



**PRIVILEGED ATTORNEY WORK PRODUCT**

October 15, 2008

Ms. Alice Silverthorn  
**Verizon Wireless**  
1120 Sanctuary Parkway  
Suite 150 (GASA5REG)  
Alpharetta, GA 30004

Bureau Veritas Project No. 22008-008034.03

Subject: FCC Form 601 Exhibit F Block EA  
Cellular Communications Tower – MO19 Gibson  
County Road 309  
Dunklin County  
Holcomb, Missouri  
Latitude: 36° 27' 03.94" North and 90° 04' 01.76" West

Dear Ms. Silverthorn:

Bureau Veritas North America, Inc. (Bureau Veritas) is pleased to present this FCC Form 601, Block Environmental Assessment letter report, which has been prepared to address the potential environmental effects which may be associated with the construction of the proposed facility. This letter report has been prepared for Verizon Wireless for submittal to the FCC. Enclosed is a copy of the report.

We appreciate the opportunity to be of service. If you have any questions, please contact me at 913.451.3600.

Sincerely,

Nancy Crow  
Senior Specialist  
Kansas City Regional Office

Enclosure

**Bureau Veritas North America, Inc.**

*Health, Safety, and Environmental Services*  
7500 College Boulevard, Suite 513  
Overland Park, Kansas 66210

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## ***FCC Form 601 Exhibit F Block EA***

---

MO19 Gibson Cell Site  
County Road 309  
Holcomb, Missouri

October 15, 2008  
Project Number: 22008-008034.03

Prepared for  
**Verizon Wireless**



*Move Forward with Confidence*

**Bureau Veritas North America, Inc.**  
*Health, Safety, and Environmental Services*  
7500 College Boulevard, Suite 513  
Overland Park, Kansas  
913.451.3600  
[www.us.bureauveritas.com](http://www.us.bureauveritas.com)



## PRIVILEGED ATTORNEY WORK PRODUCT

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## **PRIVILEGED ATTORNEY WORK PRODUCT**

### **1.0 INTRODUCTION**

Verizon Wireless is proposing to construct and operate a cellular telecommunications facility in New Madrid County, Missouri. The site is located near County Road 309 in Holcomb, Dunklin County, Missouri. The proposed facility will be located within a 100-year floodplain as defined by the Federal Management Agency (FEMA). In accordance with 47 CFR 1.1307, this Environmental Assessment (EA) has been prepared to address the potential environmental effects which may be associated with the construction of the proposed facility. No building permits, flood plain permits, or zoning are required in Dunklin County. However, construction in a flood plain zone should be two feet above base level and insurance rates may be higher.

### **1.1 PROJECT DESCRIPTION**

The project site is known as MO19 Gibson and is located near County Road 309 in Holcomb, Dunklin County, Missouri. According to Dunklin County tax records, the subject property is owned by Mr. Marty and Ms. Gentry Vancil. The subject property is located on approximately 10,000 square-feet within the approximately 75.62-acre subject parcel. The subject property currently consists of cropland in a rural setting.

According to Mr. Jason Riggs of Fortune Wireless, the proposed action involves constructing a monopole tower at an overall tower height of 199 feet and accompanying equipment shelter within a proposed 10,000 square-foot lease area. Power cabling will travel underground from the new Verizon Wireless equipment shelter, travel approximately 130 feet to the west, and power cabling will connect to an existing above-ground connection point. Telco cabling will travel underground from the new Verizon Wireless equipment shelter, travel approximately 170 feet to the west and south, and telco cabling will connect to existing above-ground connection point. As of the date of issuance of this report, plans for the proposed action include installation of a backup generator in the generator room of the proposed equipment shelter. A proposed access drive, approximately 35 feet in total length, will provide access to the subject property from County Road 309 located to the west. No building materials will likely be disturbed during the proposed action, and the ground surface will likely be disturbed during the proposed action.

### **1.2 ZONING**

There is no zoning in Dunklin County, Missouri.

### **1.3 SITE SELECTION**

Verizon Wireless is expanding its cellular network to provide channel block cellular service in Dunklin County. Several factors are considered when selecting an appropriate location for a cellular facility including service area coverage requirements, topography, environmental issues, zoning restrictions, commercial power availability and site access. This site was selected because it satisfied the selection criteria. Any alternative site in the area requiring service would be located within the same floodplain.



## **PRIVILEGED ATTORNEY WORK PRODUCT**

### **2.0 ENVIRONMENTAL ISSUES**

In accordance with 47 CFR 1.1307, facility siting with the following environmental issues require the preparation of an environmental assessment. Included in each of the following sections is a statement as to whether each of these environmental issues is applicable and if so, a discussion of the potential environmental effects is included.

#### **2.1 WILDERNESS AREAS (47 CFR § 1.1307(A)(1))**

Bureau Veritas contacted the Regional Environmental Coordinator of the National Park Service (NPS), Mr. Charles M. Scott of the United States Fish and Wildlife Service (USFWS), and Ms. Shannon Cave of the Missouri Department of Conservation (MDC) regarding the presence of officially designated wilderness areas on the subject property.

- The NPS response postmarked April 24, 2008 stated, "We have no comment on your proposed actions."
- The USFWS response dated June 3, 2008 did not address wilderness areas.
- The MDC response dated April 23, 2008 stated, "Heritage records identify no designated wilderness areas, wildlife preserves, designated critical habitats or endangered species within one mile of any of these projects."

Bureau Veritas reviewed the National Wilderness Preservation System map regarding the presence of officially designated wilderness areas on the subject property. According to the National Wilderness Preservation System map, the subject property/parcel is not located in a wilderness area (August 2004).

Based upon the research, inquiries, and responses noted in this *Section*, the subject property does not appear to be located in an officially designated wilderness area.

#### **2.2 WILDLIFE PRESERVE (47 CFR § 1.1307(A)(2))**

Bureau Veritas contacted the Regional Environmental Coordinator of the NPS, Mr. Scott of the USFWS, and Ms. Cave of the MDC regarding the presence of officially designated wildlife preserves on the subject property.

- The NPS response postmarked April 24, 2008 stated, "We have no comment on your proposed actions."
- The USFWS response dated June 3, 2008 did not address wildlife preserves.
- The MDC response dated April 23, 2008 stated, "Heritage records identify no designated wilderness areas, wildlife preserves, designated critical habitats or endangered species within one mile of any of these projects."

Bureau Veritas reviewed the National Wildlife Refuge System map regarding the presence of officially designated wildlife preserves on the subject property. According to the National Wildlife Refuge System map, the subject property/parcel is not located in a wildlife preserve (September 2006).



## **PRIVILEGED ATTORNEY WORK PRODUCT**

Based upon the research, inquiries, and responses noted in this *Section*, the subject property does not appear to be located in an officially designated wildlife preserve.

### **2.3 THREATENED OR ENDANGERED SPECIES, OR DESIGNATED OR PROPOSED CRITICAL HABITATS (47 CFR § 1.1307(A)(3))**

Bureau Veritas contacted the Regional Environmental Coordinator of the NPS, Mr. Scott of the USFWS, and Ms. Cave of the MDC regarding the presence of proposed threatened or endangered species or critical habitats on the subject property.

- The NPS response postmarked April 24, 2008 stated, "We have no comment on your proposed actions."
- The USFWS response dated June 3, 2008 stated, "The U.S. Fish and Wildlife Service has determined that no federally listed species or designated critical habitat occurs within the project area."
- The MDC response dated April 23, 2008 stated, "Heritage records identify no designated wilderness areas, wildlife preserves, designated critical habitats or endangered species within one mile of any of these projects."

Based upon the inquiries and responses noted in this *Section*, the proposed action on the subject property does not appear to affect listed or proposed threatened and endangered species and designated or proposed critical habitat.

### **2.4 HISTORICALLY OR CULTURALLY SIGNIFICANT SITE (47 CFR § 1.1307(A)(4))**

Public Notice was published in the *Daily Dunklin Democrat* on April 24 and 25, 2008.

Bureau Veritas contracted with the Center for Archaeological Research, Missouri State University to perform a cultural resource survey for districts, sites, buildings, structures or objects, significant in American history, architecture, archeology, engineering or culture that are listed or are eligible for listing, in the National Register of Historic Places that may be located on the subject property. A copy of the final report from the Center for Archaeological Research was submitted to the Missouri State Historic Preservation Office (SHPO) for concurrence with "no effect on historic properties" for the proposed action.

The Missouri SHPO response dated August 13, 2008 stated, "Adequate documentation has been provided (36 CFR Section 800.11). There will be 'no historic properties affected' by the current project."

See *Appendix D* for a copy of the Missouri SHPO response.

Based upon the inquiries and responses noted in this *Section*, the proposed action on the subject property does not appear to affect historic places.

### **2.5 INDIAN RELIGIOUS SITE**

Bureau Veritas contacted Native American individuals/organizations identified by American Indian Environmental Office (AIEO) of the United States Environmental Protection Agency (USEPA) and/or the



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State SHPO office as Federally recognized Native American individuals/organizations “who may have knowledge of cultural resources in the project area.”

Contact was initiated via the Tower Construction Notification System (TCNS ID# 38501) database with the various participating Native American individuals/organizations in the area. Approximately thirty (30) calendar days after the initial contact attempt, Bureau Veritas made a second attempt to contact the following Native American individual/organization, which had not responded to the initial request for information:

- Cheyenne-Arapaho Tribes of Oklahoma

As requested, Bureau Veritas sent the following Tribes a copy of the Missouri SHPO letter, site description with the increase in maximum overall tower height to 210 feet (final overall tower height was determined to be 199 feet), and a cultural resources survey which included a topographic map regarding the proposed project:

- Osage Nation
- Quapaw Tribe of Oklahoma
- Shawnee Tribe

Bureau Veritas has received responses from the following Native American individuals/ organizations indicating no interest, no objection, and/or no effect on historic or cultural resources in the project area:

- Chickasaw Nation
- Eastern Shawnee Tribe of Oklahoma
- Kaw Nation
- Osage Nation
- Peoria Tribe of Oklahoma
- Prairie Band Potawatomi Nation
- Quapaw Tribe of Oklahoma
- Sac and Fox Tribe of the Mississippi in Iowa
- Shawnee Tribe

As noted in the *Notice of Organizations Which Were Sent Proposed Tower Construction Notification Information – Email # 1841743*:

- The Omaha Tribe of Nebraska and the United Keetoowah Band of Cherokee Indians indicated that if the applicant receives no response from them within thirty (30) days after notification through TCNS, they have no interest in participating in pre-construction review.

On June 6, 2008, Bureau Veritas referred the Cheyenne-Arapaho Tribes of Oklahoma to the FCC as Bureau Veritas had not received any response from this Native American \organization regarding the proposed action on the subject property. On June 12, 2008, Bureau Veritas received the *Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID# 4811* from the FCC regarding the MO19 Gibson cell site (TCNS ID# 38501). With reference to this Native American organization, the message stated:



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“If you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO [Native Hawaiian Organizations] within 20 calendar days of 06/12/2008, your obligations under Section IV of the NPA [Nationwide Programmatic Agreement] with respect to these Indian Tribes or NHOs are complete.”

When Bureau Veritas was notified that the maximum overall tower height could be 210 feet instead of 180 feet as entered in TCNS, Bureau Veritas contacted all tribes who replied to see if they had any concerns or objections to the potential thirty-foot increase in tower height. Verizon Wireless ultimately decided to construct a 199-foot tower. The Eastern Shawnee Tribe of Oklahoma, the Peoria Tribe of Oklahoma, and the Prairie Band Potawatomi Nation replied via e-mail that they have “no objection” to the height increase.

On May 19, 2008, Bureau Veritas spoke with Ms. Crystal Douglass of the Kaw Nation. She indicated that she has no objection to increases in tower height.

On June 11, 2008, Bureau Veritas spoke with Mr. Johnathan Buffalo of the Sac and Fox Tribe of the Mississippi in Iowa. He stated that he is not concerned with an increase in tower height.

On August 4, 2008, Bureau Veritas spoke with Ms. Julie Ray of the Chickasaw Nation. She stated that she has no concerns and does not need to be notified of increases in tower height.

State and Federal law requires that if human remains or cultural resources are found during construction, work is to immediately stop and the lead agency and a qualified archaeologist be consulted to assess the importance of the find and appropriate management procedures. The affected local Tribes, including but not limited to those Tribes originally notified through the FCC’s TCNS must be notified in accordance with Section IX of the Nationwide Programmatic Agreement and applicable law.

Based upon the inquiries and responses noted in this *Section*, the proposed action on the subject property does not appear to affect Indian religious sites.

### **2.6 FLOOD PLAIN (47 CFR § 1.1307(A)(6))**

Bureau Veritas consulted the Federal Emergency Management Agency (FEMA) website to determine if the subject property is located in a flood plain or flood hazard area. The April 3, 1989 FEMA Flood Hazard Boundary Map (290122 0075 B) depicts the subject property in Zone A, which is defined as areas inundated by 100-year flooding where no base flood elevations have been determined.

The proposed facility will be located in a 100-year floodplain as defined by the Federal Emergency Management Act (FEMA). However, the proposed site will not be located within a designated floodway. FEMA stipulates that certain conditions be met before any construction or land alteration can commence in an area to be within a 100-year floodplain. A copy of the FEMA map is included in *Appendix C*.

### **2.7 SURFACE FEATURES (47 CFR § 1.1307(A)(7))**

Bureau Veritas contacted Mr. Jason Riggs of Fortune Wireless regarding the proposed action at the subject property and the potential for the proposed action to significantly change the surface features





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(e.g., wetland fill, deforestation or water diversion). As indicated in *Section 2.3*, the proposed action is expected to disturb the ground surface.

The 1984 USGS Campbell, Missouri-Arkansas topographic quadrangle, which includes the subject and adjoining properties, does not depict wetland indicators, creeks, drainage ways, tributaries, intermittent waterways, perennial waterways, or other types of areas inundated with water located on the subject property. Additionally, a National Wetlands Inventory (NWI) map, which includes the subject property and adjoining properties, was obtained from the USFWS and reviewed by Bureau Veritas. According to the NWI map, the subject and adjoining properties are not located in or near a mapped wetland area.

During the evaluation of the site and preparation of the NEPA due diligence research report, it was determined that consultation with the Army Corps of Engineers would not be necessary because of the past disturbance of the subject site.

### **2.8 HIGH INTENSITY LIGHTS**

The proposed facility will not be equipped with high intensity white lights.

### **2.9 RADIO FREQUENCY RADIATION**

The proposed facility will not cause human exposure limits to levels of radio frequency emissions in excess of the maximum permissible exposure limits. All transmitting antennas will be mounted higher than 10 meters above ground level.



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### 3.0 SUMMARY

This environmental assessment was prepared to demonstrate compliance of the proposed facility with NEPA as codified in FCC rules 47 CFR 1.1207 – 1.1319. The proposed facility will be located in a 100-year flood plain as defined by the Federal Emergency Management Act (FEMA). The potential impact was the basis for the preparation of this environmental assessment. There are no other issues pursuant to 47 CFR 1.1307 that would require the preparation of an environmental assessment.

Based on review of potential adverse environmental impacts identified herein, construction of the proposed facility will not result in any significant environmental impact.

Report prepared by:

Nancy Crow  
Senior Specialist  
Kansas City Regional Office

Report reviewed by:

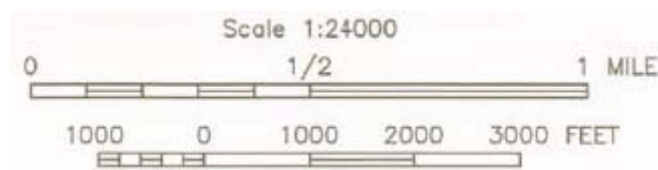
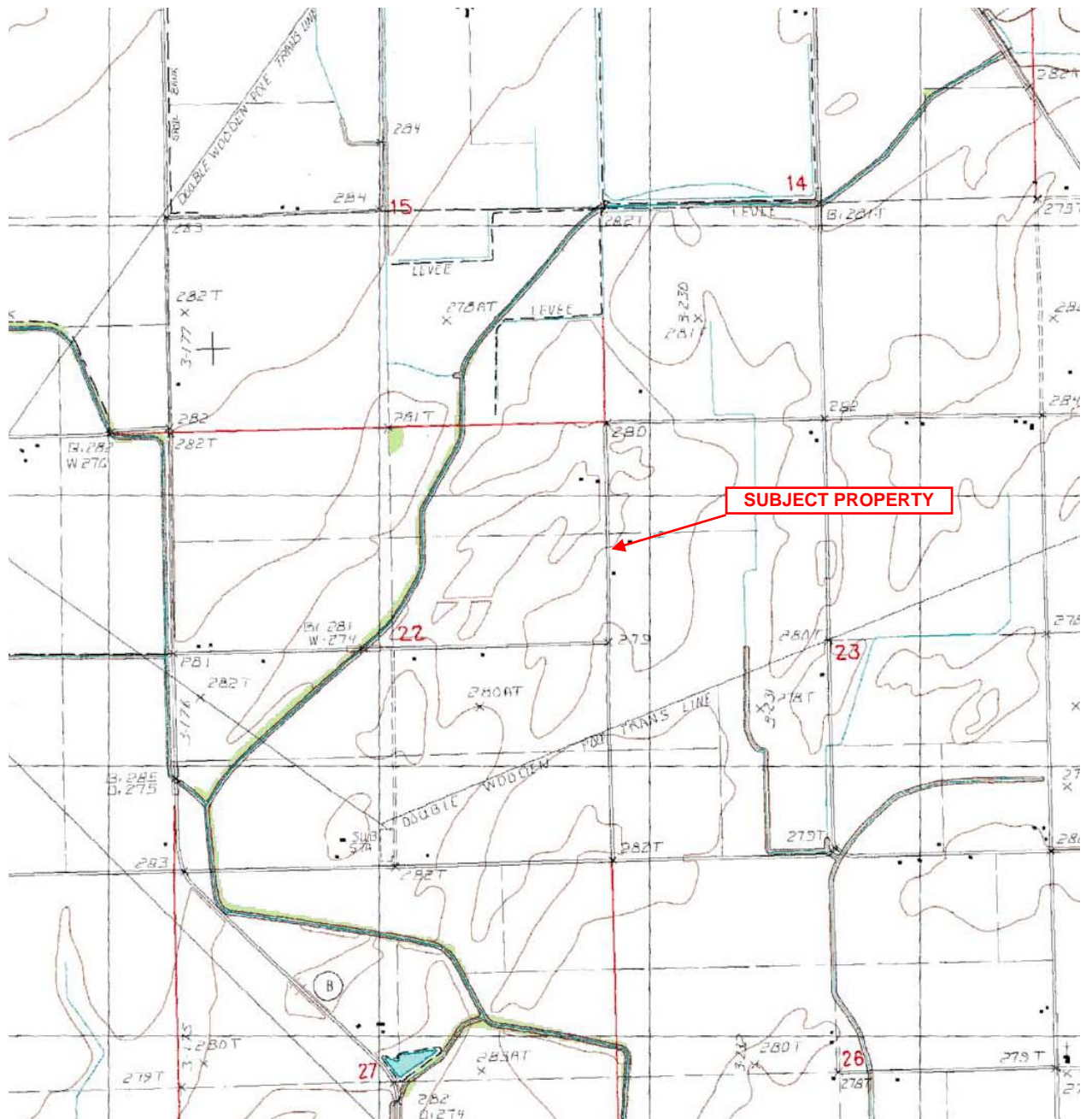
Melissa Valentine  
Project Manager  
Kansas City Regional Office

October 15, 2008



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**APPENDIX A**  
**SITE LOCATION MAPS**



**Bureau Veritas North America, Inc.**  
Health, Safety, and Environmental Services

|          |                 |
|----------|-----------------|
| CHECK BY | TJO             |
| DRAWN BY | NC              |
| DATE     | 04/14/2008      |
| SCALE    | AS SHOWN        |
| PRJ NO.  | 22008-008034.00 |

SITE LOCATION MAP

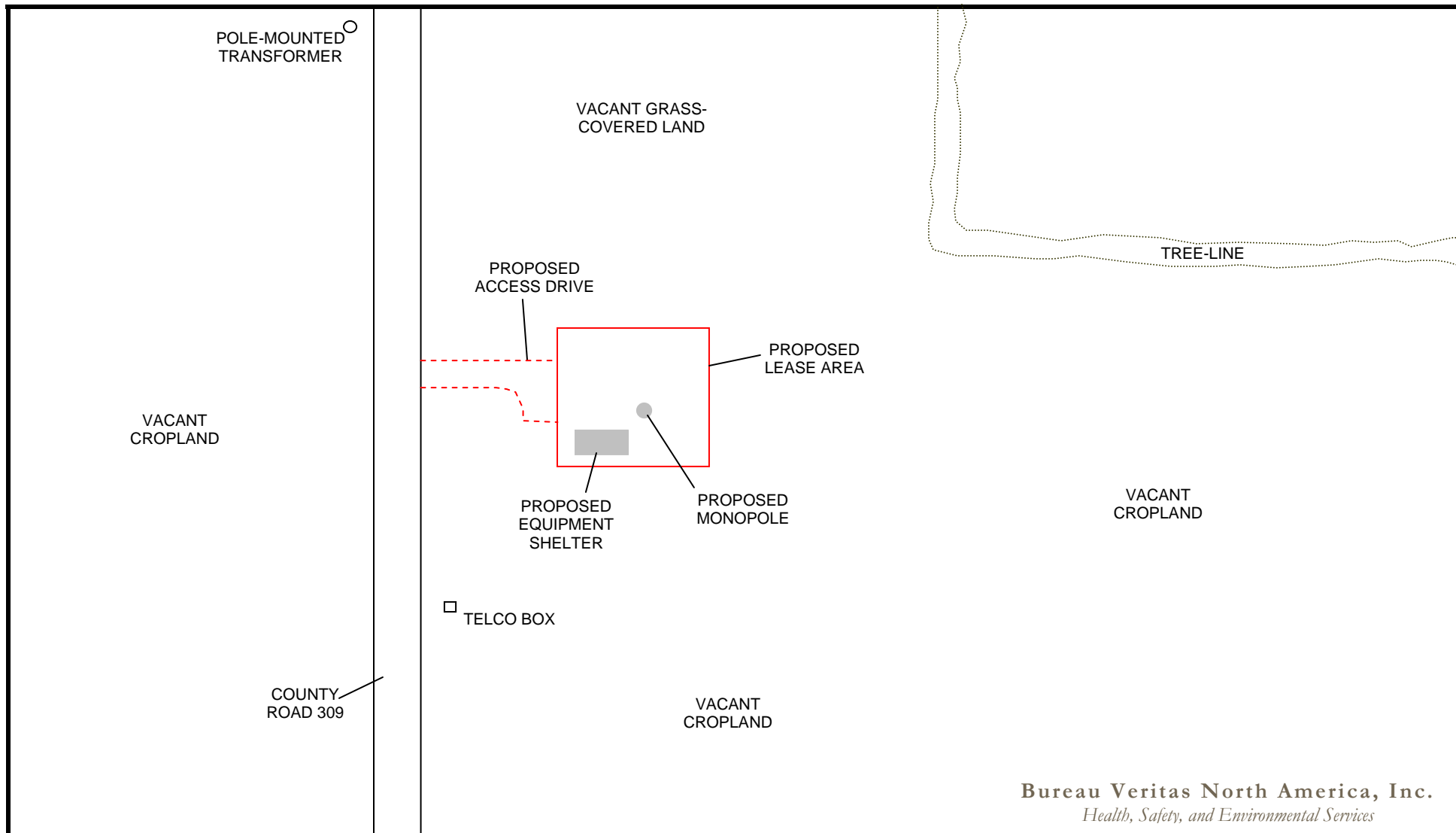
MO19 GIBSON  
COUNTY ROAD 309  
HOLCOMB, MISSOURI





FIGURE

1

SOURCE OF MAP: USGS, 7.5 MINUTE SERIES TOPOGRAPHIC QUADRANGLE MAP, 1984 CAMPBELL, MISSOURI-ARKANSAS



Bureau Veritas North America, Inc.  
*Health, Safety, and Environmental Services*

|                         |  |   |   |                 |
|-------------------------|--|---|---|-----------------|
| CHECK BY KV             | SITE VICINITY MAP<br><br>MO19 GIBSON<br>COUNTY ROAD 309<br>HOLCOMB, MISSOURI |  |  | FIGURE<br><br>2 |
| DRAWN BY ALK            |  |   |   |                 |
| DATE 04/02/2008         |  |   |   |                 |
| SCALE NOT TO SCALE      |  |   |   |                 |
| PRJ NO. 22008-008034.00 |  |   |   |                 |



**BUREAU  
VERITAS**

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**APPENDIX B**

**BUILDING PERMIT**



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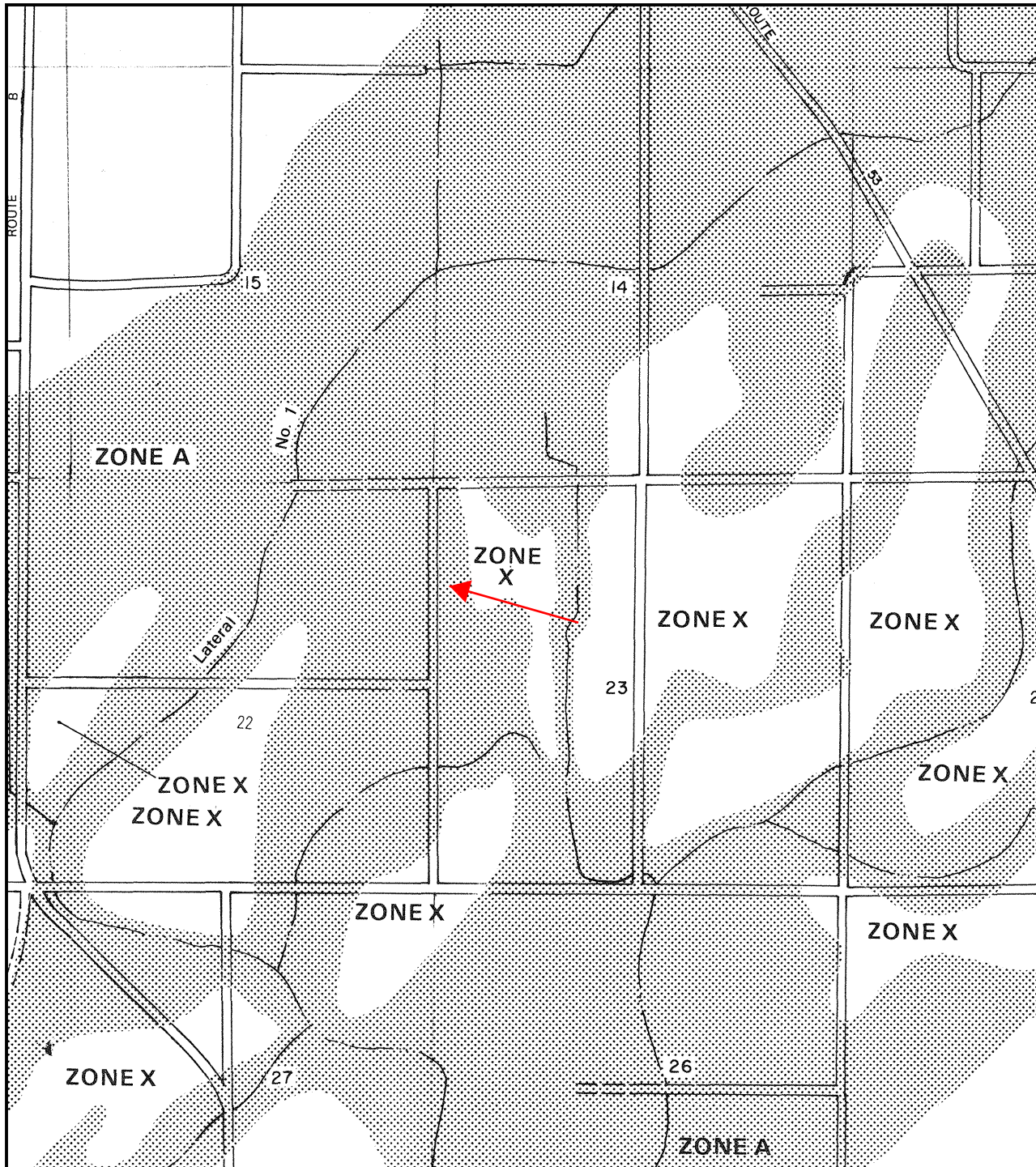
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**APPENDIX C**  
**FEMA FIRM MAP**





APPROXIMATE SCALE

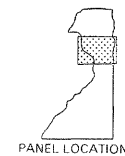
2000 0 2000 FEET

NATIONAL FLOOD INSURANCE PROGRAM

# **FIRM** FLOOD INSURANCE RATE MAP

**DUNKLIN COUNTY,  
MISSOURI  
UNINCORPORATED AREAS**

PANEL 75 OF 200  
(SEE MAP INDEX FOR PANELS NOT PRINTED)



**COMMUNITY-PANEL NUMBER**  
290122 0075 B

**EFFECTIVE DATE:**  
APRIL 3, 1989



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)



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**APPENDIX D**

**FORM 620 AND SHPO CONCURRENCE**

CULTURAL RESOURCES INVENTORY  
&  
DOCUMENTATION  
FOR THE  
VERIZON WIRELESS  
MO19 GIBSON  
COMMUNICATION TOWER

Holcomb, Dunklin County, Missouri

Township 21N, Range 9E, Section 23

by

Neal H. Lopinot

*Center for Archaeological Research*  
*Project CAR-1363F*

July 2008

Archaeology, Architectural History, History, & Tribal Consultation  
901 South National  
Missouri State University  
Springfield, Missouri 65897  
Phone 417-836-5363  
Fax 417-836-4772  
Email: [ArchaeologicalResearch@missouristate.edu](mailto:ArchaeologicalResearch@missouristate.edu)  
[www.missouristate.edu/car/](http://www.missouristate.edu/car/)

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188

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**Applicant Information**

Full Legal Name of Applicant: Cellco Partnership d/b/a Verizon Wireless

Name and Title of Contact Person: Marion Crable

Address of Contact Person (include Zip Code):

10740 Nall Avenue, Suite 400, Overland Park, KS 66211

Phone (913) 344-2896

Fax: (913)-696-5190

E-mail address: marion.crable@verizonwireless.com

**Applicant's Consultant Information**Legal Name of Applicant's Section 106 Consulting Firm: *Center for Archaeological Research*

Name of Principal Investigator: Neal H. Lopinot

Title of Principal Investigator: Director

Investigator's Address: 901 South National

City: Springfield State: Missouri Zip Code: 65897

Phone: (417)-836-5363 Fax: (417)-836-4772 E-mail Address: neallopinot@missouristate.edu

Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards? **YES[X]** / NO[ ]

Areas in which the Principal Investigator meets the Secretary of the Interior's Professional Qualification Standards:

**Historic & Prehistoric Archaeology**

Other "Secretary of the Interior qualified" staff that worked on the Submission Packet (provide name(s) as well as the area(s) in which they are qualified):

**Not Applicable****Site Information**

- a. Street Address of Site: Vacant land along County Road 309  
City or Township: Holcomb  
County / Parish: Dunklin State: Missouri Zip Code: 63852
- b. Nearest Cross Roads: County Road 309 and County Road 318
- c. NAD 83 Latitude/Longitude coordinates (to tenth of a second):  
Latitude N36 Degrees 27 Minutes 3.9 Seconds (NAD 83)  
Longitude W90 Degrees 4 Minutes 1.3 Seconds (NAD 83)
- d. Proposed tower height above ground level:  
210 Feet, 64.0 Meters
- e. Tower Type:  
[ ] Monopole  
[ ] Guyed lattice tower  
**[X] Self Supporting**  
[ ] Other (briefly describe tower)

Some attachments may contain photos or maps on which this information cannot be provided.

The Professional Qualification Standards are available on the cultural resources webpage of the National Park Service, Department of the Interior: [http://www.cr.nps.gov/local-law/arch\\_stnds\\_9.htm](http://www.cr.nps.gov/local-law/arch_stnds_9.htm). The Nationwide Agreement requires use of Secretary-qualified professionals for identification and evaluation of historic properties within the APE for direct effects, and for assessment of effects. The Nationwide Agreement encourages, but does not require, use of Secretary-qualified professionals to identify historic properties within the APE for indirect effects. See Nationwide Agreement, §§ VI.D.1.d, VI.D.1.e, VI.D.2.b, VI.E.5.

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188

**Project Status:**

- a. ☒ **Construction not yet commenced,**  
b. ☐ Construction commenced on [date]: ; or,  
c. ☐ Construction commenced on [date]: and was completed on [date]:

**Applicant's Determination of Effect:****Direct Effects (check one):**

- ☒ i. **No Historic Properties in Area of Potential Effects ("APE") for direct effects;**  
☐ ii. "No effect" on Historic Properties in APE for direct effects;  
☐ iii. "No adverse effect" on Historic Properties in APE for direct effects;  
☐ iv. "Adverse effect" on one or more Historic Properties in APE for direct effects.

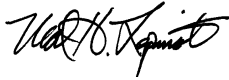
**Visual Effects (check one):**

- ☒ i. **No Historic Properties in Area of Potential Effects ("APE") for visual effects;**  
☐ ii. "No effect" on Historic Properties in APE for visual effects;  
☐ iii. "No adverse effect" on Historic Properties in APE for visual effects;  
☐ iv. "Adverse effect" on one or more Historic Properties in APE for visual effects.

**Certification and Signature**

I certify that all representations on this FCC Form 620 and the accompanying attachments are true, correct, and complete.

Signature:



Date: July 18, 2008

Printed Name: Neal H. Lopinot

Title: Principal Investigator

**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).**

Failure to provide the Submission Packet and complete the review process under Section 106 of the NHPA prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules. *See* Section X of the Nationwide Agreement.

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188

**Attachment 1 - Résumé/Vitae*****Center for Archaeological Research***

901 South National, Springfield, Missouri 65897

[neallopilot@missouristate.edu](mailto:neallopilot@missouristate.edu)<http://www.missouristate.edu/car/>

Phone: 417-836-5363

Fax: 417-836-4772

Cell: 417-425-8456

**Neal H. Lopinot – Director & Principal Investigator**

**Education** **Ph.D.** 1984 – Southern Ill. Univ., Carbondale, Anthropology, specializing in Archaeology  
**M.A.** 1977 - Southern Ill. Univ., Carbondale, Conservation Archaeology  
**B.A.** 1974 - Southern Ill. Univ., Edwardsville, Anthropology & Biology

**Experience**

**1993 to present – Director, Center for Archaeological Research, Missouri State University**, serving as Principal Investigator on hundreds of cultural resource management projects of all sizes. NHPA and NEPA compliance and other services throughout the Midwest and Midsouth. Responsible for overall administration of the Center, including preparation of proposals, oversight of all projects, active research, and editing.

**1991 to 1993 – Associate Researcher II, Southern Illinois University at Carbondale**, served as a consultant to the U.S. Army Corps of Engineers, St. Louis District, managing historical properties management projects at reservoirs and along rivers within the district's jurisdiction. Also assisted in preparation of RFPs and other documents for the Planning Division of the St. Louis District.

**1987 to 1991 - Associate Director, Contract Archaeology Program, Southern Illinois University at Edwardsville**, served as Principal Investigator on dozens of projects, mainly in Illinois and, to a lesser extent, in Missouri. Prepared technical and budget proposals, directed field and laboratory activities, and wrote reports about findings.

**1984 to 1987 – Assistant Director, Archaeological Survey, University of Missouri at St. Louis**, also served as Principal Investigator on numerous projects, mainly in Missouri and Illinois. Responsible for preparing technical and budget proposals, directing field and laboratory activities, and writing reports about findings. Also taught archaeology courses on a part-time basis in the Department of Anthropology.

**1973 to 1984 - Information Available on Request**

**Archaeological Field and Laboratory Activities:** Participated in over 350 projects in the Midwest (Missouri, Illinois, Iowa, Arkansas, Kansas, and Kentucky) and elsewhere (Tennessee, Louisiana, Pennsylvania, New Mexico, and Arizona), typically serving as Principal Investigator since 1984. Projects of all sizes ranging from small cell-tower surveys to large, multiyear mitigation projects.

**Grants and Awards:** Principal Investigator or Project Director on over \$7,000,000 in contract and grant awards; collaborated previously on several National Science Foundation grants, recipient of National Geographic Society and Green Foundation awards for work at the Big Eddy site, and also numerous grants from the National Park Service; Recipient of **Commander's Award for Civilian Service**, St. Louis District, U.S. Army Corps of Engineers, 1993; Poster Award, **1st Place, Professional Division**, Society for American Archaeology, Chicago, Illinois, 1999; **Missouri Historic Preservation Award** and Resolutions from the Missouri House of Representatives and the Missouri Senate, presented in the State Capitol Rotunda, 2003; featured in **National Geographic Magazine**, October, 2005.

**Publications:** Authored or co-authored numerous monograph-length contributions and articles in books and journals; 58 technical reports, mostly 100-500 pages in length and pertaining to large projects, as well as several hundred smaller technical reports pertaining to Cultural Resource Management projects; author or co-author of more than 50 papers delivered at professional meetings; and organizer of symposia and workshops at professional meetings.

Applicant's Name: Verizon Wireless

Project Name: MO18, Gibson

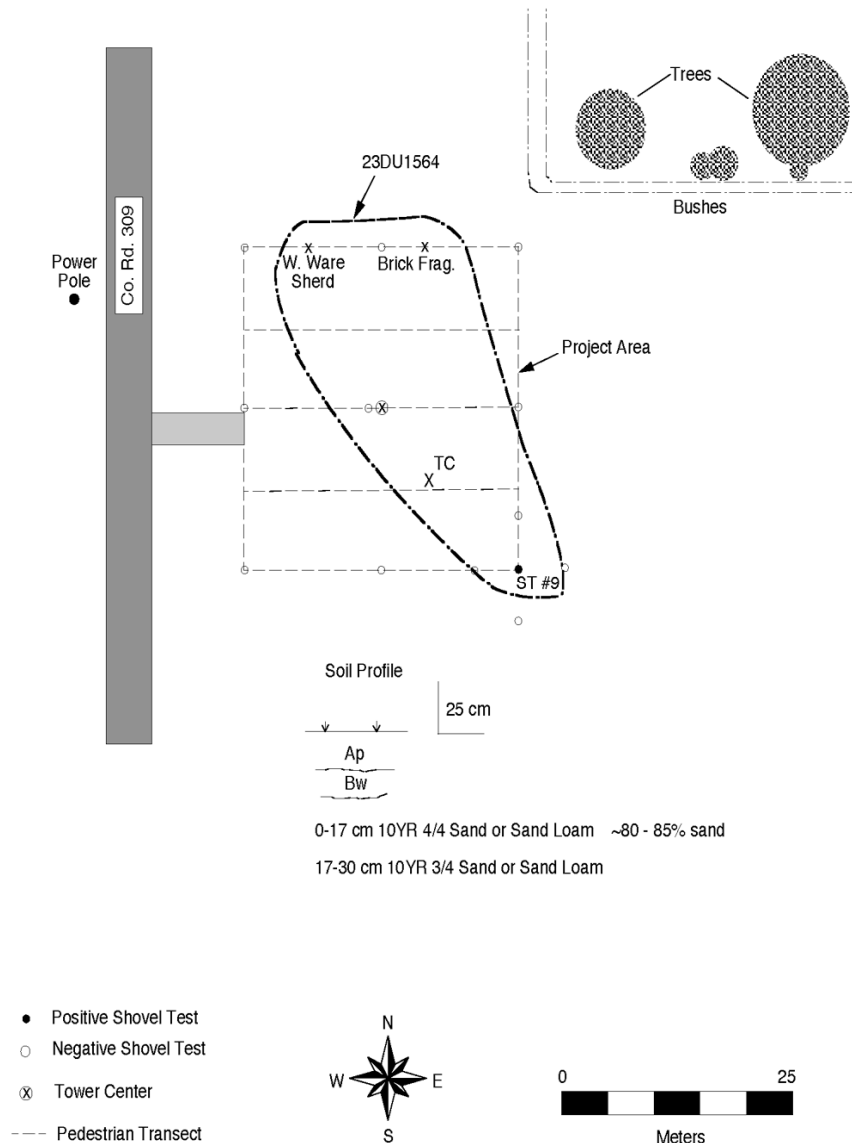
Project Number: VZW2008271188



**Attachment 2 - Additional Site Information**

- Describe any additional structures, access roads, utility fences, easements, or other construction planned for the site in conjunction with the proposed facilities.

**Verizon Wireless plans to construct a 210-ft tall monopole cellular telecommunications tower located on an elevated portion of the braided Malden Plain about 6 km northeast of the St. Francis River in northern Dunklin County, southeast Missouri. The tower will be placed on a 100-x-100-ft or 0.23-acre (930 m<sup>2</sup>) tract lease. The proposed access road will measure about 12 ft (4 m) in width and extend a distance of only 15 ft (4.6 m). The electric power and telephone will be accessed from only 50 ft away.**

**Project Plan**

Applicant's Name: Verizon Wireless  
 Project Name: MO18, Gibson  
 Project Number: VZW2008271188



## Attachment 3 - Tribal and NHO Involvement

- At an early stage in the planning process, the Nationwide Agreement requires the Applicant to gather information from appropriate Indian Tribes or Native Hawaiian Organizations (“NHOs”) to assist in the identification of historic properties of religious and cultural significance to them. Describe measures taken to identify Indian tribes and NHOs that may attach religious and cultural significance to historic properties that may be affected by the undertaking within the Areas of Potential Effects (“APE”) **for direct and visual effects**. If such Indian tribes or NHOs were identified, list them and provide a summary of contacts by the FCC, the Applicant, or the Applicant’s representative. Provide copies of relevant documents, including correspondence. If no such Indian tribes or NHOs were identified, please explain.

***A - Measures taken to identify Indian tribes and NHOs.***

1. FCC Tower Construction Notification System by Bureau Veritas.
2. Bureau Veritas will conduct follow up contacts according to the FCC procedures.

***B - List of Indian tribes and NHOs contacted through FCC’s Tower Construction Notification System (TCNS) ID#38501***

- Omaha Tribe of Nebraska
- Cheyenne-Arapaho Tribes of Oklahoma
- Prairie Band Potawatomi Nation
- Kaw Nation
- Sac & Fox Tribe of the Mississippi in Iowa
- Chickasaw Nation
- Quapaw Tribe of Oklahoma
- Osage Nation
- United Keetoowah Band of Cherokee Indians
- Eastern Shawnee Tribe of Oklahoma
- Peoria Tribe of Indians of Oklahoma
- Shawnee Tribe

Applicant’s Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188

**Attachment 4 - Local Government**

- a. Has any local government agency been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Agreement? If so, list the local government agencies contacted.  
**No.**
- b. Provide a summary of contacts and copies of any relevant documents (*e.g.*, correspondence or notices). If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.  
**Not applicable.**

**Attachment 5 - Public Involvement**

- Describe measures taken to obtain public involvement in this project (*e.g.*, notices, letters, or public meetings). Provide copies of relevant documentation.

**Notices:**

Newspaper Legal Notice – Prepared and submitted for publication in the following newspapers: *Dunklin Daily Democrat* April 24 and 25, 2008

Text of notices –

**PUBLIC NOTICE - NEW TELECOMMUNICATIONS TOWER**

Cellco Partnership d/b/a Verizon Wireless proposes to construct 190-ft monopole, .7 mi N of CR322 on E side of CR309, MO 36° 27' 03.9" N & 90° 04' 01.3" W. Any interested party wishing to submit comments regarding effect proposed facility may have on any historic property may do so by sending comments to N. Crow, Bureau Veritas, contractor for Verizon Wireless, 8717 W. 110th St., Ste. 480, Overland Park, KS, 66210 (913)451-3600. 22008-008034.01

**Letters:**

**Not applicable.**

**Public Meeting:**

**Not applicable.**

**Attachment 6 - Additional Consulting Parties**

- List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.  
**Not applicable.**

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188

**Attachment 7 - Area of Potential Effects**

- a. Describe the APE for direct effects and explain how this APE was determined.

**The APE for direct effects is limited to the area of potential ground disturbance and any property, or any portion thereof, that will be physically altered or destroyed by the Undertaking (FCC04-22 pp 16 Section VI.C.1). The APE for direct effects was based on project maps provided by Bureau Veritas. Proposed disturbances include the tower base, utility access, access road, fencing, and other ground disturbances associated with construction. The proposed cell tower compound will occupy an area of 100-x-100-ft or 0.23-acre (930 m<sup>2</sup>), whereas the proposed access road will extend a distance of only 15 ft (4.6 m).**

- b. Describe the APE for visual effects and explain how this APE was determined (See FCC04-22 pp 17 Section VI.C.4).

- ☐ a. Within a half mile from the tower site if the proposed Tower is 200 feet or less in overall height;
- ☒ **b. Within ¾ of a mile from the tower site if the proposed Tower is more than 200 but no more than 400 feet in overall height;**
- ☐ c. Within 1-½ miles from the proposed tower site if the proposed Tower is more than 400 feet in overall height.
- ☐ d. Other:

**Attachment 8 - Historic Properties Identified in the APE for Visual Effects**

- a. Provide the name and address of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.1.a. of the Nationwide Agreement.<sup>1</sup>

**A records search for this project was conducted by Gail Emrie (MS; CAR Laboratory Supervisor) at the SHPO, Jefferson City, Missouri. No National Register listed or previously recorded eligible properties of any kind occur at the location of direct effects, nor within the 3/4-mile visual APE.**

| Property Name | Address |
|---------------|---------|
|               |         |

<sup>1</sup>Section VI.D.1.a. of the Nationwide Agreement requires the Applicant to review publicly available records to identify within the APE for visual 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 National 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.

Applicant's Name: Verizon Wireless  
 Project Name: MO18, Gibson  
 Project Number: VZW2008271188

- b. Provide the name and address of each Historic Property in the APE for visual effects, not listed in Attachment 8a, identified through the comments of Indian Tribes, NHOs, local governments, or members of the public. Identify each individual or group whose comments led to the inclusion of a Historic Property in this attachment. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63).

**No such properties have been identified.**

- c. For any properties listed on Attachment 8a that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

**Not applicable.**

### **Attachment 9 - Historic Properties Identified in the APE for Direct Effects**

- a. List all properties identified in Attachment 8a or 8b that are in the APE for direct effects.

**No historic properties are within the APE for direct effects.**

- b. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for direct effects, not listed in Attachment 9a, that the Applicant considers to be eligible for listing in the National Register as a result of the Applicant's research. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63). For each property that was specifically considered and determined not to be eligible, describe why it does not satisfy the criteria of eligibility.

**Not applicable.**

- c. Describe the techniques and the methodology, including any field survey, used to identify historic properties within the APE for direct effects. If no archaeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.

**Mr. Jack H. Ray conducted the field survey for the proposed Gibson cell tower tract. The Phase I survey was undertaken on April 28, 2008, and involved 2.5 person hours of fieldwork. At the time of the survey, the proposed cell tower location was in a fallow field with surface visibility of 5-15%. Nine shovel tests spaced 15 m apart and forming a 3-x-3 grid were excavated. The surface also was inspected enroute to each shovel test within the 100-x-100-ft cell tower location, and four additional shovel tests were excavated in the vicinity of a positive shovel test. One multicomponent archaeological sites was defined within the direct impact area.**

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
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**Attachment 10 - Effects on Identified Properties**

For each property identified as a Historic Property in Attachments 8 and 9:

- a. Indicate whether the Applicant believes the proposed undertaking would have a) no effect; b) no adverse effect; or, c) an adverse effect. Explain how each such assessment was made. Provide supporting documentation where necessary.

The combination of shovel testing and pedestrian survey methods resulted in the identification of site 23DU1564, referred to as the Gibson Tower site. This site has both prehistoric and historic components. Each is represented by relatively few artifacts. A biface thinning flake of Lafayette chert was found in the plow zone of Shovel Test #9, located in the southeast corner of the 100-x-100-ft cell tower tract, whereas a tested cobble of Lafayette chert was found on the surface about 12 m to the northwest. Shovel testing in the four cardinal directions from Shovel Test #9 did not result in the recovery of additional materials and prehistoric artifacts were lacking in the other eight shovel tests excavated within the cell tower tract. Two historic artifacts also were found on the surface within the north part of the cell tower tract. These consist of a body sherd of plain whiteware and a brick fragment. They reflect a domestic occupation, but the materials almost certainly represent part of the halo of historic materials that often surrounds a historic residence(s), such as one that occurred throughout most of the twentieth century a short distance to the northeast of the cell tower tract.

Historic components similar to the Gibson Tower site occur abundantly in the region and the occupation of this site continued through the late 1950s until at least c. 1984, when the provisional edition of the Campbell 7.5' quadrangle was prepared. It is more difficult to evaluate the significance of the prehistoric component of the site, but the paucity of recovered materials from the southeast part of the cell tower tract is suggestive of relatively temporary or specialized site use that would likely not yield significant new data about the past.

Since site 23DU1564 was not considered eligible for the National Register of Historic Places (NRHP), the proposed undertaking will have no effect on a historic property.

- b. Provide copies of any correspondence and summaries of any oral communications with the SHPO/THPO.

**See appended letter.**

**Attachment 11 - Photographs**

- *Except in cases where no Historic Properties were identified within the Areas of Potential Effect*, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map (*see* Item 12 below) or text, and dated; the focal length of the lens should be noted. The source of any photograph included but not taken by the Applicant or its consultant (including copies of historic images) should be identified on the photograph.

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
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- a. Photographs taken from the tower site showing views from the proposed location in all directions. The direction (*e.g.*, north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed tower.



View north from center of proposed cell tower compound.





View east from center of proposed cell tower compound.



View south from center of proposed cell tower compound; razed houseplace at top center.

Applicant's Name: Verizon Wireless  
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View west from center of proposed cell tower compound.

b. Photographs of all listed and eligible properties within the Areas of Potential Effects

**No listed or eligible properties occur within the APE.**

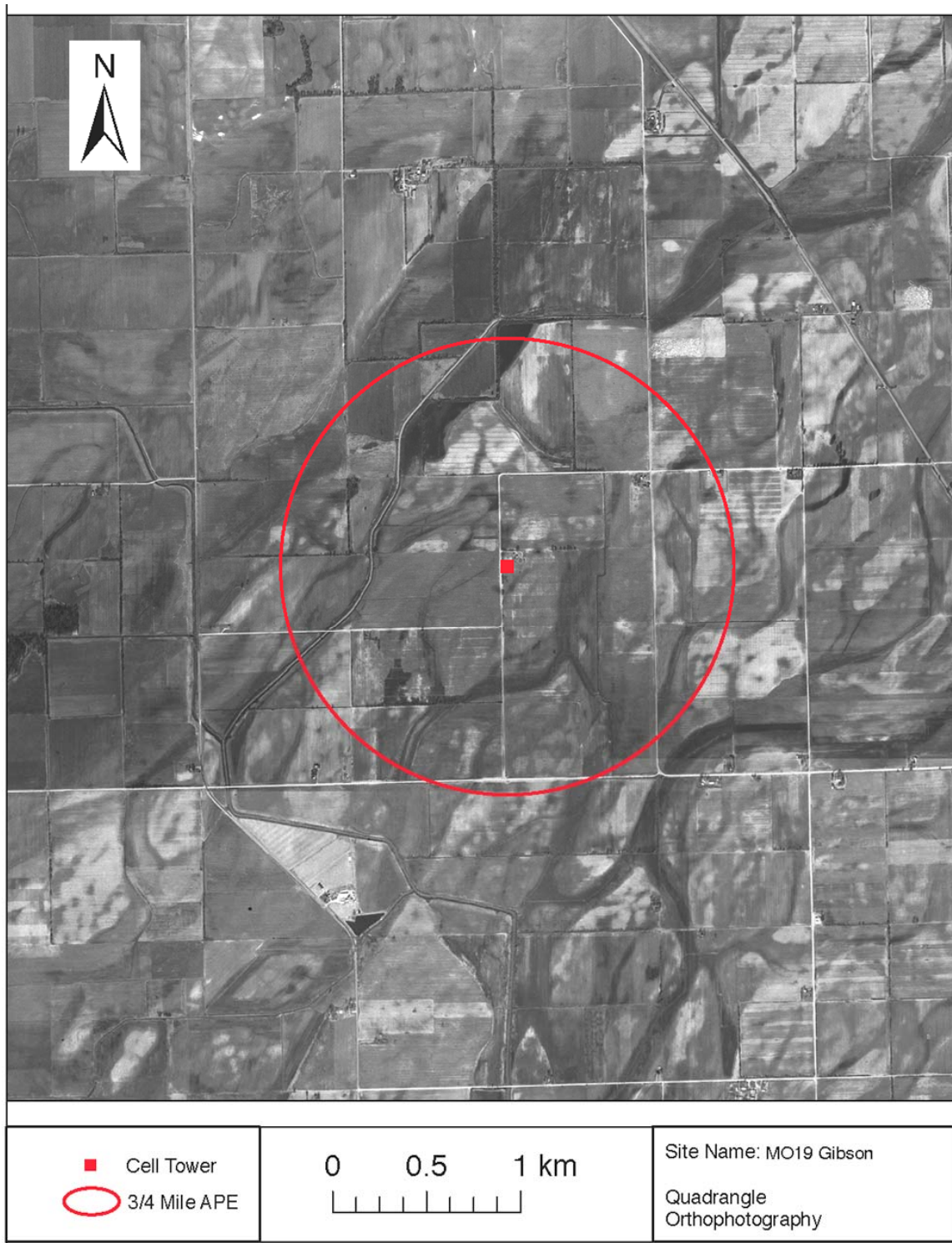
c. If any listed or eligible properties are visible from the proposed tower site, photographs looking at the tower site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included.

**No listed or eligible properties are visible from the proposed tower site.**

Applicant's Name: Verizon Wireless  
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d. Aerial photo of the APE for visual effects, if available.

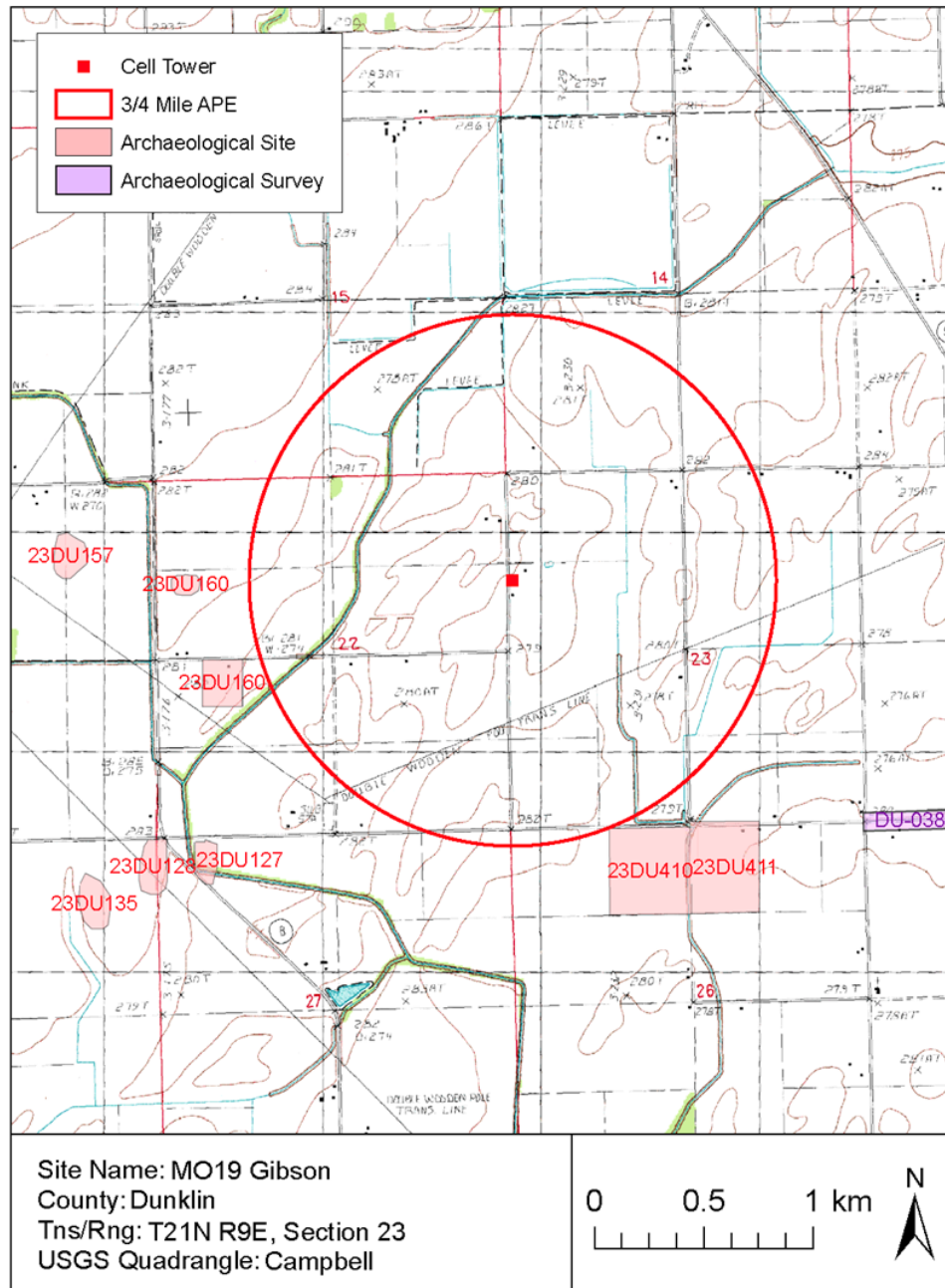


Aerial photo from Google Earth showing direct APE, visual APE, and inventory area.

Applicant's Name: Verizon Wireless  
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**Attachment 12 - Maps**

- Include one or more 7.5-minute quad USGS topographical maps that:
  - a. Identify the APEs for direct and visual effects. If map is copied from the original, include key with name of quad and date.
  - b. Show location of proposed tower and any new access roads, easements, excavations.
  - c. Show the locations of each property listed in Attachments 8 and 9.
  - d. Include keys for any symbols, colors, or other identifiers.



USGA (1984) map showing direct APE inventory area, visual APE, and tower location.

Applicant's Name: Verizon Wireless  
 Project Name: MO18, Gibson  
 Project Number: VZW2008271188

**Bibliography and References Cited**

All reports included in the Submission Packet should be footnoted and contain a bibliography of the sources consulted.

- a. Footnotes may be in a form generally accepted in the preparer's profession so long as they identify the author, title, publisher, date of publication, and pages referenced for published materials. For archival materials/documents/letters, the citation should include author, date, title or description and the name of the archive or other agency holding the document.
- b. A bibliography should be appended to each report listing the sources of information consulted in the preparation of the report. The bibliography may be in a form generally accepted in the preparer's profession.

All references or footnotes are included in the text above.

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information provided in the application to determine whether approving this application is in the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; (b) any employee of the FCC; or (c) the United States Government is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection.

If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized.

If you do not provide the information requested on this form, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

We have estimated that each response to this collection of information will take an average of .50 to 10 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-1039), Washington, DC 20554. We will also accept your comments via the Internet if you send them to [Judith-B.Herman@fcc.gov](mailto:Judith-B.Herman@fcc.gov). Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number of if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1

Applicant's Name: Verizon Wireless  
Project Name: MO18, Gibson  
Project Number: VZW2008271188



**CULTURAL RESOURCE ASSESSMENT**  
**Section 106 Review**

**CONTACT PERSON/ADDRESS:**

Ms. Nancy Crow  
Bureau Veritas North America, Inc.  
8717 West 110<sup>th</sup> Street, Suite 480  
Overland Park, KS 66210

**C:**

Neal Lopinot

**PROJECT:**

Proposed telecommunications antennae – Tower MO19 Gibson, CR 322 and CR 309, Holcomb

**FEDERAL AGENCY**

FCC

**COUNTY:**

DUNKLIN

The State Historic Preservation Office has reviewed the information submitted on the above referenced project. Based on this review, we have made the following determination:

☐

After review of initial submission, the project area has a low potential for the occurrence of cultural resources. A cultural resource survey, therefore, is not warranted.

☒

Adequate documentation has been provided (36 CFR Section 800.11). There will be "no historic properties affected" by the current project.

☐

An adequate cultural resource survey of the project area has been previously conducted. It has been determined that for the proposed undertaking there will be "no historic properties affected".

For the above checked reason, the State Historic Preservation Office has no objection to the initiation of project activities. PLEASE BE ADVISED THAT, IF THE CURRENT PROJECT AREA OR SCOPE OF WORK ARE CHANGED, A BORROW AREA IS INCLUDED IN THE PROJECT, OR CULTURAL MATERIALS ARE ENCOUNTERED DURING CONSTRUCTION, APPROPRIATE INFORMATION MUST BE PROVIDED TO THIS OFFICE FOR FURTHER REVIEW AND COMMENT. Please retain this documentation as evidence of compliance with Section 106 of the National Historic Preservation Act, as amended.

By:



Mark A. Miles, Director and Deputy State Historic Preservation Officer

August 13, 2008

Date

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HISTORIC PRESERVATION OFFICE  
P.O. Box 176, Jefferson City, Missouri 65102  
For additional information, please contact Rebecca Prater, 573-751-7958.  
Please be sure to refer to the project number: 025-DU-08



**PRIVILEGED ATTORNEY WORK PRODUCT**

**APPENDIX E**

**USFWS CORRESPONDENCE**



## Design Specifications Questionnaire for Proposed Communications Towers in Missouri



The U.S. Fish and Wildlife Service (Service) has concerns regarding potential avian mortality that could occur with the installation and operation of communications towers. Despite the well-developed visual acuity of most bird species, collisions with above ground structures often occur. The problem is especially acute at tall, lighted, guyed towers, particularly at night during inclement weather, and during spring and fall songbird migrations.

**\*Please use one form for each proposed tower and supply all requested information.**

### CONTACT INFORMATION:

**MO19 Gibson 22008-008034.01**

Name: Nancy Crow

Company: Bureau Veritas North America, Inc.

Street: 8717 W. 110<sup>th</sup> St, Suite 480

City, State, Zip: Overland Park, KS 66210

Phone: 913-451-3600

E-mail: nancy.crow@us.bureauveritas.com

### TOWER SITING LOCATION INFORMATION (ATTACH PERTINENT MAPS AND PHOTOS):

County Dunklin

USGS Quad Name Campbell, MO-AR

Lat./Long. 36° 27' 03.9" North and 90° 04' 01.3" West Size of total project area 100-feet by 100-feet

Township/Range/Section/Quarter Section: Section 23, Township 21 North, Range 9 East

Circle One: Urban or Rural Site Developed? Yes or No Tree Removal? Yes or No

Habitat Description farmland

### PLEASE CHECK ALL THAT APPLY:

1. Communications equipment will be co-located on an existing FCC licensed communication tower or other existing structure (e.g. billboard, water tower, or building mount). **If yes, describe type of structure (no further information is required):**

X 2. Tower height less than 200 feet above ground level (AGL) and will NOT require supporting guy wires.

3. Tower height less than 200 feet AGL and will NOT require supporting guy wires or lighting per Federal Aviation Administration (FAA) regulations. **If yes, complete only items 10 through 15.**

4. Tower will require guy wires for support.

**Proposed number of guy wires: 0**

5. Guyed tower will be equipped with daytime visual markers on the wires to prevent collisions by raptors, waterfowl, and other diurnally moving bird species.

6. Tower will exceed a height of 200 feet AGL and will require lights for aviation safety.

**Proposed tower height: 190 feet**

X 7. Tower will be equipped with the **minimum amount** of pilot warning and obstruction avoidance lighting required by the FAA.

8. Tower will be equipped with only white (not red)<sup>2</sup> strobe lights at night, and these will be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA.

9. Tower will be sited within an existing "antenna farm" (towers in clusters).

<sup>1</sup>For guidance on markers, see Avian Power Line Interaction Committee (APLIC). 1994. Mitigating Bird Collisions with Power Lines: The State of the Art in 1994. Edison Electric Institute, Washington, D.C., 78 pp. and Avian Power Line Interaction Committee (APLIC). 1996. Suggested Practices for Raptor Protection on Power Lines. Edison Electric Institute/Raptor Research Foundation, Washington, D.C., 128 pp. Copies can be obtained via the Internet at <http://www.eei.org/resources/pubcat/enviro/>, or by calling 1-800/334-5453.

<sup>2</sup>Current research indicates that solid or pulsating (beacon) red lights attract night-migrating birds at a much higher rate than white strobe lights. Red strobe lights have not yet been studied.



- X 10. Tower and appendant facilities will be sited, designed, and constructed to avoid or minimize habitat loss within and adjacent to the tower "footprint" (total area of ground disturbance).
- X 11. Road access and fencing will be minimized to reduce or prevent habitat fragmentation and disturbance, and to reduce above ground obstacles to birds in flight.
- X 12. Tower is designed structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for at least two additional users (**minimum of three users for each tower structure**), unless this design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower.
- X 13. Security lighting for on-ground facilities and equipment will be down-shielded to keep light within the site boundaries.
- X 14. Tower will be removed within 12 months of cessation of use or if determined to be obsolete.

**RETURN THIS FORM TO:**

U.S. Fish and Wildlife Service  
Ecological Services  
101 Park DeVille Drive, Suite A  
Columbia, MO 65203-0007  
Phone 573-234-2132; Fax 573-234-2181

**For U.S. Fish and Wildlife Service Personnel Use Only (DO NOT WRITE IN THIS BOX)**

This response is provided by the U.S. Fish and Wildlife Service under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327), the Migratory Bird Treaty Act (16 U.S.C. 703-712)<sup>3</sup>, and the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543).

- G Tower design will not adequately minimize bird strikes.
- G Significant numbers of breeding, feeding, or roosting birds are known to habitually use the proposed tower construction area. Relocation to an alternate site is recommended. If this is not an option, please contact this office at the number listed below.
- G Tower location proposed in or near stream or wetland. Relocation to an alternate site is recommended. If this is not an option, please contact this office at the number listed below.
- G Trees must be removed between November 1 and March 30 to avoid potential injury or death to roosting Indiana bats. If this is not an option, please contact this office at the number listed below.

X The U.S. Fish and Wildlife Service has determined that no federally listed species or designated critical habitat occurs within the project area.

  
Charles M. Scott, Field Supervisor

  
Date

<sup>3</sup>The Migratory Bird Treaty Act (16 U.S.C. 703-712) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. While the Act has no provision for allowing unauthorized take, it must be recognized that some birds may be killed at structures such as communications towers, even if all reasonable measures to avoid it are implemented. The Service's Division of Law Enforcement carries out its mission to protect migratory birds not only through investigations and enforcement, but also through fostering relationships with individuals and industries that proactively seek to eliminate their impacts on migratory birds.



**BUREAU**  
**VERITAS**

**PRIVILEGED ATTORNEY WORK PRODUCT**

## **APPENDIX F**

**ARMY CORPS OF ENGINEERS - STATEMENT**





## PRIVILEGED ATTORNEY WORK PRODUCT

October 15, 2008

Ms. Alice Silverthorn  
**Verizon Wireless**  
1120 Sanctuary Parkway  
Suite 150 (GASA5REG)  
Alpharetta, GA 30004

Subject: Consultation with Army Corps of Engineers  
Cellular Communications Tower – MO19 Gibson  
County Road 309  
Dunklin County  
Holcomb, Missouri  
Latitude: 36° 27' 01.42" North and 90° 04' 03.10" West

Dear Ms. Silverthorn:

During the evaluation of the site and preparation of the NEPA due diligence research report, it was determined that consultation with the Army Corps of Engineers would not be necessary because of the past disturbance of the subject site. In addition, the construction of the antenna structure at the subject property would not result in significant changes in surface features (e.g. wetlands, deforestation, or water diversion). No standing water or indicator species of flora and fauna typically associated with wetlands were identified on the subject property during the site reconnaissance.

The site is cropland located near County Road 309 in Holcomb, Dunklin County, Missouri. A new communications facility is proposed at the subject property. The proposed action involves constructing a monopole tower at an overall tower height of 199 feet and accompanying equipment shelter within a proposed 10,000 square-foot lease area. Power cabling will travel underground from the new Verizon Wireless equipment shelter, travel approximately 130 feet to the west, and power cabling will connect to an existing above-ground connection point. Telco cabling will travel underground from the new Verizon Wireless equipment shelter, travel approximately 170 feet to the west and south, and telco cabling will connect to existing above-ground connection point. As of the date of issuance of this report, plans for the proposed action include installation of a backup generator in the generator room of the proposed equipment shelter. A proposed access drive, approximately 35 feet in total length, will provide access to the subject property from County Road 309 located to the west. No building materials will likely be disturbed during the proposed action, and the ground surface will likely be disturbed during the proposed action.

**Bureau Veritas North America, Inc.**

*Health, Safety, and Environmental Services*  
7500 College Boulevard, Suite 513  
Overland Park, Kansas, 66210

Main: (913) 451-3600  
Fax: (913) 451-3937  
[www.us.bureauveritas.com](http://www.us.bureauveritas.com)



**PRIVILEGED ATTORNEY WORK PRODUCT**

We appreciate the opportunity to be of service. If you have any questions, please contact us at 913.451.3600.

Sincerely,

Nancy Crow  
Senior Specialist  
Kansas City Regional Office

Melissa Valentine  
Project Manager  
Kansas City Regional Office

ATTACHMENTS

**Bureau Veritas North America, Inc.**

*Health, Safety, and Environmental Services*  
7500 College Boulevard, Suite 513  
Overland Park, Kansas, 66210

Main: (913) 451-3600  
Fax: (913) 451-3937  
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**PRIVILEGED ATTORNEY WORK PRODUCT**

**APPENDIX G**  
**RESUMES OF KEY PERSONNEL**



## Melissa D. Valentine

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### *Project Manager*

Bachelor Of Science, Environmental  
Science, 2002  
University of Kansas, Lawrence, Kansas

OSHA 40-Hour Hazardous Waste  
Operations and Emergency Response  
(HAZWOPER)

AHERA Accredited Asbestos Inspector

Certified Asbestos Inspector:  
State of Missouri  
State of Kansas  
State of Iowa  
State of Minnesota

Melissa Valentine is an environmental and occupational health and safety Project Manager based in the Clayton Kansas City Regional Office.

Melissa Valentine has successfully provided and managed environmental services for many types of clients and projects for 4 years.

Ms. Valentine currently conducts Phase I Environmental Assessments (ESAs), Phase II ESAs, National Environmental Policy Act (NEPA) screenings, Environmental Assessments (EAs), Environmental Audits and asbestos building inspections.

Ms. Valentine conducts Phase I Environmental Site Assessments (ESAs) for various financial and commercial clients, in accordance with ASTM Designation E 1597-05 and client-designated protocols. Ms. Valentine has experience in conducting soil and groundwater sampling, and monitoring well installation.

Through subsurface investigations, including geophysical surveys and soil and groundwater sampling, Ms. Valentine has identified the presence of many recognized environmental conditions, such as underground storage tanks (USTs), volatile organic compounds (VOCs), petroleum hydrocarbons, methyl tertiary butyl ether (MTBE), metals, and residual agricultural chemicals (i.e., pesticides/metals) in soil and groundwater.



## **Melissa D. Valentine**

### **Project Experience**

#### **Phase I Due Diligence**

##### *Real Estate and Financial Services Industry*

Ms. Valentine has been involved in conducting and managing Phase I environmental assessments throughout the United States. Ms. Valentine has proven experience in proposal development as well as fully integrated project management of multiple site projects.

#### **Phase II Environmental Site Assessments**

##### *Industrial, Residential, and Commercial Properties*

Ms. Valentine has performed soil sampling, groundwater sampling, and monitoring well measurements to identify potential subsurface contamination plumes at various locations throughout the Midwest. Ms. Valentine has conducted several Phase IIs for industrial and commercial facilities during the due diligence portion of proposed acquisition of facilities, using Geoprobe® direct push sampling technology. She has prepared reports detailing investigation findings and remedial approaches for environmental concerns identified during these assessments.

#### **Phase I ESAs and NEPA Screening**

##### *Telecommunications Industry*

Ms. Valentine has conducted numerous environmental assessments, including Phase I ESAs, on telecommunication sites. These have subsurface investigations and National Environmental Policy Act (NEPA) screening reports, which are necessary to comply with Federal Communications Commission (FCC) permitting requirements. Ms. Valentine's NEPA-related work has included research into the presence of potential wilderness and wildlife areas, wetlands, endangered/threatened species, historic places/cultural resources, Indian religious sites and flood plains. She has experience managing NEPA-related projects, preparing reports, and interacting with various client representatives.

#### **Groundwater and Soil Monitoring**

##### *Confidential Clients*

Ms. Valentine has conducted quarterly groundwater and soil monitoring at Superfund sites in Kansas, Missouri and California.

#### **Asbestos Surveys**

##### *Residential and Commercial Real Estate Redevelopment*

Ms. Valentine has conducted numerous Asbestos Hazard Emergency Response Act (AHERA) asbestos surveys for residential real estate and commercial properties slated for demolition and redevelopment.

#### **Environmental Audits**

##### *Commercial Properties*

Ms. Valentine has conducted Annual Environmental Assessments (AEAs) for commercial properties in the Kansas City Metro area.



***Melissa D. Valentine***

## ***Employment History***

Bureau Veritas North America, Inc. – Overland Park, Kansas  
Project Manager  
April 2006 to Present

Haley & Aldrich, Inc. – Lenexa, Kansas  
Environmental Scientist  
2002 to March 2006

## ***Professional Affiliations***

Environmental and Water Resources Institute of Kansas City



## ***Nancy Crow***

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### ***Senior Specialist***

B.A.

Education, 1974  
MidAmerica Nazarene University,  
Olathe, Kansas

Nancy Crow is a senior specialist based in the Bureau Veritas North America, Inc. Kansas City Regional Office.

Currently, Ms. Crow is coordinating National Environmental Protection Act screening projects in the Kansas City Regional Office for a telecommunications client.

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## ***Project Experience***

### **NEPA Evaluation**

*Telecommunications Company*

Ms. Crow has performed necessary inquiries to obtain State Historic Preservation Office concurrence and FCC release on numerous projects in ten Midwestern states. She has also located qualified cultural resources firms to conduct archaeological and architectural surveys.

### **Phase I Environmental Site Assessment**

*Telecommunications Company*

Ms. Crow has reviewed Phase I environmental reports for numerous potential cell tower development sites throughout Kansas, Missouri, South Dakota, North Dakota, Illinois, Minnesota, Iowa, Nebraska, Oklahoma, and Wisconsin.

## ***Employment History***

Bureau Veritas North America, Inc. – Kansas City  
Senior Specialist  
2004 to Present

Canada Life Assurance – Overland Park, Kansas  
Administrative Assistant  
2002 to 2004

Yellow Freight – Overland Park, Kansas  
Relocation Assistant  
2000 to 2002