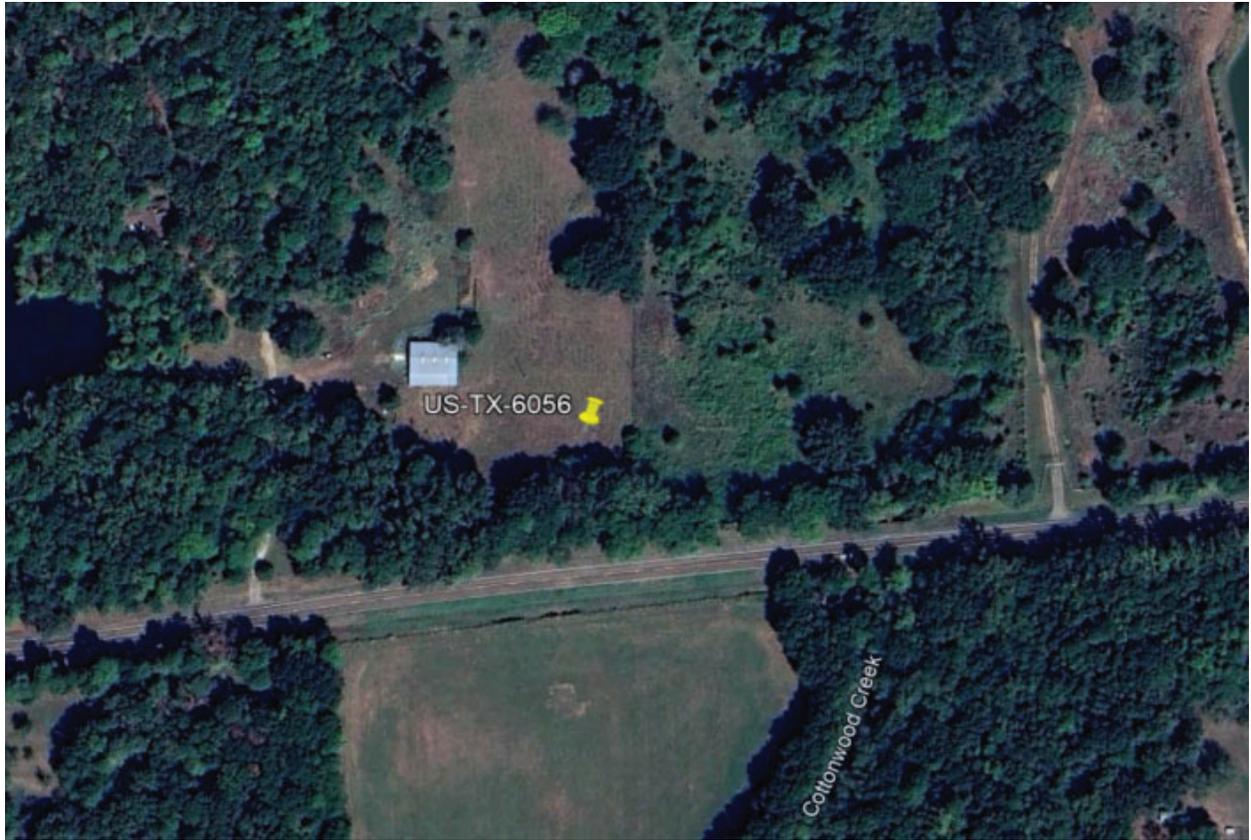
The Proposed Action is comprised of a single telecommunications facility located within southwestern Wood County, Texas. The Proposed Action is located on privately-owned land. The project area is located in an area that does not appear to have been previously disturbed except by agricultural activities. A new 310-foot tall self-supporting lattice telecommunications structure and associated ground-level equipment would be constructed within an approximate 100-foot by 100-foot fenced compound. The proposed facility would include an approximate 81-foot long by 30-foot wide access/utility easement and a proposed approximate 70-foot long by 10-foot wide utility easement.

Construction work for the Proposed Action would begin with the project areas being cleared and graded as necessary using a mini-excavator / Skid Steer and three 4-foot diameter caissons being drilled at the proposed tower legs to a depth of approximately 15 feet below ground surface. Additional excavation activities would include preparation for tower grounding and fiber and power vaults and associated conduits. The standard workday for this project is expected to last from 7am to 7pm. The skid steer is expected to be required for ten workdays, the excavator is expected to be required for three workdays, and the drill rig is expected to be required for two workdays.

Following initial civil work, concrete would be poured for the tower foundation and generator and equipment pads to be located in the tower compound. Following curing, concrete inspection and strength testing would be completed.

Once concrete inspections and strength testing are completed, a crane would be utilized to assemble the proposed lattice tower. The crane would be staged within the proposed project area and would be required for one workday. Ice bridges, antennas and cables, vaults and conduits, generators, and the grounding systems would then be installed, followed by backfill and compaction activities. Following completion of equipment installation and power and fiber connection, power up and testing activities would be completed. Installation of gravel and landscaping (as necessary), barbed-wire fencing, security hardware, and site signage would mark the completion of construction for the Proposed Action site. In total, construction activities are anticipated to last between 30-45 days.

The site location and additional site-specific design details are depicted below. Site maps, plans, and photographs are also provided in Appendix A.



3.3 No Action Alternative

The “No Action” Alternative, which must be assessed in accordance with Federal NEPA regulations, assumes no Federal funding is provided by the Middle Mile Grant Program for the construction of the wireless telecommunications facility. The existing communications infrastructure in areas surrounding the Proposed Action would continue to operate in their current capacity with no changes to communications capabilities for the surrounding communities and would provide no relief to the unserved or underserved rural communities.

Benefits of the No Action Alternative would include avoiding any potential impacts to the project site location as a result of construction activities for the new tower facility (such as the generation of emissions of particulate matter, noise, and solid waste or impacts to any cultural resources) as well as any potential impacts to aesthetics in the area surrounding the project site.

3.4 Alternatives

Other site candidate locations within the search ring were considered, however the current candidate was selected due to multiple factors including constructability and feasibility based on the clients’ needs. No other alternative locations were seriously considered as the Proposed Action was in an agricultural field that requires minimal groundwork and clearing. In addition, the Proposed Action location met the location requirements for RF coverage, and the landowner was agreeable to design parameters and site terms.

3.5 Alternatives Considered but Eliminated from Further Discussion

While other candidate locations within the search ring were considered, none of them were rejected for any specific reason. The height and design parameters chosen are standard to address the carrier’s needs. Design alternatives would include a proposed monopole design or a proposed guyed-type tower. The monopole design would not satisfy the height required to meet the RF objective for this search ring. A guyed-type tower would include a larger tower footprint, and increased potential for visual impacts and impacts to migratory birds. In addition, there were not any other outside factors, such as zoning or coverage needs, that necessitated a change in the standard design parameters.

4.0 Description of the Affected Environment

4.1 Noise

Noise at the project location currently originates from adjacent roadways and rural residential/agricultural developments. Data from the Texas Department of Transportation’s TPP Statewide Traffic County Map indicates that between 729 and 1,270 vehicles travelled along FM 779 in 2023 (TX DOT 2024). Development in the area surrounding the project is very low density and there are no passive parks, preserves or other sensitive receptors within 0.5 miles of the project site.

4.2 Air Quality

Under the Clean Air Act (CAA), the US Environmental Protection Agency (USEPA) establishes National Ambient Air Quality Standards (NAAQS) to protect public health and welfare (see 40 CFR 50). The

CAA requires states to regulate air pollution emission sources to meet and maintain NAAQS, which establish maximum acceptable concentrations for criteria pollutants, including nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}), ozone (O₃), and lead. According to the Texas Commission on Environmental Quality (TCEQ), the state implementation plan strategy for NO₂, CO, SO₂, PM₁₀, PM_{2.5}, O₃, and lead meet the national ambient air quality standards. (TCEQ n.d.)

The Proposed Action site is not located in nonattainment areas for any of the above listed criteria pollutants.

The USEPA has no 90th percentile score data for daily Air Quality Index (AQI) values for Wood County, Texas for the last three years.

4.3 Geology and Soils

Geologically, Proposed Action site is located within the Coastal Plains Physiographic Province, specifically within the West Gulf Coastal Plain section. The Coastal Plain is the flattest province and stretches from Cape Cod to the Mexican border. The region was formed during the early Mesozoic Era during the break-up of Pangea and is considered a passive continental margin (NPS 2023).

According to the USDA Web Soil Survey (Appendix C), soils located within the Proposed Action site consists of Cuthbert gravelly fine sandy loam, 8-25% slopes (CgE) and Manco loam, frequently flooded (Ma). Both soils are classified as “Not prime farmland.” Additionally, the Proposed Action site was not identified on the Protected Agricultural Lands Database.

4.4 Water Resources

Surface Water

The Proposed Action site is not located within or near surface waters. Prior land surveys of the project area indicated the presence of “standing water” in a shallow swale adjoining the west of the proposed access/utility easement. It appears that this feature holds water only temporarily following precipitation events. Additionally, the U.S. Fish and Wildlife Service’s (USFWS) National Wetlands Inventory indicated no wetlands within or in the vicinity of the footprint of the Proposed Action site (Appendix D).

Groundwater

According to the USEPA, the Proposed Action site is not located near a Sole Source Aquifer (see Appendix D). Based on a review of Texas Water Development Board data, depth to groundwater at the Proposed Action area is likely greater than 90 feet. The most recent regional groundwater depth measurement is from a well located approximately 0.70-miles northeast of the proposed action area, with a well depth of 634 feet.

Coastal Zone, Estuary and Inter-tidal Areas

The Proposed Action site is not located within or near coastal zones, estuaries, or inter-tidal areas.

Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 48499C0325C dated September 3, 2010, a portion of the proposed utility easement would be located within Zone A, which is a Special Flood Hazard Area of the 100-year floodplain where base flood elevation has not been determined (Appendix D). The proposed lease area and proposed access/utility easement are not located within a Special Flood Hazard Area.

Wild and Scenic Rivers

According to the National Wild and Scenic Rivers System, the Proposed Action site is not located within 50 miles of wild or scenic rivers.

4.5 Biological Resources

Threatened and Endangered Species

The Endangered Species Act (ESA) requires that federal agencies, in consultation with the U.S. Fish and Wildlife Service (USFWS), must ensure that projects they fund, authorize, or carry out are not likely jeopardize the continued existence of any listed species nor result in the destruction or adverse modification of designated critical habitat of such species. The law also prohibits any action that causes a "taking" of any species listed under the ESA.

Texas Parks and Wildlife Code (PWC) regulates state-listed threatened and endangered animal species. The capture, trap, take, or killing of state-listed threatened and endangered animal species is unlawful unless expressly authorized under a permit issued by the USFWS or TPWD. A copy of *TPWD Guidelines for Protection of State-Listed Species*, which includes a list of penalties for take of species, can be found on the TPWD Wildlife Habitat Assessment Program website. State-listed species may only be handled by persons with appropriate authorization from the TPWD Wildlife Permits Office.

An Official Species List generated from the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool was reviewed for federally listed and proposed threatened and endangered species that may be present at the Proposed Action site. Further, The Texas Parks and Wildlife Division (TPWD) Rare, Threatened, and Endangered Species report was reviewed for state and federally listed species that have been documented by TPWD as occurring in Wood County. A list of these species is provided in Table 4-1 below. Considering the lack of aquatic habitat within or adjoining the Proposed Action Site, non-aquatic species have been excluded from further consideration. Further discussion of specific habitat generally occupied by the identified species is included in Section 5.5 and within the Informal Biological Assessment prepared for the Proposed Action site and included in Appendix E.

Table 4-1: Non-Aquatic Federally and State Endangered or Threatened Species

Common Name	Scientific Name	Federal Status (IPaC)	State Status
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	-
Rufa red knot	<i>Calidris canutus rufa</i>	Threatened	Threatened
Piping plover	<i>Charadrius melodus</i>	Threatened	Threatened
Bachman's sparrow	<i>Peucaea aestivalis</i>	-	Threatened

Common Name	Scientific Name	Federal Status (IPaC)	State Status
White faced ibis	<i>Plegadis chihi</i>	-	Threatened
Wood stork	<i>Mycteria americana</i>	-	Threatened
Black bear	<i>Ursus americanus</i>	-	Threatened
Louisiana pine snake*	<i>Pituophis ruthveni</i>	-	Threatened
Northern scarlet snake	<i>Cemophora coccinea</i>	-	Threatened
Texas horned lizard	<i>Phrynosoma cornutum</i>	-	Threatened

*Species identified on TPWD county species list but not by USFWS IPaC

Critical or Threatened / Endangered Habitat

The Proposed Action is located within the Post Oak Savannah eco-region. This region consists of gently rolling to hilly landscapes covered with oak forests and prairie grasslands. (TPWD 2024)

According to the USFWS Critical Habitat Mapper and the IPaC Official Species List reviewed, no designated or proposed critical habitat is located within the vicinity of the Proposed Action site. Additionally, no suitable habitat for endangered or threatened species exists within the footprint of the Proposed Action site.

Migratory Birds, Eagles, and Their Habitat

Executive Order 13186 requires Federal agencies to work with the USFWS to provide protection for migratory birds. These species are protected under the 1918 Migratory Bird Treaty Act (MBTA) (16 USC 703), which prohibits the taking of any migratory birds, their parts, nests, or eggs.

PWC, Section 64.002, regarding the protection of nongame birds, provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. PWC Section 64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl. PWC Chapter 64 does not allow for incidental take.

Eagles are protected by the MBTA and the Bald and Golden Eagle Protection Act (BGEPA). This law, originally passed in 1940, provides for the protection of the bald eagle and the golden eagle (as amended in 1962) by prohibiting the take, possession, sale, purchase, barter, offer to sell, purchase or barter, transport, export or import, of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit (16 U.S.C. 668(a); 50 CFR 22). "Take" includes pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb (16 U.S.C. 668c; 50 CFR 22.3).

The Proposed Action site is located within the Central North American Migratory Bird Flyway. Based on the agricultural nature of the Proposed Action site, it is anticipated that the site would provide less than optimal habitat for migratory birds. Minimal vegetation is present that could provide opportunities for migratory bird nesting or foraging or the general presence of migratory birds. Further, the presence of migratory birds engaged in migrating activities cannot be ruled out in the general vicinity of the Proposed Action site and the proposed tower structure may provide opportunities for nesting and/or perching.

Breeding territories for bald eagles in East Texas are located mostly along rivers and near reservoirs with large, tall (40 – 120 ft) trees for nesting and roosting. Nests are usually located within one mile of water, such as lakes, reservoirs, creeks, or rivers, and are often located in the ecotone between forest and water. The Proposed Action site is surrounded primarily by agricultural and wooded land

and residential development. The nearest large body of water is over three miles to the southeast (Lake Holbrook). Based on a review of the iNaturalist.org Texas Eagle Nests data, the nearest eagle observation is over 35 miles to the west.

Wetlands Habitat

The Proposed Action site does not include areas that would provide wetlands habitat for protected species or other wetland-dependent species.

4.6 Historic and Cultural Resources

Archaeological and Architectural Resources

The Proposed Action site is not occupied by historic structures.

In July of 2020, the Advisory Council on Historic Preservation (ACHP) approved amendments to the *Program Comment to Avoid Duplicative Reviews for the Wireless Communications Facilities Construction and Modification*. This Program Comment allows select agencies, including NTIA, to rely on existing Federal Communications Commission (FCC) Section 106 procedures for those undertakings also subject to *Section 106 review under the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the FCC* (FCC Nationwide PA) and the *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*, as amended (FCC Collocation PA).

A Phase I Cultural Resources Survey was conducted per the Texas State Archaeological Survey Standards (Council of Texas Archaeologists 2020) and the FCC Nationwide PA for the Proposed Action site for the purpose of identifying and addressing potential impacts to historic and cultural resources that may be located within the areas of potential effects (APEs) for the Proposed Action. ECA reviewed cultural records and databases and identified no cultural resources and one survey (8500017403) within the APE for direct effects. No Historic Properties that are listed in or eligible for listing in the National Register of Historic Places (NRHP) were identified within the ¼-mile APE for visual effects. ECA's Phase I survey did not uncover cultural resources within the APE for direct effects. The Proposed Action site is not occupied by historic structures.

Native American Traditional, Cultural or Religious Resources

Sixteen federally recognized tribes were identified that may attach religious and cultural significance to historic properties within the area of the Proposed Action site. Interested tribes were initially contacted utilizing the Tower Construction Notification System (TCNS) on December 4, 2023. Each interested tribe received initial notification from the TCNS system by December 8, 2023. Further discussion of tribal consultation efforts is provided in Section 5.6.

4.7 Aesthetic and Visual Resources

The Proposed Action site is located within a grassed pasture and would cross through a narrow tree-line along the FM 779 right-of-way. The surrounding area is generally characterized by rural, residential development, wooded, grassed, and agricultural lands, and transportation development.

A review of the Texas Historical Commission ATLAS mapper, the National Park Service Map Finder, and Google Earth indicated no recreational areas, natural features, notable architectural features, or national or state parks are located within the vicinity of the Proposed Action site.

4.8 Land Use

The Proposed Action site consists of a proposed telecommunications facility that would be located in an area that is not currently developed. Surrounding land use for the site is characterized by wooded, grassed, and agricultural land, a pond, and residential and transportation development.

4.9 Infrastructure

Infrastructure within close proximity to the Proposed Action site generally consists of a public road (FM 779) from which access to the proposed facility would be provided. No additional infrastructure, such as power, water, or communications, are located within the footprint of the Proposed Action site, though the potential exists for buried utilities along the FM 779 right-of-way.

4.10 Socioeconomics and Environmental Justice

The Proposed Action would service portions of Wood County, Texas. Wood County maintains a population of 45,341 residents. Thirty-three percent of the population is low income, 18 percent are persons of color, and unemployment is reported at 5 percent (USEPA). A broadband internet Critical Service Gap of 17 percent has been identified in Wood County as compared to a 13 percent state and national average.

4.11 Human Health and Safety

The Proposed Action site is currently grassed pastureland and a narrow-wooded strip along FM 779. The current operations at the proposed project location (agriculture/undeveloped) present no concerns to human health and safety. No hazardous waste sites or registered USTs were identified within the vicinity of the Proposed Action.

Federal regulatory requirements addressing worker safety, protection, and health are administered and enforced by the Occupational Safety and Health Administration (OSHA). OSHA establishes worker protection standards that must be followed to prevent and minimize potential safety and health risks. Texas is not a state with an approved OSHA state plan, meaning federal OSHA regulations apply directly within the state. During construction, OSHA safety standards will be enforced for contractors and their employees. Following construction, there would be no threats to human health and safety from either the tower or the broadband equipment. The tower site will be fenced and posted to prevent unauthorized access to the tower. "NO TRESPASSING" signs will be posted. Climbing pegs will be removed from the tower below 10'. The installation of broadband will likely have a positive impact on the health of residents in the village, since they will be able to access telehealth services. Analysis of Environmental Impacts. Electromagnetic energy emitted by antennas will be below the permissible limits under the FCC's exposure limits, as required.

5.0 Analysis of Environmental Impacts

5.1 Noise

The Proposed Action would result in a negligible and temporary increase in noise levels during construction and installation activities. Construction activities would occur only during daytime hours. Following construction, increases in noise levels would also be negligible and would result from occasional and temporary noise associated with the operation of backup generators in the event of a power outage in the project location. The generators used would be the RD048 which runs a self-test lasting approximately five-twelve minutes. The test runs at a lower, quieter RPM to ensure

the system is running properly while consuming less fuel. Self-tests can be programmed to run weekly, bi-weekly, or monthly. The expected weighted decibel level (dBA) produced by the generator is 65 dBA during self-tests and 70 dBA during normal operating load. Additionally, technicians would visit the site once per month on average for standard maintenance. In the case of emergencies or the need to service or replace equipment, more frequent visit would be required, although the increased frequency would be temporary and insignificant in nature. Therefore, no appreciable level of sustained increased noise would result either during or after the construction of the Proposed Action.

A No Action Alternative would not result in a change in noise levels at the Proposed Action site and would therefore have no adverse noise impacts.

5.2 Air Quality

The Proposed Action would result in negligible and temporary increase in air emissions at and near the Proposed Action site during construction and installation activities as a result of equipment operation and ground disturbing activities. Both equipment operation and ground disturbing activities would be temporary and would occur during the 30-45 days of anticipated construction at the Proposed Action site. During construction, there will be minimal emissions from the excavator, skid steer, and crane for a few days. Equipment used during construction will use well under 600 gallons of diesel per day. Once construction is complete, a minor source of air pollution may be the occasional use of the diesel generator.

In order to minimize the generation of airborne particulate (dust) emissions as a result of ground disturbance, best management practices (BMPs) (e.g. wetting and stabilizing exposed soils, minimizing exposed soils, and minimizing traffic across unpaved areas) would be implemented. Additionally, the maximum footprint of the Proposed Action site would be less than 0.3 acres, thus minimizing the amount of exposed soil subject to dust generation. Further, development activities would be subject to both state and local air quality regulations which have been developed to address current air quality non-attainment and in accordance with the Texas State Implementation Plan (SIP). Following construction, the operation of backup generators would contribute minimally to air emissions. Generators would operate for short periods of time in the event of a power outage in the project location. Only generator engines meeting current EPA air quality standards would be utilized.

A No Action Alternative would result in no construction or operations activities at the project location and therefore would have no impact to the air quality within the vicinity of the Proposed Action site.

5.3 Geology and Soils

The Proposed Action would result in ground disturbing activities measuring less than 0.3-acres and would not occur within soils designated as prime or unique farmlands or farmlands of statewide or local importance (See Appendix C). Based on the small scale of soil disturbance that would be required for the Proposed Action and the lack of significant farmlands, impacts to the quality of soil or surrounding soil and geologic conditions would be negligible.

A No Action Alternative would result in no construction or installation activities at the Proposed Action site and therefore no impact to geologic conditions or soils.

5.4 Water Resources

The Proposed Action would not result in impacts to wetlands or surface waters and is not located within a sole source aquifer area. Prior land surveys of the project area indicated the presence of “standing water” in a shallow swale adjoining the west of the proposed access/utility easement. It appears that this feature holds water only temporarily following precipitation events. Although the jurisdictional status of the feature has not been confirmed, no impacts to the feature are proposed and sediment and erosion control measures (silt fencing and/or sediment traps) would be installed around the project area to minimize the potential for sediment runoff into this feature or elsewhere off-site.

The anticipated regional groundwater levels at the Proposed Action site would be well beneath the extent of any excavation activities, no water withdrawals are proposed, and the passive use of the proposed communications tower is not anticipated to result in adverse effects to groundwater quality. Based on the small footprint and relatively flat terrain of the Proposed Action site, changes to existing stormwater runoff rates or impacts to water resources as a result of erosion and sediment runoff are expected to be non-existent or negligible. Where applicable, sediment and erosion control best management practices would be implemented, such as silt fencing or sediment traps, and erosion control mats. Further, the Proposed Action site would not result in impacts to wetlands or other waters.

A portion of the proposed utility easement associated with the Proposed Action is located within a 100-year floodplain, Zone A. Zone A is a Special Flood Hazard Area and represents areas of the 100-year floodplain where base flood elevation has not been determined. The Grantee has committed to avoiding the placement of equipment within mapped areas of the 100-year floodplain, thus equipment elevation requirements associated with floodplain development would not apply. Utilities placed within this portion of the Special Flood Hazard Area would be trenched underground within the utility easement. After trenching, the ground surface would be returned to its original contours to ensure there would be no change in the ground elevation. Accordingly, the Proposed Action is not anticipated to result in adverse impacts related to flooding.

A No Action Alternative would result in no construction activities at the Proposed Action site and therefore would have no impact to water resources.

5.5 Biological Resources

Based on a review of the information provided by IPaC, TPWD, and site inspections, the Proposed Action site would not provide suitable habitat for federally or state listed or proposed species with the exception of the proposed endangered tricolored bat (*Perimyotis subflavus*). The tricolored bat roosts in clusters of leaves from live or recently dead deciduous hardwood trees. The proposed access/utility easement would cross through a narrow strip of hardwood trees along the FM 779 right-of-way. These trees may provide suitable roosting habitat for the tricolored bat, and several of the trees would require removal for construction of the facility access drive. Tree clearing associated with the project would total approximately 0.01 acres. No sinkholes, fissures, or other karst features were observed nearby the project area nor were large culverts or bridges.

Proposed species are not protected by the take prohibitions of the Endangered Species Act (ESA). However, under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their

action will jeopardize the continued existence of a proposed species. Based on the minimal amount of potentially suitable habitat (approx. 0.01 acres) within the assessment area, the proposed tree clearing is not likely to jeopardize the continued existence of the tricolored bat.

According to a recently published (October 23, 2024) Northern Long-Eared Bat and Tricolored Bat Range-Wide Determination Key (DKey), for actions that may affect a proposed species, agencies cannot consult, but they can confer under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the TCB be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the TCB range that previously received a No effect (NE) or may affect, not likely to adversely affect (MANLAA) determination from the key to confirm that the determination is still accurate.

On October 30, 2024, the above-referenced DKey (Appendix C) and was completed and a MANLAA finding was returned by agreeing to the avoidance of tree clearing during the Winter Torpor (December 15 - February 15) and Pup Season (May 1 - July 15) periods. The 15-day review period for the Dkey elapsed without comment from the USFWS, therefore no further coordination with their office is required for this species unless either of the following occurs:

- New information reveals effects of the action that may affect the northern long-eared bat or tricolored bat in a manner or to an extent not previously considered; or,
- The identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tricolored bat that was not considered when completing the determination key.

While the tree clearing restrictions noted above are not requirements until the official listing of this species, it is recommended that these restrictions be considered for project planning purposes as it is anticipated that these restrictions will be required in order for a MANLAA finding to apply after the TCB has been listed.

Based on the lack of suitable habitat, a determination of “no effect” was made for all other federally listed species and a determination of “no jeopardy” was made for all other federally proposed species.

Additionally, a Project Evaluation Request was sent to the Texas Parks and Wildlife Department (TPWD) for the Proposed Action. The TPWD responded indicating that “the Department does not anticipate significant adverse impacts to rare, threatened, or endangered species, or other fish and wildlife resources.” Documentation of the biological assessment prepared for the Proposed Action site and TPWD consultation is provided in Appendix E. A list of species identified by USFWS and TPWD as potentially occurring at the Proposed Action site along with suitable habitat descriptions and a finding of effect for each is provided in Table 5-1 below.

Table 5-1: Federally Endangered or Threatened Species Findings Summary

Common Name	Scientific Name	Federal Status (IPaC)	State Status	Habitat	Finding of Effect
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	-	Proposed Action located in Zone 1 year-round active zone; Primarily roost among living or dead leaf clusters of live or recently dead deciduous hardwood trees; Winter torpor in culverts, tunnels, bridges and trees	Potential suitable roosting habitat; May affect not likely to adversely affect (No jeopardy while species remains proposed); Tree clearing restricted during winter torpor and pup seasons (Dec 15-Feb 15, May 1-Jul 15)
Rufa red knot	<i>Calidris canutus rufa</i>	Threatened	Threatened	Higher elevation wetland zones with some shrubby vegetation, as well as impounded and unimpounded intermediate marshes	No suitable habitat; According to the IPaC species list for the project area, the rufa red knot only needs to be considered for wind energy projects; No effect
Piping plover	<i>Charadrius melodus</i>	Threatened	Threatened	Found along open sandy beaches, especially above tideline, and alkali flats	No suitable habitat; According to the IPaC species list for the project area, the piping plover only needs to be considered for wind energy projects; No effect
Alligator snapping turtle	<i>Macrochelys temminckii</i>	Proposed Threatened	-	Slow-moving, deep water of rivers, sloughs, oxbows, and canals or lakes associated with rivers; Nest adjacent to such waters	No suitable habitat; No jeopardy

Common Name	Scientific Name	Federal Status (IPaC)	State Status	Habitat	Finding of Effect
Bachman's sparrow	<i>Peucaea aestivalis</i>	-	Threatened	Open pine woods with scattered bushes and grassy understory in Pineywoods region, brushy or overgrown grassy hillsides, overgrown fields with thickets and brambles, grassy orchards; remnant grasslands in Post Oak Savannah region; nests on ground against grass tuft or under low shrub	No suitable habitat; No effect
White faced ibis	<i>Plegadis chihi</i>	-	Threatened	Marshes, swamps, ponds and rivers, mostly in freshwater habitats; Nests in marshes; in low tree, on the ground in bulrushes or reeds, or on a floating mat	No suitable habitat; No effect
Wood stork	<i>Mycteria americana</i>	-	Threatened	Prefers to nest in large tracts of bald cypress or red mangrove; forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water	No suitable habitat; No effect
Black bear	<i>Ursus americanus</i>	-	Threatened	This species inhabits forests and nearby openings, including forested wetlands; When inactive, they occupy dens under fallen trees, ground-level or above-ground tree cavities or hollow logs, underground cave-like sites, or the ground surface in dense cover	No suitable habitat; No effect

Common Name	Scientific Name	Federal Status (IPaC)	State Status	Habitat	Finding of Effect
Louisiana pine snake	<i>Pituophis ruthenium</i>	-	Threatened	Deep sandy soils with large stands of well-managed long leaf pine woodlands	No suitable habitat; No effect
Northern scarlet snake	<i>Cemophora coccinea</i>	-	Threatened	Prefers well drained soils with pine, hardwood, or mixed hardwood scrub in addition to open grassland habitats with appropriate soils	No suitable habitat; No effect
Texas horned lizard	<i>Phrynosoma cornutum</i>	-	Threatened	Inhabits open arid and semiarid regions with sparse vegetation with grass, cactus, or scattered brush or scrubby trees; Soil may vary in texture from sandy to rocky; When inactive, individuals burrow into the soil, enter rodent burrows, or hide under rocks	No suitable habitat; No effect

Migratory Birds and their Habitats

Per the USFWS *Recommended Best Management Practices for Communication Tower Design, Siting Construction, Operation, Maintenance, and Decommissioning* (USFWS, 2021), “evidence suggests that night-migrating songbirds are either attracted to or disoriented by tower obstruction warning lighting systems, especially during overcast (i.e., low cloud ceiling), foggy, or otherwise low visibility conditions. Birds aggregate in larger numbers at towers with non-flashing lights compared to those with flashing lights, although birds aggregate at flashing lights during the “on” phase, they disperse during the “off” phase. Additionally, birds moving across the landscape at night (e.g. owl and seabirds) can collide with communications tower wires when they are placed in high movement areas.” Further, communication towers may cause direct and indirect bird mortality through collisions with towers or guy wires or from exhaustion from circling a tower; through construction, operation, and maintenance activities; and significant loss of fat reserves spent while circling towers, leading to reduced survival during long migrations.

The Grantee has proposed to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure. Based on the specifications of the proposed tower structure, the Grantee has conformed to USFWS-recommended siting and construction measures for new

towers including 1) avoiding the use of guy wires, 2) utilizing the preferred lighting scheme for tower structures (flashing white/red lights), 3) selecting already degraded areas for tower placement, 4) not siting the tower in or near wetlands, other known bird concentration areas, or in known migratory bird movement routes, daily movement flyways, areas of breeding concentration, in habitat of threatened or endangered species, key habitats for birds of conservation concern, or near breeding areas of prairie grouse, 5) avoiding ridgelines, coastal areas, wetlands, or other known bird concentration areas, and 6) designing tower and associated facilities so as to avoid or minimize habitat loss within and adjacent to the tower footprint. Further, considering the habitat present on site which consists of a grassed pasture and a narrow tree line along the FM 779 right-of-way, the Proposed Action site is not expected to provide quality migratory bird habitat, thus pre-construction nest clearance surveys are not deemed necessary. Considering the USFWS guidance and the specification of the Proposed Action, the Grantee has committed to mitigation measures that would decrease risks to migratory birds.

Considering the proposed measures, the project is not anticipated to adversely affect migratory birds.

Bald and Golden Eagles

The Applicant would comply with the Bald and Golden Eagle Protection Act, which prohibits the take of bald or golden eagles without authorization from the Secretary of Interior. Based on the data reviewed (inaturalist.org, 2024) and the lack of suitable breeding/foraging habitat within at least three miles of the Proposed Action, no impacts to eagles are anticipated. Should bald eagle nesting occur within 660 feet of the proposed site in the future, guidance provided in the National Bald Eagle Management Guidelines would be followed to minimize the potential for impacts to nesting eagles.

A No Action Alternative would result in no construction activities at the Proposed Action site and therefore would have no impact to biological resources.

5.6 Historic and Cultural Resources

In July of 2020, the Advisory Council on Historic Preservation (ACHP) approved amendments to the *Program Comment to Avoid Duplicative Reviews for the Wireless Communications Facilities Construction and Modification*. This Program Comment allows select agencies, including NTIA, to rely on existing Federal Communications Commission (FCC) Section 106 procedures for those undertakings also subject to *Section 106 review under the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the FCC* (FCC Nationwide PA) and the *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*, as amended (FCC Collocation PA).

The Texas Historical Commission (THC) was provided with a Phase I Cultural Resources Survey for the Proposed Action. The THC issued a “no historic properties affected” determination for above ground and archaeological resources for the Proposed Action. Documentation of THC consultation is included in Appendix F.

Sixteen federally recognized tribes were identified that may attach religious and cultural significance to Historic Properties within the areas of each proposed undertaking. All Native American Tribes that

have expressed interest within this area have either concurred with the project or expressed no further interest. Documentation of THPO consultation is included in Appendix F.

The No Action Alternative would result in no construction activities at the Proposed Action site and therefore would have no impact to historic and cultural resources.

5.7 Aesthetic and Visual Resources

The Proposed Action would include the installation of a proposed 310-foot tall self-supporting lattice telecommunications tower. No sensitive aesthetic or visual are located within the viewshed of the Proposed Action, thus no adverse impacts to aesthetic and visual resources are anticipated.

A No Action Alternative would result in no construction activities or new additions to the landscape at the Proposed Action site and therefore would have no impact to aesthetic and visual resources.

5.8 Land Use

The Proposed Action would result minimal changes to the overall land use for the larger tract on which the Proposed Action would take place, and the Proposed Action would result in no changes to surrounding property land uses.

A No Action Alternative would result in no construction activities at the Proposed Action site and therefore would have no impact to land uses.

5.9 Infrastructure

The Proposed Action would require additional energy demands for the wireless facility, including a temporary increase during construction and installation activities. However, the overall increase in energy demand for the Proposed Action would be within the existing capabilities of local electrical distribution providers during construction and implementation as well as for continued operation of the wireless facilities. No new public roadways would be required for the construction of the Proposed Action, and since the Proposed Action involves unmanned wireless facilities, no water and sewer infrastructure would be required. While minimal impacts to local traffic would potentially occur during the staging and construction portions of the Proposed Action, there would be no long-term impacts to traffic as a result of the operation of Proposed Action.

A No Action Alternative would result in no construction activities at the Proposed Action site and therefore would have no impact to infrastructure.

5.10 Socioeconomics and Environmental Justice

Based on a review of the USEPA EJSCREEN report for Wood County, the County has a lower percentage of people of color, a higher percentage of low-income population, and a lower demographic index than the national averages. As compared to states averages, the County has a much lower percentage of people of color and a similar low-income population. Wood County is a predominantly rural community of northeastern Texas. The enhanced capabilities and reliability of voice and data communications resulting from the Proposed Action would provide additional economic and educational opportunities and improved access to telehealth care services for Wood County residents. This would not only provide a more equitable distribution of these vital services, but also increase the sense of security and wellbeing among the surrounding community. Impacts related to noise, air quality, and traffic disruptions would be minimal both during and post-

construction. The Proposed Action would not result in disproportionately high and adverse environmental effects to EJ communities.

A No Action Alternative would result in no construction activities at the Proposed Action site and would therefore have no impact on the surrounding community, who would continue to lack access to modern communications capabilities and the benefits of access to such services.

5.11 Human Health and Safety

No hazardous waste sites or registered USTs were identified within the vicinity of the Proposed Action. If ground disturbance within the FM 779 right-of-way is required for providing access or utilities to the Proposed Action, the Grantee would identify buried utilities in the right-of-way prior to subsurface construction methods through the use of 811 (call before you dig) and permit-only workers qualified by training or experience to operate heavy machinery and equipment. During construction, Occupational Safety and Health Administration (OSHA) safety standards would be enforced for contractors and their employees. Following construction, the tower would be surrounded by barbed-wire fencing that would include gate access secured by a padlock to prevent and discourage public access to the site. The Proposed Action would result in no adverse impacts to human health and safety. The enhanced capabilities and reliability of voice and data communications resulting from the Proposed Action would be beneficial to human health by providing additional economic and educational opportunities and improved access to telehealth care services for Wood County residents.

A No Action Alternative would result in no construction activities at the Proposed Action site and therefore negatively impact Wood County and surrounding communities, who would continue to have diminished access to healthcare services.

6.0 Cumulative Impacts

Cumulative impacts are the incremental impacts on the environment from the Proposed Action, in addition to the environmental impacts from other past, present, and reasonably foreseeable future (i.e., 20 years) actions. Cumulative impacts can result from individually insignificant but collectively significant actions taking place over a period of time for a particular resource type or area of concern.

The Proposed Action is comprised of the construction and operation of a proposed 310-foot tall self-supporting lattice type tower that would be constructed within a compound of less than 0.3-acres in size.

Impacts to the environment from the Proposed Action and associated actions, when combined with other past, present, or potential future actions, would be minimal. Further, the minimal negative impacts to the environment from the Proposed Action and associated actions would be greatly outweighed by the benefit to quality of life for the population surrounding the Proposed Action area. There are therefore no foreseeable cumulative effects that would result from the Proposed Action.

7.0 Applicable Environmental Permits and Regulatory Requirements

Table 7-1: Potential Applicable Statutory, Regulatory, and Other Requirements

Potentially Applicable Requirement	Relevant Project Information
All Resources	
National Environmental Policy Act (NEPA) of 1969 42 U.S.C. § 4321 et seq.	NEPA requires all federal agencies to assess environmental effects of their proposed actions; this Environmental Assessment fulfills that requirement.
Vegetation, Wildlife, and Fish	
Endangered Species Act of 1973 16 U.S.C. § 1531 et seq.	Sections 7(a)(1) and 7(a)(2) of the Endangered Species Act requires federal agencies to aid in the conservation of listed species and ensure activities are not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habitat; a No Effect determination has been made for protected species and no critical habitat is located within the Proposed Action vicinity.
Waters, Wetlands, and Floodplain Protection	
Clean Water Act 33 U.S.C. § 1251 et seq.	The Clean Water Act prohibits the discharge of any pollutant from a point source into navigable waters; no surface waters have been identified within or near the Proposed Action site.
Floodplain Management Executive Order 11988	Executive Order 11988 requires federal activities to avoid adverse impacts to wetlands where practicable, and Executive Order 11990 requires federal activities to elevate structures located within floodplains above the base flood level where practicable; no wetlands or floodplains have been identified within or near the Proposed Action site.
Protection of Wetlands Executive Order 11990	
Cultural and Historic Resources	
National Historic Preservation Act (NHPA), as amended, inclusive of Section 106 54 U.S.C. § 306108 et seq.	Section 106 NHPA requires federal agencies to identify and assess the effects its actions may have on historic properties; the Section 106 review process has revealed no adverse effects on historic properties as a result of the Proposed Action.
Noise, Public Health, and Safety	
Federal Communications Commission (FCC)	47 CFR 1.1310 provides radiofrequency radiation exposure limits from FCC; the Proposed Action would comply with the criteria set forth in 47 CFR 1.1310.

8.0 Consultations

Table 8-1: Agency Consultations

Agency and Name	Consultation	Status
Texas Parks and Wildlife Department	Protected Species and Natural Resources Consultation	Complete: TPWD response received June 18, 2024
Texas Historical Commission – Justin Kockritz (512) 463-6094	Section 106 Historic Preservation Consultation	Complete: SHPO response received 02/1/2024
Kiowa Indian Tribe Tribal Historic Preservation Office – Amanda Hill (580) 654-2300	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Tonkawa Tribe Tribal Historic Preservation Office – Joshua Waffle (580) 628-2561	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Apache Tribe of Oklahoma Tribal Historic Preservation Office – Darrin Cisco (405) 247-7494 (x. 103)	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Eastern Shoshone Tribe Tribal Historic Preservation Office – Josh Mann (307) 335-2081	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Northern Arapaho Tribal Historic Preservation Office – Benjamin Ridgley (307) 856-1628	Section 106 Historic Preservation Consultation	Complete: THPO response received 12/6/2023 & 1/11/2024
Coushatta Indian Tribe Tribal Historic Preservation Office - Dakota John (337) 584-1401	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Jena Band of Choctaw Indians Tribal Historic Preservation Office – Lille Williamson (318) 992-8258	Section 106 Historic Preservation Consultation	Complete: THPO response received 1/25/2024
Muscogee (Creek) Nation Tribal Historic Preservation Office – Jason Sawyer (918) 732-7835	Section 106 Historic Preservation Consultation	Complete: THPO response received 2/7/2024
United Keetoowah Band of Cherokee Indians Tribal	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024

Agency and Name	Consultation	Status
Historic Preservation Office (918) 871-2852		
Alabama Quassarte Tribal Town Tribal Historic Preservation Office – Mary Tiger (405) 452-3987	Section 106 Historic Preservation Consultation	Complete: THPO response received 12/8/2023
Thlopthlocco Tribal Town Tribal Historic Preservation Office – Ryan Morrow	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Shawnee Tribe Tribal Historic Preservation Office – Tonya Tipton (918) 542-2441	Section 106 Historic Preservation Consultation	Complete: THPO response received 1/19/2024
Northwestern Band of Shoshone Nation Tribal Historic Preservation Office – Montana & Associates LLC (715) 597-6464	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Caddo Nation of Oklahoma Tribal Historic Preservation Office – Jonathan M Rohrer (405) 656 2344	Section 106 Historic Preservation Consultation	Complete: THPO response received 1/24/2024
Mescalero Apache Tribe Tribal Historic Preservation Office – Holly B. Houghten (575) 464-3005	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt = 2/22/2024 and cleared via Escalation on 3/8/2024
Northern Cheyenne Tribe Tribal Historic Preservation Office – Gary LaFranier (406) 477-8114	Section 106 Historic Preservation Consultation	Complete: THPO response received 2/13/2024

9.0 References

Council of Texas Archaeologists – Standards and Guidelines Committee
2020 *Intensive Terrestrial Survey Guidelines*. chrome-
extension://efaidnbmnnnibpcajpcglclefindmkaj/https://counciloftexasarcheologists.org/resources/Documents/CTA%20Intensive%20Survey%20Standards.pdf. Accessed January 10, 2024.

Federal Emergency Management Agency. Flood Map Service Center. 27 April 2024.
<<https://msc.fema.gov/portal/home>>.

Google Earth. 1996 Aerial Photograph. 10 January 2024.

Google Earth. 2003 Aerial Photograph. 10 January 2024.

Google Earth. 2023 Aerial Photograph. 10 January 2024.

Inaturalist.org. Texas Eagle Nests. 10 October 2024.

<https://www.inaturalist.org/projects/texas-eagle-nests>

National Telecommunications and Information Administration. NTIA Permitting and Environmental Information Application. 26 July 2024.

<<https://nbam.maps.arcgis.com/apps/instant/portfolio/index.html?appid=c7906b72e14045bf9fa6fe9add469a0>>.

Natural Resources Conservation Service. Web Soil Survey. 27 April 2024.

<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

National Wild and Scenic River System. 16 October 2024

<https://hub.arcgis.com/datasets/usfs::national-wild-and-scenic-river-line/explore?location=37.978297%2C-96.102423%2C6.00>

Protected Agricultural Lands Database. 1 May 2024. <<https://farmlandinfo.org/statistics/pald>>.

Texas Commission on Environmental Quality. 3 October 2024.

<<https://www.tceq.texas.gov/airquality/stationary-rules/stationary-sources>>.

Texas Department of Transportation TPP Statewide Traffic Count Map

<<https://experience.arcgis.com/experience/6c0166bfc5144afe83926a3a529a8d03>>.

<<https://tpwd.texas.gov/wildlife/wildlife-diversity/wildscapes/wildscapes-plant-guidance-by-ecoregion/post-oak-savannah/#:~:text=Immediately%20west%20of%20the%20East,to%2045%20inches%20per%20year>>.

U.S. Census Bureau. QuickFacts. 27 April 2024.

<<https://www.census.gov/quickfacts/fact/table/woodcountytexas,US,TX/PST045222>>.

U.S. Environmental Protection Agency. Air Quality Index Report. 27 April 2024.

<<https://www.epa.gov/outdoor-air-quality-data/air-quality-index-report>>.

U.S. Environmental Protection Agency. EJSCREEN Report. 25 July 2024.

<<https://ejscreen.epa.gov/mapper/>>.

U.S. Environmental Protection Agency. Map of Sole Source Aquifer Locations. 27 April 2024.

<<https://www.epa.gov/dwssa/map-sole-source-aquifer-locations>>.

U.S. National Park Service. Coastal Plains Physiographic Province. 27 April 2024.

< <https://www.nps.gov/articles/coastalplain.htm>>.

U.S. Fish and Wildlife Service. Coastal Barrier Resource System. 27 April 2024.

<<https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>>.

U.S. Fish and Wildlife Service. Information for Planning and Consultation System. Web. 25 July 2024.

<<https://ipac.ecosphere.fws.gov>>.

U.S. Fish and Wildlife Service. National Wetlands Inventory. Web. 27 April 2024.

<<https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>>.

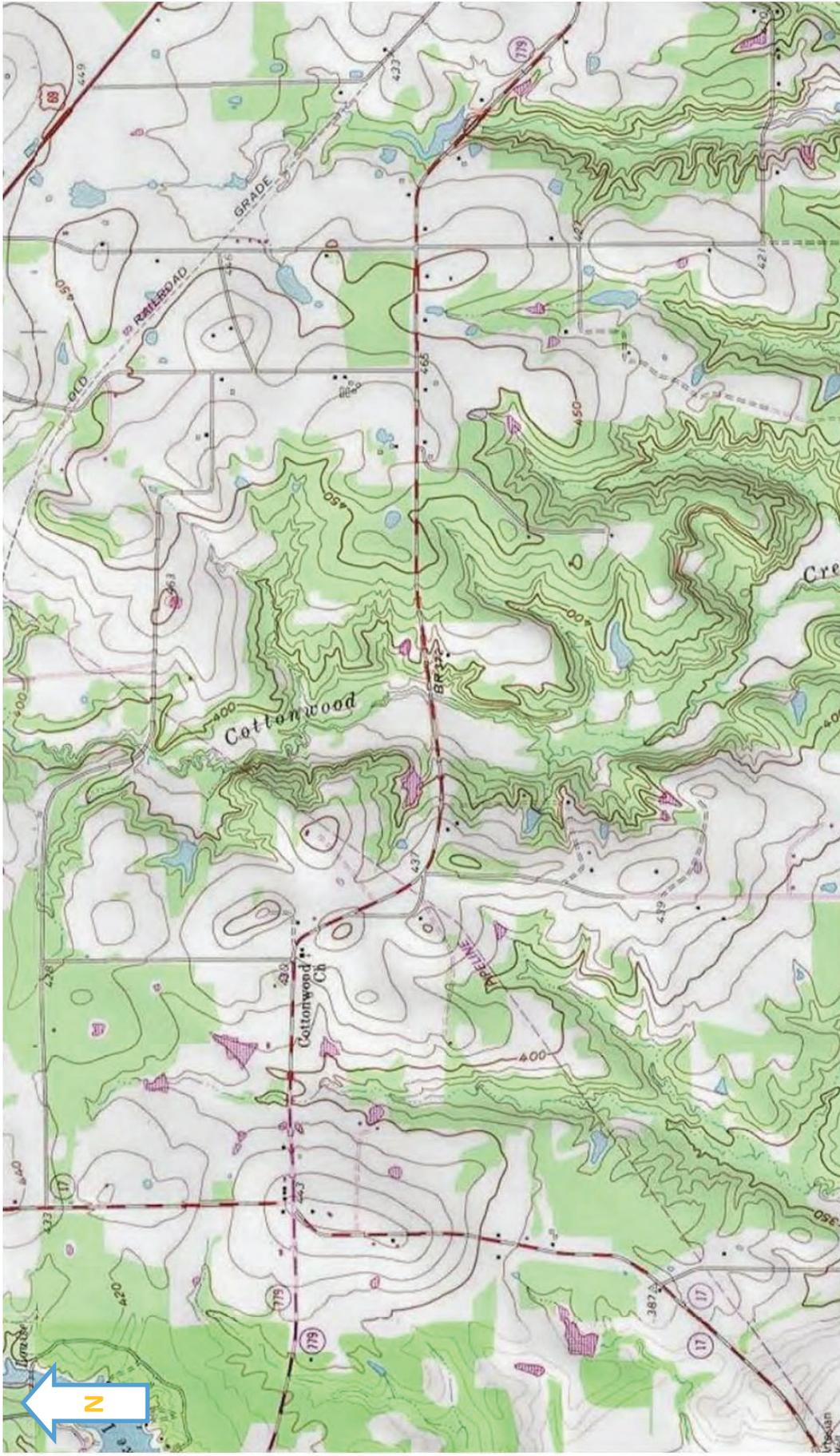
U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. Alba, TX (1958, photorevised 1981).

U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. Calvary, TX (1959, photorevised 1981).

U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. Golden, TX (1959, photorevised 1981).

U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. Grand Saline, TX (1959, photorevised 1981).

Appendix A
Site Maps and Photographs

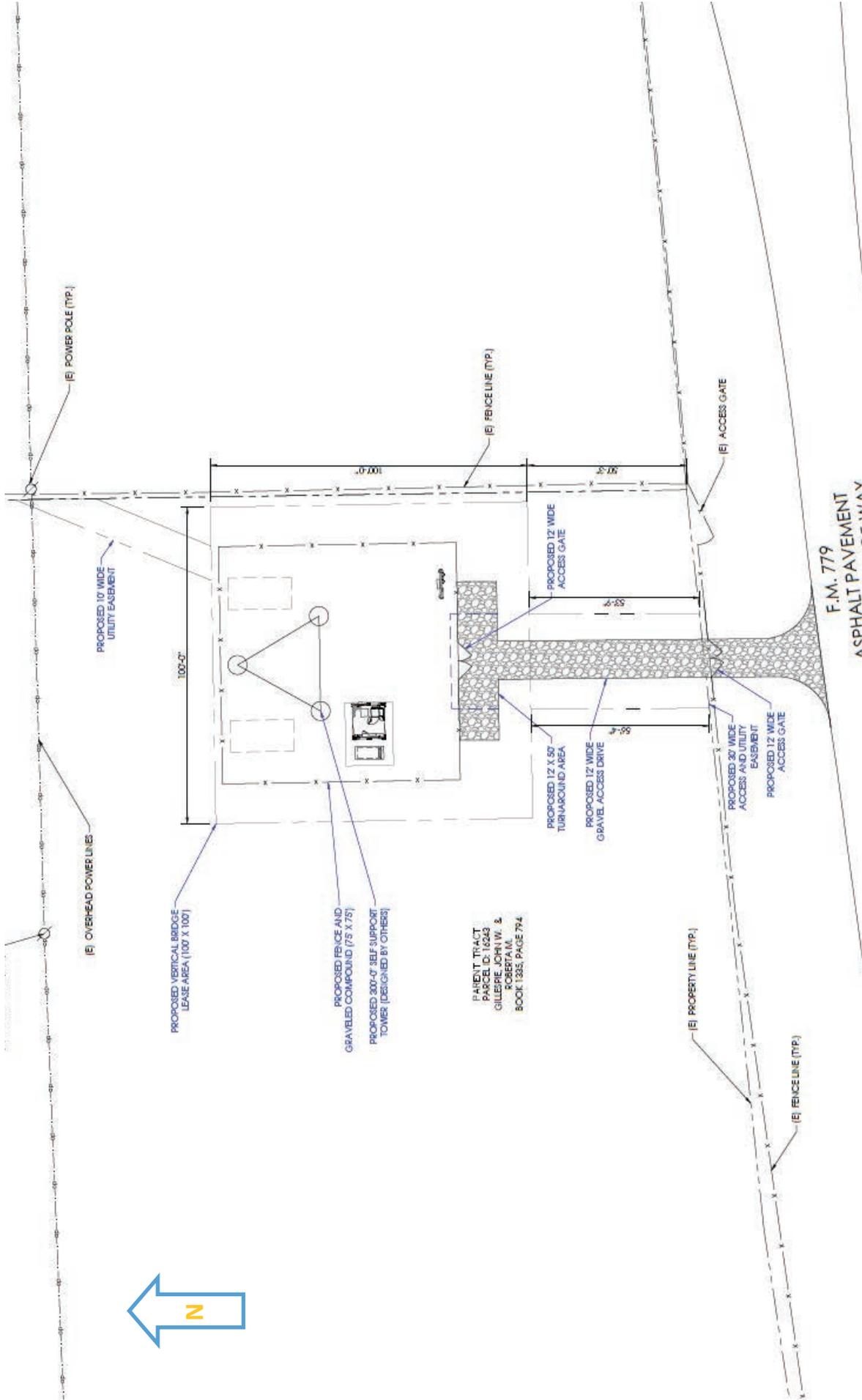


Source: USGS Topographic Maps 7.5 Minute Series, *Alba, TX* (1958, photorevised 1981), *Calvary, TX* (1959, photorevised 1981), *Grand Saline, TX* (1959, photorevised 1981), and *Golden, TX* (1959, photorevised 1981).

Figure 1: Site Location Map

ECA ID: 23-003640

ECA



Source: Applicant

Figure 2: Site Vicinity Plan

ECA ID: 23-003640





Source: Google Earth 2023



ECA ID: 23-003640

Figure 3: Aerial Photograph



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Photographs

ECA ID: 23-003640





E: Northwesterly Overview of the Proposed Lease Area



F: Southeasterly Overview of the Proposed Lease Area



G: Southerly View of the Proposed Access/Utility Easement



H: Northerly View of the Proposed Access/Utility Easement

Photographs

ECA ID: 23-003640

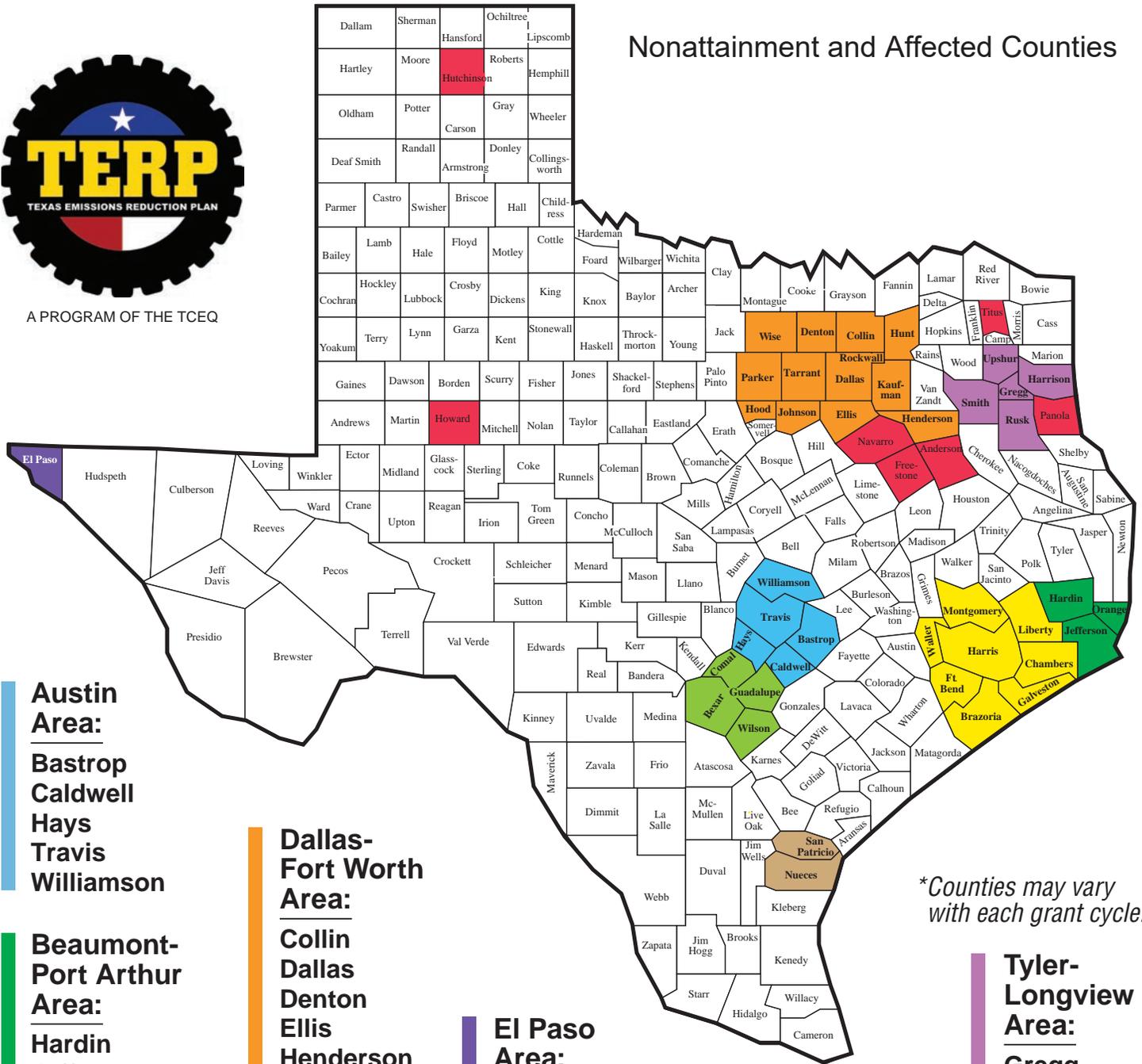
The logo for ECA, consisting of the letters "ECA" in white, bold, sans-serif font, set against a blue rectangular background.

Appendix B
Air Quality and EPA Programs



A PROGRAM OF THE TCEQ

Nonattainment and Affected Counties



Austin Area:

- Bastrop
- Caldwell
- Hays
- Travis
- Williamson

Beaumont-Port Arthur Area:

- Hardin
- Jefferson
- Orange

Corpus Christi Area:

- Nueces
- San Patricio

Dallas-Fort Worth Area:

- Collin
- Dallas
- Denton
- Ellis
- Henderson
- Hood
- Hunt
- Johnson
- Kaufman
- Parker
- Rockwall
- Tarrant
- Wise

El Paso Area:

Houston-Galveston-Brazoria Area:

- Brazoria
- Chambers
- Fort Bend
- Galveston
- Harris
- Liberty
- Montgomery
- Waller

San Antonio Area:

- Bexar
- Comal
- Guadalupe
- Wilson

Tyler-Longview Area:

- Gregg
- Harrison
- Rusk
- Smith
- Upshur

Other:

- Anderson
- Freestone
- Howard
- Hutchinson
- Navarro
- Panola
- Titus

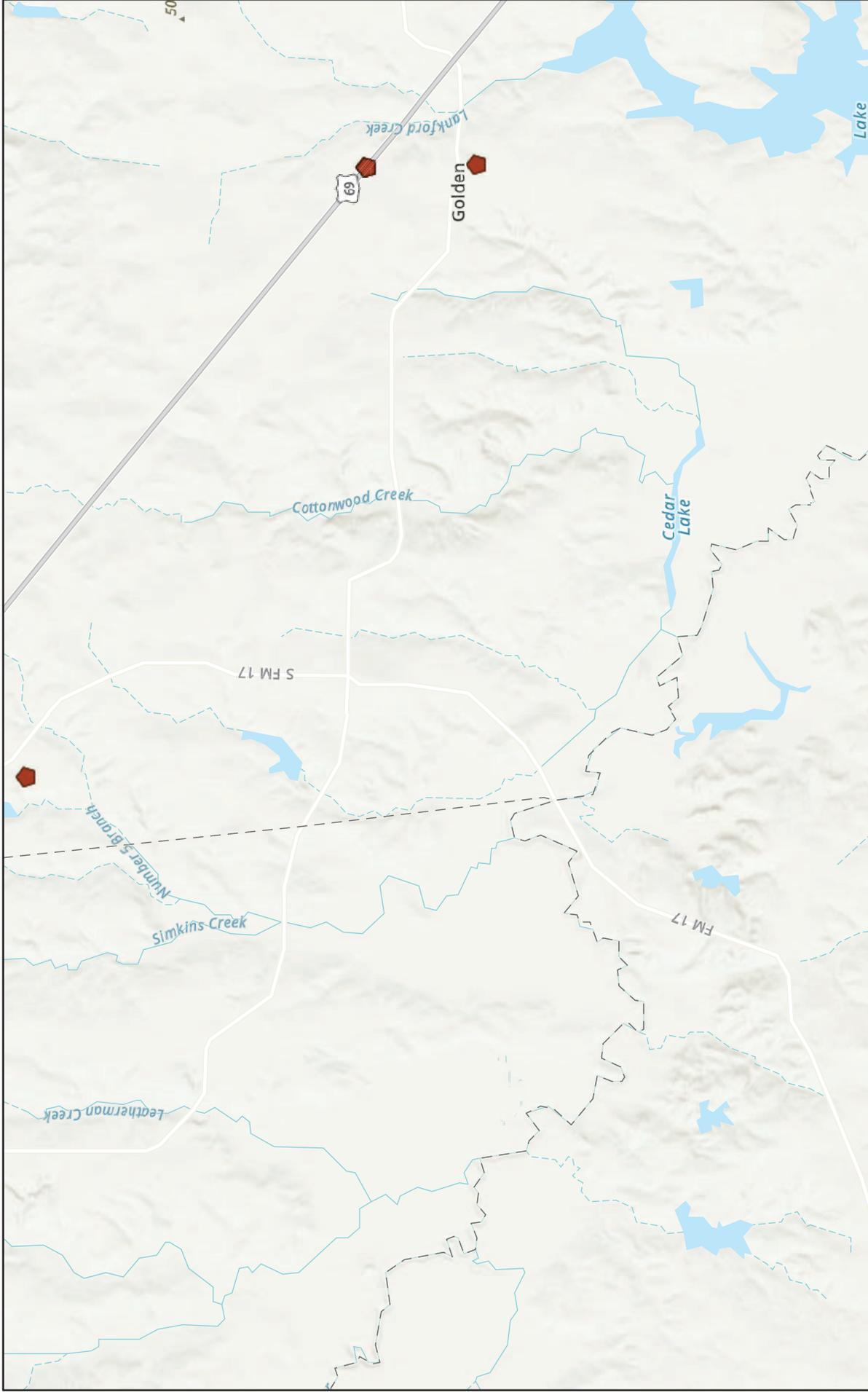
**Counties may vary with each grant cycle.*



January 2023

This map was generated by the TCEQ's Air Grants Division solely for informational purposes and does not represent property boundaries. If you have questions concerning this map, contact the division at 800-919-TERP.

EPA Programs



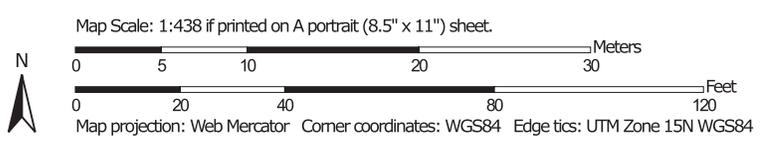
Baylor University, Texas Parks & Wildlife, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, MET/NASA, USGS, EPA, NPS, USDA, USFWS, Esri,

Appendix C
Geology and Soils

Farmland Classification—Wood County, Texas

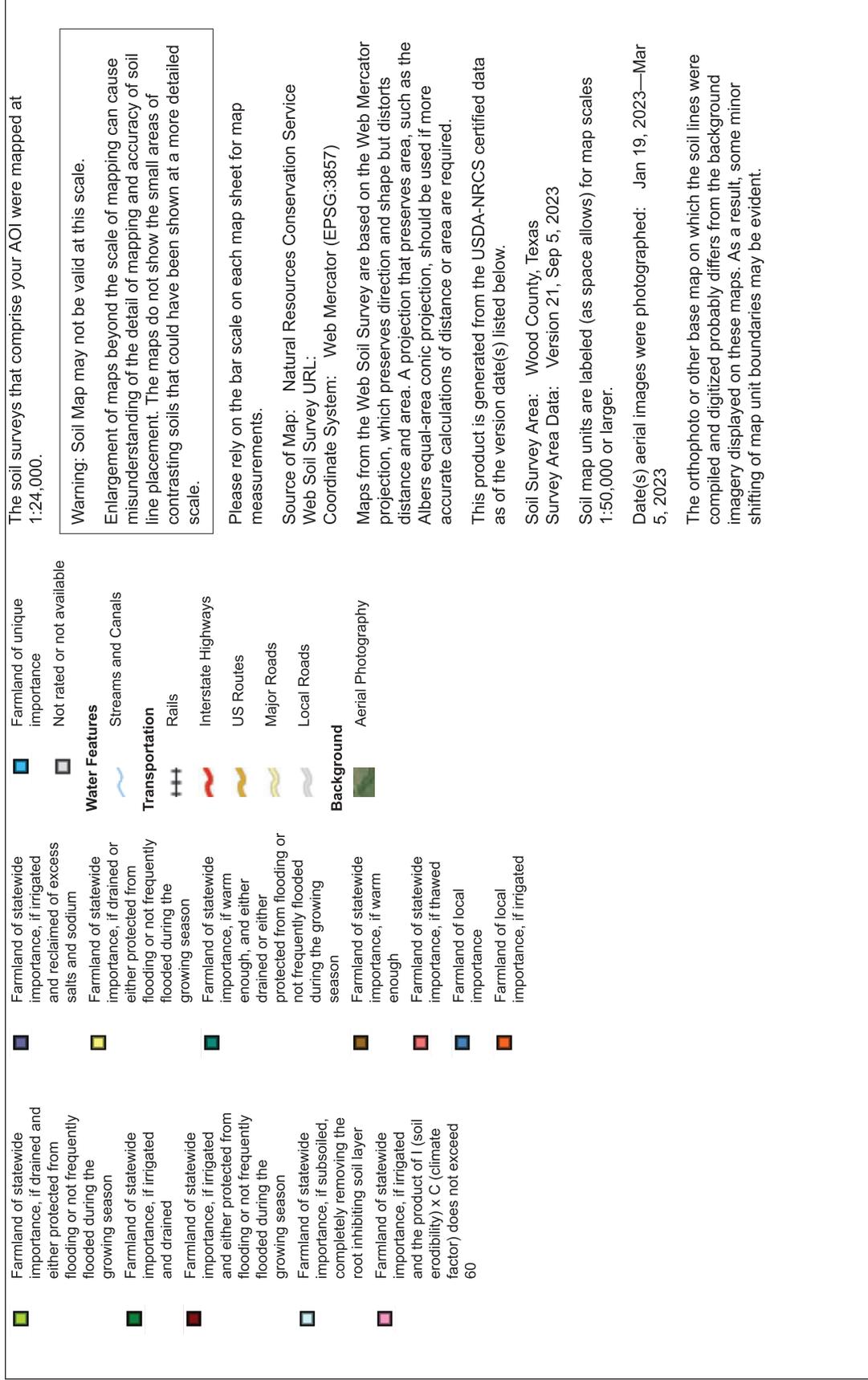


Soil Map may not be valid at this scale.



Farmland Classification—Wood County, Texas

	Prime farmland if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium		Farmland of unique importance		Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
	Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season		Not rated or not available	Prime farmland if irrigated and reclaimed of excess salts and sodium	
	Prime farmland if irrigated and reclaimed of excess salts and sodium		Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if warm enough		Soil Rating Points	Prime farmland if irrigated and reclaimed of excess salts and sodium	
	Farmland of statewide importance		Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if warm enough		Not prime farmland	Farmland of statewide importance	
	Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if thawed		All areas are prime farmland	Farmland of statewide importance, if drained	
	Farmland of statewide importance, if irrigated		Farmland of local importance, if irrigated		Farmland of local importance		Prime farmland if drained	Farmland of statewide importance, if drained	
	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of local importance, if irrigated		Farmland of local importance, if irrigated		Prime farmland if protected from flooding or not frequently flooded during the growing season	Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season	
	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of local importance, if irrigated		Farmland of local importance, if irrigated		Prime farmland if irrigated and drained	Farmland of statewide importance, if irrigated	
	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of local importance, if irrigated		Farmland of local importance, if irrigated		Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	



Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
CgE	Cuthbert gravelly fine sandy loam, 8 to 25 percent slopes	Not prime farmland	0.1	13.9%
Ma	Manco loam, frequently flooded	Not prime farmland	0.9	86.1%
Totals for Area of Interest			1.0	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

MAP LEGEND

- Area of Interest (AOI)
- Area of Interest (AOI)
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points
- Special Point Features**
 - Blowout
 - Borrow Pit
 - Clay Spot
 - Closed Depression
 - Gravel Pit
 - Gravelly Spot
 - Landfill
 - Lava Flow
 - Marsh or swamp
 - Mine or Quarry
 - Miscellaneous Water
 - Perennial Water
 - Rock Outcrop
 - Saline Spot
 - Sandy Spot
 - Severely Eroded Spot
 - Sinkhole
 - Slide or Slip
 - Sodic Spot
- Water Features**
 - Streams and Canals
- Transportation**
 - Rails
 - Interstate Highways
 - US Routes
 - Major Roads
 - Local Roads
- Background**
 - Aerial Photography
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Wood County, Texas
 Survey Area Data: Version 21, Sep 5, 2023

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 19, 2023—Mar 5, 2023

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
CgE	Cuthbert gravelly fine sandy loam, 8 to 25 percent slopes	0.4	19.6%
Ma	Manco loam, frequently flooded	1.7	80.4%
Totals for Area of Interest		2.2	100.0%

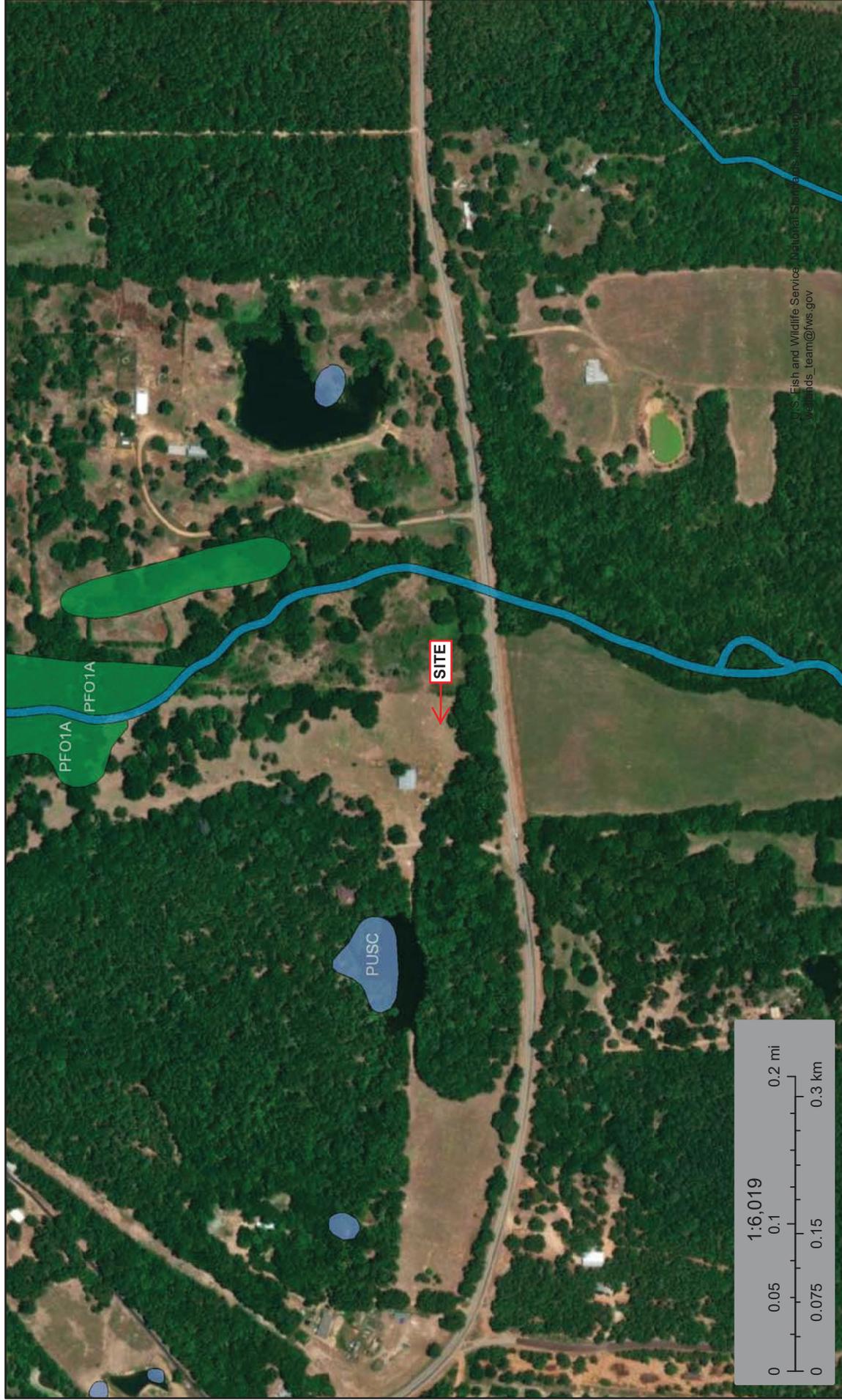
Appendix D
Water Resources



U.S. Fish and Wildlife Service

National Wetlands Inventory

US-TX-6056 (DA02178)



U.S. Fish and Wildlife Service National Wetlands Inventory Team
wetlands_team@fws.gov

December 4, 2023

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette

95°36'19"W 32°44'26"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE)
Zone A, V, A99
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS

- Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs *Zone D*
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

CROSS SECTIONS WITH 1% ANNUAL CHANCE WATER SURFACE ELEVATION

- 20.2
- 17.5
- 8

OTHER FEATURES

- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS

- Digital Data Available
- No Digital Data Available
- Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

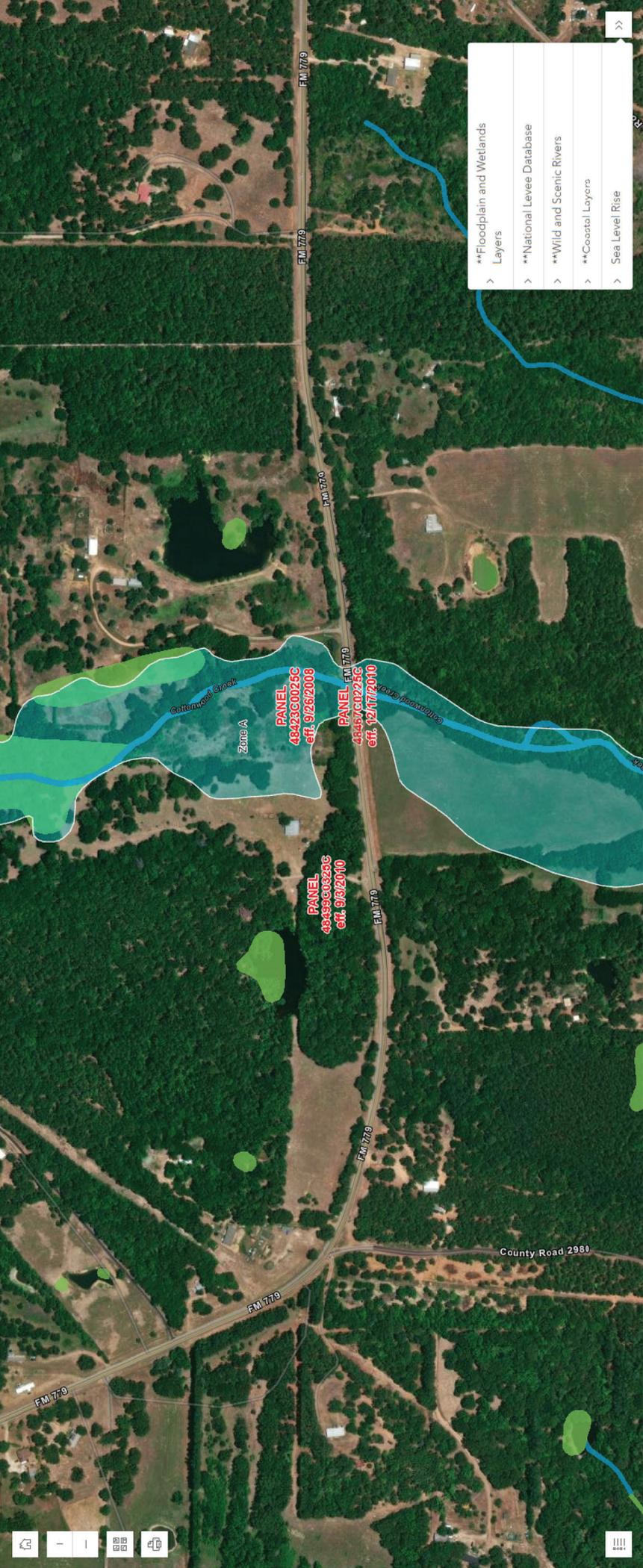
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/22/2023 at 10:13 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



95°35'42"W 32°43'56"N



- > **Floodplain and Wetlands Layers
- > **National Levee Database
- > **Wild and Scenic Rivers
- > **Coastal Layers
- > Sea Level Rise

Appendix E
Biological Resources



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

November 15, 2024

U.S. Department of Commerce
National Telecommunications & Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Attention: Ms. Suzanne Derrick

**Subject: Informal Biological Assessment
Threatened, Endangered, and Proposed Threatened and Endangered Species
Proposed 300-Foot Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
Golden, Tex. USGS Quadrangle Map
Latitude: N 32° 44' 11.1" Longitude: W 95° 36' 0.6"
ECA Project #: 23-003640**

Dear Ms. Derrick:

Environmental Corporation of America (ECA) is assisting VB BTS II, LLC (Applicant) with National Environmental Policy Act (NEPA) documentation for the proposed project. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA), and the NTIA has been identified as the lead federal agency (LFA) for the proposed undertaking.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a “no jeopardy” determination for the proposed endangered tricolored bat and “no effect” determinations for all other species listed as potentially occurring within the project area. Further, ECA utilized the recently published Northern Long-Eared Bat and Tricolored Bat Range-Wide Determination Key (DKey) to reach a determination of “may affect, not likely to adversely affect” prior to official listing of the tricolored bat and contingent upon the avoidance of tree clearing activities during the Winter Torpor and Pup Season for the tricolored bat. Further discussion is provided below. Therefore, it is our recommendations that further consultation with the United States Fish and Wildlife Service (USFWS) would not be required at this time. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1 in Attachment A. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. VB BTS II, LLC plans to install a 310-foot tall self-supporting lattice telecommunications tower structure (overall height including appurtenances) within the project area. The proposed structure will utilize FAA Style E lighting (dual-style, medium intensity), but will not utilize guy-wires.

The project area would consist of a proposed 100-foot by 100-foot foot lease area, a proposed approximate 57-foot long by 30-foot wide access/utility easement, and a proposed approximate 70-foot long by 10-foot wide utility easement. The proposed lease area and utility easement are occupied by a grassed area. The proposed access/utility easement would originate on the northern edge of FM 779 and traverse in a northerly direction through a strip of trees and grassed area. The surrounding area consists of wooded and grassed land with rural residential development.

Photographs of the project area are included in Attachment B. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2 of Attachment A.

Based on the National Wetlands Inventory data, no wetlands or waters are mapped within the proposed project area. During our site visit, no evidence of surface waters or the three criteria required for an area to be characterized as a wetland was observed within the proposed project area. Therefore, it does not appear that the proposed project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation System (IPaC) species list for the proposed project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. The habitat at the site was evaluated during our December 20, 2023 site visit, which was conducted by Ms. Gabriela Ruiz of ECA.

Discussion of Findings

Because the proposed undertaking would not result in impacts to surface waters, aquatic species are not a concern for this undertaking and are excluded from the discussion below. The nearest surface water is Cottonwood Creek located approximately 400 feet east of the proposed lease area at its closest point. Non-aquatic species recognized by the USFWS as potentially occurring in the project area vicinity are listed in the table below along with a habitat description and a finding of effect for each.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Proposed Action located in Zone 1 year-round active zone; Primarily roost among living or dead leaf clusters of live or recently dead deciduous hardwood trees; Winter torpor in culverts, tunnels, bridges and trees	Potential suitable roosting habitat; No jeopardy May affect, not likely to adversely affect per DKey and contingent upon avoidance of tree clearing during Winter Torpor and Pup Season periods (see discussion below)
Piping plover	<i>Charadrius melodus</i>	Threatened	Found along open sandy beaches, especially above tideline, and alkali flats	No suitable habitat; According to the IPaC species list for the project area, the piping plover only needs to be considered for wind energy projects; No effect
Rufa red knot	<i>Calidris canutus rufa</i>	Threatened	Higher elevation wetland zones with some shrubby vegetation, as well as impounded and unimpounded intermediate marshes	No suitable habitat; According to the IPaC species list for the project area, the rufa red knot only needs to be considered for wind energy projects; No effect

The proposed lease area and utility easement are occupied by a grassed area. The proposed access/utility easement would originate on the northern edge of FM 779 and traverse in a northerly direction through a narrow line of trees and grassed area. The surrounding area consists of wooded and grassed land with rural residential development.

Wooded portions of the project area may provide suitable roosting/foraging habitat for the proposed endangered tricolored bat (TCB). No sinkholes, fissures, or other karst features were observed nearby the project area nor were large culverts or bridges. Proposed species are not protected by the take prohibitions of the Endangered Species Act (ESA). However, under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action will jeopardize the continued existence of a proposed species. Based on the minimal amount of potentially suitable habitat (approx. 0.01 acres) within the assessment area, the proposed tree clearing is not likely to jeopardize the continued existence of the tricolored bat.

According to a recently published (October 23, 2024) Northern Long-Eared Bat and Tricolored Bat Range-Wide Determination Key (DKey), for actions that may affect a proposed species, agencies cannot consult, but they can confer under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the TCB be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the TCB range that previously received a No

effect (NE) or may affect, not likely to adversely affect (MANLAA) determination from the key to confirm that the determination is still accurate.

On October 30, 2024, ECA completed the above-referenced DKey (Appendix C) and was able to obtain MANLAA finding by agreeing to the avoidance of tree clearing during the Winter Torpor (December 15 - February 15) and Pup Season (May 1 - July 15) periods. The 15-day review period for the Dkey elapsed without comment from the USFWS, therefore no further coordination with their office is required for this species unless either of the following occurs:

- New information reveals effects of the action that may affect the northern long-eared bat or tricolored bat in a manner or to an extent not previously considered; or,
- The identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tricolored bat that was not considered when completing the determination key.

While the tree clearing restrictions noted above are not requirements until the official listing of this species, it is recommended that these restrictions be considered for project planning purposes as it is anticipated that these restrictions will be required in order for a MANLAA finding to apply after the TCB has been listed.

No other suitable habitat for federally listed or proposed threatened or endangered species identified by the USFWS as potentially occurring within the project area was identified in the project area vicinity during ECA's site visit. Additionally, the proposed project area is not located within designated or proposed critical habitat. A Tower Site Evaluation Form is in Attachment D.

Conclusions

Based on the information reviewed and our site inspection, suitable roosting and/or foraging habitat for the tricolored bat was identified within the project area. Construction of the project would require the removal of approximately 0.01 acres of potentially suitable wooded habitat. Based on the DKey prepared for the project, it is recommended that the following restrictions be considered: No tree clearing during the Winter Torpor (December 15 - February 15) and Pup Season (May 1 - July 15) periods. While these are only recommendations at this time, considering the DKey finding and the stipulations required to reach the finding, it is anticipated that these will be requirements for a determination of MANLAA once the species becomes listed. Therefore, ECA recommends that these restrictions be considered for project planning purposes. Should the tricolored bat be listed, projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or MANLAA determination from the key must be reviewed to confirm that the determination is still accurate.

ECA has found no evidence that suitable habitat for other federally listed threatened and endangered species identified by USFWS as potentially occurring within the project area vicinity is present within the project area. Therefore, the proposed project would have no effect on other federally listed threatened or endangered species. Additionally, the proposed project would not affect designated critical habitat and would not result in the destruction or adverse modification of proposed critical habitat.

Closure

We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ben Salter by phone at 828-226-0056, by email at ben.salter@eca-usa.com.

Sincerely yours,

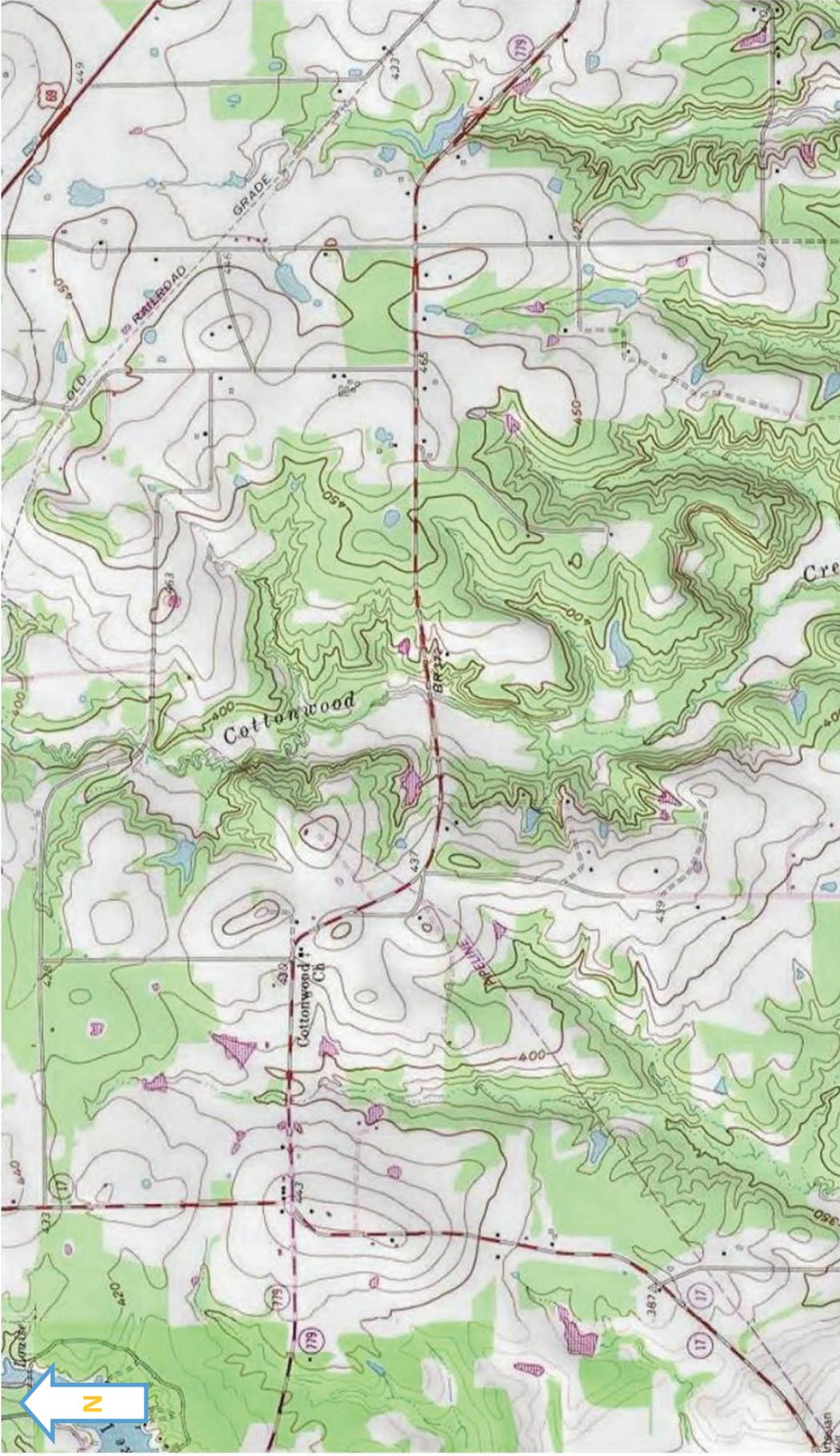
Environmental Corporation of America

A handwritten signature in black ink that reads "Ben Salter". The signature is written in a cursive, slightly slanted style.

Ben Salter
Principal Biologist

ATTACHMENT A

Figures

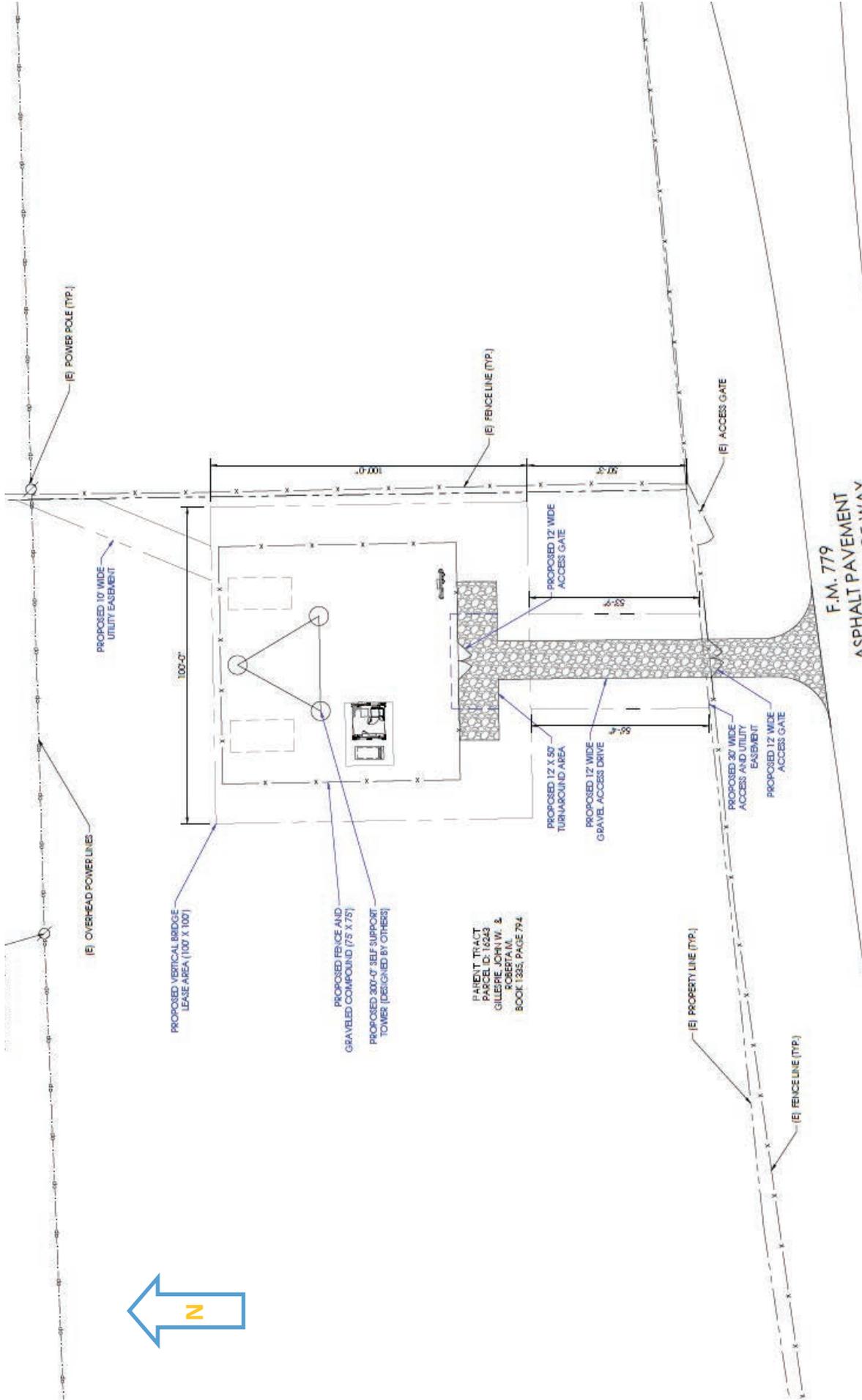


Source: USGS Topographic Maps 7.5 Minute Series, Alba, TX (1958, photorevised 1981), Calvary, TX (1959, photorevised 1981), Grand Saline, TX (1959, photorevised 1981), and Golden, TX (1959, photorevised 1981).

Figure 1: Site Location Map

ECA ID: 23-003640





Source: Applicant

Figure 2: Site Vicinity Plan

ECA ID: 23-003640





Source: Google Earth 2023



ECA ID: 23-003640

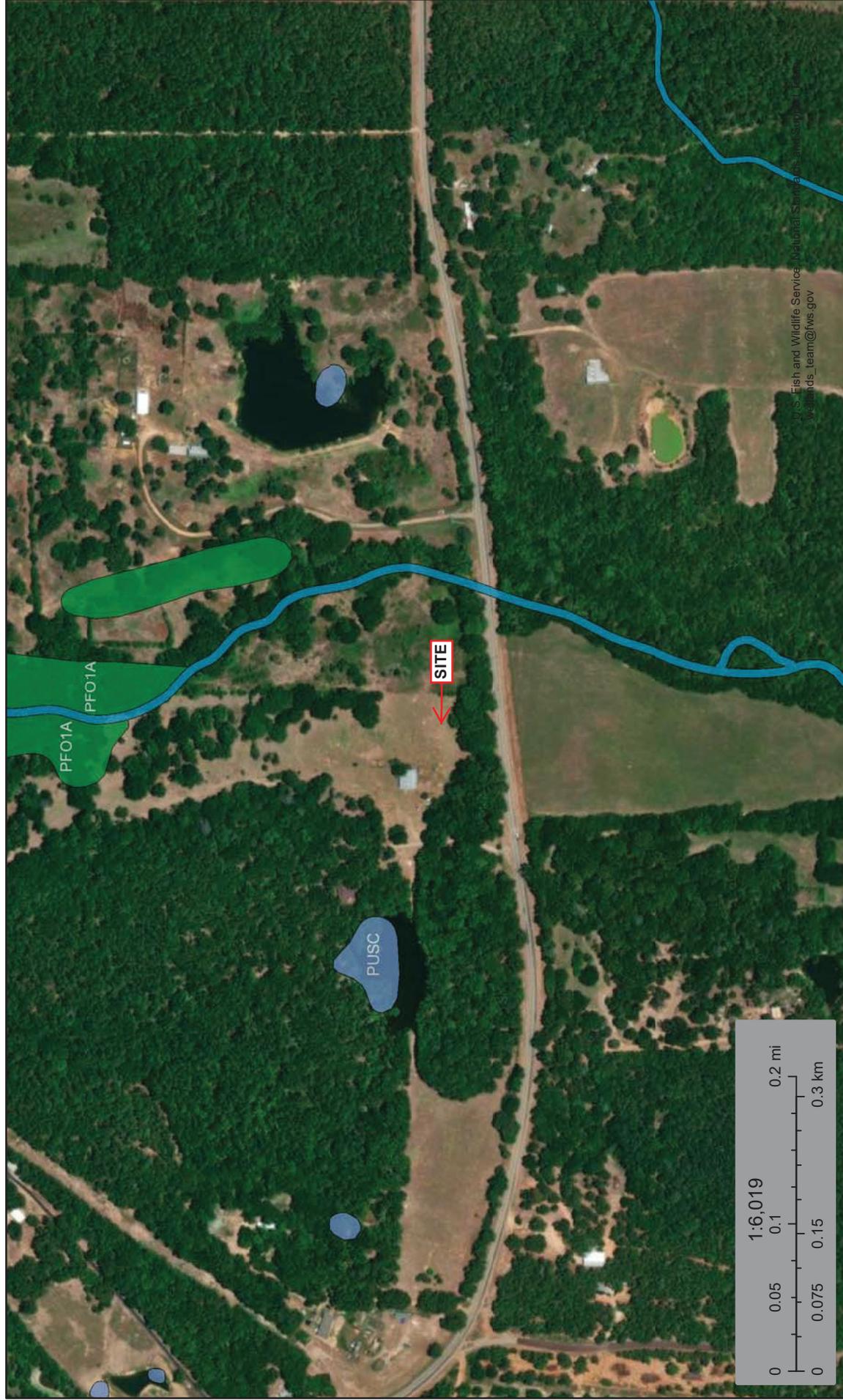
Figure 3: Aerial Photograph



U.S. Fish and Wildlife Service

National Wetlands Inventory

US-TX-6056 (DA02178)



December 4, 2023

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland
-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond
-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette

95°36'19"W 32°44'26"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE)
Zone A, V, A99
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS

- Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs *Zone D*
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

CROSS SECTIONS WITH 1% ANNUAL CHANCE WATER SURFACE ELEVATION

- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS

- Digital Data Available
- No Digital Data Available
- Unmapped

OTHER FEATURES

- Digital Data Available
- No Digital Data Available
- Unmapped

MAP PANELS

- Digital Data Available
- No Digital Data Available
- Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/22/2023 at 10:13 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



MAP LEGEND

- Area of Interest (AOI)
- Area of Interest (AOI)
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points
- Special Point Features**
 - Blowout
 - Borrow Pit
 - Clay Spot
 - Closed Depression
 - Gravel Pit
 - Gravelly Spot
 - Landfill
 - Lava Flow
 - Marsh or swamp
 - Mine or Quarry
 - Miscellaneous Water
 - Perennial Water
 - Rock Outcrop
 - Saline Spot
 - Sandy Spot
 - Severely Eroded Spot
 - Sinkhole
 - Slide or Slip
 - Sodic Spot
- Water Features**
 - Streams and Canals
- Transportation**
 - Rails
 - Interstate Highways
 - US Routes
 - Major Roads
 - Local Roads
- Background**
 - Aerial Photography
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Wood County, Texas
 Survey Area Data: Version 21, Sep 5, 2023

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 19, 2023—Mar 5, 2023

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
CgE	Cuthbert gravelly fine sandy loam, 8 to 25 percent slopes	0.4	19.6%
Ma	Manco loam, frequently flooded	1.7	80.4%
Totals for Area of Interest		2.2	100.0%

ATTACHMENT B

Photographs



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Photographs

ECA ID: 23-003640



E: Northwesterly Overview of the Proposed Lease Area



F: Southeasterly Overview of the Proposed Lease Area



G: Southerly View of the Proposed Access/Utility Easement



H: Northerly View of the Proposed Access/Utility Easement

Photographs

ECA ID: 23-003640



ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arlington Ecological Services Field Office
17629 El Camino Real, Suite 211
Houston, TX 77058-3051
Phone: (817) 277-1100 Fax: (817) 277-1129
Email Address: arles@fws.gov

In Reply Refer To:
Project Code: 2024-0079791
Project Name: US-TX-6056

10/30/2024 17:28:50 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, which may occur within the boundary of your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under section 7(a)(1) of the Act, Federal agencies are directed to utilize their authorities to carry out programs for the conservation of threatened and endangered species. Under and 7(a)(2) and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to determine whether their actions may affect threatened and endangered species and/or designated critical habitat. A Federal action is an activity or program authorized, funded, or carried out, in whole or in part, by a Federal agency (50 CFR 402.02).

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For Federal actions other than major construction activities, the Service suggests that a biological evaluation (similar to a Biological Assessment) be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

After evaluating the potential effects of a proposed action on federally listed species, one of the following determinations should be made by the Federal agency:

1. *No effect* - the appropriate determination when a project, as proposed, is anticipated to have no effects to listed species or critical habitat. A "no effect" determination does not require section 7 consultation and no coordination or contact with the Service is necessary. However, the action agency should maintain a complete record of their evaluation, including the steps leading to the determination of affect, the qualified personnel conducting the evaluation, habitat conditions, site photographs, and any other related information.
2. *May affect, but is not likely to adversely affect* - the appropriate determination when a proposed action's anticipated effects to listed species or critical habitat are insignificant, discountable, or completely beneficial. Insignificant effects relate to the size of the impact and should never reach the scale where "take" of a listed species occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not be able to meaningfully measure, detect, or evaluate insignificant effects, or expect discountable effects to occur. This determination requires written concurrence from the Service. A biological evaluation or other supporting information justifying this determination should be submitted with a request for written concurrence.
3. *May affect, is likely to adversely affect* - the appropriate determination if any adverse effect to listed species or critical habitat may occur as a consequence of the proposed action, and

the effect is not discountable or insignificant. This determination requires formal section 7 consultation.

The Service has performed up-front analysis for certain project types and species in your project area. These analyses have been compiled into *determination keys*, which allows an action agency, or its designated non-federal representative, to initiate a streamlined process for determining a proposed project's potential effects on federally listed species. The determination keys can be accessed through IPaC.

The Service recommends that candidate species, proposed species, and proposed critical habitat be addressed should consultation be necessary. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at: <https://www.fws.gov/service/section-7-consultations>

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (<https://www.fws.gov/library/collections/bald-and-golden-eagle-management>). Additionally, wind energy projects should follow the wind energy guidelines (<https://www.fws.gov/media/land-based-wind-energy-guidelines>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>. The Federal Aviation Administration (FAA) released specifications for and made mandatory flashing L-810 lights on new towers 150-350 feet AGL, and the elimination of L-810 steady-burning side lights on towers above 350 feet AGL. While the FAA made these changes to reduce the number of migratory bird collisions (by as much as 70%), extinguishing steady-burning side lights also reduces maintenance costs to tower owners. For additional information concerning migratory birds and eagle conservation plans, please contact the Service's Migratory Bird Office at 505-248-7882.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in

the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arlington Ecological Services Field Office

17629 El Camino Real, Suite 211

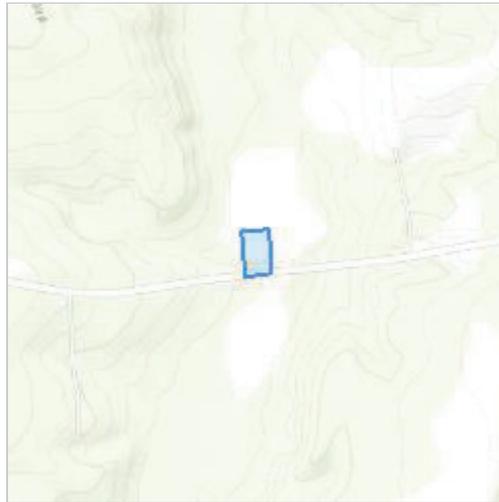
Houston, TX 77058-3051

(817) 277-1100

PROJECT SUMMARY

Project Code: 2024-0079791
Project Name: US-TX-6056
Project Type: Communication Tower New Construction
Project Description: Proposed 310' Lattice Tower
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.7362214,-95.6001259437752,14z>



Counties: Wood County, Texas

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. Your location does not overlap the critical habitat. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot <i>Calidris canutus rufa</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened

REPTILES

NAME	STATUS
Alligator Snapping Turtle <i>Macrochelys temminckii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

CLAMS

NAME	STATUS
Texas Heelsplitter <i>Potamilus amphichaenus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/299	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

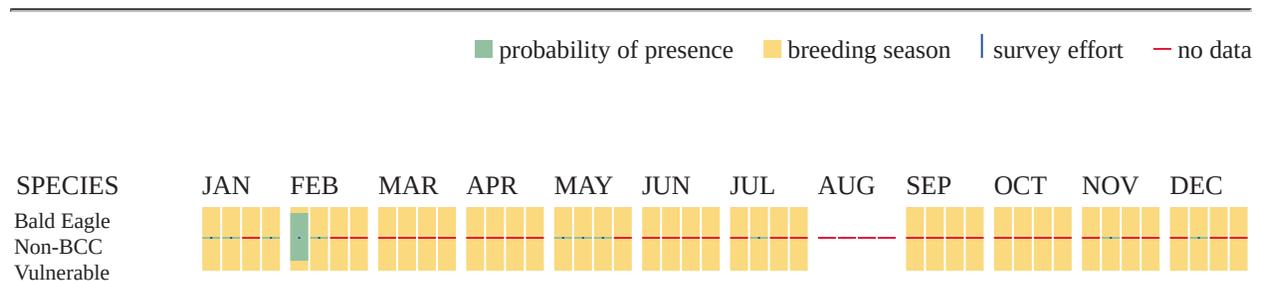
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

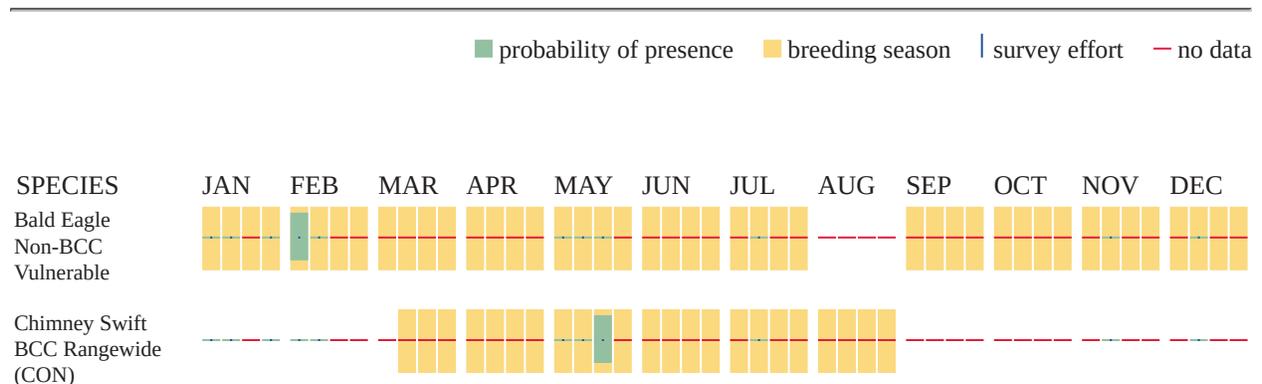
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America
Name: Ben Salter
Address: 1340 Patton Ave
Address Line 2: Suite K
City: Asheville
State: NC
Zip: 28806
Email: ben.salter@eca-usa.com
Phone: 8282260056

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arlington Ecological Services Field Office
17629 El Camino Real, Suite 211
Houston, TX 77058-3051
Phone: (817) 277-1100 Fax: (817) 277-1129
Email Address: arles@fws.gov

In Reply Refer To:
Project code: 2024-0079791
Project Name: US-TX-6056

10/30/2024 18:12:38 UTC

Federal Nexus: yes
Federal Action Agency (if applicable): National Telecommunications and Information Administration

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for 'US-TX-6056'

Dear Ben Salter:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on October 30, 2024, for 'US-TX-6056' (here forward, Project). This project has been assigned Project Code 2024-0079791 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements may not be complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid. Note that conservation measures for northern long-eared bat and tricolored bat may differ. If both bat species are present in the action area and the key suggests more conservative measures for one of the species for your Project, the Project may need to apply***

the most conservative measures in order to avoid adverse effects. If unsure which conservation measures should be applied, please contact the appropriate Ecological Services Field Office.

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed	NLAA
	Endangered	

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

Unless the Service advises you within 15 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that consultation on the Action is complete for northern long-eared bat and/or tricolored bat and no further action is necessary unless either of the following occurs:

- new information reveals effects of the action that may affect the northern long-eared bat or tricolored bat in a manner or to an extent not previously considered; or,
- the identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tricolored bat that was not considered when completing the determination key.

15-Day Review Period

As indicated above, the Service will notify you within 15 calendar days if we determine that this proposed ACTION does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for the northern long-eared bat and/or tricolored bat. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the identified Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that we did not anticipate when developing the key. In such cases, the identified Ecological Services Field Office may request additional information to verify the effects determination reached through the Northern Long-eared Bat and Tricolored Bat DKey.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Alligator Snapping Turtle *Macrochelys temminckii* Proposed Threatened
- Monarch Butterfly *Danaus plexippus* Candidate
- Piping Plover *Charadrius melodus* Threatened
- Rufa Red Knot *Calidris canutus rufa* Threatened
- Texas Heelsplitter *Potamilus amphichaenus* Proposed Endangered

You may coordinate with our Office to determine whether the Action may affect the species and/or critical habitat listed above. Note that reinitiation of consultation would be necessary if a new species is listed or critical habitat designated that may be affected by the identified action before it is complete.

If you have any questions regarding this letter or need further assistance, please contact the Arlington Ecological Services Field Office and reference Project Code 2024-0079791 associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

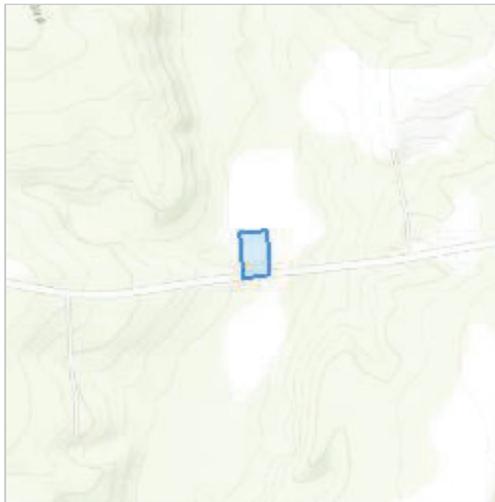
US-TX-6056

2. Description

The following description was provided for the project 'US-TX-6056':

Proposed 310' Lattice Tower

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.7362214,-95.6001259437752,14z>



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect, but not likely to adversely affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

Yes

4. Your project overlaps with an area where northern long-eared bats or tricolored bats may be present and roosting in trees year-round.

Do you understand that your project may impact bats roosting in trees at any time during the year?

Yes

5. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

Note: For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

6. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Yes

7. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

8. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

Yes

9. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

No

10. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

11. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

12. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

No

13. Will the action cause effects to a bridge?

Note: Covered bridges should be considered as bridges in this question.

No

14. Will the action result in effects to a culvert or tunnel at any time of year?

No

15. Are trees present within 1000 feet of the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

16. Does the action include the intentional exclusion of bats from a building or structure?

Note: Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

No

17. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats?**

No

18. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

19. Will the action include or cause any construction or other activity that is reasonably certain to increase average daily traffic permanently or temporarily on one or more existing roads?

Note: For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

21. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

Note: For information regarding NSF/ANSI 60 please visit <https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects>

No

22. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

23. Will the action include drilling or blasting?

Yes

24. Your project overlaps with an area where northern long-eared and tricolored bats may be present year-round.

Will the drilling or blasting produce noise or vibrations above existing background levels that will affect suitable habitat within the active year-round portion for NLEB and/or TCB?

Note: Additional information defining suitable suitable summer habitat for the northern long-eared bat and/or tricolored bat, can be found in Appendix A in the USFWS' Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>

No

25. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

No

26. Will the proposed action involve the use of herbicides or other pesticides other than herbicides (e.g., fungicides, insecticides, or rodenticides)?

No

27. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

28. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

29. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

Yes

30. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

No

31. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

No

32. Does the project intersect with the 0- 9.9% forest density category?

Automatically answered

No

33. Does the project intersect with the 10.0- 19.9% forest density category map?

Automatically answered

No

34. Does the project intersect with the 20.0- 29.9% forest density category map?

Automatically answered

No

35. Does the project intersect with the 30.0- 100% forest density category map?

Automatically answered

Yes

36. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 100 acres in total extent?

No

37. Will the proposed action result in the use of prescribed fire?

Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

No

38. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

39. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

40. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Has a presence/probable absence survey for the tricolored bat following the Service's [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#) been conducted within the project area? If unsure, answer "No."

No

41. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

42. Do any of the trees proposed for cutting or other means of knocking down, bringing down, topping, or trimming provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pine trees)?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

43. Will tree cutting/trimming or other knocking or bringing down of trees occur during Winter Torpor and/or the Pup Season?

Note: Bat activity periods for your state can be found in Appendix L of the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#)

No

44. Do you have any documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

0.01

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America
Name: Ben Salter
Address: 1340 Patton Ave
Address Line 2: Suite K
City: Asheville
State: NC
Zip: 28806
Email: ben.salter@eca-usa.com
Phone: 8282260056

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration
Name: Suzanne Derrick
Email: sderrick@ntia.gov
Phone: 2029410938

ATTACHMENT D

Tower Site Evaluation Form

TOWER SITE EVALUATION FORM

1. Location (Provide maps if possible):

State: TX County: Wood

Latitude/Longitude/GPS Grid: Latitude: 32° 44' 11.1" N, Longitude: 95° 36' 0.6" W

Directions: From Alba, TX: Head south on S. Broadway Street and then turn left onto E. Greenville Street. After 0.5 miles, turn right onto Grand Saline Street and continue for 0.3 miles. Continue onto S. Farm to Market Road 17 and continue for 3.1 miles. Turn left onto FM779 and the project area will be on the left after 1.4 miles.

2. Elevation above mean sea level: ~ 374 feet (NAVD88)
3. Will the equipment be co-located on an existing **FCC licensed tower** or other existing structure (building, billboard, etc.)? (y/n) No If yes, type of structure: _____

If yes, no further information is required.

4. If no, provide proposed specifications for new tower:
Height 310' Construction type (lattice, monopole, etc.): Self-Supporting Lattice
Guy-wired? (y/n) No Bands: N/A No. Wires: N/A
Lighting (Security & Aviation): FAA Style E (dual-style, medium intensity)

If tower will be lighted or guy-wired, complete items 5-19. If not, complete only items 19 and 20.

5. Area of tower footprint in acres or square feet: 10,000 square-feet
6. Length and width of access road in feet: Approximately 57ft long by 30ft wide and approximately 70ft long by 10ft wide
7. General description of terrain – mountainous, rolling hills flat to undulation, etc. Photographs of the site and surrounding area are beneficial: Rolling hills
8. Meteorological conditions (incidence of fog, low ceilings, etc.): Occasional fog
9. Soil type(s): Cuthbert gravelly fine sandy loam, 8-25% slopes (CgE) and Manco loam, frequently flooded (Ma)
10. Habitat types and land use on and adjacent to the site, by acreage and percentage of total: On site: 60% grassed land, 40% wooded land; Off Site: 70% wooded land, 20% grassed land, 10% rural residential development
11. Dominant vegetative species in each habitat: Various grass and hardwood and coniferous tree species
12. Average diameter breast height of dominant tree species in forested areas: Unknown
13. Will construction at this site cause fragmentation of a larger block of habitat into two or more smaller blocks? (y/n) No If yes, describe:

14. Is evidence of birds roosts or rookeries present? (y/n) No If yes, describe: Unknown
15. Distance to nearest wetland area (forested swamp, marsh, riparian, marine, etc.), and coastline if applicable: Cottonwood Creek located approximately 400 feet east of the proposed lease area at its closest point
16. Distance to nearest telecommunications tower: Unknown
17. Potential for co-location of antennas on existing towers or other structures: Unknown
18. Have measures been incorporated to minimizing impacts to migratory birds? (y/n) Yes: Tower is less than 450 feet, guy-wires would not be utilized, and FAA Style E (medium intensity, dual style lighting) would be utilized.
19. Has an evaluation been made to determine if proposed facility may affect listed or proposed endangered or threatened species or their habitat as required by FCC regulation at 47 CFR 1.1307(a)(3)? (y/n) Yes If, yes present findings: No jeopardy for tricolored bat (based on current status); Per DKey, MANLAA for tricolored bat upon official listing contingent upon avoidance of tree clearing during Winter Torpor and Pup Season periods; No Effect for all other species identified as potentially inhabiting the project area vicinity
20. Additional information required:

ATTACHMENT E

Resume



Ben Salter, PWS

Vice President of Environmental and Ecological Services/Principal Scientist
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
ben.salter@eca-usa.com

EDUCATION

Western Carolina University

Master of Science, Biology, August 2004

Cullowhee, NC

Georgia College & State University

Bachelor of Science, Biology, December 1998
Chemistry Minor

Milledgeville, GA

Short Courses/Specialized Training

OSHA HAZWOPER, 40-hour, 2016
Asbestos Building Inspector, 2015
Tennessee Hydrologic Determination Training Course, 2014
Applying the NEPA Process and Writing Effective NEPA Documents, 2013
Interagency Coordination for Endangered Species, 2013
NEPA Cumulative Effects Analysis, 2013
SonoBat Workshop, 2013
Overview of NHPA Section 106, 2013
GA DOT Coastal Wetland Plant Identification w/ Dr. Bob Mohlenbrock, 2010
Airports Council International – North American NEPA Workshop, 2009
NC State Stream Restoration Design Principles, 2007
Rosgen Level 1 – Applied Fluvial Geomorphology, 2006
VDEQ Stream Impact and Compensation Assessment Manual Workshop, 2006
VIMS Perennial Stream Workshop, 2005

PROFESSIONAL REGISTRATIONS

Society of Wetland Scientists, Professional Wetland Scientist, 2012 to present
EPA AHERA-Accredited Asbestos Building Inspector, 1999 to 2002; 2015 to present

PROFESSIONAL EXPERIENCE

November 2007 – Present

Environmental Corporation of America

Asheville, NC

Position: Principal Scientist, Vice President of Environmental and Ecological Services

Responsibilities:

Technical Compliance Lead and Manager of ECA Environmental Team and Services including Phase I and II ESA, NEPA, T&E Species and Migratory Bird Assessment/Consultation, and Wetlands/Waters delineation and permitting; Responsible for client management, staff development, final QA/QC review, and overall success, efficiency, and technical/regulatory oversight for managed services.

April 2006 – November 2007

Blue Ridge Ecological

Waynesville, NC

Position: Principal Scientist, Partner

Responsibilities:

Partner/Principal Scientist in natural resource management firm focused on fisheries/lake management, watershed assessment, water quality monitoring, and biological assessment.

January 2005 – November 2007

Malcolm Pirnie, Inc.

Newport News, VA

Position: Project Environmental Scientist

Responsibilities:

Wetland and Stream Scientist, National Environmental Policy Act Specialist, and Environmental Scientist; Primary responsibilities included EA and EIS writer, wetland and stream field scientist, and environmental site assessor.

August 2002 – December 2004 **Western Carolina University** Cullowhee, NC
Position: Research and Teaching Assistant
Responsibilities:
Fisheries Scientist and Biology/Ecology Laboratory Instructor

May 2003 – September 2003 **United States Forest Service** Asheville, NC
Position: Biological Science Technician
Responsibilities:
Fisheries scientist for southern Appalachian brook trout project. Collected brook trout tissue samples in headwater streams throughout Western North Carolina and conducted genetic analysis for determining origin.

January 1999 – May 2001 **Environmental Corporation of America** Alpharetta, GA
Position: Project Scientist/Manager
Responsibilities:
Project manager for environmental projects including Phase I and II Environmental Assessments, FCC NEPA assessment, asbestos and lead-based paint inspection, and abatement monitoring and specification preparation, cultural resource assessments, threatened and endangered species surveys, wetland delineation, groundwater monitoring and remediation system installation, geotechnical investigation, construction materials testing, and telecommunications tower construction plan review.

JOURNAL PUBLICATIONS

Miller, JR, **EB Salter**, JB Anderson, PJ Lechler, SL Kondrad, PF Galbreath. 2005. Influence of Temporal Variations in Water Chemistry on the Pb Isotopic Compositions of Rainbow Trout (*Oncorhynchus mykiss*). *Science of the Total Environment*, 350, p. 204-224.

REPRESENTATIVE EXPERIENCE

Wetland/Waters Delineation and Section 404/401 Permitting

Project/Field Scientist and Principal Scientist involvement in wetland/waters delineations and assessments and associated Section 404/401 (Nationwide and Individual Permits), CZMA, and local permitting for projects in over 20 states.

Phase I and II ESA, Hazardous Remediation/Waste Handling, and Health and Safety Compliance

Qualified Environmental Professional per 40 CFR 312.10(b); Project Scientist/Manager and Principal Scientist involvement in Phase I and II ESAs throughout the nation on a variety of property types including commercial, industrial, municipal, government, communications, and residential facilities, and large undeveloped tracts; Field Staff and Technical Lead for field execution, scoping, and regulatory compliance related to Phase II ESA and coordination of remediation of impacted soil and associated waste disposal and handling as necessary; Primary Phase II and waste disposal and handling experience with existing and proposed communications facilities but with involvement at commercial, industrial, residential, and fuel station/automotive facilities; Technical Lead for preparation of Health and Safety Plans and impacted media management plans for communications facilities across the nation.

National Environmental Policy Act Evaluation/Documentation

Project Manager, Principal Scientist, and lead agency/stakeholder liaison for NEPA related services nationwide for numerous lead federal agencies; Involvement with EIS, EA, Categorical Exclusions, and Feasibility Studies; Expert FCC NEPA Scientist with over 20 years in the communications industry.

Threatened and Endangered Species and Migratory Bird Evaluation/Consultation

Project and Principal level involvement in thousands of T&E species evaluations and consultations with the USFWS and State Wildlife Agencies including technical assistance, programmatic agreement, self-certification, informal, and formal consultations; Field and Principal level participation in hundreds of migratory bird nest evaluations at communications facilities to ensure compliance with the Migratory Bird Treaty Act; Technical Compliance/Regulatory Lead and staff management in support of all company T&E and migratory bird-related services.

From: [Ryan Edson](#)
To: [Autumn Dubois](#); [Ben Salter](#)
Cc: [Shannon Lowman](#); [Dina Bazzill](#)
Subject: FW: 23-003640 US-TX-6056 Proposed 310-foot self-supporting lattice telecommunications structure; TPWD Project 52441
Date: Tuesday, June 18, 2024 9:54:00 AM

TPWD clearance for 23-003640.

Thanks!

Ryan Edson
Client Manager/Senior NEPA Specialist
Environmental Corporation of America
678-477-4509

From: Karen Hardin <Karen.Hardin@tpwd.texas.gov>
Sent: Tuesday, June 18, 2024 9:47 AM
To: Ryan Edson <ryan.edson@eca-usa.com>
Subject: RE: 23-003640 US-TX-6056 Proposed 310-foot self-supporting lattice telecommunications structure; TPWD Project 52441

Dear Ryan Edson,

Thank you for providing the VB BTS II, LLC proposed US056 / DA02178 telecommunication project in Wood County, submitted May 20, 2024, for review. Based on a review of the documentation and description provided, the Texas Parks and Wildlife Department (TPWD) Ecological and Environmental Planning Program does not anticipate significant adverse impacts to rare, threatened, or endangered species, or other fish and wildlife resources.

Please note it is the responsibility of the project proponent to comply with all federal, state, and local laws that protect fish and wildlife.

Provided the project plans do not change, TPWD considers coordination to be complete.

The Environmental Review Team (ERT) is seeking feedback to assist us in continuing to provide effective and meaningful service and conservation value to our customers. Please complete the 5-minute survey linked below. Feel free to reach out directly to us if you would like to provide more detailed feedback after submitting your survey response. Thank you!

<https://www.surveymonkey.com/r/8ZP2L7Z>

Sincerely,

Karen Hardin

Environmental Review Biologist
Ecological & Environmental Planning Program
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, TX 78744
903-322-5001
Karen.Hardin@tpwd.texas.gov

From: Ryan Edson <ryan.edson@eca-usa.com>
Sent: Monday, May 20, 2024 3:30 PM
To: WHAB <WHAB@tpwd.texas.gov>
Cc: Autumn Dubois <autumn.dubois@eca-usa.com>; Ben Salter <ben.salter@eca-usa.com>; Hazel Errett <Hazel.Errett@eca-usa.com>
Subject: 23-003640 US-TX-6056 Proposed 310-foot self-supporting lattice telecommunications structure

You don't often get email from ryan.edson@eca-usa.com. [Learn why this is important](#)

ALERT: This email came from an external source. Do not open attachments or click on links in unknown or unexpected emails.

Good afternoon,

Attached is a State Species Letter for the above referenced site for your review. Please let us know if you have any questions or comments.

Thanks!

Ryan Edson (he/him)
Client Manager/Senior NEPA Specialist
Environmental Corporation of America (ECA)
678-477-4509 (Mobile/Remote)
ryan.edson@eca-usa.com
www.eca-usa.com

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Project Coordination and Review Requests **(Including Threatened and Endangered Species)**

EARLY PROJECT COORDINATION

If you are in the information gathering phase of project coordination and assessment, *in lieu of* submitting a Project Review form or a letter request, you may obtain information from the following Texas Parks and Wildlife Department (TPWD) sources regarding sensitive resource information for use in your analyses. TPWD recommends you use at least the following two sources of information when analyzing for project impacts to sensitive resources, including before submitting a request for TPWD review and recommendations.

RARE, THREATENED, AND ENDANGERED SPECIES OF TEXAS BY COUNTY - This database includes lists of species known to occur and potentially occurring in Texas at the county level. It can be accessed online at: http://www.tpwd.state.tx.us/landwater/land/maps/gis/ris/endangered_species/ or by contacting our administrative staff at (512) 389-4571. Appropriate use and interpretation of the county level lists are the responsibility of the recipient.

TEXAS NATURAL DIVERSITY DATABASE (TXNDD) – The TXNDD is publicly available location specific data on rare, threatened and endangered species, natural communities and other significant features of conservation concern to TPWD. This information can be obtained by submitting a data request to txndd@tpwd.state.tx.us. Response to a data request will include available TXNDD records, reports, and geographic information system compatible shapefiles of recorded locations for species and other rare resources on the U.S. Geological Survey (USGS) 7.5 minute topographic quadrangle of the project and surrounding area. Responses generally take a maximum of five business days from receipt of the request. Appropriate use and interpretation of TXNDD data are the responsibility of the recipient.

WILDLIFE HABITAT ASSESSMENT (WHAB) PROGRAM REVIEW

PROJECT REVIEW REQUESTS – The WHAB Program can provide a review of your assessment, after your analysis for impacts using the above two data sources. Please complete the WHAB Review Request form (attached; use Word format for fill-in version), or use the form as an outline of information to include with your letter request. The WHAB Program response will provide an evaluation of your environmental assessment for impacts to fish and wildlife and their habitats, including rare, threatened, and endangered species, other significant resources and concerns presently known or potentially occurring in the vicinity of your project. WHAB Program responses generally take 4 to 6 weeks on average from receipt, depending on the size of your request.

The request should include all the information listed on the next two pages and be sent to the address shown on the last page. The more pertinent information you provide, the more customized our review, and the faster our turnaround. Review requests submitted without adequate project detail may cause a delay in our response as we will need to contact you and wait for supplemental information. The potential for adverse impacts to natural resources from project activities varies based on the type of activity; location; season; vegetation; present physical features (both natural and man-made); degree of disturbance; planned avoidance, minimization, mitigation, enhancement, and restoration measures; species-specific tolerance levels; etc. Current color photographs and aerial photographs of the site greatly facilitate the review process. Complete information allows us to more accurately assess the potential for project impacts, as well as, assists us in narrowing the list of rare, threatened, and endangered species and other natural resources that may need to be addressed further.



WILDLIFE HABITAT ASSESSMENT PROGRAM

Review Requests

(Including Threatened and Endangered Species)

Name: Hazel Errett Date: May 10, 2024
Your Company: Environmental Corporation of America Phone: (770) 667-2040
Your Company Address: 1375 Union Hill Industrial Court Fax: ()
City, State, Zip: Alpharetta GA 30004 E-mail: hazel.errett@eca-usa.com
Project Title, Number and Site Location: Vertical Bridge Site US-TX-6056 (DA02178)
Off FM 779, Alba, Wood County, Texas County(ies): Wood

1. Scope of Project:

(a) What regulations will this review help you to comply with? OR, if not regulatory, why is the review being requested? Who is the project sponsor?

National Environmental Policy Act

(b) What and where is the project site? What activities will be conducted at the site? (Especially activity types, extent, boundaries, length & width, waterways, vegetation disturbance, and total acreage of site and acreage of the site that will be disturbed)

Please see the attached State Natural Resources Project Review Request

(c) If this request is for a site investigation or risk assessment, why is the site being investigated? If applicable, what contaminant pathways are being evaluated?

Proposed 310-foot tall self-supporting lattice tower

(d) Schedule of activities – Approximately when (which calendar months, how many years) will the project be active on the site?

To be determined

2. Vegetation: Species, dominant plants, structure and composition, vegetation layers, height of layers, natural vegetation community types.

Please see the attached State Natural Resources Project Review Request

3. Other Natural Resources/Physical Features:

(a) Soils, geology, watercourses, aquifers, flood zones, etc.

Please see the attached State Natural Resources Project Review Request

(b) Habitat, animals, animal assemblages, other sensitive features, etc.

Please see the attached State Natural Resources Project Review Request

4. Existing Site Development: Extent of pavement, gravel, shell, or other cover; buildings, landscaped, xeriscaped, drainage system, etc.

N/A

5. Historic Use/Function of Site: Pasture, forest, urban, row crops, rangeland, wetland, etc. If the request is for a risk assessment, when was, or for how long, has the site been active, inactive? Are cultural resources present on the site or will the project cross or impact state or federal lands, local parklands?

N/A

6. Has a threatened and endangered species survey or assessment, wetland delineation, or other biological assessment already been performed? (In general, TPWD recommends an on-site habitat assessment be performed.) Yes No

(a) If yes, provide surveyor name, qualifications, methods or protocols, acreage surveyed, level of effort, weather conditions, time of day, and dates the survey was performed.

Habitat assessment conducted by ECA staff December 20, 2023 See attached State Natural Resources Project Review Request

WILDLIFE HABITAT ASSESSMENT PROGRAM
Review Requests (Continued)
(Including Threatened and Endangered Species)

6. (b) If yes, please provide results and copy of survey/assessment report.

7. **Could current on-site or adjacent habitat support rare species?** Yes No
Specifically, explain why or why not.

Please see the attached State Natural Resources Project Review Request

8. **Provide a description of potential negative direct and indirect impacts** from proposed project activities or former and current site activities, such as types of habitat and acreage to be degraded or lost, temporarily and permanently. Also, describe cumulative effects that could be anticipated from the project on the natural environment.

Please see the attached State Natural Resources Project Review Request

9. **Provide a description of planned beneficial mitigation and enhancements** or restoration efforts. Be sure to note the avoidance, minimization, and compensatory mitigation measures planned to address the threat of negative impacts (e.g. which erosion control measures will be used, what will site restoration activities encompass, etc.).

Please see the attached State Natural Resources Project Review Request

10. **Include copies of coordination with other agencies** relevant to impacts or enhancements of natural resources for this project, or agency & contact name.

11. **Clearly delineate exact location of site and its boundaries** using an applicable USGS quad (most preferable) as the base layer or best map available. The topographic map citation should include the USGS quad name. The map must contain identifiable features and a scale that allows us to find your site **and** accurately pinpoint your site boundaries. When using internet maps, provide both a location map (zoomed out for highway reference) and a layout map (zoomed in for site features, boundaries, and neighboring street reference)

12. **Originals or color-copy photographs** of site and surrounding area with captions or narratives.

13. **Aerial photographs with pertinent features labeled.** Aerials should show the year photograph was taken.

Send completed form to:

Texas Parks and Wildlife Department
Wildlife Division
Wildlife Habitat Assessment Program
4200 Smith School Road
Austin, Texas 78744-3291
(512) 389-4571 (Phone) (512) 389-4599 (Fax)

Texas Parks and Wildlife Department maintains the information collected through this form. With few exceptions, you are entitled to be informed about the information we collect. Under Sections 552.021 and 552.023 of the Texas Government Code, you are also entitled to receive and review the information. Under Section 559.004, you are also entitled to have this information corrected.



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

May 20, 2024

Texas Parks and Wildlife Division
4200 Smith School Road
Austin, TX 78744

**Subject: State Natural Resources Project Review Request
Threatened, Endangered, and Proposed Threatened and Endangered Species
Proposed 300-Foot Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
Golden, Tex. USGS Quadrangle Map
Latitude: N 32° 44' 11.1" Longitude: W 95° 36' 0.6"
ECA Project #: 23-003640**

Environmental Corporation of America (ECA) is assisting VB BTS II, LLC (Applicant) with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project. The purpose of this letter is to request comments relative to potential effects on state or federal listed or proposed threatened or endangered species.

Background

The project area location is shown on Figure 1 in Attachment A. Figure 2 is a site vicinity plan that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. VB BTS II, LLC plans to construct a 310-foot tall self-supporting lattice telecommunications structure (overall height including appurtenances) within a proposed 100-foot by 100-foot lease area. The proposed lease area would be accessible and receive utilities via a proposed approximate 81-foot long by 30-foot wide access/utility easement. The proposed structure will utilize FAA Style E lighting (dual-style, medium intensity), but will not utilize guy-wires.

The proposed lease area is occupied by a grassed area. The proposed access/utility easement would originate on the northern edge of FM 779 and traverse in a northerly direction through a wooded tree line and grassed area. The surrounding area consists of wooded and grassed land with rural residential development. Photographs of the project area are included in Attachment B. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2 of Attachment A.

Based on the National Wetlands Inventory data, no wetlands or waters are mapped within the proposed project area. During our site visit, no evidence of surface waters or the three criteria required for an area to be characterized as a wetland was observed within the proposed project area. Therefore, it does not appear that the proposed project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally and state listed threatened and endangered species within the project area and to request comments relative to potential effects on state or federal listed or proposed threatened or endangered species.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area, the Texas Parks and Wildlife Division Rare, Threatened, and Endangered Species of Texas report for Wood County, and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during our December 20, 2023, site visit, which was conducted by Ms. Gabriela Ruiz of ECA.

Discussion of Findings

Because the proposed undertaking would not result in impacts to surface waters, aquatic species are not a concern for this undertaking and are excluded from the discussion below. The nearest surface water is Cottonwood Creek located approximately 400 feet east of the proposed lease area at its closest point. Additionally, the FEMA Flood Insurance Rate Map 48499C0325C dated September 3, 2010 indicates that the northern portion of the lease area is located with Zone A, which is a Special Flood Hazard Area of the 100-year floodplain. The rest of the project area is located in Zone X and is therefore not located within a Special Flood Hazard Area of the 100-year floodplain. ECA understands that project development would be limited to areas outside of the 100-year floodplain.

Non-aquatic species recognized by the USFWS and TPWD as potentially inhabiting the project area vicinity are listed in the table below along with a habitat description and a finding of effect for each.

Common Name	Scientific Name	Federal Status	State Status	Habitat	Finding of Effect
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	-	Found in woodland habitats where they forage near trees and along waterways; They utilize caves, mines, and crevices in rocks or trees for summer roosting habitat and in the Winter they will hibernate in caves, mines, tunnels, or sometimes man-made structures	Potential suitable habitat present (wooded land, approximately 0.1 acres total to be cleared and/or trimmed) in the proposed access/utility easement; tree clearing would not result in fragmentation of suitable habitat and total amount of tree clearing would be considered insignificant/discountable; May affect, but not likely to jeopardize
Rufa red knot	<i>Calidris canutus rufa</i>	Threatened	Threatened	Higher elevation wetland zones with some shrubby vegetation, as well as impounded and unimpounded intermediate marshes	No suitable habitat; According to the IPaC species list for the project area, the rufa red knot only needs to be considered for wind energy projects; No effect
Piping plover	<i>Charadrius melodus</i>	Threatened	Threatened	This species is found along open sandy beaches, especially above tideline, and alkali flats	No suitable habitat; According to the IPaC species list for the project area, the piping plover only needs to be considered for wind energy projects; No effect
Bachman's sparrow	<i>Peucaea aestivalis</i>	-	Threatened	Open pine woods with scattered bushes and grassy understory in Pineywoods region, brushy or overgrown grassy hillsides, overgrown fields with thickets and brambles, grassy orchards; remnant grasslands in Post Oak Savannah region; nests on ground against grass tuft or under low shrub	No suitable habitat; No effect
White faced ibis	<i>Plegadis chihi</i>	-	Threatened	Marshes, swamps, ponds and rivers, mostly in freshwater habitats; Nests in marshes; in low tree, on the ground in bulrushes or reeds, or on a floating mat	No suitable habitat; No effect

Common Name	Scientific Name	Federal Status	State Status	Habitat	Finding of Effect
Wood stork	<i>Mycteria americana</i>	-	Threatened	Prefers to nest in large tracts of bald cypress or red mangrove; forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960	No suitable habitat; No effect
Black bear	<i>Ursus americanus</i>	-	Threatened	This species inhabits forests and nearby openings, including forested wetlands; When inactive, they occupy dens under fallen trees, ground-level or above-ground tree cavities or hollow logs, underground cave-like sites, or the ground surface in dense cover	No suitable habitat; No effect
Louisiana pine snake	<i>Pituophis ruthveni</i>	Threatened	Threatened	Deep sandy soils with large stands of well-managed long leaf pine woodlands	No suitable habitat; No effect
Northern scarlett snake	<i>Cemophora coccinea</i>	-	Threatened	Prefers well drained soils with pine, hardwood, or mixed hardwood scrub in addition to open grassland habitats with appropriate soils	No suitable habitat; No effect
Texas horned lizard	<i>Phrynosoma cornutum</i>	-	Threatened	Inhabits open arid and semiarid regions with sparse vegetation with grass, cactus, or scattered brush or scrubby trees; Soil may vary in texture from sandy to rocky; When inactive, individuals burrow into the soil, enter rodent burrows, or hide under rocks	No suitable habitat; No effect

The proposed lease area is occupied by a grassed pasture. The proposed access/utility easement would originate on the northern edge of FM 779 and traverse in a northerly direction through a wooded tree line and grassed area. The surrounding area consists of wooded and grassed land with rural residential development. According to the TPWD Texas Ecosystem Analytical Mapper, the project area is located in an area categorized as pineywoods (small stream and riparian wet prairie). The surrounding area is generally occupied by grassed and wooded land and residential development. Wooded land within the project area consists of young to intermediate aged hardwood tree species. Of the total approximately 0.3-acre project area, less than 0.1 acres are occupied by wooded land.

During our site visit, ECA identified hardwood trees within the proposed access/utility easement that could serve as potential roosting and/or foraging habitat for the tricolored bat. However, based on the abundance of other suitable habitat in the surrounding area and the minor extent of removal of the habitat on-site (<0.1 acres), ECA would consider the impact of tree clearing to be insignificant and/or discountable and is not likely to jeopardize the continued existence of the tricolored bat. Further, ECA did not observe any sinkholes, fissures, or other karst features within or near the project area. Proposed species are not protected by the take prohibitions of the Endangered Species Act (ESA). However, under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action will jeopardize the continued existence of a proposed species. Based on the minimal amount of suitable habitat (<0.1 acres) within the assessment area and the avoidance of fragmentation of forested habitat, the proposed tree clearing is not likely to jeopardize the continued existence of the tricolored bat and no consultation with the USFWS regarding this species is required at this time. If tree clearing activities are scheduled after this species has become officially listed, consultation with the USFWS may be required at that time.

No suitable habitat for any other federally or state threatened or endangered species identified by the USFWS or TPWD as potentially occurring in the project area vicinity was observed during ECA's site visit. Additionally, the proposed project area is not located within designated or proposed critical habitat.

Migratory Birds

The Applicant has proposed to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure. Based on the specifications of the proposed tower structure, the Applicant has conformed to siting and construction measures for new towers including 1) avoiding the use of guy wires, 2) utilizing the preferred lighting scheme for tower structures (flashing white/red lights), and 3) the overall height of the proposed tower structure is not greater than 450 feet above ground level, the height at which the FCC requires that an Environmental Assessment be prepared to specifically address migratory bird concerns. Therefore, the Applicant has committed to mitigation measures that would decrease risks to migratory birds.

Conclusions

Based on the information reviewed and observations made during our site visit, suitable roosting and/or foraging habitat for the federally proposed endangered tricolored bat was identified within the project area. However, based on the minimal amount of tree clearing/trimming required and the avoidance of fragmentation of forested habitat, ECA anticipates the effects of tree removal/trimming to be insignificant/discountable. Therefore, based on these factors, ECA has determined a finding of "may affect, not likely to jeopardize" for the proposed endangered tricolored bat and no consultation with the USFWS regarding this species is required at this time. If tree clearing activities are scheduled after this species has become officially listed, consultation with the USFWS will be initiated at that time.

ECA has found no evidence that any suitable habitat for any other federally listed or proposed threatened or endangered species identified by USFWS or TPWD as potentially occurring in the

project area vicinity, or that any designated or proposed critical habitat is present within the project vicinity.

The Applicant has proposed to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure. Based on the specifications of the proposed tower structure, the Applicant has committed to mitigation measures that would decrease risks to migratory birds.

ECA request comments relative to potential effects on state or federal listed or proposed threatened or endangered species.

Closure

Ryan Edson collected the applicable information and compiled this report. Gabriela Ruiz conducted the site visit and area inspection. Hazel Errett reviewed this report. Ms. Errett is a Senior Environmental Scientist with ECA and her resume is included in Attachment D.

We appreciate the opportunity to provide these professional services. For any questions or additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Suite A, Alpharetta, Georgia, 30004.

Sincerely yours,

Environmental Corporation of America



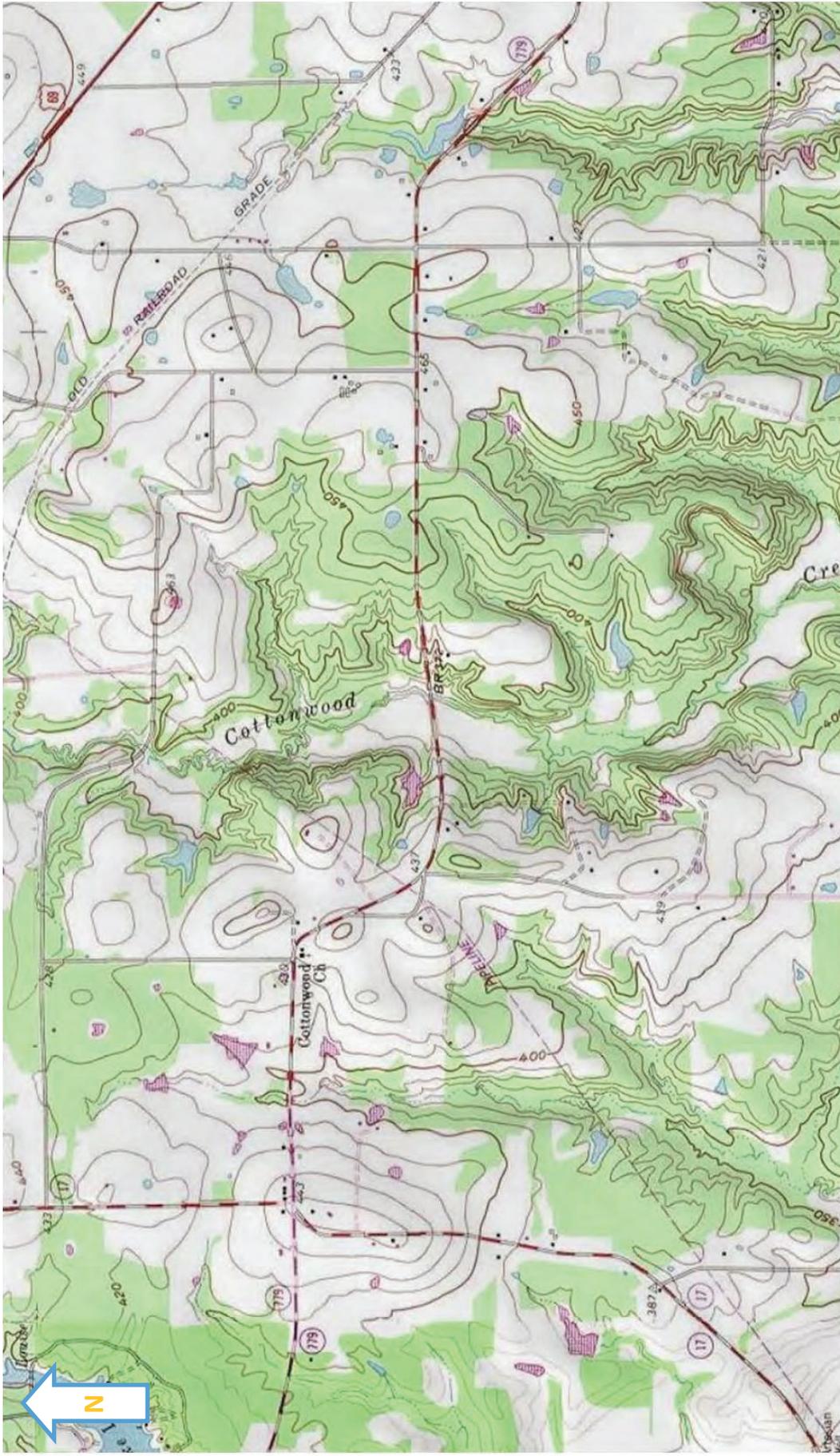
Ryan Edson
Project Manager



Hazel Errett
Senior Environmental Scientist

ATTACHMENT A

Figures

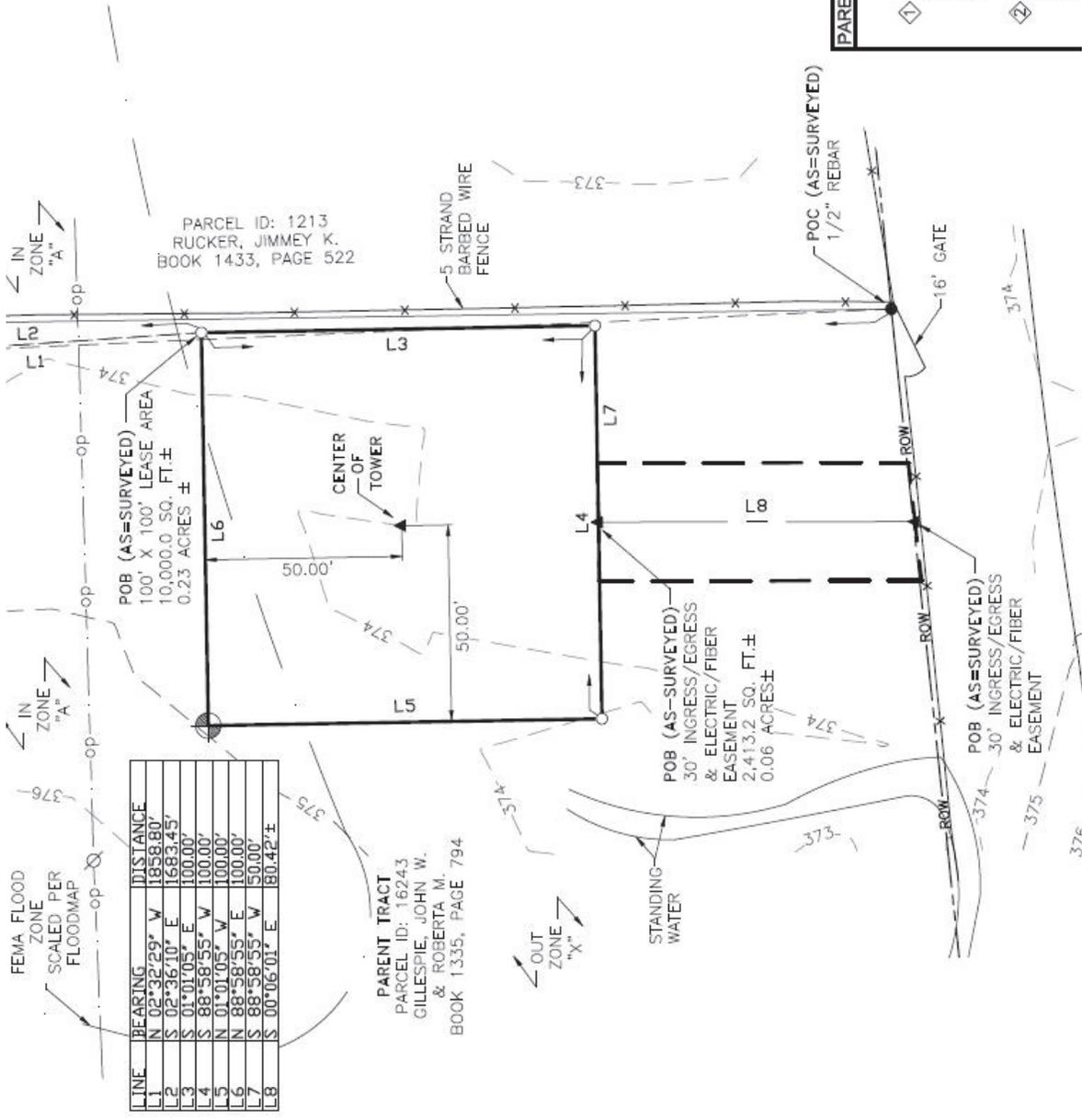


Source: USGS Topographic Maps 7.5 Minute Series, *Alba, TX* (1958, photorevised 1981), *Calvary, TX* (1959, photorevised 1981), *Grand Saline, TX* (1959, photorevised 1981), and *Golden, TX* (1959, photorevised 1981).

Figure 1: Site Location Map

ECA ID: 23-003640





LINE	BEARING	DISTANCE
L1	N 02°32'29" W	1858.80'
L2	S 02°36'10" E	1683.45'
L3	S 01°01'05" E	100.00'
L4	S 88°58'55" W	100.00'
L5	N 01°01'05" W	100.00'
L6	N 88°58'55" E	100.00'
L7	S 88°58'55" W	50.00'
L8	S 00°06'01" E	80.42'±

PARCEL ID: 1213
RUCKER, JIMMEY K.
BOOK 1433, PAGE 522

PARCEL ID: 16243
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 1335, PAGE 794

POB (AS-SURVEYED)
100' X 100' LEASE AREA
10,000.0 SQ. FT.±
0.23 ACRES ±

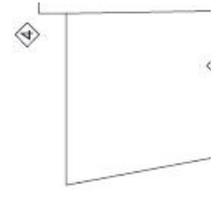
POB (AS-SURVEYED)
30' INGRESS/EGRESS
& ELECTRIC/FIBER
EASEMENT
2,413.2 SQ. FT.±
0.06 ACRES±

POB (AS-SURVEYED)
30' INGRESS/EGRESS
& ELECTRIC/FIBER
EASEMENT

PARCEL ID: 16243
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 1335, PAGE 794

PARCEL ID: 7990
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 2043, PAGE 695

PARENT TRACT OVERVIEW



Source: Applicant



ECA ID: 23-003640

Figure 2: Site Vicinity Plan



Source: Google Earth 2023



ECA ID: 23-003640

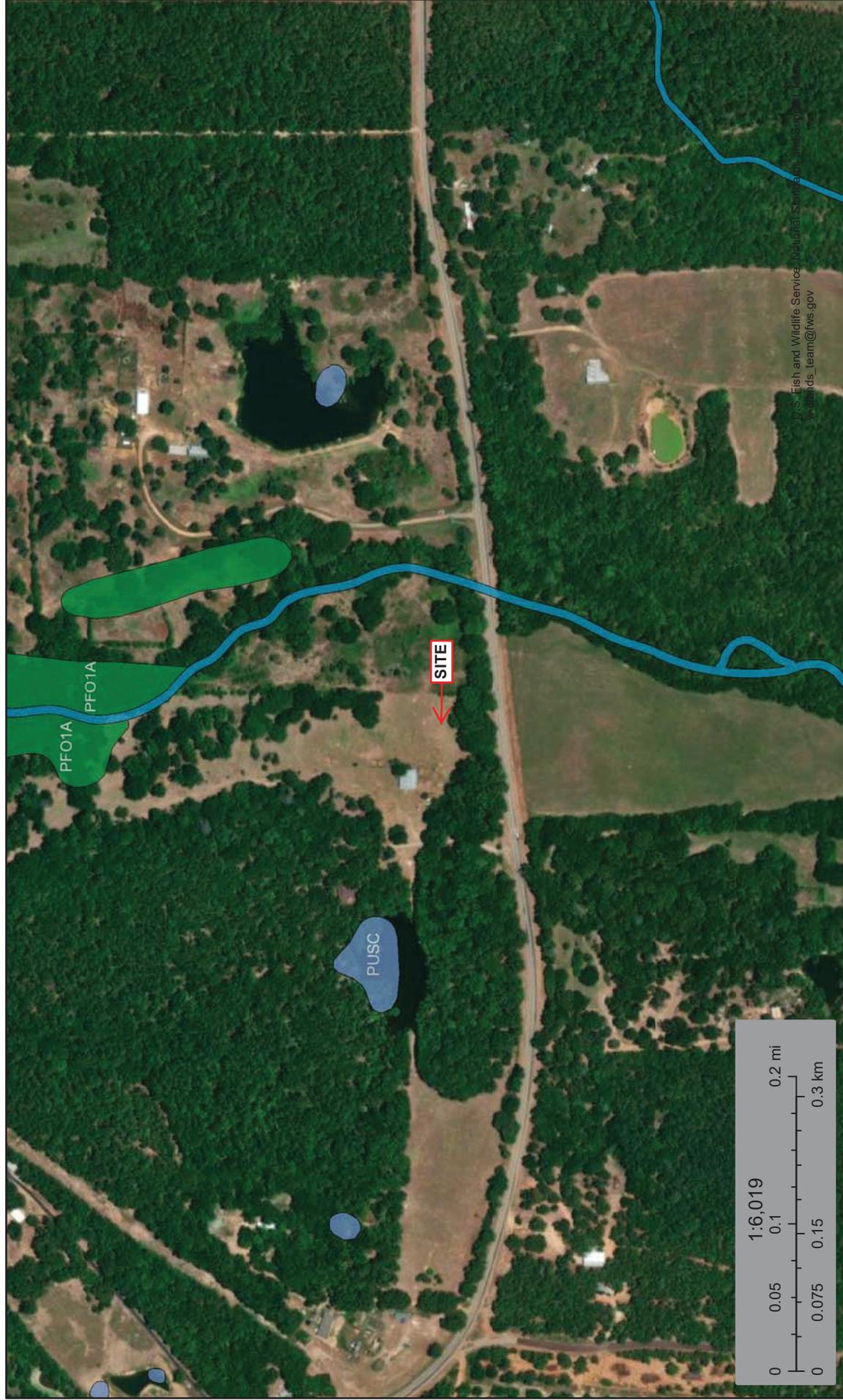
Figure 3: Aerial Photograph



U.S. Fish and Wildlife Service

National Wetlands Inventory

US-TX-6056 (DA02178)



December 4, 2023

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland
-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond
-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette

95°36'19"W 32°44'26"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE)
Zone A, V, A99
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*

Future Conditions 1% Annual Chance Flood Hazard *Zone X*
 Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
 Area with Flood Risk due to Levee *Zone D*

OTHER AREAS OF FLOOD HAZARD

NO SCREEN *Zone X*
 Area of Minimal Flood Hazard *Zone X*
 Effective LOMR *Zone D*
 Area of Undetermined Flood Hazard *Zone D*

OTHER AREAS

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

Cross Sections with 1% Annual Chance Water Surface Elevation
 Coastal Transect
 Base Flood Elevation Line (BFE)
 Limit of Study

OTHER FEATURES

Jurisdiction Boundary
 Coastal Transect Baseline
 Profile Baseline
 Hydrographic Feature

Digital Data Available
 No Digital Data Available
 Unmapped

MAP PANELS



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/22/2023 at 10:13 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



95°35'42\"/>

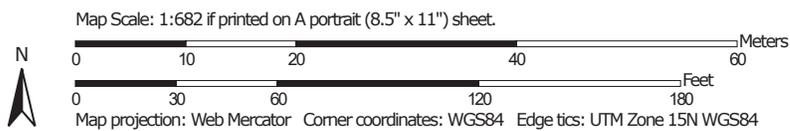
0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap Imagery Source: USGS National Map 2023

Soil Map—Wood County, Texas



Soil Map may not be valid at this scale.



MAP LEGEND

- Area of Interest (AOI)
- Area of Interest (AOI)
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points
- Special Point Features**
 - Blowout
 - Borrow Pit
 - Clay Spot
 - Closed Depression
 - Gravel Pit
 - Gravelly Spot
 - Landfill
 - Lava Flow
 - Marsh or swamp
 - Mine or Quarry
 - Miscellaneous Water
 - Perennial Water
 - Rock Outcrop
 - Saline Spot
 - Sandy Spot
 - Severely Eroded Spot
 - Sinkhole
 - Slide or Slip
 - Sodic Spot
- Water Features**
 - Streams and Canals
- Transportation**
 - Rails
 - Interstate Highways
 - US Routes
 - Major Roads
 - Local Roads
- Background**
 - Aerial Photography
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Wood County, Texas
 Survey Area Data: Version 21, Sep 5, 2023

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 19, 2023—Mar 5, 2023

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
CgE	Cuthbert gravelly fine sandy loam, 8 to 25 percent slopes	0.4	19.6%
Ma	Manco loam, frequently flooded	1.7	80.4%
Totals for Area of Interest		2.2	100.0%

ATTACHMENT B

Photographs



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Photographs

ECA ID: 23-003640





E: Northwesterly Overview of the Proposed Lease Area



F: Southeasterly Overview of the Proposed Lease Area



G: Southerly View of the Proposed Access/Utility Easement



H: Northerly View of the Proposed Access/Utility Easement

Photographs

ECA ID: 23-003640



ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arlington Ecological Services Field Office
501 West Felix Street
Suite 1105
Fort Worth, TX 76115-3410
Phone: (817) 277-1100 Fax: (817) 277-1129
Email Address: arles@fws.gov

In Reply Refer To:

04/19/2024 20:25:08 UTC

Project Code: 2024-0079791

Project Name: US-TX-6056

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, which may occur within the boundary of your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under section 7(a)(1) of the Act, Federal agencies are directed to utilize their authorities to carry out programs for the conservation of threatened and endangered species. Under and 7(a)(2) and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to determine whether their actions may affect threatened and endangered species and/or designated critical habitat. A Federal action is an activity or program authorized, funded, or carried out, in whole or in part, by a Federal agency (50 CFR 402.02).

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For Federal actions other than major construction activities, the Service suggests that a biological evaluation (similar to a Biological Assessment) be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

After evaluating the potential effects of a proposed action on federally listed species, one of the following determinations should be made by the Federal agency:

1. *No effect* - the appropriate determination when a project, as proposed, is anticipated to have no effects to listed species or critical habitat. A "no effect" determination does not require section 7 consultation and no coordination or contact with the Service is necessary. However, the action agency should maintain a complete record of their evaluation, including the steps leading to the determination of affect, the qualified personnel conducting the evaluation, habitat conditions, site photographs, and any other related information.
2. *May affect, but is not likely to adversely affect* - the appropriate determination when a proposed action's anticipated effects to listed species or critical habitat are insignificant, discountable, or completely beneficial. Insignificant effects relate to the size of the impact and should never reach the scale where "take" of a listed species occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not be able to meaningfully measure, detect, or evaluate insignificant effects, or expect discountable effects to occur. This determination requires written concurrence from the Service. A biological evaluation or other supporting information justifying this determination should be submitted with a request for written concurrence.
3. *May affect, is likely to adversely affect* - the appropriate determination if any adverse effect to listed species or critical habitat may occur as a consequence of the proposed action, and the effect is not discountable or insignificant. This determination requires formal section 7 consultation.

The Service has performed up-front analysis for certain project types and species in your project area. These analyses have been compiled into *determination keys*, which allows an action agency, or its designated non-federal representative, to initiate a streamlined process for determining a proposed project's potential effects on federally listed species. The determination keys can be accessed through IPaC.

The Service recommends that candidate species, proposed species, and proposed critical habitat be addressed should consultation be necessary. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at: <https://www.fws.gov/service/section-7-consultations>

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (<https://www.fws.gov/library/collections/bald-and-golden-eagle-management>). Additionally, wind energy projects should follow the wind energy guidelines (<https://www.fws.gov/media/land-based-wind-energy-guidelines>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>. The Federal Aviation Administration (FAA) released specifications for and made mandatory flashing L-810 lights on new towers 150-350 feet AGL, and the elimination of L-810 steady-burning side lights on towers above 350 feet AGL. While the FAA made these changes to reduce the number of migratory bird collisions (by as much as 70%), extinguishing steady-burning side lights also reduces maintenance costs to tower owners. For additional information concerning migratory birds and eagle conservation plans, please contact the Service's Migratory Bird Office at 505-248-7882.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arlington Ecological Services Field Office

501 West Felix Street

Suite 1105

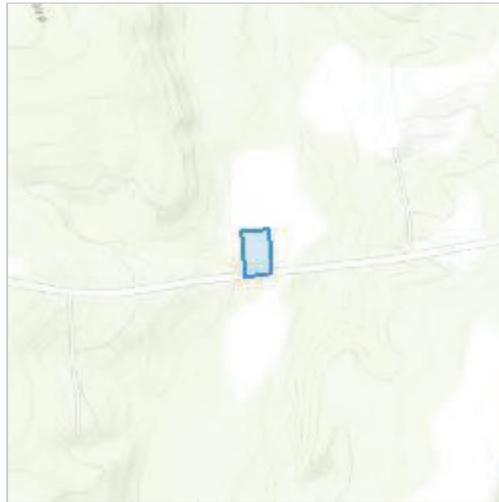
Fort Worth, TX 76115-3410

(817) 277-1100

PROJECT SUMMARY

Project Code: 2024-0079791
Project Name: US-TX-6056
Project Type: Communication Tower New Construction
Project Description: Proposed 310' Lattice Tower
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.736218,-95.60012570908913,14z>



Counties: Wood County, Texas

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. Your location does not overlap the critical habitat. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot <i>Calidris canutus rufa</i> There is proposed critical habitat for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened

REPTILES

NAME	STATUS
Alligator Snapping Turtle <i>Macrochelys temminckii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

CLAMS

NAME	STATUS
Texas Heelsplitter <i>Potamilus amphichaenus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/299	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

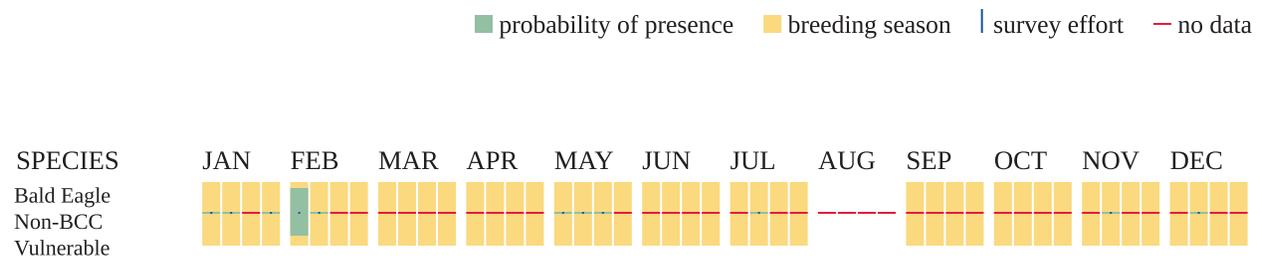
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

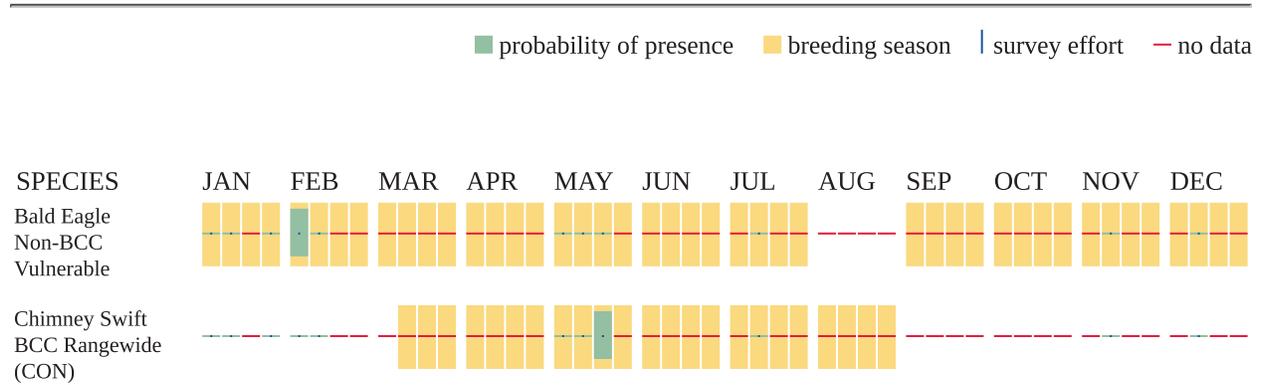
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Ryan Edson
Address: 1375 Union Hill Industrial Ct.
City: Alpharetta
State: GA
Zip: 30004
Email: ryan.edson@eca-usa.com
Phone: 7706672040

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration

Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

300ft

Maxar

Last Update: 9/1/2023

WOOD COUNTY

AMPHIBIANS

eastern tiger salamander *Ambystoma tigrinum*

Terrestrial adults generally occur under cover objects or in burrows surrounding a variety of lentic freshwater habitats, such as ponds, lakes, bottomland wetlands, or upland ephemeral pools. The specific terrestrial habitats are also varied and the occurrence of this species seems to be more closely associated with sandy, loamy or other soils which have easy burrowing properties, rather than any particular ecological system type. Requires fishless breeding pools for successful reproduction.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S3

Gulf Coast waterdog *Necturus beyeri*

This species is associated with permanent flowing water within forested habitats, from small streams to large rivers. They are frequently associated with slow moving, sandy bottomed spring fed streams with lots of aquatic habitat such as log jams and leaf litter beds.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: GNR State Rank: S3

southern crawfish frog *Lithobates areolatus areolatus*

Terrestrial and aquatic: The terrestrial habitat is primarily grassland and can vary from pasture to intact prairie; it can also include small prairies in the middle of large forested areas. Aquatic habitat is any body of water but preferred habitat is ephemeral wetlands.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G4T4 State Rank: S3

spotted dusky salamander *Desmognathus conanti*

This species occurs in association with aquatic habitats in forested areas. Small, clear, spring fed streams with sandy substrate bordered with ferns and moss as well as murky, stagnant water bodies in cypress swamps, baygalls, and flood plains in bottomland forests support populations of this species.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S1

Strecker's chorus frog *Pseudacris streckeri*

Terrestrial and aquatic: Wooded floodplains and flats, prairies, cultivated fields and marshes. Likes sandy substrates.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S3

Woodhouse's toad *Anaxyrus woodhousii*

Terrestrial and aquatic: A wide variety of terrestrial habitats are used by this species, including forests, grasslands, and barrier island sand dunes. Aquatic habitats are equally varied.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: SU

BIRDS

Bachman's sparrow *Peucaea aestivalis*

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

BIRDS

Open pine woods with scattered bushes and grassy understory in Pineywoods region, brushy or overgrown grassy hillsides, overgrown fields with thickets and brambles, grassy orchards; remnant grasslands in Post Oak Savannah region; nests on ground against grass tuft or under low shrub

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S1B

bald eagle *Haliaeetus leucocephalus*

Found primarily near rivers and large lakes; nests in tall trees or on cliffs near water; communally roosts, especially in winter; hunts live prey, scavenges, and pirates food from other birds

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3B,S3N

black rail *Laterallus jamaicensis*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Salt, brackish, and freshwater marshes, pond borders, wet meadows, and grassy swamps; nests in or along edge of marsh, sometimes on damp ground, but usually on mat of previous years dead grasses; nest usually hidden in marsh grass or at base of Salicornia

Federal Status: T	State Status: T	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S2

chestnut-collared longspur *Calcarius ornatus*

Occurs in open shortgrass settings especially in patches with some bare ground. Also occurs in grain sorghum fields and Conservation Reserve Program lands

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

Franklin's gull *Leucophaeus pipixcan*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. This species is only a spring and fall migrant throughout Texas. It does not breed in or near Texas. Winter records are unusual consisting of one or a few individuals at a given site (especially along the Gulf coastline). During migration, these gulls fly during daylight hours but often come down to wetlands, lake shore, or islands to roost for the night.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S2N

piping plover *Charadrius melodus*

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

BIRDS

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Beaches, sandflats, and dunes along Gulf Coast beaches and adjacent offshore islands. Also spoil islands in the Intracoastal Waterway. Based on the November 30, 1992 Section 6 Job No. 9.1, Piping Plover and Snowy Plover Winter Habitat Status Survey, algal flats appear to be the highest quality habitat. Some of the most important aspects of algal flats are their relative inaccessibility and their continuous availability throughout all tidal conditions. Sand flats often appear to be preferred over algal flats when both are available, but large portions of sand flats along the Texas coast are available only during low-very low tides and are often completely unavailable during extreme high tides or strong north winds. Beaches appear to serve as a secondary habitat to the flats associated with the primary bays, lagoons, and inter-island passes. Beaches are rarely used on the southern Texas coast, where bayside habitat is always available, and are abandoned as bayside habitats become available on the central and northern coast. However, beaches are probably a vital habitat along the central and northern coast (i.e. north of Padre Island) during periods of extreme high tides that cover the flats. Optimal site characteristics appear to be large in area, sparsely vegetated, continuously available or in close proximity to secondary habitat, and with limited human disturbance.

Federal Status: LT	State Status: T	SGCN: Y
Endemic: N	Global Rank: G3	State Rank: S2N

Sprague's pipit *Anthus spragueii*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Habitat during migration and in winter consists of pastures and weedy fields (AOU 1983), including grasslands with dense herbaceous vegetation or grassy agricultural fields.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S3N

swallow-tailed kite *Elanoides forficatus*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Lowland forested regions, especially swampy areas, ranging into open woodland; marshes, along rivers, lakes, and ponds; nests high in tall tree in clearing or on forest woodland edge, usually in pine, cypress, or various deciduous trees.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S2B

white-faced ibis *Plegadis chihi*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Prefers freshwater marshes, sloughs, and irrigated rice fields, but will attend brackish and saltwater habitats; currently confined to near-coastal rookeries in so-called hog-wallow prairies. Nests in marshes, in low trees, on the ground in bulrushes or reeds, or on floating mats.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S4B

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

BIRDS

wood stork *Mycteria americana*

The county distribution for this species includes geographic areas that the species may use during migration. Time of year should be factored into evaluations to determine potential presence of this species in a specific county. Prefers to nest in large tracts of baldcypress (*Taxodium distichum*) or red mangrove (*Rhizophora mangle*); forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: SHB,S2N

FISH

blackspot shiner *Notropis atrocaudalis*

Occurs from the lower Brazos River to the Sabine River drainage; Red River drainage. Small to moderate size tributary streams in runs and pools over all types of substrates.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S3

ironcolor shiner *Notropis chalybaeus*

Found only in northeastern streams from the Sabine to the Red River with the exception of an isolated population found in the San Marcos River headwaters. Found primarily in acidic, tannin-stained, non-turbid, sluggish Coastal Plain streams and rivers of low to moderate gradient. Occurs in aggregation, often at the upstream ends of pools, with a moderate to sluggish current and sand, mud, silt or detritus substrates. Usually associated with aquatic vegetation.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S3

silverband shiner *Notropis shumardi*

In Texas, found from Red River to Lavaca River; Main channel with moderate to swift current velocities and moderate to deep depths; associated with turbid water over silt, sand, and gravel.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S4

western creek chubsucker *Erimyzon claviformis*

Eastern Texas streams from the Red River to the San Jacinto drainage. Habitat includes silt-, sand-, and gravel-bottomed pools of clear headwaters, creeks, and small rivers; often near vegetation; occasionally in lakes. Spawning occurs in river mouths or pools, riffles, lake outlets, or upstream creeks. Prefers headwaters, but seldom occurs in springs.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S2S3

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

INSECTS

American bumblebee *Bombus pensylvanicus*

Habitat description is not available at this time.

Federal Status:	State Status:	SGCN: Y
Endemic:	Global Rank: G3G4	State Rank: SNR

MAMMALS

big brown bat *Eptesicus fuscus*

Any wooded areas or woodlands except south Texas. Riparian areas in west Texas.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S5

black bear *Ursus americanus*

Generalist. Historically found throughout Texas. In Chisos, prefers higher elevations where pinyon-oaks predominate; also occasionally sighted in desert scrub of Trans-Pecos (Black Gap Wildlife Management Area) and Edwards Plateau in juniper-oak habitat. For ssp. *luteolus*, bottomland hardwoods, floodplain forests, upland hardwoods with mixed pine; marsh. Bottomland hardwoods and large tracts of inaccessible forested areas.

Federal Status:	State Status: T	SGCN: Y
Endemic: N	Global Rank: G5	State Rank: S3

eastern red bat *Lasiurus borealis*

Red bats are migratory bats that are common across Texas. They are most common in the eastern and central parts of the state, due to their requirement of forests for foliage roosting. West Texas specimens are associated with forested areas (cottonwoods). Also common along the coastline. These bats are highly mobile, seasonally migratory, and practice a type of "wandering migration". Associations with specific habitat is difficult unless specific migratory stopover sites or wintering grounds are found. Likely associated with any forested area in East, Central, and North Texas but can occur statewide.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S4

eastern spotted skunk *Spilogale putorius*

Generalist; open fields prairies, croplands, fence rows, farmyards, forest edges & woodlands. Prefer wooded, brushy areas & tallgrass prairies. S.p. ssp. *interrupta* found in wooded areas and tallgrass prairies, preferring rocky canyons and outcrops when such sites are available.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G4	State Rank: S1S3

hoary bat *Lasiurus cinereus*

Hoary bats are highly migratory, high-flying bats that have been noted throughout the state. Females are known to migrate to Mexico in the winter, males tend to remain further north and may stay in Texas year-round. Commonly associated with forests (foliage roosting species) but are found in unforested parts of the state and lowland deserts. Tend to be captured over water and large, open flyways.

Federal Status:	State Status:	SGCN: Y
Endemic: N	Global Rank: G3G4	State Rank: S3

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

MAMMALS

long-tailed weasel

Mustela frenata

Includes brushlands, fence rows, upland woods and bottomland hardwoods, forest edges & rocky desert scrub. Usually live close to water.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

mountain lion

Puma concolor

Generalist; found in a wide range of habitats statewide. Found most frequently in rugged mountains & riparian zones.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S2S3

muskkrat

Ondatra zibethicus

Found in fresh or brackish marshes, lakes, ponds, swamps, and other bodies of slow-moving water. Most abundant in areas with cattail. Dens in bank burrow or conical house of vegetation in shallow vegetated water. It is primarily found in the Rio Grande near El Paso and in SE Texas in the Houston area.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

southeastern myotis bat

Myotis austroriparius

Caves are rare in Texas portion of range; buildings, hollow trees are probably important. Historically, lowland pine and hardwood forests with large hollow trees; associated with ecological communities near water. Roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G4

State Rank: S3?

swamp rabbit

Sylvilagus aquaticus

Primarily found in lowland areas near water including: cypress bogs and marshes, floodplains, creeks and rivers.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5

State Rank: S5

tricolored bat

Perimyotis subflavus

Forest, woodland and riparian areas are important. Caves are very important to this species.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3G4

State Rank: S2

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

MOLLUSKS

Louisiana pigtoe

Pleurobema riddellii

Occurs in small streams to large rivers in slow to moderate currents in substrates of clay, mud, sand, and gravel. Not known from impoundments (Howells 2010f; Randklev et al. 2013b; Troia et al. 2015). [Mussels of Texas 2019]

Federal Status: PT

State Status: T

SGCN: Y

Endemic: N

Global Rank: G1G2

State Rank: S1

sandbank pocketbook

Lampsilis satura

Occurs in small streams to large rivers in slow to moderate current in sandy mud to sand and gravel substrate. Can occur in a variety of habitats but most common in littoral habitats such as banks or backwaters or in protected areas along point bars (Randklev et al. 2013b; Randklev et al. 2014a; Troia et al. 2015). [Mussels of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic:

Global Rank: G2?

State Rank: S1

southern hickorynut

Obovaria arkansasensis

Clay, sand, and medium sized gravel substrates with low to moderate current; Neches, Sabine, and Cypress river basins

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: GNR

State Rank: S1

Texas heelsplitter

Potamilus amphichaenus

Occurs in small streams to large rivers in standing to slow-flowing water; most common in banks, backwaters and quiet pools; adapts to some reservoirs. Often found in soft substrates such as mud, silt or sand (Howells et al. 1996; Randklev et al. 2017a). [Mussels of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G1G3

State Rank: S1

Texas pigtoe

Fusconaia askewi

Occurs in small streams to large rivers, usually in water with at least some current; not known from reservoirs. Found in a variety of habitats but most common in riffles. Inhabits various substrates though most often sand, gravel, and cobble (Howells 2010a; Randklev et al. 2013b; Randklev et al. 2014a; Troia et al 2015).[Mussel of Texas 2019]

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G2?

State Rank: S2S3

REPTILES

alligator snapping turtle

Macrochelys temminckii

Aquatic: Perennial water bodies; rivers, canals, lakes, and oxbows; also swamps, bayous, and ponds near running water; sometimes enters brackish coastal waters. Females emerge to lay eggs close to the waters edge.

Federal Status:

State Status: T

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S2

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

REPTILES

eastern box turtle

Terrapene carolina

Terrestrial: Eastern box turtles inhabit forests, fields, forest-brush, and forest-field ecotones. In some areas they move seasonally from fields in spring to forest in summer. They commonly enters pools of shallow water in summer. For shelter, they burrow into loose soil, debris, mud, old stump holes, or under leaf litter. They can successfully hibernate in sites that may experience subfreezing temperatures.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S3

Louisiana pine snake

Pituophis ruthveni

Terrestrial: Deep sandy soils with large stands of well-managed long leaf pine woodlands.

Federal Status: LT State Status: T SGCN: Y
Endemic: N Global Rank: G1G2 State Rank: S1

northern scarlet snake

Cemophora coccinea

Terrestrial: Prefers well drained soils with pine, hardwood, or mixed hardwood scrub in addition to open grassland habitats with appropriate soils.

Federal Status: State Status: T SGCN: Y
Endemic: N Global Rank: G5 State Rank: S4

prairie skink

Plestiodon septentrionalis

The prairie skink can occur in any native grassland habitat across the Rolling Plains, Blackland Prairie, Post Oak Savanna and Pineywoods ecoregions.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S2

pygmy rattlesnake

Sistrurus miliarius

The pygmy rattlesnake occurs in a variety of wooded habitats from bottomland coastal hardwood forests to upland savannas. The species is frequently found in association with standing water.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S2S3

slender glass lizard

Ophisaurus attenuatus

Terrestrial: Habitats include open grassland, prairie, woodland edge, open woodland, oak savannas, longleaf pine flatwoods, scrubby areas, fallow fields, and areas near streams and ponds, often in habitats with sandy soil.

Federal Status: State Status: SGCN: Y
Endemic: N Global Rank: G5 State Rank: S3

Texas horned lizard

Phrynosoma cornutum

Terrestrial: Open habitats with sparse vegetation, including grass, prairie, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive. Occurs to 6000 feet, but largely limited below the pinyon-juniper zone on mountains in the Big Bend area.

Federal Status: State Status: T SGCN: Y

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

REPTILES

Endemic: N Global Rank: G4G5 State Rank: S3

timber (canebrake) rattlesnake *Crotalus horridus*

Terrestrial: Swamps, floodplains, upland pine and deciduous woodland, riparian zones, abandoned farmland. Limestone bluffs, sandy soil or black clay. Prefers dense ground cover, i.e. grapevines, palmetto.

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G4 State Rank: S4

western box turtle *Terrapene ornata*

Terrestrial: Ornate or western box turtles inhabit prairie grassland, pasture, fields, sandhills, and open woodland. They are essentially terrestrial but sometimes enter slow, shallow streams and creek pools. For shelter, they burrow into soil (e.g., under plants such as yucca) (Converse et al. 2002) or enter burrows made by other species.

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G5 State Rank: S3

western hognose snake *Heterodon nasicus*

Terrestrial: Shortgrass or mixed grass prairie, with gravel or sandy soils. Often found associated with draws, floodplains, and more mesic habitats within the arid landscape. Frequently occurs in shrub encroached grasslands.

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G5 State Rank: S4

PLANTS

Chapman's yellow-eyed grass *Xyris chapmanii*

Mostly in soft, spongy, peaty substrates in deep muck seepage bogs; mostly in muckiest parts of hillside seepage bogs; flowering August-September, with seed maturing September-October

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G3 State Rank: S3

cypress knee sedge *Carex decomposita*

Occurs in shallow water or on baldcypress stumps and logs in wooded ponds or swamps; Perennial; Flowering/Fruiting April-May

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G3G4 State Rank: S1

goldenwave tickseed *Coreopsis intermedia*

In deep sandy soils of sandhills in openings in or along margins of post oak woodlands and pine-oak forests of east Texas; Perennial; Flowering/Fruiting May-Aug

Federal Status: State Status: SGCN: Y

Endemic: N Global Rank: G3 State Rank: S3

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

PLANTS

large beakrush

Rhynchospora macra

Found in ombrotropic quaking peat bogs; Perennial; Flowering/Fruiting Aug-Oct

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3G4

State Rank: S2

Mohlenbrock's sedge

Cyperus grayioides

Deep sand and sandy loam in dry, almost barren openings in upland longleaf pine savannas, mixed pine-oak forests, and post oak woodlands; Occurs primarily in deep, periodically disturbed sandy soils in open areas maintained by factors such as wind, erosion, or fire. This species does not occur in shaded areas or in areas of high competition with other herbaceous species. Habitats include remnant sand prairies, sandy fields, sand blow outs, sandhill woodlands, pine barrens, and open barrens in which the slope is sufficient to produce sand erosion. May also occur in areas where the soils have been disturbed by logging or road construction; Perennial

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3G4

State Rank: S3S4

panicked indigobush

Amorpha paniculata

A stout shrub, 3 m (9 ft) tall that grows in acid seep forests, peat bogs, wet floodplain forests, and seasonal wetlands on the edge of Saline Prairies in East Texas. It is distinguished from other *Amorpha* species by its fuzzy leaflets with prominent raised veins underneath, and the flower panicles, which are 8 to 16 inches long and slender, held above the foliage. Perennial; Flowering May-August.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S3

roughleaf yellow-eyed grass

Xyris scabrifolia

Wet sand and/or peat in acid seepage areas or hillside seepage bogs on the Catahoula formation or near the contact of the Catahoula and the Willis formations, in open areas and in partial shade of evergreen shrub thickets, often on Sphagnum hummocks; flowering late July-early September

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S2

rough-stem aster

Symphotrichum puniceum var. *scabricaule*

Relatively open sites in saturated soils associated with seepage areas, bogs, marshes, ponds, drainages, and degraded wetland remnants on the Queen City, Carrizo, and Sparta sand formations; flowering late September-early November.

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G5T2

State Rank: S1S2

Soxman's milkvetch

Astragalus soxmaniorum

Primarily in deep sandy soils of sandhills, fallow fields, and open scrub oak-pine woodlands; Perennial; Flowering March-June; Fruiting April-June

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S3

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

WOOD COUNTY

PLANTS

Texas sandmint

Rhododon ciliatus

Open sandy areas in the Post Oak Belt of east-central Texas; Annual; Flowering April-Aug; Fruiting May-Aug

Federal Status:

State Status:

SGCN: Y

Endemic: Y

Global Rank: G3

State Rank: S3

Texas trillium

Trillium texanum

In or along the margins of hardwood forests on wet acid soils of bottoms and lower slopes, strongly associated with forested seeps and baygalls; flowering March-May

Federal Status:

State Status:

SGCN: Y

Endemic: N

Global Rank: G3

State Rank: S3

DISCLAIMER

The information on this web application is provided "as is" without warranty as to the currentness, completeness, or accuracy of any specific data. The data provided are for planning, assessment, and informational purposes. Refer to the Frequently Asked Questions (FAQs) on the application website for further information.

ATTACHMENT D

Resume



Hazel Errett

Senior Environmental Scientist/Program Manager
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
hazel.errett@eca-usa.com

EDUCATION

University of North Carolina at Asheville

Bachelor of Science, Environmental Studies, December 2016

Asheville, NC

CURRENT EXPERIENCE

Environmental Corporation of America

May 2017 – Present

Position: Project Scientist

Asheville, NC

Responsibilities:

- Preparation of FCC National Environmental Policy Act (NEPA) Checklist and Environmental Assessment (EA) evaluations for proposed telecommunications facilities
- Preparation of USFWS requests for technical assistance, Informal Biological Assessments (IBA), and species-specific surveys – Identify potential habitat that may or may not be located within a project area for species listed by the USFWS as “Threatened” or “Endangered”
- Osprey/Bald Eagle Nest Investigations to determine activity status of reported osprey or bald eagle nests on telecommunications towers
- Preparation of Phase I and Phase II Environmental Site Assessments (ESAs) to determine whether or not a “recognized environmental condition” (REC) is present in connection with the Property in accordance with ASTM E1527-13
- Section 106 Review Documentation/Archaeological Assessments for Telecommunications Projects

REPRESENTATIVE EXPERIENCE

Migratory Bird Nest Evaluation/Monitoring

Determine activity status of reported migratory bird nests to recommendations regarding timing and planning construction, installation, and/or maintenance activities can be made. Monitoring construction/maintenance activities in close proximity to occupied nests so actions are within applicable regulatory guidelines.

Phase I Environmental Site Assessments

Project Manager, Participation in Alabama, Florida, Indiana, Kentucky, Missouri, North Carolina, Oklahoma, South Carolina, and Tennessee

Section 106 Review

Project Manager, Participation in numerous Section 106 reviews in Alabama, Florida, Kentucky, Missouri, North Carolina, and Oklahoma.

Federal Communications Commission NEPA Assessments

Project Manager and/or Project Scientist, Participation in Alabama, Florida, Kentucky, Missouri, North Carolina, and Oklahoma.

Protected Species Evaluations/ USFWS and State Wildlife Agency Consultations

Project Manager and/or Project Scientist, Participation in numerous projects within the United States.

Appendix F
Historic and Cultural Resources

SHPO Consultation

Ryan Edson

From: Dina Bazzill
Sent: Tuesday, July 30, 2024 1:02 PM
To: rebecca.shelton@thc.texas.gov; caitlin.brashear@thc.texas.gov
Cc: Ryan Edson
Subject: RE: US-TX-6056 (DA02178)

Good afternoon Rebecca and Caitlin,

I hope all is well!

I wanted to let you know that, since you responded to this project, the Applicant has determined that they will use NTIA Middle Mile Grant Program funding for this facility. We are working with Suzanne Derrick, NTIA Environmental Program Officer, and Suzanne let us know that NTIA will utilize the *Program Comment to Avoid Duplicative Reviews for the Wireless Communications Facilities Construction and Modification*. Please let me know if you have any questions or need anything further from us.

Thanks!

Dina M. Bazzill – MA, RPA (She/Her)
VP Cultural Resources/Tribal Coordinator
Environmental Corporation of America (ECA)
252-412-7960 (mobile)
dina.bazzill@eca-usa.com
www.eca-usa.com
www.linkedin.com/in/dina-bazzill-00867b94



From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Thursday, February 1, 2024 11:26 AM
To: Dina Bazzill <dina.bazzill@eca-usa.com>; reviews@thc.state.tx.us
Subject: US-TX-6056 (DA02178)



TEXAS HISTORICAL COMMISSION
real places telling real stories

Re: Project Review under Section 106 of the National Historic Preservation Act

THC Tracking #202404965

Date: 02/01/2024

US-TX-6056 (DA02178)

Off FM 779

Alba, TX 75410

Description: Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure (310-Foot Overall Height Including Appurtenances)

Dear Dina Bazzill:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Rebecca Shelton and Caitlin Brashear, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

- No historic properties are present or affected by the project as proposed. However, if historic properties are discovered or unanticipated effects on historic properties are found, work should cease in the immediate area; work can continue where no historic properties are present. Please contact the THC's History Programs Division at 512-463-5853 to consult on further actions that may be necessary to protect historic properties.

Archeology Comments

- No historic properties affected. However, if cultural materials are encountered during construction or disturbance activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the THC's Archeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: rebecca.shelton@thc.texas.gov, caitlin.brashear@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Bradford Patterson, Chief Deputy State Historic Preservation Officer
Deputy Executive Director, Texas Historical Commission

Please do not respond to this email.

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: [Dina Bazzill](#)
To: [Project Managers](#)
Subject: FW: US-TX-6056 (DA02178)
Date: Thursday, February 1, 2024 11:36:05 AM

Dina M. Bazzill – M.A.,RPA (She/Her)
Environmental Corporation of America (ECA)
252-412-7960 (mobile)

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Thursday, February 1, 2024 11:26 AM
To: Dina Bazzill <dina.bazzill@eca-usa.com>; reviews@thc.state.tx.us
Subject: US-TX-6056 (DA02178)



Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202404965
Date: 02/01/2024
US-TX-6056 (DA02178)
Off FM 779
Alba, TX 75410

Description: Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure (310-Foot Overall Height Including Appurtenances)

Dear Dina Bazzill:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Rebecca Shelton and Caitlin Brashear, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

- No historic properties are present or affected by the project as proposed. However, if historic properties are discovered or unanticipated effects on historic properties are found, work should cease in the immediate area; work can continue where no historic

properties are present. Please contact the THC's History Programs Division at 512-463-5853 to consult on further actions that may be necessary to protect historic properties.

Archeology Comments

- No historic properties affected. However, if cultural materials are encountered during construction or disturbance activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the THC's Archeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: rebecca.shelton@thc.texas.gov, caitlin.brashear@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Bradford Patterson, Chief Deputy State Historic Preservation Officer
Deputy Executive Director, Texas Historical Commission

Please do not respond to this email.

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Wood County Monitor

PO Box 210
715 Mimosa St.
Mineola TX 75773
903-569-2442

PUBLISHER'S AFFIDAVIT

The State of Texas
County of Wood

Before me, the undersigned authority, personally appeared Phillip Major, known to me, who, being duly sworn on his/her oath deposes and says he/she is the publisher/authorized representative of the Wood County Monitor newspaper of general circulation published in said county; that said newspaper has been continuously and regularly published in said county for a period of more than one year, that a copy of the within and foregoing was published in said newspaper on the following date(s):

Jan. 18, 2024 _____

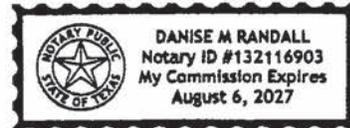
and a newspaper copy of which is hereto attached.

Phillip Major
Publisher/authorized representative

Sworn to and subscribed to before me this 25th day of January, 2024

Danise Randall
Notary Public, State of Texas

Commission expires: 8-6-2027



er club. He specifically thanked the parents for their emotional and logistical support as their sons and daughters played sports. He also acknowledged the work of the boosters, who this year have raised \$66,000

ber of the 2023 varsity volleyball team was recognized as an academic all-district student-athlete.

The cheerleading contingent placed 25th in the state at the recent state-wide competition.

lowjacket football player should embody. The fact that a sophomore, Eddie Guerra, was named to this honor along with senior Bryson Myers indicates that the Mineola football has a bright future.

Public Notice

VB BTS II, LLC is proposing to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure located near 11042 AL-87, Alba, Wood County, Texas (N32° 44' 11.1"; W95° 36' 00.6"). The tower will be lit with FAA Style E lighting. VB BTS II, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places. Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.

In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only raise environmental concerns and can be filed online using the FCC pleadings system at www.fcc.gov or mailed to FCC Requests for Environmental Review, Attn: Ramon Williams, 445 12th Street SW, Washington, DC 20554 within 30 days of the date that notice of this proposed action is published on the FCC's website. Refer to File No. A1261083 when submitting the request and to view the specific information about the proposed action. 23-003640/CVG



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

Section 106 Review

TCNS ID 274385

Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)

US-TX-6056 (DA02178)

**Off FM 779
Alba, Wood County,
Texas**

ECA Project No. 23-003640



SUBMITTED TO:

Justin Kockritz
Texas Historical Commission
History Programs Division
P.O. Box 12276
Austin, Texas 78711-2276

PREPARED BY:

Environmental Corporation of America
1375 Union Hill Industrial Court, Suite A
Alpharetta, GA 30004



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

January 10, 2024

Justin Kockritz
Texas Historical Commission
History Programs Division
P.O. Box 12276
Austin, Texas 78711-2276

Attention: Mr. Justin Kockritz

**Subject: Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640**

Dear Mr. Kockritz:

Environmental Corporation of America's (ECA's) client, VB BTS II, LLC, is proposing to construct a telecommunications facility as described in the following FCC Form 620, New Tower (NT) Submission Packet. ECA understands that VB BTS II, LLC plans to construct a 310-foot tall overall height self-supporting lattice telecommunications structure within a proposed approximate 100-foot by 100-foot (30-meter by 30-meter) lease area. The facility would be accessible by a proposed approximate 81-foot long by 30-foot wide (25-meter by 9-meter) access/utility easement. The Area of Potential Effect (APE) for direct effects is located on private land.

ECA has identified and evaluated Historic Properties, if any, within the APE for visual and direct effects as directed in Section VI.D.1 and 2 of the Nationwide Programmatic Agreement, effective on March 7, 2005. We identified no Historic Properties listed in the National Register of Historic Places (NRHP) within the 3/4-mile APE for visual effects or the APE for direct effects.

Based on our review of the online Texas Historical Commission (THC) Atlas Map, we found no NRHP-eligible Historic Properties within the 3/4-mile APE for visual effects or the APE for direct effects.

An archaeological assessment was conducted within the APE for direct effects. During our database research utilizing the Online Texas Archaeological Sites Atlas, we identified no previously recorded archaeological sites and one survey (8500017403) within the APE for direct effects. If any archaeological sites or cultural resource surveys were identified during ECA's research outside the APE for direct effects, they are discussed further in the Phase I Cultural Resources Survey. During our fieldwork, we uncovered no archaeological sites (see separate archaeological assessment report).

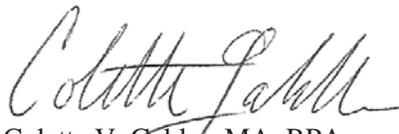
Mr. Justin Kockritz
Page 2

Based on this documentation, prepared in accordance with the Nationwide Programmatic Agreement effective March 7, 2005, ECA believes that this proposed undertaking would have no effect on any Historic Properties identified in accordance with the NPA. Therefore, ECA recommends a finding of No Historic Properties Affected for the proposed undertaking for the APE for visual and direct effects.

We are submitting this letter, on behalf of VB BTS II, LLC to seek concurrence with this finding and to comply with Federal Communications Commission (FCC) requirements as identified in 47 CFR 1.1307. We request your concurrence with our finding. Please contact Dina M. Bazzill at 252-412-7960 or dina.bazzill@eca-usa.com with questions or comments.

Sincerely,

Environmental Corporation of America



Colette V. Gabler, MA, RPA
Senior Project Manager



Annamarie Howell, MA
Principal Historian

Notification Date:

See instructions for

File Number:

public burden estimates

General Information

1) (Select only one) (NE) NE – New UA – Update of Application WD – Withdrawal of Application	
2) If this application is for an Update or Withdrawal, enter the file number of the pending application currently on file.	File Number:

Applicant Information

3) FCC Registration Number (FRN): 0026963173
4) Name: VB BTS II, LLC

Contact Name

5) First Name: Richard	6) MI:	7) Last Name: Hickey	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 750 Park of Commerce Drive, Suite 200	
12) City: Boca Raton		13) State: FL	14) Zip Code: 33487
15) Telephone Number: (561)406-4015		16) Fax Number:	
17) E-mail Address: Regulatory@verticalbridge.com			

Consultant Information

18) FCC Registration Number (FRN): 0011662921
19) Name: Environmental Corporation of America

Principal Investigator

20) First Name: Dina	21) MI:	22) Last Name: Bazzill	23) Suffix:
24) Title: MA, RPA Principal Investigator			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 1375 Union Hill Industrial Court Suite A	
27) City: Alpharetta		28) State: GA	29) Zip Code: 30004
30) Telephone Number: (770)677-2040		31) Fax Number:	
32) E-mail Address: dina.bazzill@eca-usa.com			

Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
34) Areas of Professional Qualification: <input checked="" type="checkbox"/> Archaeologist <input type="checkbox"/> Architectural Historian <input checked="" type="checkbox"/> Historian <input type="checkbox"/> Architect <input type="checkbox"/> Other (Specify) _____	

Additional Staff

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
--	--

If "YES," complete the following:

36) First Name: Annamarie	37) MI:	38) Last Name: Howell	39) Suffix:
----------------------------------	---------	------------------------------	-------------

40) Title: MA - Principal Historian
--

41) Areas of Professional Qualification: <input type="checkbox"/> Archaeologist <input type="checkbox"/> Architectural Historian <input checked="" type="checkbox"/> Historian <input type="checkbox"/> Architect <input type="checkbox"/> Other (Specify) _____

36) First Name: Matt	37) MI:	38) Last Name: Beazley	39) Suffix:
-----------------------------	---------	-------------------------------	-------------

40) Title: MA, RPA - Principal Investigator
--

41) Areas of Professional Qualification: <input checked="" type="checkbox"/> Archaeologist <input type="checkbox"/> Architectural Historian <input checked="" type="checkbox"/> Historian <input type="checkbox"/> Architect <input type="checkbox"/> Other (Specify) _____
--

36) First Name: Colette	37) MI: V	38) Last Name: Gabler	39) Suffix:
40) Title: MA, RPA - Senior Project Manager			
41) Areas of Professional Qualification:			
<input checked="" type="checkbox"/> Archaeologist <input type="checkbox"/> Architectural Historian <input checked="" type="checkbox"/> Historian <input type="checkbox"/> Architect <input type="checkbox"/> Other (Specify) _____			

36) First Name: Gabriela	37) MI:	38) Last Name: Ruiz	39) Suffix:
40) Title: MA - Project Archaeologist			
41) Areas of Professional Qualification:			
<input checked="" type="checkbox"/> Archaeologist <input type="checkbox"/> Architectural Historian <input checked="" type="checkbox"/> Historian <input type="checkbox"/> Architect <input type="checkbox"/> Other (Specify) _____			

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **274385**

Site Information

2) Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: () Yes (**X**) No

3) Site Name: **US-TX-6056 (DA02178)**

4) Site Address: **Near 11042 AL-87**

5) Detailed Description of Project:

23-003640

6) City: **Alba**

7) State: **TX**

8) Zip Code: **75410**

9) County/Borough/Parish: **WOOD**

10) Nearest Crossroads: **FM 779 & Co Rd 2980**

11) NAD 83 Latitude (DD-MM-SS.S): **32-44-11.1**

(**X**) N or () S

12) NAD 83 Longitude (DD-MM-SS.S): **095-36-00.6**

() E or (**X**) W

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **94.5** () Feet (**X**) Meters

14) Tower Type (Select One):

() Guyed lattice tower

(**X**) Self-supporting lattice

() Monopole

() Other (Describe):

Project Status

15) Current Project Status (Select One):

(**X**) Construction has not yet commenced

() Construction has commenced, but is not completed

Construction commenced on: _____

() Construction has been completed

Construction commenced on: _____

Construction completed on: _____

Determination of Effect

14) Direct Effects (Select One):

- No Historic Properties in Area of Potential Effects (APE)
- No Effect on Historic Properties in APE
- No Adverse Effect on Historic Properties in APE
- Adverse Effect on one or more Historic Properties in APE

15) Visual Effects (Select One):

- No Historic Properties in Area of Potential Effects (APE)
- No Effect on Historic Properties in APE
- No Adverse Effect on Historic Properties in APE
- Adverse Effect on one or more Historic Properties in APE

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u>	Number of Tribes/NHOs: <u>16</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Alabama Quassarte Tribal Town

Contact Name

5) First Name: Mary	6) MI:	7) Last Name: Tiger	8) Suffix:
9) Title: Second Chief			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Apache Tribe of Oklahoma

Contact Name

5) First Name: Darrin	6) MI:	7) Last Name: Cisco	8) Suffix:
9) Title:			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u> Number of Tribes/NHOs: <u>16</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Caddo Nation of Oklahoma

Contact Name

5) First Name: Jonathan	6) MI: M	7) Last Name: Rohrer	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/07/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Coushatta Indian Tribe

Contact Name

5) First Name: Dakota	6) MI:	7) Last Name: John	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	<input checked="" type="checkbox"/> <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u> Number of Tribes/NHOs: <u>16</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Eastern Shoshone Tribe

Contact Name

5) First Name: Josh	6) MI:	7) Last Name: Mann	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
<input checked="" type="checkbox"/> No Reply	
<input type="checkbox"/> Replied/No Interest	
<input type="checkbox"/> Replied/Have Interest	
<input type="checkbox"/> Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Jena Band of Choctaw Indians

Contact Name

5) First Name: Lillie	6) MI:	7) Last Name: Williamson	8) Suffix:
9) Title: TCNS Representative			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
<input checked="" type="checkbox"/> No Reply	
<input type="checkbox"/> Replied/No Interest	
<input type="checkbox"/> Replied/Have Interest	
<input type="checkbox"/> Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u>	Number of Tribes/NHOs: <u>16</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Kiowa Indian Tribe THPO

Contact Name

5) First Name: Amanda	6) MI:	7) Last Name: Hill	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Mescalero Apache Tribe

Contact Name

5) First Name: Holly	6) MI: B	7) Last Name: Houghten	8) Suffix:
9) Title: Tribal Historic Preservation Officer			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u>	Number of Tribes/NHOs: <u>16</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Muscogee (Creek) Nation

Contact Name

5) First Name: Jason	6) MI:	7) Last Name: Sawyer	8) Suffix: Mr
9) Title: TCNS Manager			

Dates & Response

10) Date Contacted <u>12/07/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
(<input type="checkbox"/>) Replied/No Interest	
(<input type="checkbox"/>) Replied/Have Interest	
(<input type="checkbox"/>) Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Northern Arapaho

Contact Name

5) First Name: Benjamin	6) MI:	7) Last Name: Ridgley	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied <u>12/06/2023</u>
(<input type="checkbox"/>) No Reply	
(<input type="checkbox"/>) Replied/No Interest	
(<input type="checkbox"/>) Replied/Have Interest	
(<input checked="" type="checkbox"/>) Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u> Number of Tribes/NHOs: <u>16</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Northern Cheyenne Tribe

Contact Name

5) First Name: Gary	6) MI:	7) Last Name: LaFranier	8) Suffix:
9) Title: FCC Specialist			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied <u>12/07/2023</u>
() No Reply	
() Replied/No Interest	
(<input checked="" type="checkbox"/>) Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Northwestern Band of Shoshone Nation

Contact Name

5) First Name: Montana & Associates	6) MI:	7) Last Name: LLC	8) Suffix:
9) Title: Attorney			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u>	Number of Tribes/NHOs: <u>16</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Shawnee Tribe

Contact Name

5) First Name: Tonya	6) MI:	7) Last Name: Tipton	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Thlopthlocco Tribal Town

Contact Name

5) First Name: Ryan	6) MI:	7) Last Name: Morrow	8) Suffix:
9) Title: Mekko			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Yes</u> (<input type="checkbox"/>) <u>No</u>
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>274385</u> Number of Tribes/NHOs: <u>16</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Tonkawa Tribe

Contact Name

5) First Name: Joshua	6) MI:	7) Last Name: Waffle	8) Suffix:
9) Title: TCNS Administrator			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
(<input type="checkbox"/>) Replied/No Interest	
(<input type="checkbox"/>) Replied/Have Interest	
(<input type="checkbox"/>) Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: United Keetoowah Band of Cherokee Indians in Oklahoma

Contact Name

5) First Name: THPO	6) MI:	7) Last Name: Department	8) Suffix:
9) Title: THPO Dept			

Dates & Response

10) Date Contacted <u>12/06/2023</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
(<input type="checkbox"/>) Replied/No Interest	
(<input type="checkbox"/>) Replied/Have Interest	
(<input type="checkbox"/>) Replied/Other	

Other Tribes/NHOs Contacted

Tribe/NHO Information

1) FCC Registration Number (FRN):
2) Name:

Contact Name

3) First Name:	4) MI:	5) Last Name:	6) Suffix:
7) Title:			

Contact Information

8) P.O. Box:	And /Or	9) Street Address:		
10) City:		11) State:	12) Zip Code:	
13) Telephone Number:		14) Fax Number:		
15) E-mail Address:				
16) Preferred means of communication: <input type="checkbox"/> E-mail <input type="checkbox"/> Letter <input type="checkbox"/> Both				

Dates & Response

17) Date Contacted _____	18) Date Replied _____
<input type="checkbox"/> No Reply <input type="checkbox"/> Replied/No Interest <input type="checkbox"/> Replied/Have Interest <input type="checkbox"/> Replied/Other	

Historic Properties

Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o

Historic Property

4) Property Name:
5) SHPO Site Number:

Property Address

6) Street Address:		
7) City:	8) State:	9) Zip Code:
10) County/Borough/Parish:		

Status & Eligibility

11) Is this property listed on the National Register? Source: _____	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: _____	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o
13) Is this property a National Historic Landmark?	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o

14) Direct Effects (Select One): <input type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One): <input type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):

2) Name: **Wood County Clerk**

Contact Name

3) First Name: **Kelley**

4) MI:

5) Last Name: **Price**

6) Suffix:

7) Title: **County Clerk**

Contact Information

8) P.O. Box: **1796**

And
/Or

9) Street Address:

10) City: **Quitman**

11) State: **TX**

12) Zip Code: **75783**

13) Telephone Number: **(903)763-2711**

14) Fax Number:

15) E-mail Address: **kprice@mywoodcounty.com**

16) Preferred means of communication:

() E-mail

() Letter

() Both

Dates & Response

17) Date Contacted **01/08/2024**

18) Date Replied _____

() No Reply

() Replied/No Interest

() Replied/Have Interest

() Replied/Other

Additional Information

19) Information on local government's role or interest (optional):

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	() <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
--	--

Consulting Party

2) FCC Registration Number (FRN):
3) Name:

Contact Name

4) First Name:	5) MI:	6) Last Name:	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address:		
11) City:		12) State:	13) Zip Code:	
14) Telephone Number:		15) Fax Number:		
16) E-mail Address:				
17) Preferred means of communication:				
() E-mail				
() Letter				
() Both				

Dates & Response

18) Date Contacted _____	19) Date Replied _____
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

20) Information on other consulting parties' role or interest (optional):

Designation of SHPO/THPO

1) Designate the Lead State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) based on the location of the tower.

SHPO/THPO

Name: Texas Historical Commission

2) You may also designate up to three additional SHPOs/THPOs if the APEs include multiple states. If the APEs include other countries, enter the name of the National Historic Preservation Agency and any state and provincial Historic Preservation Agency.

SHPO/THPO Name: _____

SHPO/THPO Name: _____

SHPO/THPO Name: _____

Certification

I certify that all representations on this FCC Form 620 Submission Packet and the accompanying attachments are true, correct, and complete.

Party Authorized to Sign

First Name: Annamarie	MI:	Last Name: Howell	Suffix:
--------------------------	-----	----------------------	---------

Signature: <i>Annamarie Howell</i>	Date: 1/10/2024
---------------------------------------	--------------------

FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Attachment A

Consultant Information

Resume/Curriculum Vitae



Dina M. Bazzill, MA, RPA

Principal Archaeologist/Historian
1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004
(770) 667-2040 Ext. 111
dina.bazzill@eca-usa.com

EDUCATION

East Carolina University Greenville, NC
M.A., Maritime Studies
Graduated: May 2007
GPA: 3.89/4.0

Southwest Missouri State University Springfield, MO
B.A., Anthropology, minor in Antiquities
Graduated: May 2004, Magna Cum Laude
Grade-Point Average: 3.8/4.0

PROFESSIONAL CERTIFICATIONS

Secretary of the Interior's 36CFR61 Professional Qualification Standards for Archaeology and History since 2007
Register of Professional Archaeologist since 2007
Section 106 Training Certification from SRI Foundation, 2009
Advanced Section 106 Training Certification from the Advisory Council on Historic Preservation, 2009
NEPA Compliance and Cultural Resources Training Certification from the National Preservation Institute, 2009
Section 4 (f) Compliance for Historic Properties Training Certification from the National Preservation Institute, 2009
Identification and Management of Traditional Cultural Properties Training Certification from the National Preservation Institute, 2009
Tribal Consultation Training Certification from the SRI Foundation, 2010

RELATED EMPLOYMENT

June 2007 - Present **Environmental Corporation of America** Alpharetta, GA
Position: Principal Investigator
Responsibilities:

- Archaeological and historical research.
- Conducting archaeological and historical site assessments for Section 106 compliance.
- Authoring Section 106/archaeological assessment/phase one environmental impact reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies.

REPRESENTATIVE EXPERIENCE

June 2007 - Present **Section 106 Cell Tower Evaluations** USA
Dina M. Bazzill, Principal Archaeologist/Historian
Goals: The scope of work for these projects has included archaeological and historic standing structures site assessments for the Section 106 review process in forty different states.

May/June 2011 **Chicago and North Western Railway Bridge Replacement: Phase I Underwater Archaeological Survey** Oshkosh, WI
Dina M. Bazzill, Principal Archaeologist/Historian
Goals: The scope of work for this project included a Phase I side-scan sonar survey for the replacement of the Chicago and North Western Railway Line over the Fox River in Oshkosh, Winnebago County, Wisconsin. The side-scan sonar survey was performed by Jerry Guyer of Pirate's Cove Diving Inc. Dina M. Bazzill performed the necessary research, analyzed the side-scan sonar data, and prepared a report in conformance with Wisconsin Historical Society Guidelines.

April/May 2010 **Snowbird Youth Center Phase I** Robbinsville, NC
Dina M. Bazzill, Field Director and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a survey for a proposed Eastern Band of Cherokee Indians Youth Center located on Forest Service land in Robbinsville, North Carolina. High probability landforms were tested as per Forest Service archaeological testing guidelines. Shovel tests were excavated at 65-foot intervals, where appropriate. Key staff members included Dina M. Bazzill, Field Director and John P. McCarthy, Principal Director. Dina M. Bazzill authored the report, with the assistance of John P. McCarthy.

April/May 2010 **CabeJail Phase I - EBCI Reservation** Cherokee, NC
Dina M. Bazzill, Project Archaeologist and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a survey for a proposed jail located on the Eastern Band of Cherokee Indians reservation in Cherokee, North Carolina. The entire proposed property was systematically surveyed utilizing guidelines provided by the EBCI THPO office. Shovel tests were excavated at 65-foot intervals, where appropriate. Key staff members included Dina M. Bazzill, Project Archaeologist and John P. McCarthy, Principal Director. John P. McCarthy authored the report, with the assistance of Dina M. Bazzill.

October /November 2009 **Old #4 Sewer Line Replacement - EBCI Indian Reservation** Cherokee, NC
Dina M. Bazzill, Field Director and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a systematic survey for a proposed sewer line replacement located on the Eastern Band of Cherokee Indian Reservation in Cherokee, North Carolina. A pedestrian survey was conducted, and shovel tests were conducted as per EBCI THPO office guidelines. This entailed excavating shovel tests at 65-foot intervals, where appropriate. Crew members included Dina M. Bazzill, Field Director, who supervised Mary E. Seagrave, field technician, Dave McGlothlin, field technician, and Landon Abernethy, field technician. John P. McCarthy oversaw the fieldwork and the report preparations, with assistance from Dina M. Bazzill.

July 2009 **Phase II Archaeological Site Delineation** Lewis Creek, IN
Dina M. Bazzill, Principal Investigator
Goals: The scope of work for this project included delineating a circa 1840 pioneer homestead located in Lewis Creek, Indiana in order to determine National Register of Historic Places eligibility. Dina M. Bazzill served as Principal Investigator and supervised Mary E. Seagrave, Project Archaeologist. Artifacts recovered from the field work were analyzed and photographed by Dina M. Bazzill. A Section 106 Review was prepared by Dina M. Bazzill and submitted to the Indiana State Historic Preservation Office for their review and comment.

April/May 2008 **City of Norcross - Proposed Greenspace Park** Norcross, GA
Dina M. Bazzill, Field Director and Principal Investigator
Goals: The scope of work for this project includes a Phase I survey of a seven acre tract of land in the City of Norcross, Georgia. ECA evaluated archaeological and historic resources present within the survey area and advise the City of Norcross on how best to preserve these resources and utilize them for educational purposes. In addition, a comprehensive user friendly report was produced.

November 2007 **Deep Testing for Archaeological Deposits** Nashville, TN
Artis West, Principal Investigator
Goals: The scope of work for this project included placing 10-foot deep two trenches with the proposed APE for direct effects for a proposed cell tower located adjacent to the Harpeth River in Nashville, Tennessee. Backfill soil was selectively sampled and negative findings were recorded. A report summarizing the findings was prepared and accepted by the Tennessee Historical Commission, Division of Archaeology.



Annamarie Howell

Principal Historian/Client Manager

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

annamarie.howell@eca-usa.com

(770)-667-2040

STRENGTHS AND SKILLS

Secretary of the Interior qualified Historian and telecommunications compliance professional with five years of specific telecommunications industry experience; five years as Project Manager; four years as Client Manager

EDUCATION

Georgia Southern University

Statesboro, GA

- Bachelor of Arts in History, Art History Minor, May 2015
- Master of Arts in History, May 2017

PROFESSIONAL CERTIFICATIONS

- Professional Certificate in Public History, May 2017
- Basics of NEPA and Section 106 Integration, ACHP 2019
- Coordinating NEPA and Section 106, ACHP 2019
- Successfully Navigating Section 106 Review, ACHP 2019
- Early Coordination with Indian Tribes for Infrastructure Projects, ACHP 2019
- Secretary of the Interior's 36CFR61 Professional Qualification Standards for History

PROFESSIONAL EXPERIENCE

June 2021 – Present

Environmental Corporation of America

Alpharetta, GA

Position: Principal Historian/Client Manager

Responsibilities:

- Archaeological and historical research/ Conduct historical site assessments for Section 106 compliance
- Supervise the completion of regulatory compliance reviews under Section 106, the National Environmental Policy Act (NEPA)
- Review associates' work and directly correspond with relevant state agencies, local preservation organizations and Certified Local Governments (CLG's) including the National Park Service, Tribal Historic Preservation Offices, State Historic Preservation Offices
- Act as an advocate on the client's behalf when interacting with government offices and agencies, educating the client about the general processes and procedures involved in project completion, ensuring prompt delivery of quality products and services, preparing weekly updates for ongoing projects

- June 2019 – June 2021 **Environmental Corporation of America** **Alpharetta, GA**
Position: Senior Historian/Client Manager
Responsibilities:
- Conducted historical site assessments for Section 106 compliance
 - Authored Section 106/Archaeological Assessments for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies
 - Consulted with National Park Service, Tribal Historic Preservation Offices, State Historic Preservation Offices, and local government entities
 - Managed and completed NEPA Environmental Checklists/Documentation
 - Act as an advocate on the client's behalf when interacting with government offices and agencies, educating the client about the general processes and procedures involved in project completion, ensuring prompt delivery of quality products and services, preparing weekly updates for ongoing projects
- June 2017 – June 2019 **Environmental Corporation of America** **Alpharetta, GA**
Position: Project Manager/Project Historian
Responsibilities:
- Conducted historical site assessments for Section 106 compliance
 - Authored Section 106/Archaeological Assessment/Phase I Environmental Assessment reports/ Fish and Wildlife species impact reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies
 - Consulted with National Park Service, Tribal Historic Preservation Offices, State Historic Preservation Offices, and local government entities
 - Managed and completed NEPA Environmental Checklists/Documentation
- August 2015 – May 2017 **Georgia Southern University Center for Art and Theatre** **Statesboro, GA**
Position: Collections Manager
Responsibilities:
- Organized and maintained the university's seven permanent art collections
 - Curated all permanent art collection exhibitions
 - Managed donation records and incoming/outgoing loans
- Curation/Design Experience:**
- "Common Clay: The History of Folk Pottery in North Carolina, South Carolina, and Georgia" (2017) Center for Art and Theatre, Statesboro, GA
 - Folk Art exhibit "Celebrating African American Artists" (2016) Center for Art and Theatre, Statesboro, GA
 - Folk Art exhibit "Where Liberty Dwells" (2016) Center for Art and Theatre, Statesboro, GA
 - Co-designed history exhibit for the Convention and Visitor's Bureau of Statesboro, GA (2016)
 - Co-Curated "Georgia Artists" (2015) Center for Art and Theatre, Statesboro, GA
- August 2013-December 2013 **Coastal Georgia Botanical Gardens** **Savannah, GA**
Position: Student Intern
Responsibilities:
- Researched the garden's history to create an educational lecture/program
 - Corresponded with National Archives for research materials
 - Archived historic documents and artifacts



Matthew Beazley, MA, RPA

Principal Archaeologist/Historian

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

(770) 667-2040 Ext. 109

Matthew.beazley@eca-usa.com

STRENGTHS AND SKILLS

Mr. Beazley has been a professional archaeologist for sixteen years, eleven of those years with ECA. He has been a Principal Investigator for the last seven years. In addition to reviewing cultural resource documents, Mr. Beazley also conducts archaeological fieldwork including Phase I survey, Phase II testing, site delineations, cemetery surveys, and metal detection surveys. Mr. Beazley is also the primary operative for conducting historical research and creating report templates and he manages ECA's artifact lab.

EDUCATION

North Carolina State University

M.A., Liberal Studies, Anthropology emphasis, 2009

Raleigh, NC

Georgia College and State University

B.S., History, Photography minor, 2005

Milledgeville, GA

PROFESSIONAL CERTIFICATIONS

Registered Professional Archaeologist (RPA) 2010

Secretary of the Interior's 36CFR61 Professional Qualification Standards archaeology and history 2010

Advanced Metal Detecting for the Archaeologist Certification (RPA) 2012

Successfully Navigating Section 106 Review Certification (ACHP) 2019

Coordinating NEPA and Section 106 Certification (ACHP) 2019

Basics of NEPA and Section 106 Integration (ACHP) 2019

Early Coordination with Indian Tribes for Infrastructure Projects Certification (ACHP) 2019

PROFESSIONAL EXPERIENCE

January 2014 – Present

Environmental Corporation of America

Alpharetta, GA

Position: Principal Archaeologist/Historian

Responsibilities: Archaeological and historical research / Conducting archaeological and historical site assessments for Section 106 compliance / Authoring Section 106/archaeological assessment/phase one environmental assessment reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies / Reviewing Section 106 reports / Managing archaeology lab and site form submissions.

January 2010 – January 2014

Environmental Corporation of America

Alpharetta, GA

Position: Project Manager/ Project Archaeologist

Responsibilities: Archaeological and historical research, conducting archaeological and historical site assessments for Section 106 compliance, Authoring Section 106/archaeological assessment/phase one environmental assessment reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies, Authoring Fish and Wildlife species impact reports, Producing NEPA reports.

August 2005 – December 2009 **Cultural Resources Assessment Group** **Raleigh, NC**

Position: Senior Archaeological Field Technician

Responsibilities/Training: Archaeological and historic research, cultural resource surveys, artifact analysis, report writing, use of AutoCAD, GIS, SketchUp, Photoshop, and Microsoft Office software

2006 – 2009 **Via Consolare Project in Pompeii (VCP)** **Pompeii, Italy**

Position: CAD/three-dimensional modeling specialist

June 2004 – July 2004 **APVA Jamestown Fieldschool** **Jamestown, VA**

Position: Field student

June 2003 – July 2003 **AAPP Fieldschool at Pompeii** **Pompeii, Italy**

Position: Field student

REPRESENTATIVE PROJECT EXPERIENCE

Project Manager/Archaeologist for over 600 telecommunications projects. Investigations have included National Register of Historic Places evaluation of historic structures and archaeological site assessments for the Section 106 review process under the terms a Nationwide Programmatic Agreement in Alabama, Arkansas, California, Colorado, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Rhode Island, Tennessee, Texas, Virginia, West Virginia, Washington, Wisconsin, and Wyoming.

2019 to present **Archaeological Survey for GDOT Projects** **Multiple Counties in GA**

Field Director/Principal Investigator

Goal: The survey, identification, and evaluation of archaeological and/or cultural sites for road widening and realignment projects and intersection improvement projects in Chatham, Henry, Muscogee, and Troup Counties on behalf of the Georgia DOT.

2016 to present **Archaeological Survey for NCDOT Projects** **Multiple Counties in NC**

Principal Investigator

Goal: The survey, identification, and evaluation of archaeological and/or cultural sites for road widening projects and intersection improvement projects in Burke, Camden, Davidson, Lenoir, Nash, Rockingham, and Stokes Counties on behalf of the North Carolina DOT.

2017 **Archaeological Survey for the Bridges Street Extension Project** **Carteret County, NC**

Principal Investigator

Goal: The survey, identification, and evaluation of archaeological and/or cultural sites for an extension of Bridges Street in Morehead City, NC on behalf of the North Carolina DOT. The survey area was more than 1,400 acres in size.

July 1, 2014 **Relocation of Proposed Communications Facility**

Field Director

Goal: The initial archaeological assessment for a proposed communications facility in Florahome, FL encountered a significant number of woodland period artifacts within the project area. In an effort to

avoid disturbing a potentially significant archaeological site a new lease area and access easement was surveyed around the delineated archaeological site boundary.

- June – August 2009 **Wal-Mart development site monitoring** **Charlotte, NC**
Monitoring of a sensitive site located within the property boundary over the course of two months as well as revisits to other sites located on the property.
- August 2005 – September 2006 **Carolina Lakes Project** **Lancaster County, SC**
Senior field technician for a cultural resources phase I survey of a 2,500-acre tract and subsequent phase III excavations of three sites of significance.
- June 2007 **Doby's Bridge Project** **York County, SC**
Senior field technician for a cultural resources phase I survey of a 600-acre tract and subsequent phase II testing of two sites of significance.



Colette Gabler, MA, RPA

Client Manager

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

(770) 667-2040

colette.gabler@eca-usa.com

EDUCATION

Georgia State University

Master of Arts in Anthropology, primary focus in Archaeology, 2017

Atlanta, GA

Ursinus College

Bachelor of Arts., Anthropology and Sociology, 2013

Collegeville, PA

PROFESSIONAL REGISTRATIONS/CERTIFICATIONS:

- Registered Professional Archaeologist (2021)
- Secretary of the Interior's Professional Qualification Standards (2021)

PROFESSIONAL EXPERIENCE

July 2017 – Present

Environmental Corporation of America

Alpharetta, GA

Position: Assistant Team Lead, Client Manager, Project Manager, and SOI-qualified Archaeologist

Responsibilities:

- Assist with managing a team of Project Managers
- Manage several clients with projects located in several regions across the U.S.
- Archaeological and historical research
- Processing artifacts and producing archaeological site forms
- Conducting archaeological and historical site assessments for Section 106 compliance
- Producing NEPA reports
- Authoring USFWS species impact reports
- Authoring Section 106 Reviews and archaeological assessments submission to clients, SHPO offices, tribes, consulting parties, and other state agencies
- Client managed and project managed sites located in the following states: Alabama, Arkansas, California, Florida, Georgia, Illinois, Indiana, Louisiana, Massachusetts, Nebraska, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, and Virginia
- Conducted archaeological research and excavation in the following states: Alabama, California, Florida, Georgia, Illinois, Iowa, Kansas, North Carolina, Pennsylvania, South Carolina, Texas

January 2018

NC Department of Transportation Archaeology Project

Morehead City, NC

Position: Field Archaeologist

Responsibilities:

- Conducted archaeological research and excavation
- Shovel Tests and screening
- Phase II delineations
- Documentation of shovel tests and artifacts

August 2016 – May 2017

Georgia State University

Atlanta, GA

Position: Graduate Assistant

Responsibilities:

- Assisted professors in grading papers, proctoring exams, and teaching classes
- Held office hours to assist undergraduate students in their studies
- Put together study guides and held review sessions for students prior to exams

March 2014 – August 2015

Newark Museum

Newark, NJ

Position: Museum Educator

Responsibilities:

- Instructed school groups in the Museum's science and classical galleries

- Initiated and supported in organizing curriculum for the Science Department
- Responsible for aiding in any additions to science exhibits
- Maintained organization in the office

January 2014 – August 2014 **Museum of Jewish Heritage** **New York City, NY**

Position: Intern

Responsibilities:

- Collaborated with Museum Educators in administrative tasks
- Aided in transcribing Holocaust interviews for the Director of Education

June 2013 – September 2013 **Newark Museum** **Newark, NJ**

Position: Intern

Responsibilities:

- Instructed school groups in natural earth sciences and health and fitness programs
- Contributed to developing curriculum for school programs and family events
- Launched summer events at the museum

2009-2012 **Pharmacology and Toxicology Department at Rutgers University** **Piscataway, NJ**

Position: Lab Technician Assistant and Intern

Responsibilities:

- Competent in cellular biology techniques (Immunohistochemistry [IHC], enzyme-linked immunosorbent assay [ELISA]) and molecular biology techniques (real-time polymerase chain reaction [PCR] and cell culture techniques)
- Proficient in Microsoft Excel for statistics and normalization
- Contributed to the *Structural changes in the skin of hairless mice following exposure to sulfur mustard correlate with inflammation and DNA damage* by collecting data by performing immunohistochemistry
- Assisted on the project that performed the study of the effects of Ozone on the liver by running Western blots and immunohistochemistry
- Analyzed how UV-B affects human cells and skin

GRANTS

2016 National Science Foundation (Elemental Analysis Facility – Field Museum, Chicago) \$3,000

CONFERENCE PRESENTATIONS

2017 Gabler, C. V. “Craft Production and Exchange in the Pre-Hispanic Andes: LA-ICP-MS and pXRF Analyses of Tiwanaku Ceramics.” Presentation at the Southern Anthropological Society Annual Meeting (March 23-25)



Gabriela Yenitza Ruiz Vélez M.A.,

Project Archaeologist

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

gabriela.ruiz@eca-usa.com

(939) 294-9391

EDUCATION

University of Maryland

Master of Arts (MA), Anthropology, May 2023

College Park, MD

University of Puerto Rico at Río Piedras

Bachelor of Arts (BA), Archaeology, May 2020

Río Piedras, PR

PROFESSIONAL CERTIFICATIONS

Secretary of the Interior's 36CFR61 Professional Qualification Standards archaeology and history
Register of Professional Archaeologists since 2021

PROFESSIONAL EXPERIENCE

August 2023 – Present

Environmental Corporation of America

Alpharetta, GA

Position: SOI qualified Project Archaeologist

Responsibilities:

- Conducting archaeological research, historical background research, and site assessments for Section 106 compliance
- Conducting archaeological and architectural site assessments in North/South Carolina, Virginia, West Virginia, California, Texas, Tennessee, Kentucky, Illinois, Missouri, Kansas, Oklahoma, Louisiana, Mississippi, Alabama, Florida, Colorado, and Idaho
- Conducting Phase 1 environmental site assessments
- Conducting archaeological monitoring during construction of FCC licensed telecommunications facilities
- Compiling information for reports during the beginning stages of archaeological/ Phase1/ Historical assessments
- Compiling project location assessments upon the completion of fieldwork to disseminate findings on conditions within the project area and any artifacts discovered with recommendations on how to proceed

June 2023 - August 2023

AECOM

Germantown, MD

Position: Field Technician

Responsibilities:

- Edited archaeological documents that reported the results of the Cultural Resource Management Project (CRMP)
- Served as a member of a cohesive interdisciplinary team during this project; maintained compliance with federal laws, regulations, and guidelines, e.g., National Environmental Policy Act (NEPA) analysis
- Interpreted various technical information about soil samples and advised new workers on said procedures
- Used dating methods and other analytical techniques on uncovered stone tools to determine the age and usage of the artifact
- Actively administered Grey & Pape's Cultural Resource Management Plan
- Trained as a contract officer's technical representative
- Worked often in isolated places, suburban environments, and infrastructure such as transmission lines

May 2022 - August 2022

National Park Service (COLO)

Yorktown, VA

Position: Intern

Responsibilities:

- Sorted through various artifacts from the Mid-Atlantic region of the United States
- Identified cultural relevance of Native American artifacts
- Entered sample findings into the school's database in easily understood wording for those unfamiliar with archaeology

Attachment B

Site Information

1: Photographs

The following photographs were taken using a digital camera from a height of 5'5".

- a:** Directional photographs taken from the Proposed Tower Site.
- b:** Photographs of all listed or eligible properties within the Areas of Potential Effects, if any.
- c:** Photographs from listed or eligible properties within the Area of Potential Effects looking toward the proposed tower site, if any.
- d:** Google Earth 2023 aerial photograph showing APE for visual effects.



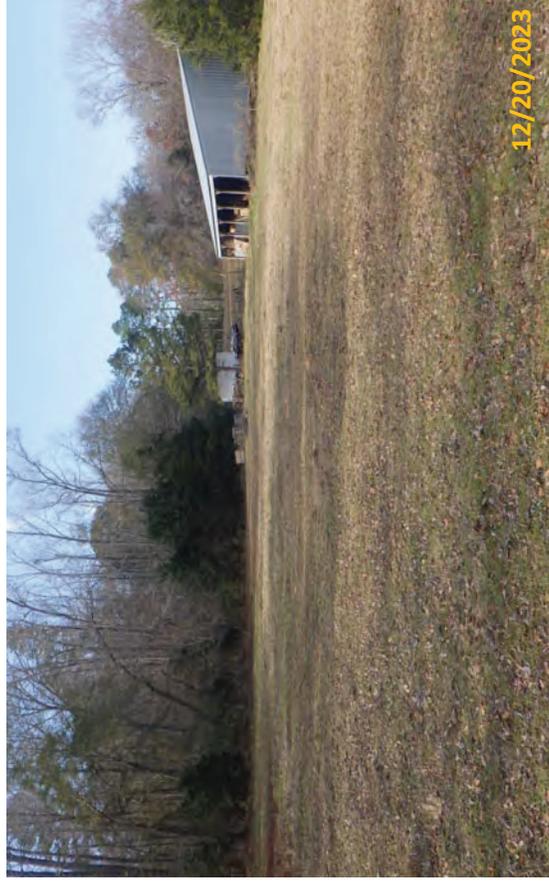
A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Attachment B-1a: Photographs

ECA ID: 23-003640





E: Northwesterly Overview of the Proposed Lease Area



F: Southeasterly Overview of the Proposed Lease Area



G: Southerly View of the Proposed Access/Utility Easement



H: Northerly View of the Proposed Access/Utility Easement

Attachment B-1a: Photographs

ECA ID: 23-003640





I: Overview of Shovel Test Pit Two (STP2)



J: Profile of Shovel Test Pit Two (STP2)

Attachment B-1a: Photographs

ECA ID: 23-003640

ECA



Source: Google Earth 2023

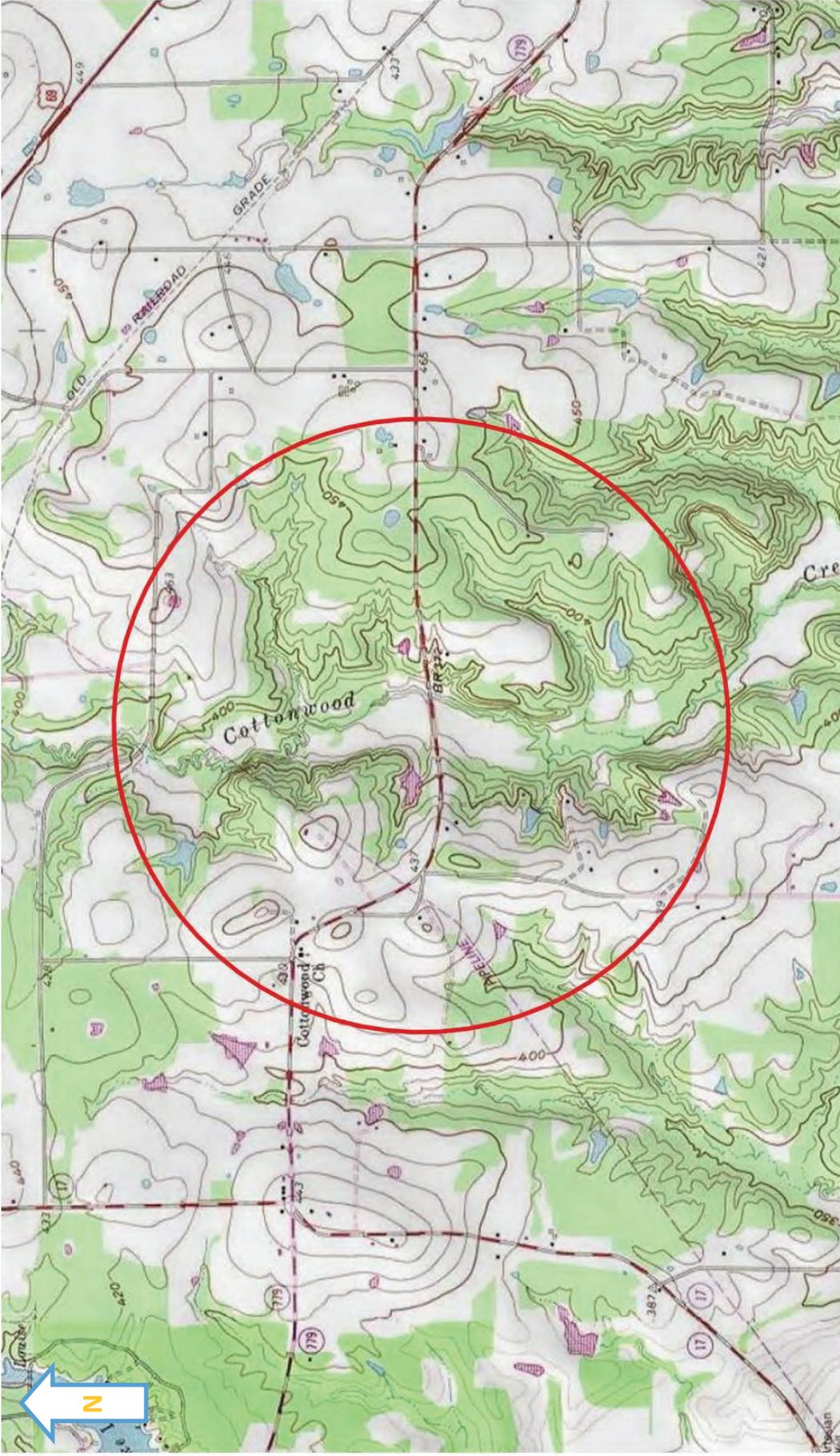
Attachment B-1d: Aerial Photograph

ECA ID: 23-003640

ECA

2: Maps

- a:** 7.5-Minute topographic map showing the Area of Visual Effects and the location of any identified historic properties, if any.
- b:** 7.5-Minute topographic map showing the Area of Direct Effects including any new access roads or other easements.
- c:** Site Vicinity Plan showing the location of the proposed tower site, any new access roads, easements, additional structures, utility lines, fences, and excavations.



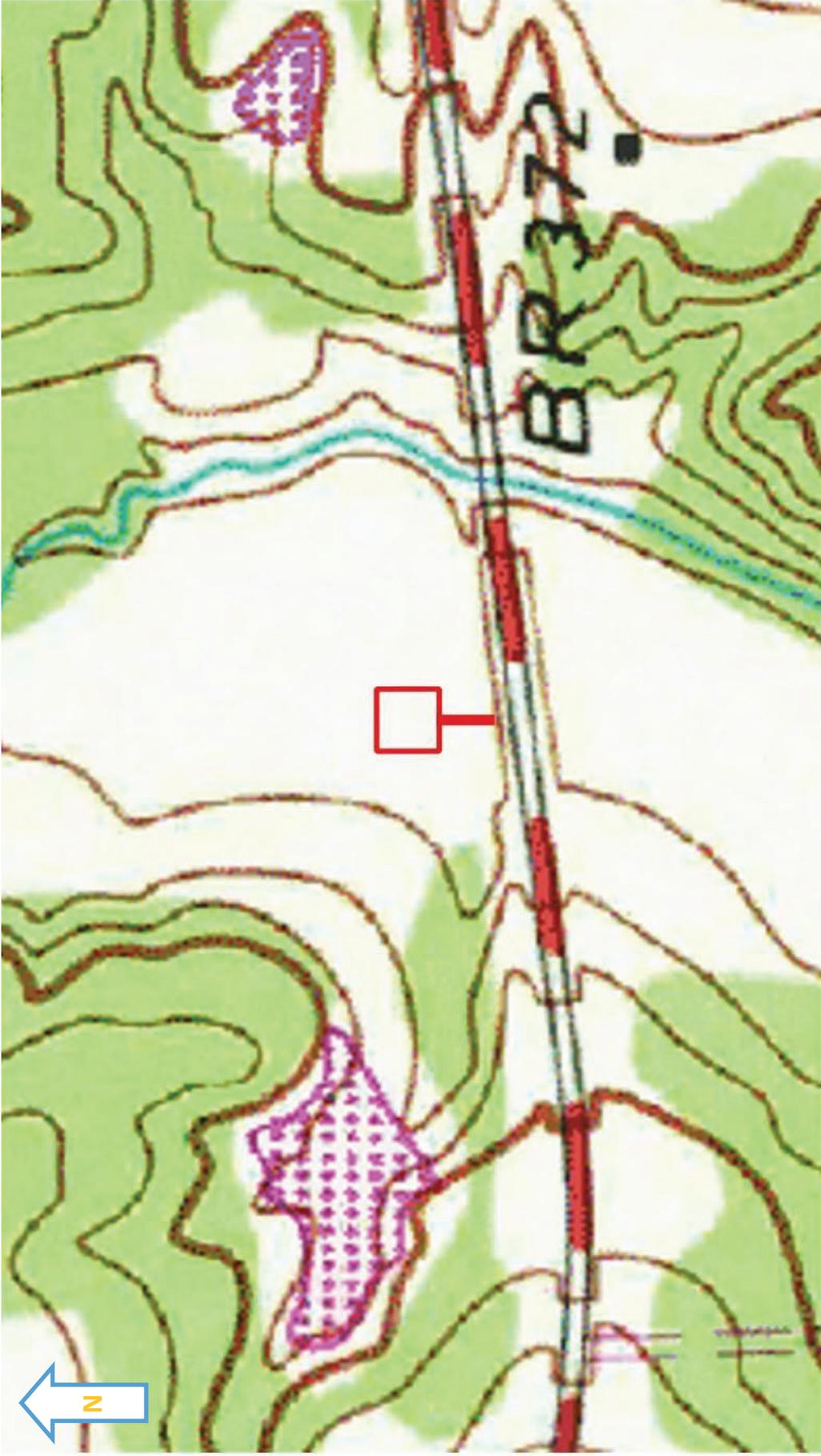
Source: USGS Topographic Maps 7.5 Minute Series, Alba, TX (1958, photorevised 1981), Calvary, TX (1959, photorevised 1981), Grand Saline, TX (1959, photorevised 1981), and Golden, TX (1959, photorevised 1981).

APE for Visual Effects = 3/4-Mile

Attachment B-2a: APE for Visual Effects

ECA ID: 23-003640





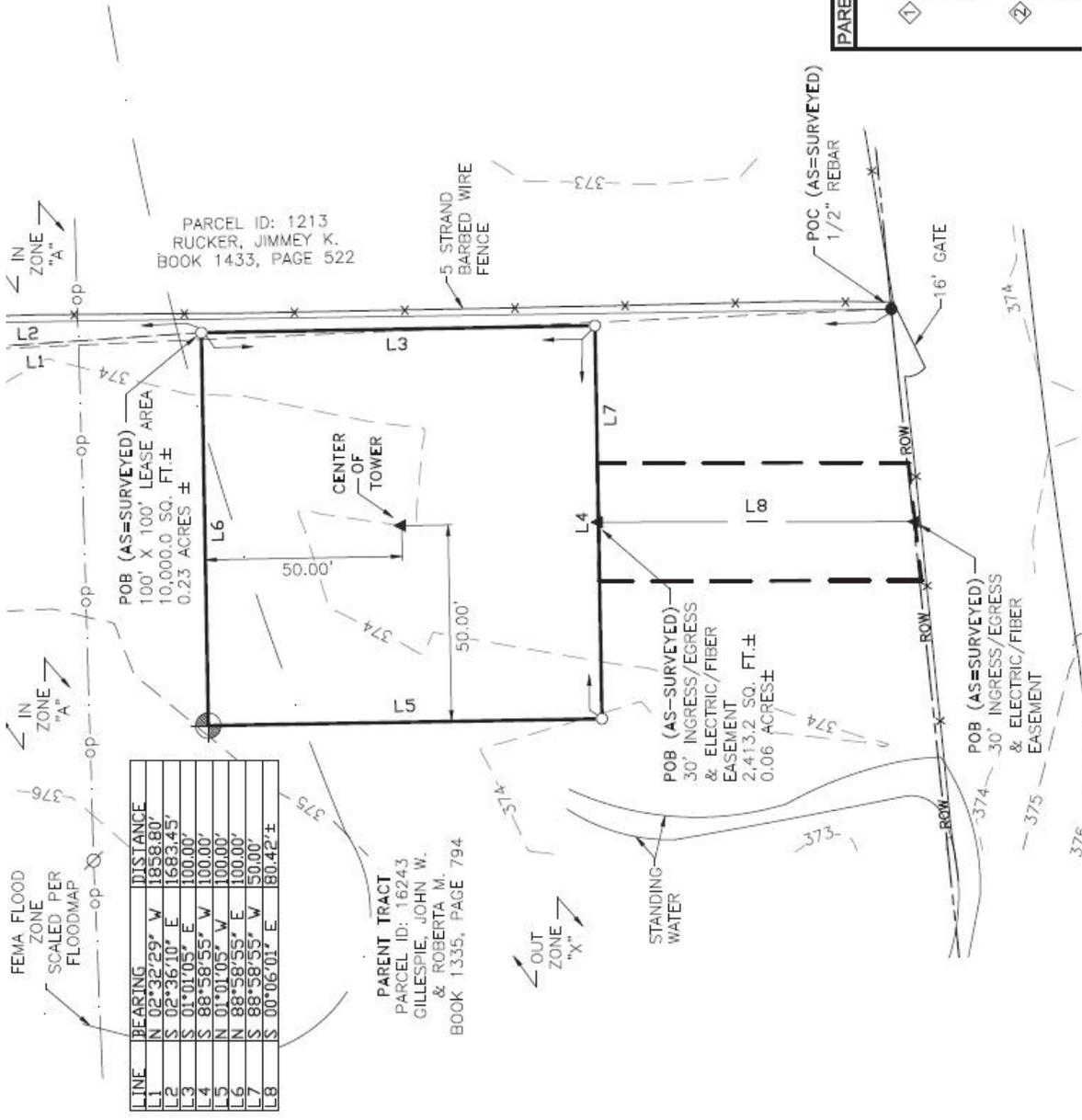
250 0 250 ft

Source: USGS Topographic Maps 7.5 Series, Golden, TX (1959, photorevised 1981).

Attachment B-2b: APE for Direct Effects

ECA ID: 23-003640

ECA



LINE	BEARING	DISTANCE
L1	N 02°32'29" W	1858.80'
L2	S 02°36'10" E	1683.45'
L3	S 01°01'05" E	100.00'
L4	S 88°58'55" W	100.00'
L5	N 01°01'05" W	100.00'
L6	N 88°58'55" E	100.00'
L7	S 88°58'55" W	50.00'
L8	S 00°06'01" E	80.42'±

PARCEL ID: 1213
RUCKER, JIMMEY K.
BOOK 1433, PAGE 522

PARCEL ID: 16243
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 1335, PAGE 794

POB (AS=SURVEYED)
100' X 100' LEASE AREA
10,000.0 SQ. FT.±
0.23 ACRES ±

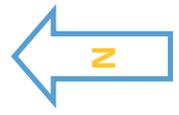
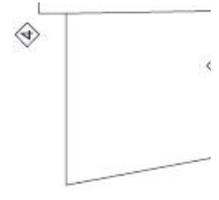
POB (AS=SURVEYED)
30' INGRESS/EGRESS
& ELECTRIC/FIBER
EASEMENT
2,413.2 SQ. FT.±
0.06 ACRES±

POB (AS=SURVEYED)
30' INGRESS/EGRESS
& ELECTRIC/FIBER
EASEMENT

PARCEL ID: 16243
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 1335, PAGE 794

PARCEL ID: 7990
GILLESPIE, JOHN W.
& ROBERTA M.
BOOK 2043, PAGE 695

PARENT TRACT OVERVIEW



Source: Applicant

ECA ID: 23-003640

Attachment B-2c: Site Vicinity Plan



Attachment C

Determination of Effect

1: Areas of Potential Effects

a: Direct Effects

The APE for direct effects is limited to the site of the proposed tower and surrounding easements, as described in the Nationwide Programmatic Agreement.¹ For this particular undertaking ground disturbance would be within the proposed approximate 100-foot by 100-foot (30-meter by 30-meter) lease area, the proposed approximate 81-foot long by 30-foot wide (25-meter by 9-meter) access/utility easement, and all the immediately adjacent areas. The general APE for direct effects is shown in Attachment B-2b and Attachment B-2c.

b: Visual Effects

The APE for visual effects is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of Historic Properties.² Unless otherwise noted, the area of potential effect for visual effect is as described in the Nationwide Programmatic Agreement:

- If the proposed tower is 200 feet or less in overall height, the APE is ½ mile in radius from the proposed tower.
- If the proposed tower is more than 200 feet in height and no more than 400 feet in height, the APE is ¾-mile in radius from the proposed tower.
- If the proposed tower is more than 400 feet in height, the APE is 1 ½ miles in radius from the proposed tower.³

The APE for visual effects is shown in Attachment B-2a: Area of Visual Effect.

2: Mitigation of Effect

a: Copies of correspondence and summaries of oral communications with SHPO/THPO and any consulting parties including descriptions of alternatives that have been considered in order to avoid, minimize, or mitigate any adverse effects

Not Applicable.

¹ Section VI.C.2 of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

² Section II.3 of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

³ Section VI.C.4.a-c of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

Attachment D

Tribal and NHO Involvement

ECA made notification through the FCC Tower Construction Notification System (TCNS) in order to identify Indian Tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the tower project within the APE for direct or visual effects. All Tribes that have expressed an interest in the proposed undertaking and requested a copy of this submission packet will be provided a copy, with the exception of those Tribes that have elected to receive no documentation. All interested Tribes will be provided an opportunity to comment in accordance with the FCC's rules. Copies of all relevant documents received to date, including correspondence, are provided in the following pages.

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		DA02178	Site Number:		US-TX-6056	NOO Date:		12/8/2023
TCNS #:		274385	ECA Project#:		23-003640	ECA PM:		CVG
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of FCC Escalation	Tribal Response Date	Tribal Response	
1	Kiowa Indian Tribe		Electronic	thpo@kiowatribe.org				
2	Tonkawa Tribe		Electronic	JWaffle@TonkawaTribe.com				
3	Apache Tribe of Oklahoma		Electronic	Apacheculture510@yahoo.com				
4	Eastern Shoshone Tribe		Electronic (Website)	jmann@easternshoshone.org				
5	Northern Arapaho		Electronic	archtech.nathpo@gmail.com				
6	Coushatta Indian Tribe		Electronic	dakotajohn@coushatta.org ; kdawsey@coushatta.org				
7	Jena Band of Choctaw Indians		Electronic	williamson@jenachoctaw.org				
8	Muscogee (Creek) Nation		Mail	mcntcns@mcn-nsn.gov ; section106@mcn-nsn.gov				
9	United Keetoowah Band of Cherokee Indians		Electronic	tcns@ukb-nsn.gov				
10	Alabama Quassarte Tribal Town		Electronic	mary.tiger@alabama-quassarte.org				
11	Thlopthlocco Tribal Town		Electronic	thpo@ttown.org				
12	Shawnee Tribe		Electronic	tcns@shawnee-tribe.com				
13	Northwestern Band of Shoshone Nation		Electronic	Northwesternbandshoshonetcnsfcc@outlook.com ; garymontana@montanaandassociates.com				
14	Caddo Nation of Oklahoma		Electronic and Mail	bgonzalez@mycaddonation.com				
15	Mescalero Apache Tribe		Electronic	holly@mathpo.org				
16	Northern Cheyenne Tribe		Electronic (Website)	glafranier@ncthpo.com ; virginia.m.w.boyale@gmail.com				

From: towernotifyinfo@fcc.gov
To: tribal.notify
Subject: Proposed Tower Structure Info - Email ID #8726760
Date: Monday, December 4, 2023 2:13:34 PM

Dear Dina M Bazzill,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 12/04/2023

Notification ID: 274385
Tower Owner Individual or Entity Name: VB BTS II, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 44 min 11.1 sec N
Longitude: 95 deg 36 min 0.6 sec W
Location Description: Near 11042 AL-87
City: Alba
State: TEXAS
County: WOOD

Detailed Description of Project: 23-003640
Ground Elevation: 114 meters
Support Structure: 91.4 meters above ground level
Overall Structure: 94.5 meters above ground level
Overall Height AMSL: 208.5 meters above mean sea level

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: towernotifyinfo@fcc.gov
To: tribal.notify
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #8727953
Date: Friday, December 8, 2023 3:02:05 AM

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO Amanda Hill - Kiowa Indian Tribe THPO - (PO Box: 369) Carnegie, OK - thpo@kiowatribe.org; ahill@kiowatribe.org - 580-654-2300 - electronic mail

2. TCNS Administrator Joshua Waffle - Tonkawa Tribe - 1 Rush Buffalo Road Tonkawa, OK
- JWaffle@TonkawaTribe.com - 580-628-2561 - electronic mail

3. Darrin Cisco - Apache Tribe of Oklahoma - 510 E Colorado Drive (PO Box: 1330)
Anadarko, OK - Apacheculture510@yahoo.com - 405-247-7494 (ext: 103) - electronic mail

4. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY -
jmann@easternshoshone.org - 307-335-2081 - electronic mail

Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online submittals. Our website address is: <http://www.esthpo.com>. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where you can submit relevant project files for our consultation review.

Your submission should include:

- Appropriate SHPO determination or response letter
- Cultural Resource Report and or Archaeological Survey Report
- Photographic project site documentation
- Topographic or Quadrangle Maps
- Site Plans/Construction Drawings
- FCC Forms 620 and 621
- Lat/Long Coordinates for the proposed project.
- Project Coordinator Contact Information

Our 30-day review period will commence once all project details have been submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin,

sdurgin@easternshoshone.org or by phone at: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

5. THPO Benjamin Ridgley - Northern Arapaho - 1010 Railroad Ave (PO Box: 67) St. Stephens, WY - archtech.nathpo@gmail.com; pejuta.villa@northernarapaho.com - 307-856-1628 - electronic mail

Exclusions: PLEASE SEND AN ARCHAEOLOGICAL SURVEY OR SITE INVENTORY/MAP FOR THE AREA WITHIN 1 MILE OF THE APE FOR PRE-CONSTRUCTION, COLLOCATION PROJECTS AND PTC POLES. The request gives the tribe an opportunity to comment on past projects that are now proposed as collocation projects.

Email reports to: archtech.nathpo@gmail.com

Please include the TCNS number on all correspondence, reports, maps.

ANY QUESTIONS CALL OR EMAIL:

Benjamin Ridgley
3078561628
benjamin.ridgley@northernarapaho.com

Crystal C'Bearing
crystal.cbearing@northernarapaho.com

6. THPO Dakota John - Coshatta Indian Tribe - 1940 C.C Bel Road Elton, LA - dakotajohn@coshatta.org; kdawsey@coshatta.org - 337-584-1401 - electronic mail

7. TCNS Representative Lillie Williamson - Jena Band of Choctaw Indians - (PO Box: 14)
Jena, LA - lwilliamson@jenachoctaw.org - 318-992-8258 - electronic mail
Exclusions: All FCC correspondence should be sent electronically to the e-mail
lwilliamson@jenachoctaw.org

8. TCNS Manager Jason Sawyer Mr - Muscogee (Creek) Nation - Highway 75 & Loop 56
(PO Box: 580) Okmulgee, OK - MCNTCNS@muscogeenation.com;
Jsawyer@muscogeenation.com - 918-732-7835 - regular mail

9. THPO Dept THPO Department - United Keetoowah Band of Cherokee Indians in
Oklahoma - (PO Box: 746) Tahlequah, OK - tcns@ukb-nsn.gov - 918-871-2852 - electronic
mail

10. Second Chief Mary Tiger - Alabama Quassarte Tribal Town - (PO Box: 218) Wetumka,
OK - mary.tiger@alabama-quassarte.org - 405-452-3987 - electronic mail
Exclusions: The Alabama Quassarte Tribal Town is unaware of any cultural or sacred sites
located within the immediate project area. The AQTT's Historic Preservation Department
concurs that there should be no adverse effect to any known historic properties and that work
should proceed as planned. However, as the project is located in an area that is general historic
interest to the Tribe, we request that work be stopped and our office contacted immediately if
any Native American cultural materials or human remains are encountered.

If you have any questions, please contact our office at the number below.

Respectfully,

Alabama Quassarte Tribal Town
P.O. Box 187
Wetumka, Ok 74883
(P) 405-452-3881
(F) 405-452-3889

11. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - 000-000-0000 - electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

12. THPO Tonya Tipton - Shawnee Tribe - 29 South 69A Highway Miami, OK - tcns@shawnee-tribe.com - 918-542-2441 (ext: 103) - electronic mail

Exclusions: In the case of projects with NO ground disturbance such as antennae on the sides of buildings or existing poles, the Shawnee Tribe concurs that no known historic properties will be negatively impacted by the project. The Shawnee Tribe DOES NOT wish to consult on those projects with NO ground disturbance.

If the project DOES involve ground disturbance at all, the Shawnee Tribe would like to ACCEPT your invitation for consultation and will provide a review.

If you have any questions, you may contact the Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

13. Attorney Montana & Associates LLC - Northwestern Band of Shoshone Nation - N 12923 N. Prairie Rd Osseo, WI - Northwesternbandshoshonetcnsfcc@outlook.com; garymontana@montanaandassociates.com - 715-597-6464 - electronic mail

Exclusions: Northwestern Band of Shoshone as of 2/19/2020 will not be reviewing colocations of antennas on buildings.

14. THPO Jonathan M Rohrer - Caddo Nation of Oklahoma - (PO Box: 487) Binger, OK - jrohrer@mycaddonation.com; sbotone@mycaddonation.com - 405-656-2344 - regular mail

Exclusions: Please see our website for additional details regarding Section 106 consultation for cell tower projects at:

<https://mycaddonation.com/historic-preservation>

15. Tribal Historic Preservation Officer Holly B Houghten - Mescalero Apache Tribe -

Mescalero Apache Tribal Historic Preservation Office 101 Central Ave (PO Box: 227)
Mescalero, NM - holly@mathpo.org - 575-464-3005 - electronic mail

16. FCC Specialist Gary LaFranier - Northern Cheyenne Tribe - (PO Box: 128) Lame Deer, MT - gary.lafranier@cheyennenation.com - 406-477-8114 - electronic mail

Exclusions: The Northern Cheyenne Tribe requirement for consultation is digitally through our departmental website. Our website is <http://cms.cheyennenation.com>

We do not accept mailed paper or emailed digital submissions of project material. To speed up our response time and to be in compliance with our environmental practices we do not accept paper submissions. All proposed projects must be processed through our website. Multiple people in our department need access to the project files and department notes to be able to do their work on the project. For organization, documentation, and financial regulation, all Section 106 project compliance work.

Just as the majority of State Historic Preservation Offices elect to have companies submit their proposed project directly to them in the format they require, as a sovereign nation, we have the right to ask for the same courtesy.

We require that you submit Form 620 or 621, complete with all of its attachments to our website.

It would expedite the process of getting your project into compliance if you would wait and submit your proposed project to our department when Form 620/621 and all of its attachments are ready - particularly the complete cultural resource report. We waste quite a bit of time contacting companies and searching for the Form 620/621 if the proposed project is submitted to us with only a dot on the map.

If you have any questions or need more information please contact FCC specialist Gary LaFranier at gary.lafranier@cheyennenation.com and 406-477-8114, or THPO Teanna Limpy at teanna.limpy@cheyennenation.com and 406-477-4839.

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a

Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

17. SHPO Cathie Matthews - Department of Arkansas Heritage - 323 Center Street Suite 1500 Little Rock, AR - cathiem@arkansasheritage.org - 501-324-9150 - electronic mail

18. Deputy SHPO Ken Grunewald - Department of Arkansas Heritage - 323 Center Street Suite 1500 Little Rock, AR - keng@arkansasheritage.org - 501-324-9357 - electronic mail

19. SHPO Trait Thompson - Oklahoma Historical Society - Oklahoma History Center 800 Nazih Zuhdi Drive Oklahoma City, OK - trait.thompson@history.ok.gov - 405-522-5201 - electronic mail

20. Historian Sarah K Forbes - Texas Historical Commission - (PO Box: 12276) Austin, TX - TexFcc@thc.state.tx.us - 512-936-7403 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 12/04/2023
Notification ID: 274385
Excluded from SHPO Review: No
Tower Owner Individual or Entity Name: VB BTS II, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court

Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 44 min 11.1 sec N
Longitude: 95 deg 36 min 0.6 sec W
Location Description: Near 11042 AL-87
City: Alba
State: TEXAS
County: WOOD
Detailed Description of Project: 23-003640
Ground Elevation: 114.0 meters
Support Structure: 91.4 meters above ground level
Overall Structure: 94.5 meters above ground level
Overall Height AMSL: 208.5 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

<https://www.fcc.gov/wireless/available-support-services>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Attachment E

Historic Properties

Method of Identification:

The following sources and records were reviewed to identify Historic Properties within the Area of Potential Effect (APE) for visual and direct effects:

- i. Properties listed in the National Register;
- ii. Properties formally determined eligible for listing by the Keeper of the National Register;
- iii. Properties that the SHPO/THPO certifies are in the process of being nominated to the Nation Register;
- iv. Properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local government representing the Department of Housing and Urban Development (HUD); and
- v. Properties listed in the SHPO/THPO Inventory that the SHPO/THPO has previously evaluated and found to meet the National Register Criteria, and that are identified accordingly in the SHPO/THPO Inventory.⁴

⁴ Section VI.D.1.a.i-v of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222)

1: Historic Properties Identified in the APE for Direct Effects

a: Historic Properties identified within the APE for direct effects

If any Historic Properties were identified, see *Historic Properties* pages within the FCC Form 620.

b: Historic Properties within the APE, not listed in “a”, that ECA Considers to be Eligible for Listing in the National Register as a result of ECA’s research.

ECA has identified no Historic Properties within the area for direct effects.

c: Description of techniques and methodology used to identify Historic Properties within the APE for direct effects.

See *Archaeological Assessment*, Attachment E-1c.

2: Historic Properties Identified in the APE for Visual Effects

- a: Historic Properties Identified in the APE for visual effects that are listed in the National Register, have been formally determined eligible by the Keeper of the National Register, or have been evaluated and found to meet NR criteria for listing by the SHPO/THPO and are identified as such in the SHPO/THPO inventory.**

If any historic resources were identified, see *Historic Properties* pages within the FCC Form 620, or if more than ten identified historic resources see *Cultural Resource Report*, Attachment E-2a.

- b: Historic Properties, not listed in part “a,” that are in the APE for visual effects that were identified through the comments of Indian Tribes, NHOs, local government, or members of the public.**

See *Historic Properties* pages within the FCC Form 620.

- c: Properties listed in part “a,” which ECA considers no longer eligible for inclusion in the National Register**

Not Applicable.

Attachment E-1c
Archaeological Assessment
(Attached Separately)

CONFIDENTIAL NOTICE: Attachment E-1c and Attachment H may contain information on historic and/or prehistoric archaeological cultural resources. This information is to be regarded as strictly confidential and is not for public dissemination or distribution and is not to be published in the public domain or provided to any unauthorized parties.

Attachment F

Local Government Involvement

Contact Information

- a: List of all government agencies contacted and a summary of contact including copies of relevant documents.**

Please see the *Local Government* pages of the FCC Form 620 for a list of agencies contacted. Documentation of our correspondence follows this page.

- b: Local government agencies that will be contacted, but have not as of this date.**

Not Applicable.



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

January 8, 2024

Wood County Clerk
P.O. Box 1796
Quitman, TX 75783-1796

Attention: Mx. Kelley Price – County Clerk

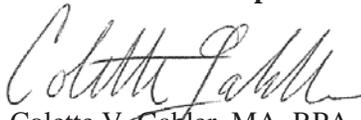
Subject: Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

Dear Mx. Price:

VB BTS II, LLC is proposing to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure located off FM 779, Alba, Wood County, Texas (N32° 44' 11.1"; W95° 36' 00.6"). **A map is included for your reference.** In accordance with the Federal Communications Commission (FCC) regulation at 47 C.F.R. 1.1307(a)(4), we are providing notice to you and seeking any comments that you may have regarding the effect of the proposed action described above on **Historic Properties** in your community. Please note that a **historic property** is defined in Section II.A.9. of the FCC's 2004 Nationwide Programmatic Agreement as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the **National Register of Historic Places (NRHP)**. Based on your level of interest in the project, you may wish to become a consulting party. *This notice is not intended to supplant any local zoning or permitting requirements but is necessary before we can request review of the action by the State Historic Preservation Office (SHPO).*

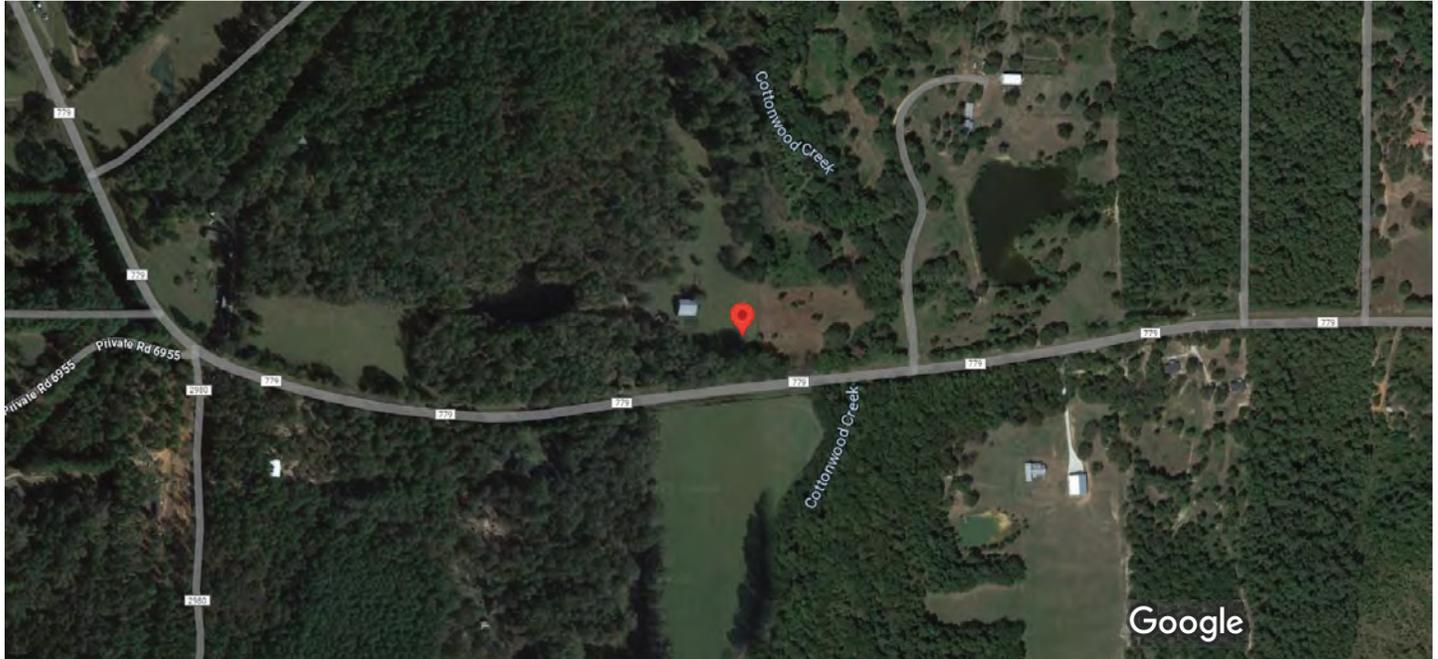
We welcome any comments that you may have regarding any **Historic Properties listed on or eligible for listing on the NRHP** that may be affected by the undertaking. Please direct your comments to Annamarie Howell, Environmental Corporation of America, 1375 Union Hill Industrial Court, Suite A, Alpharetta, Georgia 30004, 770-667-2040 x 108 or via email to publicnotice@eca-usa.com. As we would like to submit the project to the SHPO for review as soon as possible, we request that you provide any documents that you may have within 30 days. Thank you for your cooperation.

Sincerely,
Environmental Corporation of America


Colette V. Gabler, MA, RPA
Senior Project Manager


Annamarie Howell, MA
Principal Historian

Google Maps 32°44'11.1"N 95°36'00.6"W



Imagery ©2023 Airbus, CNES / Airbus, Maxar Technologies, USDA/FPAC/GEO, Map data ©2023 200 ft



32°44'11.1"N 95°36'00.6"W

32.736417, -95.600167



Directions



Save



Nearby



Send to phone



Share

Alba-Golden Independent School District, TX

P9PX+HW8 Golden, Texas

Photos

Attachment G

Consulting Parties

Public Involvement by Legal Notices, Letters, or Public Meetings

Copies of all relevant documents, including correspondence and legal notices, are provided in the following pages.

Subject Name: Telecommunications Structure / Client Reference: 23-003640 (DA02178)

Notice Type	Miscellaneous
InkLynk Notice ID	80626
Ad Number	Not Yet Provided
Notice Created	12/19/2023 03:32 PM
Run Dates	12/27/2023
Newspaper	Wood County Democrat
County, State	WOOD, TX
Status	QUOTE REQUESTED

Documents Payment/Receipt Audit Log Notes

[Download Notice Document](#) Download Your Original Notice Document

[Download Affidavit](#) When the notice completes the affidavit will be available

Original Notice Text

- start -
VB BTS II, LLC is proposing to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure located near 11042 AL-87, Alba, Wood County, Texas (N32° 44' 11.1"; W95° 36' 00.6"). The tower will be lit with FAA Style E lighting. VB BTS II, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places. Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.
In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only

- start -

VB BTS II, LLC is proposing to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure located near 11042 AL-87, Alba, Wood County, Texas (N32° 44' 11.1"; W95° 36' 00.6"). The tower will be lit with FAA Style E lighting. VB BTS II, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places. Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.

In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only raise environmental concerns and can be filed online using the FCC pleadings system at www.fcc.gov or mailed to FCC Requests for Environmental Review, Attn: Ramon Williams, 445 12th Street SW, Washington, DC 20554 within 30 days of the date that notice of this proposed action is published on the FCC's website. Refer to File No. A1261083 when submitting the request and to view the specific information about the proposed action. 23-003640/CVG

- stop -

Attachment H

Designation of SHPO/THPO

SHPO/THPO Specific Forms

The following pages include copies of all additional forms specific to the Section 106 Review process for the lead SHPO/THPO reviewing this filing.

Bibliography

Google Earth

2023 Aerial Photograph

National Register Information System (NRIS)

2023 National Register of Historic Places

<http://www.nps.gov/nr>. Accessed January 2024.

Texas Historical Commission (THC)

<http://nueces.thc.state.tx.us>. Accessed January 2024.

United States Federal Communications Commission (FCC)

2005 Federal Communications Commission Federal Register, 47 CFR Part 1, Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act; Final Rule, WT Docket No. 03-128; FCC 04-222. Washington, DC.

United States Geological Survey USGS

1958 Photorevised 1981, *Alba, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.

1959 Photorevised 1981, *Calvary, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.

1959 Photorevised 1981, *Grand Saline, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.

1959 Photorevised 1981, *Golden, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.

Phase I Cultural Resources Survey
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas



ECA Project#: 23-003640



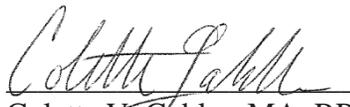
TCNS ID #: 274385

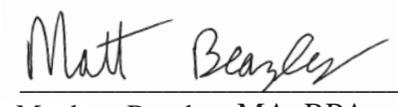


Report Date: January 10, 2024

Lead Federal Agency:
Federal Communications Commission

Submitted By:


Colette V. Gabler, MA, RPA
Senior Project Manager


Matthew Beazley, MA, RPA
Principal Investigator



ABSTRACT

Environmental Corporation of America's client, VB BTS II, LLC is proposing to construct a 310-foot tall (overall height) self-supporting lattice telecommunications structure located off FM 779, Alba, Wood County, Texas. ECA conducted a Phase I Archaeological Assessment of the Area of Potential Effects (APE) consisting of background research, field investigations, and preparation of this report. The APE for direct effects is located on private land.

ECA reviewed cultural records and databases and did not identify any archaeological sites and one survey (8500017403) within the APE for direct effects. If any archaeological sites or cultural resource surveys were identified during ECA's research outside the APE for direct effects, they are discussed further in the Site File Research section of this report. During the course of the field survey portion of this archaeological assessment, no archaeological cultural resources were encountered.

ECA believes that the proposed undertaking would have no effect on any archaeological resources that are listed in or eligible for listing in the National Register of Historic Places. Based on our findings related to archaeological resources, we recommend no further consultation under Section 106 Review of the National Historic Preservation Act for this proposed undertaking.

TABLE OF CONTENTS

ABSTRACT.....	ii
TABLE OF CONTENTS.....	iii
LIST OF FIGURES	iv
LIST OF PHOTOGRAPHS.....	iv
LIST OF TABLES	iv
INTRODUCTION	1
ENVIRONMENTAL SETTING	5
LAND USE HISTORY.....	11
SITE FILE RESEARCH.....	11
FIELD CONDITIONS.....	12
FIELD METHODS.....	16
FIELD SURVEY RESULTS.....	16
LABORATORY METHODS.....	19
CURATION.....	19
RECOMMENDATIONS.....	19
CLOSURE	19
REFERENCES CITED.....	20

**Resumes of key personnel involved with the project can be provided upon request.*

List of Figures

Figure 1: Site Location on Topographic Quadrangles	2
Figure 2: Topographic Map Depicting the APE for Direct Effects	3
Figure 3: Site Vicinity Plan.....	4
Figure 4: 2023 Google Earth Aerial Photograph	6
Figure 5: 2003 Google Earth Aerial Photograph	7
Figure 6: 1996 Google Earth Aerial Photograph	8
Figure 7: 1983 Historicaerials.com Aerial Photograph.....	9
Figure 8: 1957 Historicaerials.com Aerial Photograph.....	10

List of Photographs

Photograph A: Northerly View from the Center of the Proposed Lease Area.....	14
Photograph B: Easterly View from the Center of the Proposed Lease Area	14
Photograph C: Southerly View from the Center of the Proposed Lease Area	14
Photograph D: Westerly View from the Center of the Proposed Lease Area.....	14
Photograph E: Northwesterly Overview of the Proposed Lease Area.....	15
Photograph F: Southeasterly Overview of the Proposed Lease Area	15
Photograph G: Southerly View of the Proposed Access/Utility Easement.....	15
Photograph H: Northerly View of the Proposed Access/Utility Easement.....	15
Photograph I: Overview of Shovel Test Pit Two (STP2)	18
Photograph J: Profile of Shovel Test Pit Two (STP2).....	18

List of Tables

Table 1: APE for Direct Effects Description	1
Table 2: Project Location Information.....	1
Table 3: Mapped Soil Types within the Project Area	5
Table 4: Archaeological Sites Identified Within a 1-Mile Research Radius	12
Table 5: Archaeological Surveys Identified Within a 1-Mile Research Radius	12
Table 6: Surface Visibility within the APE for Direct Effects.....	13
Table 7: Shovel Test Pit Descriptions.....	17

INTRODUCTION

Environmental Corporation of America was contracted by VB BTS II, LLC to perform an archaeological assessment as part of the Section 106 Review process for a proposed telecommunications facility. The proposed facility would be located off FM 779, Alba, Wood County, Texas. The purpose of our work was to determine whether any archaeological cultural resources might exist within the proposed project area (APE for direct effects).

The Area of Potential Effect (APE) is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist” (FCC 2003). For purposes of this work, the APE for direct effects is the actual physical impact area. The APE for direct effects is further described in the below table.

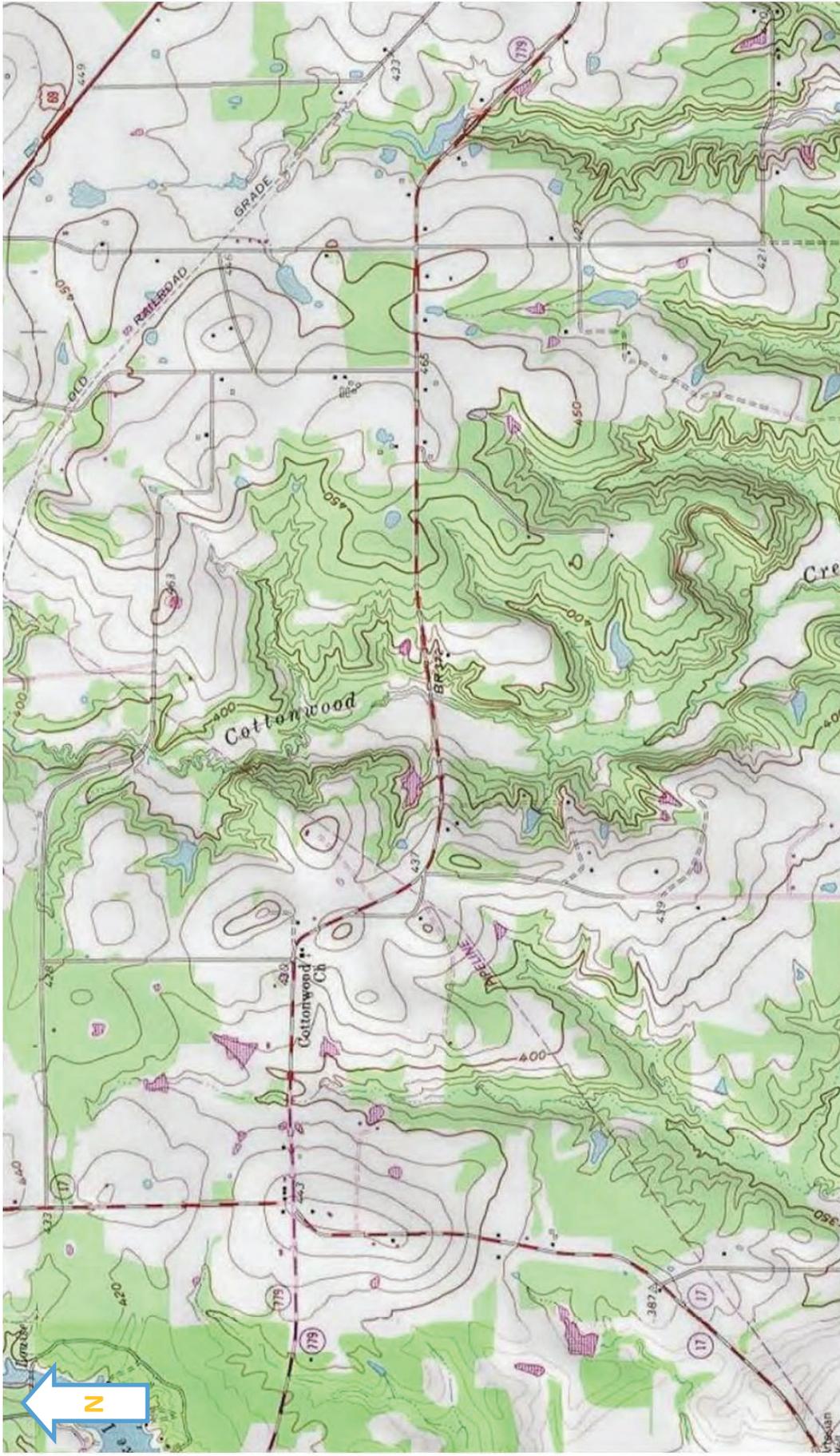
Table 1: APE for Direct Effects Description

Proposed Lease Area	Proposed Access/Utility Easement	Additional Easements
100ft x 100ft (30m x 30m)	Approximately 81ft long x 30ft wide (25m x 9m)	N/A
Total Project Acreage: 0.29 acres (0.12 hectares)		

ECA understands that VB BTS II, LLC plans to construct a 310-foot tall overall height self-supporting lattice telecommunications structure within the lease area. The proposed lease area would be located within a grassed area. The lease area would be accessed and receive utilities by a proposed access/utility easement that would traverse in a northerly direction from the right-of-way (ROW) of FM 779 through a wooded area and then a grassed area before terminating at the proposed lease area.

Table 2: Project Location Information

Tower Coordinates (NAD83) (degrees/minutes/seconds)	Tower Coordinates (UTM)	Tower Elevation (feet/meters)	Township/Range/Section
N32° 44' 11.1" W95° 36' 0.6"	Zone 15N 256349E, 3625058N	374 / 114.0	N/A

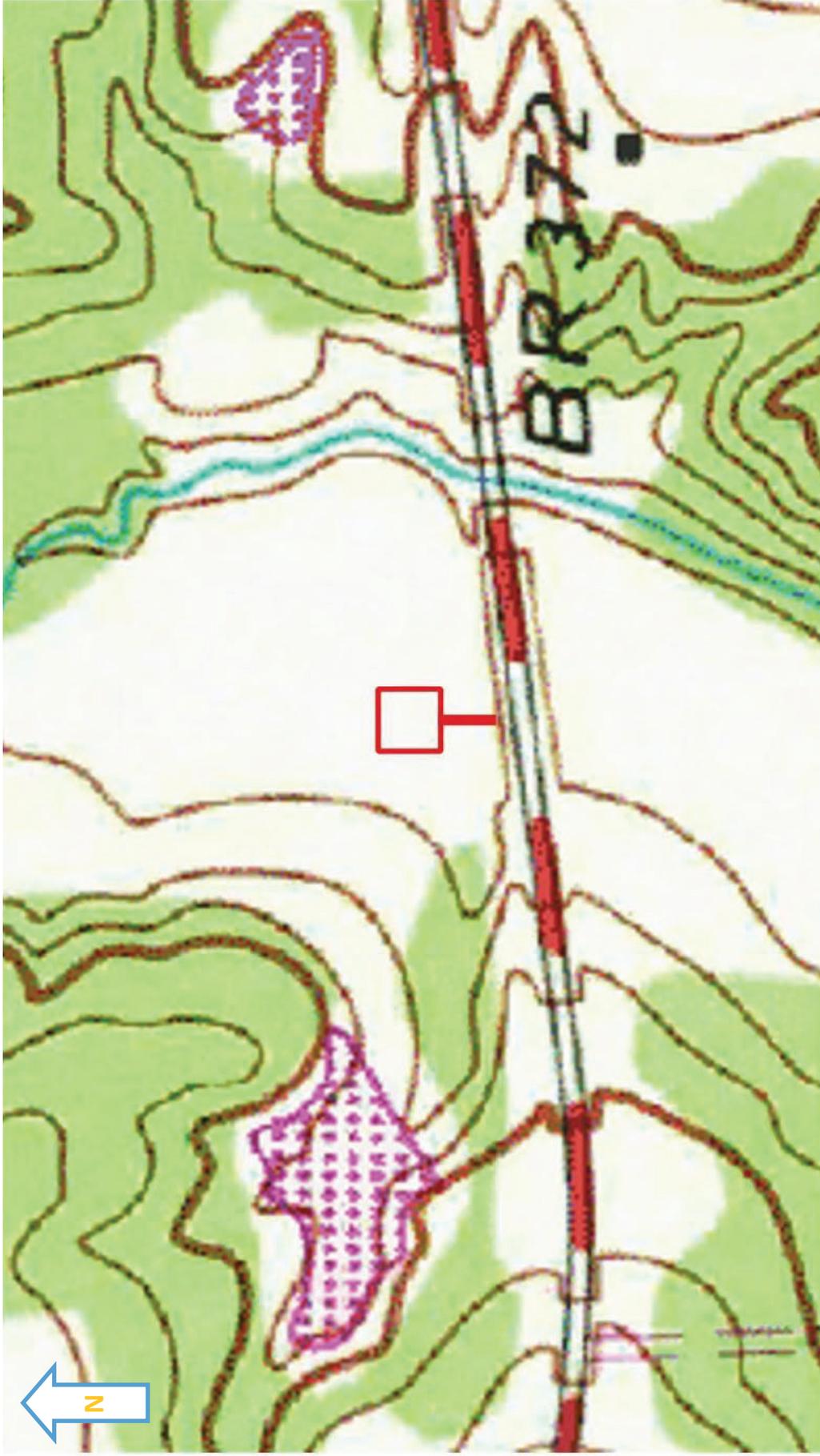


Source: USGS Topographic Maps 7.5 Minute Series, *Alba, TX* (1958, photorevised 1981), *Calvary, TX* (1959, photorevised 1981), *Grand Saline, TX* (1959, photorevised 1981), and *Golden, TX* (1959, photorevised 1981).



ECA ID: 23-003640

Figure 1: Site Location Map



250 0 250 ft

Source: USGS Topographic Map 7.5 Minute Series, Golden, TX (1959, photorevised 1981).



ECA ID: 23-003640

Figure 2: APE for Direct Effects

ECA reviewed cultural records and databases and did not identify any archaeological sites and one survey (8500017403) within the APE for direct effects. If any archaeological sites or cultural resource surveys were identified during ECA’s research outside the APE for direct effects, they are discussed further in the Site File Research section of this report. During the course of the field survey portion of this archaeological assessment which included a pedestrian survey and systematic shovel testing, no archaeological sites or cultural resources were encountered.

Gabriela Ruiz, MA, Project Archaeologist, conducted the fieldwork. Colette Gabler, MA, RPA, Senior Project Manager, authored this report. The project was conducted under the direction and supervision of Matt Beazley, MA, RPA, Principal Investigator. Resumes of these key personnel can be provided upon request.

ENVIRONMENTAL SETTING

Geologically, the project area is located within the Coastal Plains Physiographic Province, specifically within the West Gulf Coastal Plain section. The Coastal Plain is the flattest province and stretches from Cape Cod to the Mexican border. The region was formed during the early Mesozoic Era during the break-up of Pangea and is considered a passive continental margin (NPS 2023).

According to the USDA Soil Survey, soils found at the property consists of Cuthbert gravelly fine sandy loam, 8-25% slopes (CgE) and Manco loam, frequently flooded (Ma). Descriptions of the dominant mapped soil types are displayed in the table below.

Table 3: Mapped Soil Types within the Project Area

Mapped Soil Type	Soil Series Description	Known Subsoil	Typical Subsoil Depth Below Surface
Cuthbert	Consists of soils that are moderately deep to weakly consolidated sandstone and shale; Soils are well drained and slowly to moderately slowly permeable and are on strongly sloping to steep uplands.	Dark red (2.5YR 3/6) clay	8-20 inches (20-51 cm)
Manco	Consists of very deep, somewhat poorly drained, moderately permeable soils that formed in loamy alluvial sediments.	Grayish brown (10YR 5/2) loam	3-11 inches (8-28 cm)

(Source: NRCS)



Source: Google Earth 2023



ECA ID: 23-003640

Figure 4: Aerial Photograph



Source: Google Earth 2003



ECA ID: 23-003640

Figure 5: Aerial Photograph



Source: Google Earth 1996



ECA ID: 23-003640

Figure 6: Aerial Photograph



Source: historicaerials.com (1983)



ECA ID: 23-003640

Figure 7: Aerial Photograph



Source: historicaerials.com (1957)



ECA ID: 23-003640

Figure 8: Aerial Photograph

LAND USE HISTORY

Based on a review of aerial photographs, the proposed project area was located in a grassed area in 1957. The tree line within the ROW along FM 779 started to increase and grow between 1957 and 1983. However, the tree line grew and fully expanded across the ROW of FM 779 by 1996. The existing shed west of the lease area was constructed sometime between 1996 and 2003 and the tree growth increased since 2003. With the exception of increased tree growth, the area has remained relatively unchanged since 2003.

SITE FILE RESEARCH

National Register of Historic Places

The National Register of Historic Places (NRHP) is the Nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The National Park Service, which is part of the U.S. Department of the Interior, administers the National Register. ECA conducted a review of the NRHP to determine whether any listed Historic Properties were located within or near the APE for direct effects. The document search revealed no NRHP-listed Historic Properties within or near the APE for direct effects (NRIS 2021).

Texas Historical Commission Files (THC)

The Texas Historical Commission files are a compilation of archaeological and historic resource surveys throughout the state. We reviewed these files to discover whether historic resources or archaeological sites or surveys were within the area of direct effects or a 1-mile background research radius. During our review of the files throughout the THC website, we identified one previously recorded archaeological site and three surveys within a 1-mile background research radius.

Table 4: Archaeological Sites Identified Within a 1-Mile Research Radius

SHPO ID	Site Name	Site Type	Evaluation Status	Location
41WD639	N/A	Prehistoric campsite & lithic reduction area	Unevaluated	200ft (61m) Northeast

Table 5: Archeological Surveys Identified Within a 1-Mile Research Radius

Survey #	Survey Title	Author(s)	Year	Approximate Location from Tower Center
8400009436	N/A	N/A	N/A	3,350ft (1,021m) Northwest
8500016385	N/A	Rebecca Shelton & Cody S. Davis	2009	3,550ft (1,082m) Northeast
8500017403	N/A	N/A	1971	Within APE for Direct Effects

In general, most site location models include distance to a permanent water source as a major factor in determining the existence of archaeological sites and also the density of such sites. There is a higher probability of encountering a prehistoric archaeological site the closer one is to a source of fresh water with the distances varying depending on topography and difficulty of access. As a result, there are a greater number of prehistoric sites located near streams and natural freshwater lakes. Due to the historic ability of excavating wells, historic period sites, in rural areas, can be found equally distributed across the uplands as well as within valleys. The nearest natural source of water is Cottonwood Creek, located approximately 400 feet (122 meters) east of the proposed lease area at its closest point. A review of historic aerial photographs and maps did not identify any former structures or evidence for significant previous ground disturbance within the APE for direct effects. In addition, proximity to water and topography do not suggest a low site probability. As a result, we believe there is a moderate probability for encountering undisturbed archaeological artifacts or features within the project's APE for direct effects.

FIELD CONDITIONS

The proposed lease area would be located within a grassed area. The lease area would be accessed and receive utilities by a proposed access/utility easement that would traverse in a northerly direction from the ROW of FM 779 through a wooded area and then a grassed area before terminating at the proposed lease area.

Table 6: Surface Visibility within the APE for Direct Effects

Lease Area	Access/Utility Easement	Additional Easements
0% due to grass vegetation	0% due to grass and leaves vegetation	N/A



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Photographs

ECA ID: 23-003640





E: Northwesterly Overview of the Proposed Lease Area



F: Southeasterly Overview of the Proposed Lease Area



G: Southerly View of the Proposed Access/Utility Easement



H: Northerly View of the Proposed Access/Utility Easement

Photographs

ECA ID: 23-003640



FIELD METHODS

The methodology for the Phase I intensive field survey for this project was determined by the professional opinions and experience of our principal and staff archaeologists, applicable SHPO guidelines, and applicable tribal guidelines. The survey was performed by Gabriela Ruiz, MA, Project Archaeologist, on December 20, 2023. Approximately three hours of field time was recorded for the Phase I intensive field study.

A pedestrian survey was conducted over the project site by visual inspection of exposed ground surfaces throughout the proposed lease area, the proposed access/utility easement, and all of the immediately adjacent areas. Visual inspections were conducted at approximately 15-foot (5-meter) intervals.

A subsurface survey was also conducted within the APE for direct effects. ECA determined that two shovel test pits (STPs) within the proposed lease area and one STP within the proposed access easement would be an adequate representative sampling of the proposed project area. All shovel test pits were excavated at 100-foot (30m) intervals and measured 16-inches by 16-inches (41cm by 41cm) square in size. Shovel test pits are terminated when one of the following four conditions are met: a depth of 36 inches (91cm) is reached, or until sterile subsoil, bedrock, or the water table is encountered. All excavated soils were screened through a six-millimeter wire mesh archaeology screen to isolate any cultural artifacts.

FIELD SURVEY RESULTS

Two STPs were excavated in the proposed lease area and one STP was excavated within the proposed access/utility easement. Shovel test dimension measurements and soil characteristics are listed in the following table:

Table 7: Shovel Test Pit Descriptions

Shovel Test Pit (STP)	Munsell Color/Texture	Depth		Artifacts Encountered
		Inches	cm	
STP1	Dark grayish brown (10YR 4/2) silt loam	0-3	0-8	No
	Grayish brown (10YR 5/2) loam	3-16	8-41	No
STP2	Dark yellowish brown (10YR 3/6) loam	0-16	0-41	No
STP3	Very dark gray (10YR 3/1) fine sandy loam	0-7	0-18	No
	Dark red (2.5YR 3/6) mottled clay	7-17	18-43	No

No archaeological sites or cultural artifacts were identified during surface or subsurface investigations. Subsoil characteristics generally matched the range in characteristics for the mapped soil series (NRCS).



I: Overview of Shovel Test Pit Two (STP2)



J: Profile of Shovel Test Pit Two (STP2)

LABORATORY METHODS

Since no artifacts were recovered during the field survey, no laboratory methods were employed.

CURATION

Since no archaeological sites were identified, artifact curation is not applicable to this work. All field notes, project photographs, and reports associated with this project will be curated at ECA's Alpharetta, Georgia office.

RECOMMENDATIONS

During the course of this archaeological assessment, no archaeological sites or cultural resources were located in the APE for direct effects. We believe that no archaeological cultural resources will be affected by the proposed project. Therefore, we recommend a finding of No Effect for the proposed undertaking as it relates to archaeology. We request your concurrence with our finding. If inadvertent discoveries of buried cultural materials or human remains are found during construction, all work should cease and potentially affected Tribes, as well as the State Historic Preservation Office should be notified immediately.

CLOSURE

We are submitting this report for VB BTS II, LLC to seek concurrence with our finding and to comply with Federal Communications Commission (FCC) requirements as identified in 47 CFR 1.1307. Gabriela Ruiz, MA, Project Archaeologist, performed the fieldwork. Colette Gabler, MA, RPA, Senior Project Manager, conducted background research and wrote the report. Matt Beazley, MA, RPA, Principal Investigator, reviewed this assessment. We request your concurrence with our finding. Please contact our office with questions or comments or if additional information is required.

REFERENCES CITED

Atlas# 8400009436

Atlas# 8500017403

Google Earth

2023 Aerial Photograph

2003 Aerial Photograph

1996 Aerial Photograph

Historicaerials.com

1983 Aerial Photograph

1957 Aerial Photograph

National Park Services

2023 “Physiographic Provinces.”

<https://www.nps.gov/subjects/geology/physiographic-provinces.htm>. Accessed January 2024.

National Register Information System (NRIS)

2023 National Register of Historic Places

<http://www.nps.gov/nr>. Accessed January 2024.

Natural Resources Conservation Service, Soil Survey (NRCS)

2004 *Cuthbert*. Official series description.

https://soilseries.sc.egov.usda.gov/OSD_Docs/C/CUTHBERT.html. Accessed January 2024.

1999 *Manco*. Official series description.

https://soilseries.sc.egov.usda.gov/OSD_Docs/M/MANCO.html. Accessed January 2024.

Shelton, Rebecca & Cody S. Davis

2009 Atlas# 8500016385

Texas Historical Commission (THC)

<http://nueces.thc.state.tx.us>. Accessed January 2024.

United States Department of Agriculture (USDA)

2023 Web Soil Survey.

<http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed January 2024.

United States Federal Communications Commission (FCC)

2005 Federal Communications Commission Federal Register, 47 CFR Part 1, Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act; Final Rule, WT Docket No. 03-128; FCC 04-222. Washington, DC.

United States Geological Survey USGS

- 1958 Photorevised 1981, *Alba, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.
- 1959 Photorevised 1981, *Calvary, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.
- 1959 Photorevised 1981, *Grand Saline, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.
- 1959 Photorevised 1981, *Golden, TX*, Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington DC.

Tribal Consultation

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		DA02178	Site Number:		US-TX-6056	NOO Date:		12/8/2023
TCNS #:		274385	ECA Project#:		23-003640	ECA PM:		CVG
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of FCC Escalation	Tribal Response Date	Tribal Response	
1	Kiowa Indian Tribe	1/15/2024	Electronic	thpo@kiowatribe.org	2/22/2024	3/8/2024	Cleared via Escalation	
2	Tonkawa Tribe	1/15/2024	Electronic	JWaffle@TonkawaTribe.com	2/22/2024	3/8/2024	Cleared via Escalation	
3	Apache Tribe of Oklahoma	1/15/2024	Electronic	Apacheculture510@yahoo.com	2/22/2024	3/8/2024	Cleared via Escalation	
4	Eastern Shoshone Tribe	1/15/2024	Electronic (Website)	jmann@easternshoshone.org	2/22/2024	3/8/2024	Cleared via Escalation	
5	Northern Arapaho	N/A	Electronic	archtech.nathpo@gmail.com	N/A	12/6/2023 & 1/11/2024	Cleared via TCNS & E106	
6	Coushatta Indian Tribe	1/15/2024	Electronic	dakotajohn@coushatta.org ; kdawsey@coushatta.org	2/22/2024	3/8/2024	Cleared via Escalation	
7	Jena Band of Choctaw Indians	1/15/2024	Electronic	williamson@jenachoctaw.org	N/A	1/25/2024	Cleared via TCNS	
8	Muscogee (Creek) Nation	1/10/2024	Mail	mcntcns@mcn-nsn.gov ; section106@mcn-nsn.gov	N/A	2/7/2024	Cleared via Letter	
9	United Keetoowah Band of Cherokee Indians	1/15/2024	Electronic	tcns@ukb-nsn.gov	2/22/2024	3/8/2024	Cleared via Escalation	
10	Alabama Quassarte Tribal Town	N/A	Electronic	mary.tiger@alabama-quassarte.org	N/A	12/8/2023	Cleared via NOO	
11	Thlopthlocco Tribal Town	1/15/2024	Electronic	thpo@ttown.org	2/22/2024	3/8/2024	Cleared via Escalation	
12	Shawnee Tribe	1/15/2024	Electronic	tcns@shawnee-tribe.com	N/A	1/19/2024	Cleared via Email	
13	Northwestern Band of Shoshone Nation	1/15/2024	Electronic	Northwesternbandshoshonetcnsfcc@outlook.com ; garymontana@montanaandassociates.com	2/22/2024	3/8/2024	Cleared via Escalation	
14	Caddo Nation of Oklahoma	1/10/2024	Electronic and Mail	bjgonzalez@mycaddonation.com	N/A	1/24/2024	Cleared via Email	
15	Mescalero Apache Tribe	1/15/2024	Electronic	holly@mathpo.org	2/22/2024	3/8/2024	Cleared via Escalation	
16	Northern Cheyenne Tribe	1/15/2024	Electronic (Website)	glafranier@ncthpo.com ; virginia.m.w.boyale@gmail.com	N/A	2/13/2024	Cleared via Email	

TCNS Notification Statements

From: towernotifyinfo@fcc.gov
To: tribal.notify
Subject: Proposed Tower Structure Info - Email ID #8726760
Date: Monday, December 4, 2023 2:13:34 PM

Dear Dina M Bazzill,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 12/04/2023

Notification ID: 274385

Tower Owner Individual or Entity Name: VB BTS II, LLC

Consultant Name: Dina M Bazzill

Street Address: 1375 Union Hill Industrial Court
Suite A

City: Alpharetta

State: GEORGIA

Zip Code: 30004

Phone: 770-667-2040

Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower

Latitude: 32 deg 44 min 11.1 sec N

Longitude: 95 deg 36 min 0.6 sec W

Location Description: Near 11042 AL-87

City: Alba

State: TEXAS

County: WOOD

Detailed Description of Project: 23-003640

Ground Elevation: 114 meters

Support Structure: 91.4 meters above ground level

Overall Structure: 94.5 meters above ground level

Overall Height AMSL: 208.5 meters above mean sea level

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: towernotifyinfo@fcc.gov
To: tribal.notify
Cc: tcnweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #8727953
Date: Friday, December 8, 2023 3:02:05 AM

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO Amanda Hill - Kiowa Indian Tribe THPO - (PO Box: 369) Carnegie, OK - thpo@kiowatribe.org; ahill@kiowatribe.org - 580-654-2300 - electronic mail

2. TCNS Administrator Joshua Waffle - Tonkawa Tribe - 1 Rush Buffalo Road Tonkawa, OK
- JWaffle@TonkawaTribe.com - 580-628-2561 - electronic mail

3. Darrin Cisco - Apache Tribe of Oklahoma - 510 E Colorado Drive (PO Box: 1330)
Anadarko, OK - Apacheculture510@yahoo.com - 405-247-7494 (ext: 103) - electronic mail

4. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY -
jmann@easternshoshone.org - 307-335-2081 - electronic mail
Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online submittals. Our website address is: <http://www.esthpo.com>. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where you can submit relevant project files for our consultation review.

Your submission should include:

- Appropriate SHPO determination or response letter
- Cultural Resource Report and or Archaeological Survey Report
- Photographic project site documentation
- Topographic or Quadrangle Maps
- Site Plans/Construction Drawings
- FCC Forms 620 and 621
- Lat/Long Coordinates for the proposed project.
- Project Coordinator Contact Information

Our 30-day review period will commence once all project details have been submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin,

sdurgin@easternshoshone.org or by phone at: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

5. THPO Benjamin Ridgley - Northern Arapaho - 1010 Railroad Ave (PO Box: 67) St. Stephens, WY - archtech.nathpo@gmail.com; pejuta.villa@northernarapaho.com - 307-856-1628 - electronic mail

Exclusions: PLEASE SEND AN ARCHAEOLOGICAL SURVEY OR SITE INVENTORY/MAP FOR THE AREA WITHIN 1 MILE OF THE APE FOR PRE-CONSTRUCTION, COLLOCATION PROJECTS AND PTC POLES. The request gives the tribe an opportunity to comment on past projects that are now proposed as collocation projects.

Email reports to: archtech.nathpo@gmail.com

Please include the TCNS number on all correspondence, reports, maps.

ANY QUESTIONS CALL OR EMAIL:

Benjamin Ridgley
3078561628
benjamin.ridgley@northernarapaho.com

Crystal C'Bearing
crystal.cbearing@northernarapaho.com

6. THPO Dakota John - Coshatta Indian Tribe - 1940 C.C Bel Road Elton, LA - dakotajohn@coshatta.org; kdawsey@coshatta.org - 337-584-1401 - electronic mail

7. TCNS Representative Lillie Williamson - Jena Band of Choctaw Indians - (PO Box: 14)
Jena, LA - lwilliamson@jenachoctaw.org - 318-992-8258 - electronic mail
Exclusions: All FCC correspondence should be sent electronically to the e-mail
lwilliamson@jenachoctaw.org

8. TCNS Manager Jason Sawyer Mr - Muscogee (Creek) Nation - Highway 75 & Loop 56
(PO Box: 580) Okmulgee, OK - MCNTCNS@muscogeenation.com;
Jsawyer@muscogeenation.com - 918-732-7835 - regular mail

9. THPO Dept THPO Department - United Keetoowah Band of Cherokee Indians in
Oklahoma - (PO Box: 746) Tahlequah, OK - tcns@ukb-nsn.gov - 918-871-2852 - electronic
mail

10. Second Chief Mary Tiger - Alabama Quassarte Tribal Town - (PO Box: 218) Wetumka,
OK - mary.tiger@alabama-quassarte.org - 405-452-3987 - electronic mail
Exclusions: The Alabama Quassarte Tribal Town is unaware of any cultural or sacred sites
located within the immediate project area. The AQTT's Historic Preservation Department
concurs that there should be no adverse effect to any known historic properties and that work
should proceed as planned. However, as the project is located in an area that is general historic
interest to the Tribe, we request that work be stopped and our office contacted immediately if
any Native American cultural materials or human remains are encountered.

If you have any questions, please contact our office at the number below.

Respectfully,

Alabama Quassarte Tribal Town
P.O. Box 187
Wetumka, Ok 74883
(P) 405-452-3881
(F) 405-452-3889

11. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - 000-000-0000 - electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

12. THPO Tonya Tipton - Shawnee Tribe - 29 South 69A Highway Miami, OK - tcns@shawnee-tribe.com - 918-542-2441 (ext: 103) - electronic mail

Exclusions: In the case of projects with NO ground disturbance such as antennae on the sides of buildings or existing poles, the Shawnee Tribe concurs that no known historic properties will be negatively impacted by the project. The Shawnee Tribe DOES NOT wish to consult on those projects with NO ground disturbance.

If the project DOES involve ground disturbance at all, the Shawnee Tribe would like to ACCEPT your invitation for consultation and will provide a review.

If you have any questions, you may contact the Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

13. Attorney Montana & Associates LLC - Northwestern Band of Shoshone Nation - N 12923 N. Prairie Rd Osseo, WI - Northwesternbandshoshonetcnsfcc@outlook.com; garymontana@montanaandassociates.com - 715-597-6464 - electronic mail
Exclusions: Northwestern Band of Shoshone as of 2/19/2020 will not be reviewing colocations of antennas on buildings.

14. THPO Jonathan M Rohrer - Caddo Nation of Oklahoma - (PO Box: 487) Binger, OK - jrohrer@mycaddonation.com; sbotone@mycaddonation.com - 405-656-2344 - regular mail
Exclusions: Please see our website for additional details regarding Section 106 consultation for cell tower projects at:

<https://mycaddonation.com/historic-preservation>

15. Tribal Historic Preservation Officer Holly B Houghten - Mescalero Apache Tribe -

Mescalero Apache Tribal Historic Preservation Office 101 Central Ave (PO Box: 227)
Mescalero, NM - holly@mathpo.org - 575-464-3005 - electronic mail

16. FCC Specialist Gary LaFranier - Northern Cheyenne Tribe - (PO Box: 128) Lame Deer, MT - gary.lafranier@cheyennenation.com - 406-477-8114 - electronic mail

Exclusions: The Northern Cheyenne Tribe requirement for consultation is digitally through our departmental website. Our website is <http://cms.cheyennenation.com>

We do not accept mailed paper or emailed digital submissions of project material. To speed up our response time and to be in compliance with our environmental practices we do not accept paper submissions. All proposed projects must be processed through our website. Multiple people in our department need access to the project files and department notes to be able to do their work on the project. For organization, documentation, and financial regulation, all Section 106 project compliance work.

Just as the majority of State Historic Preservation Offices elect to have companies submit their proposed project directly to them in the format they require, as a sovereign nation, we have the right to ask for the same courtesy.

We require that you submit Form 620 or 621, complete with all of its attachments to our website.

It would expedite the process of getting your project into compliance if you would wait and submit your proposed project to our department when Form 620/621 and all of its attachments are ready - particularly the complete cultural resource report. We waste quite a bit of time contacting companies and searching for the Form 620/621 if the proposed project is submitted to us with only a dot on the map.

If you have any questions or need more information please contact FCC specialist Gary LaFranier at gary.lafranier@cheyennenation.com and 406-477-8114, or THPO Teanna Limpy at teanna.limpy@cheyennenation.com and 406-477-4839.

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a

Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

17. SHPO Cathie Matthews - Department of Arkansas Heritage - 323 Center Street Suite 1500 Little Rock, AR - cathiem@arkansasheritage.org - 501-324-9150 - electronic mail

18. Deputy SHPO Ken Grunewald - Department of Arkansas Heritage - 323 Center Street Suite 1500 Little Rock, AR - keng@arkansasheritage.org - 501-324-9357 - electronic mail

19. SHPO Trait Thompson - Oklahoma Historical Society - Oklahoma History Center 800 Nazih Zuhdi Drive Oklahoma City, OK - trait.thompson@history.ok.gov - 405-522-5201 - electronic mail

20. Historian Sarah K Forbes - Texas Historical Commission - (PO Box: 12276) Austin, TX - TexFcc@thc.state.tx.us - 512-936-7403 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tenshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 12/04/2023

Notification ID: 274385

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: VB BTS II, LLC

Consultant Name: Dina M Bazzill

Street Address: 1375 Union Hill Industrial Court

Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 44 min 11.1 sec N
Longitude: 95 deg 36 min 0.6 sec W
Location Description: Near 11042 AL-87
City: Alba
State: TEXAS
County: WOOD
Detailed Description of Project: 23-003640
Ground Elevation: 114.0 meters
Support Structure: 91.4 meters above ground level
Overall Structure: 94.5 meters above ground level
Overall Height AMSL: 208.5 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

<https://www.fcc.gov/wireless/available-support-services>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Follow-Up Documents

From: [Colette Gabler](mailto:Colette.Gabler@eca-usa.com)
To: thpo@kiowatribe.org; ahill@kiowatribe.org
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:04:00 PM
Attachments: [US-TX-6056_DA02178_Section_106_ECA_23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Kiowa Indian Tribe through the FCC Tower Construction Notification System (TCNS).

Section 106 Review

TCNS ID# 274385

Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)

US-TX-6056 (DA02178)

Off FM 779

Alba, Wood County, Texas

ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA

Client Manager

Environmental Corporation of America (ECA)

908-642-4601 (mobile)

colette.gabler@eca-usa.com

www.eca-usa.com



From: [Colette Gabler](#)
To: JWaffle@TonkawaTribe.com
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:05:00 PM
Attachments: [US-TX-6056_DA02178_Section_106_ECA_23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tonkawa Tribe through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



From: [Colette Gabler](#)
To: Apacheculture510@yahoo.com
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:06:00 PM
Attachments: [US-TX-6056_DA02178_Section_106_ECA_23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Apache Tribe of Oklahoma through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



From: [XTIRI](#)
To: [Colette Gabler](#)
Subject: Project Application Confirmation
Date: Tuesday, January 16, 2024 11:18:49 AM

Your Project Application has been received
for US-TX-6056 (DA02178), 23-003640,
274385 - Thank You!

powered by [xtiri](#)

This email was sent to colette.gabler@eca-usa.com [unsubscribe from this list](#)

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: [Colette Gabler](#)
To: dakotajohn@coushatta.org; kdawsey@coushatta.org
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:06:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Coushatta Indian Tribe through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



From: [Colette Gabler](#)
To: [Lillie Williamson](#)
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:07:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Jena Band of Choctaw Indians through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



Environmental Corp. of America
1375 Union Hill Industrial Court
Suite A
Alpharetta, GA 30004



Phone: 770-667-2040
Fax No.: 770-667-2041

From: Colette Gabler
Colette.Gabler@eca-usa.com

To: Ms. Anne Edwards-Martel
Muscogee Nation
Cultural Preservation Office
Highway 75 & Loop 56
P.O. Box 580
Okmulgee, OK 74447

TRANSMITTAL COVER SHEET

Date: January 10, 2024

Subject: Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

Notes: Dear Ms. Edwards-Martel:

As indicated in your TCNS response, the Muscogee Nation would like to become a consulting party for the above referenced site. The Section 106 Review documentation is included in this package. Please call or email (colette.gabler@eca-usa.com) if you need any further information or if you have any questions. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Colette Gabler".

Colette V. Gabler, MA, RPA
Senior Project Manager

From: [Colette Gabler](#)
To: tcns@ukb-nsn.gov
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:07:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the United Keetoowah Band of Cherokee Indians in Oklahoma through the FCC Tower Construction Notification System (TCNS).

Section 106 Review

TCNS ID# 274385

Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)

US-TX-6056 (DA02178)

Off FM 779

Alba, Wood County, Texas

ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA

Client Manager

Environmental Corporation of America (ECA)

908-642-4601 (mobile)

colette.gabler@eca-usa.com

www.eca-usa.com



From: [Colette Gabler](#)
To: [THPO](#)
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:08:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Thlophlocco Tribal Town through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



From: [Colette Gabler](#)
To: [Cell Tower](#)
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:08:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Shawnee Tribe through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



From: [Colette Gabler](#)
To: Northwesternbandshoshonetcnsfcc@outlook.com; [Gary Montana](#)
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:10:00 PM
Attachments: [US-TX-6056 DA02178 Section 106 ECA 23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Northwestern Band of Shoshone Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



Environmental Corp. of America
1375 Union Hill Industrial Court
Suite A
Alpharetta, GA 30004



Phone: 770-667-2040
Fax No.: 770-667-2041

From: Colette Gabler
Colette.Gabler@eca-usa.com

To: Caddo Nation of Oklahoma
THPO Jonathan M. Rohrer
P.O. Box 487
Binger, OK 73009

TRANSMITTAL COVER SHEET

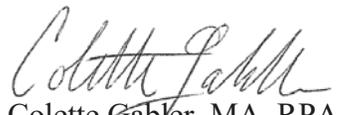
Date: January 10, 2024

Subject: Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

Notes: Dear Mr. Rohrer:

As indicated in your TCNS response, the Caddo Nation of Oklahoma would like to become a consulting party for the above referenced site. The Section 106 Review Addendum documentation is included in this package. Please call or email (colette.gabler@eca-usa.com) if you need any further information or if you have any questions. Thank you.

Sincerely,


Colette Gabler, MA, RPA
Senior Project Manager

From: [Colette Gabler](#)
To: holly@mathpo.org
Subject: TCNS#274385_US-TX-6056_DA02178_23-003640 - Alba, Wood County, Texas - Section 106 Report for Review
Date: Monday, January 15, 2024 3:10:00 PM
Attachments: [US-TX-6056_DA02178_Section_106_ECA_23-003640.pdf](#)
[image001.png](#)

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Mescalero Apache Tribe through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID# 274385
Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure
(310-Foot Overall Height Including Appurtenances)
US-TX-6056 (DA02178)
Off FM 779
Alba, Wood County, Texas
ECA Project #: 23-003640

We look forward to your response.

Thank you,

Colette Vale Gabler, MA, RPA
Client Manager
Environmental Corporation of America (ECA)
908-642-4601 (mobile)
colette.gabler@eca-usa.com
www.eca-usa.com



274

Proj

Num

1

Num

0

cms.cheyennation.com says

Thank You! Your submission was accepted.

OK

Project Name

US-TX-6056 (DA02178)

Land Ownership

Private

Project Description

Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure (310-Foot Overall Height Including Appurtenances)

Addition Project Information

Off FM 779, Alba, Wood County, Texas

Choose Files

US-TX-6056_...-003640.pdf

Choose Files

No file chosen

Back

Submit

Referrals

From: towernotifyinfo@fcc.gov
To: tribal.notify
Cc: tcnweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #35591
Date: Thursday, February 22, 2024 9:01:00 AM

Cellco Partnership d/b/a Verizon Wireless
Dina M Bazzill
1375 Union Hill Industrial Court
Suite A
Alpharetta, GA 30004

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 02/15/2024 and 02/22/2024. Our contact with these Tribal Nations or NHOs was sent on 02/22/2024.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 02/22/2024, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review. In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Tribal Nation or NHO. A Tribal Nation's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Tribal Nation or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,
Jill Springer
Federal Preservation Officer
Federal Communications Commission
jill.springer@fcc.gov

1) See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, Second Report and Order, FCC 18-30 (Mar. 30, 2018) (Wireless Infrastructure Second Report and Order).

2) See *id.* at paras. 111-112.

LIST OF PROPOSED COMMUNICATIONS TOWERS

TCNS# 274954 Referred Date: 02/20/2024 Location: 503 US Hwy 90 E, Sanderson, TX
Detailed Description of Project: ECA Project# 22-004401
Tribe Name: Apache Tribe of Oklahoma

Tribe Name: Comanche Nation
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Northwestern Band of Shoshone Nation
Tribe Name: Tonkawa Tribe
Tribe Name: Ysleta del Sur Pueblo

TCNS# 274385 Referred Date: 02/20/2024 Location: Near 11042 AL-87, Alba, TX

Detailed Description of Project: 23-003640

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Coshatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Northwestern Band of Shoshone Nation
Tribe Name: Thlopthlocco Tribal Town
Tribe Name: Tonkawa Tribe
Tribe Name: United Keetoowah Band of Cherokee Indians in Oklahoma

TCNS# 274201 Referred Date: 02/19/2024 Location: Off S Reelfoot Avenue, Samburg, TN

Detailed Description of Project: Atlas Tower Group Site - Samburg 23-002549

Tribe Name: Coshatta Indian Tribe
Tribe Name: Osage Nation
Tribe Name: Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
Tribe Name: Shawnee Tribe
Tribe Name: United Keetoowah Band of Cherokee Indians in Oklahoma

TCNS# 275188 Referred Date: 02/19/2024 Location: Off Industrial Blvd, McKinney, TX

Detailed Description of Project: Proposed 33-foot tall overall height small cell pole telecommunications support structure

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Coshatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Northwestern Band of Shoshone Nation
Tribe Name: Thlopthlocco Tribal Town
Tribe Name: Tonkawa Tribe
Tribe Name: Wichita and Affiliated Tribes

TCNS# 274324 Referred Date: 02/16/2024 Location: FM Hwy 517, Dickinson, TX

Detailed Description of Project: 23-003635

Tribe Name: Alabama-Coshatta Tribe of Texas
Tribe Name: Northwestern Band of Shoshone Nation
Tribe Name: Tonkawa Tribe
Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Coshatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe

TCNS# 273431 Referred Date: 02/16/2024 Location: Off Covered Bridge Road, Wendell, NC

Detailed Description of Project: 23-003388

Tribe Name: Catawba Indian Nation

Tribal Clearances

From: towernotifyinfo@fcc.gov
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; archtech.nathpo@gmail.com; pejuta.villa@northernarapaho.com
Subject: Reply to Proposed Tower Structure (Notification ID: 274385) - Email ID #8729378
Date: Wednesday, December 6, 2023 11:04:23 AM

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from THPO Benjamin Ridgley of the Northern Arapaho in reference to Notification ID #274385:

The Northern Arapaho THPO has reviewed your Consultation Request under the National Environmental Protection Act & National Historic Preservation Act, Section 106 process, regarding the proposed project & offers the following response:

No Historic Properties in the Direct or Visual APE

Our office has come to this determination by drawing conclusions from the report, ethnography, previous survey search from SHPO and maps depicting province of sites in regards to Direct and Visual APE. There are no cultural resources and no eligible historic properties within the APE. Currently, there are no properties of religious and cultural significance to the Northern Arapaho within the area of potential effect. However, if traditional cultural properties, rock features, or human remains are found during excavation with any new ground disturbance, we request to be contacted and a report provided.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 12/04/2023
Notification ID: 274385
Tower Owner Individual or Entity Name: VB BTS II, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 44 min 11.1 sec N
Longitude: 95 deg 36 min 0.6 sec W
Location Description: Near 11042 AL-87
City: Alba
State: TEXAS

From: [Dina Bazzill](#)
To: [tribal.notify](#)
Subject: FW: Section 106 Notification of Consulting Party's Determination of Effect- Email ID #9279713
Date: Thursday, January 11, 2024 12:21:48 PM

Dina M. Bazzill – M.A.,RPA (She/Her)
Environmental Corporation of America (ECA)
252-412-7960 (mobile)

From: towernotifyinfo@fcc.gov <towernotifyinfo@fcc.gov>
Sent: Thursday, January 11, 2024 11:16 AM
To: Dina Bazzill <dina.bazzill@eca-usa.com>
Subject: Section 106 Notification of Consulting Party's Determination of Effect- Email ID #9279713

This is to notify you that a consulting party has specified a determination of effect for the following filing:

Source: Northern Arapaho

Date of Action: 01/11/2024

Direct Effect: No Effect on Historic Properties in APE

Visual Effect: No Effect on Historic Properties in APE

Comment Text: The Northern Arapaho THPO has reviewed your Consultation Request under the National Environmental Protection Act & National Historic Preservation Act, Section 106 process, regarding the proposed project & offers the following response:

No Historic Properties in the Direct or Visual APE

Our office has come to this determination by drawing conclusions from the report, ethnography, previous survey search from SHPO and maps depicting province of sites in regards to Direct and Visual APE. There are no cultural resources and no eligible historic properties within the APE. Currently, there are no properties of religious and cultural significance to the Northern Arapaho within the area of potential effect. However, if traditional cultural properties, rockfeatures, or human remains are found during excavation with any new ground disturbance, we request to be contacted and a report provided.

File Number: 0010850218

TCNS Number: 274385

Purpose: New Tower Submission Packet

Notification Date: 7AM EST 01/11/2024

Applicant: VB BTS II, LLC

Consultant: Environmental Corporation of America

Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No

Site Name: US-TX-6056 (DA02178)

From: towernotifyinfo@fcc.gov
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; lwilliamson@jenachoctaw.org
Subject: Reply to Proposed Tower Structure (Notification ID: 274385) - Email ID #8761794
Date: Thursday, January 25, 2024 12:26:45 PM

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from TCNS Representative Lillie Williamson of the Jena Band of Choctaw Indians in reference to Notification ID #274385:

To Whom It May Concern:

We are unaware of any sacred sites or significant cultural resources in this area.

However, if the applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

If you have any comments or questions, please feel free to contact me.

Please refer to the information below.

Thank you.

Lillie Williamson
TCNS Representative
Jena Band of Choctaw Indians
P. O. Box 14
Jena, LA 71342
PH: 318-992-8258
FAX: 318-992-8244
EMAIL: lwilliamson@jenachoctaw.org

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 12/04/2023
Notification ID: 274385
Tower Owner Individual or Entity Name: VB BTS II, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004



DAVID W. HILL
PRINCIPAL CHIEF

DEL BEAVER
SECOND CHIEF

Department of Historic and Cultural Preservation
P.O. Box 580 | Okmulgee, OK 74447
T 918.732.7835 F 918.758.0649

February 7, 2024

ECA Corp.
1375 Union Hill Industrial Ct
Suite A
Alpharetta, GA 30004

RE: TCNS #274385
US-TX-6056 (DA 02178)
Near 11042 AL-87
Alba, Wood County, TX 75410

Dear Mr. Gabler,

In keeping with the Federal Communications Commission (FCC), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Muscogee (Creek) Nation has received notice of for TCNS # 274385 94.5 ft self-support pole.

After reviewing all pertinent information and our records, at this time we are currently unaware of any historic, cultural, religious or sacred sites at this exact location.

Therefore, we recommend a finding of **“No Historic in the APE”** for the proposed Thank you for contacting the Muscogee (Creek) Nation Historic and Cultural Preservation Department. **Project is out of our area of interest so we would like to respectfully defer to the other federally recognized tribes that have been contacted.**

Furthermore, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur, we request all work cease and the Muscogee (Creek) Nation and other appropriate agencies be notified immediately.



DAVID W. HILL
PRINCIPAL CHIEF

DEL BEAVER
SECOND CHIEF

at

Should further information or comment be required please do not hesitate to contact me

(918) 732-7835, fax: (918) 758-0649, or by e-mail: jasawyer@mcn-nsn.gov

Sincerely,

J.Sawyer, TCNS Manager
Muscogee (Creek) Nation

From: [Lasefiche Notification](#)
To: [Colette Gabler](#)
Subject: TCNS Consultation - 274385
Date: Friday, January 19, 2024 3:14:23 PM

This email is in response to 274385.

The Shawnee Tribe's Tribal Historic Preservation Department concurs that no known historic properties will be negatively impacted by this project. However, there is still potential for the discovery of unknown resources.

We have no issues or concerns at this time. Please continue with the project as planned, but in the event archaeological materials are encountered during construction, use, or maintenance of this location, please re-notify us at that time as we would like to resume immediate consultation under such a circumstance.

If you have any questions, you may contact me via email at TCNS@shawnee-tribe.com

Thank you for giving us the opportunity to comment on this project



Erin Paden

TRIBAL HISTORIC PRESERVATION
SPECIALIST

Office: (918) 542-2441, x140

Email: epaden@shawnee-tribe.com

29 S Hwy 69A

Miami, OK 74354

shawnee-tribe.com

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: [Jonathan Rohrer](#)
To: [Colette Gabler](#)
Subject: Proposed 300-Foot Tall Self-Supporting Lattice Telecommunications Structure (310-Foot Overall Height Including Appurtenances), US-TX-6056 (DA02178), Alba, Wood County, Texas - TCNS ID # 274385, ECA Project #: 23-003640
Date: Wednesday, January 24, 2024 11:29:05 AM

Colette

Thank you for your request for consultation, received on 01-23-2024. The Caddo Nation appreciates your willingness to conduct proper consultation, pursuant to Section 106 of the National Historic Preservation Act.

Upon review of the project and location I have determined that it does not affect known cultural, traditional or sacred sites of interest to the Caddo Nation. As such, the Caddo Nation has no objection to the project at this time. However, in the event that an inadvertent discovery of potentially relevant cultural sites, funerary objects, or human remains occurs, we request that the project be immediately halted and the proper authorities be contacted. Additionally, The Caddo Nation would need to be notified of an inadvertent discovery with 24 hours.

Should you have any question or concerns regarding this response please feel free to contact our office.

Best regards,

Jonathan

Jonathan M. Rohrer
Tribal Historic Preservation Officer



Caddo Nation
P.O. Box 487
Binger, OK 73009
t: (405)656-0970 Ext. 2070
e: jrohrer@mycaddonation.com

www.mycaddonation.com



This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

From: gary.lafranier@cheyennenation.com
To: [Colette Gabler](#)
Subject: TCNS #274385
Date: Tuesday, February 13, 2024 6:43:44 PM
Importance: High

Good Afternoon,

TCNS #274385 will have a determination of No Effect. Project may proceed as planned.

Thank You,

Gary LaFranier

FCC/ Section 106 Coordinator

(406) 477-8114

Lame Deer, MT. 59043

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Appendix G
List of Preparers

Name	Organization	Discipline/Expertise	Years of Experience	Role in Preparing EA
Ryan Edson	Environmental Corporation of America	NEPA / Cultural Resources	6 years	Document preparation
Eric Johnson	Environmental Corporation of America	NEPA/Environmental Sciences	14 years	Principal review and document preparation
Ashley Bean	Environmental Corporation of America	Biology/Environmental Sciences	1 year	Document preparation
Ben Salter	Environmental Corporation of America	NEPA/Biology/Environmental Sciences	23 years	Principal review and oversight
Shannon Lowman	Environmental Corporation of America	Cultural Resources	6 years	Document preparation
Dina Bazzill	Environmental Corporation of America	NEPA / Cultural Resources	15 years	Principal review and oversight