Environmental Assessment

CSX Fish Camp
AW Solutions #109943-A
FA # 10138249
248 Whitney Street
Satsuma, Florida 32189

Prepared For:
AT&T Mobility, LLC
1101 Greenwood Boulevard, 4th Floor
Lake Mary, Florida 32746

As Requested By:
AW Solutions, Inc.
300 Crown Oak Centre Drive
Longwood, Florida 32750

Trileaf No. 608796

Prepared By:

June 5, 2014
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1. INTRODUCTION

AW Solutions on behalf of AT&T Mobility, LLC (AWS/AT&T) retained Trileaf Corporation (Trileaf) to conduct an Environmental Assessment (EA) of the proposed location of a 27’ tall wood pole communications tower and associated 42 square foot compound located at 248 Whitney Street, Satsuma, Florida 32189; Parcel# 39-11-26-0000-0200-0000. The EA is mandated by the Federal Communications Commission (FCC) (47 CFR 1.1307) in its procedures to implement the National Environmental Policy Act of 1969 (NEPA).

1.1. Purpose

Trileaf evaluated the subject site in accordance with the FCC NEPA procedures outlined in 47 CFR 1.1307. As noted in the NEPA Report, dated March 31, 2014 and provided in Appendix 7.2, all items were answered in the negative, with the exception of 47 CFR 1.1307(a)(6) which states that an environmental assessment must be prepared for facilities that will be located in a floodplain. Therefore, this EA has been conducted to address 47 CFR 1.1307(a)(6). The facility was determined to be located within a 100-year floodplain, as noted on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Panel# 12107C0315 C, dated February 2, 2012, for Putnam County, Florida.

1.2. Limitations and Exceptions to Assessment

The information contained in this report is limited to the visual inspection of the property by a Trileaf representative on December 26, 2013, and research conducted subsequent to the site visit, as discussed in this report.

2. SITE DESCRIPTION

2.1. Property Location

The subject site, proposed to be located at 248 Whitney Street, Satsuma, Florida 32189, is depicted on the topographic map provided in Appendix 7.1 and in the NEPA Report in Appendix 7.2.

2.2. Site Characteristics

The proposed 27’ tall wood pole communications tower and associated equipment will be located in a 42 square foot compound. The 42 square foot area currently consists of a gravel-covered area and brush-covered landscaped area associated with a CSX Transportation Fish Camp facility. Photographs of the site are included in the NEPA Report in Appendix 7.2.

During the site reconnaissance conducted on December 26, 2013, the current use of the surrounding properties was observed. North of the site is an existing fenced compound which houses two (2) diesel AST’s and an associated generator, followed by a freshwater stream, followed by Whitney Street. East of the site is a storage shed, followed by an asphalt covered parking area, followed by wooded land. South of the site is an asphalt-covered parking area, followed by apartment buildings associated with
CSX, followed by the St. John’s River. West of the site is a grass-covered area and tennis courts, followed by Whitney Street, followed by wooded land.

2.3. Proposed Improvements

The proposed 42 square foot compound associated with a 27' wood pole communications tower is proposed to be located at 248 Whitney Street, Satsuma, Florida 32189, as noted on the construction drawings included in Appendix 7.3.

In order to determine if the project was located within the 100-year floodplain, Trileaf reviewed the USGS 7.5 minute topographic map titled “Satsuma NW, FL” Quadrangle and the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Panel# 12107C0315 C, dated February 2, 2012, for Putnam County, Florida.

In addition, a Trileaf scientist conducted site reconnaissance on December 26, 2013. Based on the above information, Trileaf determined that the Property is located in Zone AE, a special flood hazard area subject to inundation by the 1% annual chance flood with established base flood elevations, which have a 1% chance of being equaled or exceeded in any given year. The Base Flood Elevation (BFE) for this site is 5 feet. Based on the findings of this review, “Yes” was marked on the NEPA checklist. The FEMA flood map is provided in Appendix 7.1.

2.4. Zoning

According to the Putnam County Property Appraiser, the zoning classification of the Property is clubs, lodges, and union halls (77). A copy of the building permit issued by the Putnam County Building and Zoning Division or similar local jurisdiction will be forwarded upon receipt.

3. POTENTIAL IMPACTS OF THE PROPOSED TOWER

Trileaf reviewed each of the following criteria to determine if the project had an impact per 47 CFR 1.1307. All of the documentation described below can be found in the NEPA Report in Appendix 7.2.

3.1 Designated Wilderness Areas

Trileaf reviewed the relevant USGS 7.5 minute topographic map titled Satsuma NW, Florida Quadrangle, available hard copy street maps, and information from National Wilderness Preservation System (NWPS) (http://www.wilderness.net/NWPS) to determine if the site is located within an officially designated wilderness area. Based on this review, the project site is not located within an officially designated wilderness area.

3.2 Designated Wildlife Preserves

Trileaf reviewed the USGS 7.5 minute topographic map titled “Satsuma NW, Florida” Quadrangle, available hard copy street maps, and information from the National Wildlife Refuge System (NWRS) website (www.fws.gov/refuges) to determine if the site is located within an officially designated wildlife preserve/refuge. Based on this review, the project site is not located within an officially designated wildlife preserve/refuge.
3.3 Listed and Proposed, Threatened or Endangered Species and Designated Critical Habitat

**FEDERAL**

In accordance with the United States Department of Interior, United States Fish & Wildlife Service (USFWS), Jacksonville Ecological Services Field Office letter dated March 12, 2010, titled *Clearance to Proceed with Communication Towers Projects*, the project site is categorically excluded from further consultation with the USFWS. A copy of the March 12, 2010 USFWS clearance letter is attached and included in the NEPA Report in Appendix 7.2.

**STATE**

In a letter dated January 9, 2014, the Florida Fish and Wildlife Conservation Commission (FWC) informed Trileaf that FWC does not have the resources to provide consultation on communications tower projects. Consequently, the FWC provided Trileaf with Geographic Information System (GIS) files containing all information available in the FWC database regarding known locations of threatened and endangered species and critical habitat. Trileaf determined through review of the FWC database, that no records of listed species occurrences or critical habitats are located on the project site. A copy of January 9, 2014 FWC letter is attached and included in the NEPA Report in Appendix 7.2.

**IBA**

On December 26, 2013, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or critical habitats resulting from the proposed action are not anticipated. A copy of the IBA and project site photograph template are attached and included in the NEPA Report in Appendix 7.2.

3.4 Federally Designated Historic and Cultural Resources

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is contained in, on, or within the viewshed of a building, site, district, structure, or object, significant in American history, architecture, archaeology, engineering, or culture, that is listed, or eligible for listing on the National Registers of Historic Places, or located in or on an Indian Religious Site.

The National Register of Historic Places (NRHP) for listed Florida properties, the Florida Division of Historical Resources (DHR), and the Florida Master Site Files (FMSF), were examined by Mr. Richard Geidel, qualified archaeologist for Johnson, Mirmiran, and Thompson (JMT), to identify any cultural resources within the Area of Potential Effects (APE), a 0.50 mile radius, that could be affected by the project.

It was determined that no historic properties were identified within APE for direct or visual effects. Additionally, the identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to DHR via
Form 620 on January 21, 2014. The DHR concurred that the proposed undertaking would have no direct effects and no visual effects on historic properties. A copy of the DHR concurrence letter is attached and included in the NEPA Report in Appendix 7.2.

**NATIONAL SCENIC TRAILS**

On October 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic or Historic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System (http://www.nps.gov/nts/nts_trails.html) created by the National Trails System Act of 1968 (16 U.S.C. § 1241 et seq.) and the Florida Trail Association (http://www.floridatrail.org/html/gps_data.cfm).

There is one (1) National Scenic Trail located in the State of Florida. The Florida National Scenic Trail courses primarily from Escambia County, FL to Collier County, FL beginning Big Cypress National Preserve and ending at Gulf Islands National Seashore, including the loop around Lake Okeechobee, the loop in the center of the state, the trail from Lake Okeechobee to the Atlantic Ocean, and the spur trail from Harold, FL to the Alabama State line.

According to the information obtained from the NPS and Florida Trail Association, the project site is not located within one mile of Florida National Scenic Trail.

**NATIONAL WILD AND SCENIC RIVERS**

The National Wild and Scenic Rivers Act of 1968 protects designated free-flowing rivers that have "outstanding remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural and other similar values."

In order to determine if the project site is located within one mile of a National Wild or Scenic River, Trileaf reviewed information from the National Wild and Scenic Rivers System (http://www.rivers.gov/wildriverslist.html).

There are two (2) National Wild and Scenic Rivers located in the State of Florida, the Wekiva and Loxahatchee Rivers. The Wekiva River, which consists of its confluence with the St. Johns River to Wekiwa Springs, Rock Springs Run from its headwaters at Rock Springs to the confluence with the Wekiwa Springs Run, and Black Water Creek from the outflow from Lake Norris to the confluence with the Wekiva River, for a total of 41.6 miles. The Loxahatchee River courses from Riverbend Park to Jonathan Dickinson State Park, for a total of 7.6 miles.

According to the information obtained from the National Wild and Scenic River System, the project site is not located within one mile of a National Wild and Scenic River.
3.5 Native American Religious or Sacred Sites

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is located in or on an Indian Religious Site.

On December 20, 2013, Trileaf entered project site information into the Federal Communications Commission (FCC) Tower Construction Notification System (TCNS) who initiated contact with the Indian tribes on December 27, 2013. Trileaf subsequently submitted requested documentation and/or fees as required by interested Indian tribes.

Upon completion of the Tribal consultation process, it was determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that AT&T suspend all construction activities immediately and notify the appropriate persons. Tribal consultation documentation and associated correspondence is attached and included in the NEPA Report in Appendix 7.2.

3.6 Floodplains

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel # 12107C0315C, dated February 2, 2012, obtained from the FEMA Map Service Center website (http://msc.fema.gov), in addition to the FEMA Google Earth™ layer (FEMA_NFHL_v2.4.kmz), to determine if the project site was located within the one percent annual-chance floodplain.

Trileaf determined that the project site is located in Zone AE, areas subject to inundation by the 1-percent-annual-chance flood event. The base flood elevation (BFE) for this site is 5 feet. Therefore, the project site is located within a 100-year floodplain. Based on the findings of the review, “Yes” was marked on the NEPA checklist. A copy of the FIRM showing the project site location is attached and included in Appendix A.

3.7 Surface Features – Wetlands, Deforestation or Fill

The Clean Water Act (40 CFR § 230.3) defines wetlands as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil condition. Wetlands generally include swamps, marshes, bogs, and similar areas.”

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5 minute topographic map titled Satsuma, Florida Quadrangle, and the USFWS National Wetlands Inventory (NWI) map (http://www.fws.gov/wetlands/Wetlands-Mapper.html) that the project site is located south and east adjacent of a Palustrine forested Broad-leaved deciduous/needle-leaved deciduous semipermanently flooded (PFO1/2F) wetland, and north adjacent of a Riverine tidal unconsolidated bottom permanent-tidal (R1UBV) wetland.

Trileaf’s site assessment did not reveal any evidence of hydrology or hydrophytic vegetation located on the project site. A review of the United States Department of Agriculture (USDA), Soil Survey of Putnam County, Florida (1975), determined that soils beneath the project site are classified as Astor mucky fine sand and are designated as
being hydric; however, the project site is located within and immediately adjacent to an existing developed gravel-covered compound and therefore no wetlands are anticipated to be disturbed as a result of the AT&T installation.

The project site consists of an unutilized gravel-covered portion of an existing AST compound, and a gravel-covered area south adjacent to the compound. Therefore, the proposed undertaking will not result in significant deforestation.

Based on review of the referenced information, significant change in surface features resulting from the proposed action are not anticipated.

3.8 Zoning/High Intensity White Lights/Radio Frequency

As a standard practice, AT&T does not construct facilities requiring high intensity white lights that are to be located in residential neighborhoods, as defined by applicable zoning law. According to AT&T, high intensity white lights will not be used for towers less than 500 feet in height. In the event that the FAA requires high intensity white lights to be utilized on such a facility, AT&T will request a dual mode lighting system consisting of red lights for night and medium intensity white lights for daylight and twilight hours.

As specified in 47 CFR § 1.1307(b) the FCC Requires an EA if a particular facility, operation, or transmitter would cause human exposure to levels of radiofrequency (RF) radiation in excess of limits in 47 CFR §§ 1.1310 and 2.1093. It is the responsibility of AT&T to ensure that their facilities, operations, or transmitters comply with the established RF exposure standards outlined in 47 CFR §§ 1.1310 and 2.1093.

3.9. Investigation of Alternative Locations

AWS/AT&T reviewed alternative locations, heights, and designs but there were no other feasible alternatives available to meet RF requirements. AT&T selected this site to improve coverage and capacity for the users of the existing CSX Fish Camp facility. Also, this location is the only location that would be suitable as the limited range antenna needed to be within close proximity of the facility’s existing buildings, which are also located within Zone AE of the 100-year floodplain. Additionally, collocation opportunities were not available in the target coverage area.

3.10. Public Comment

At this time, AWS/AT&T is not aware of any public controversy regarding the proposed project site. On December 26, 2013, Trileaf published a public notice of the proposed construction of the 27' wood pole communications tower within a compound in the Palatka Daily News Newspaper, a daily newspaper published in Putnam County, Florida. Trileaf has received no comments from members of the public regarding this tower.

4. CONCLUSIONS

Trileaf performed a NEPA review as mandated by the Federal Communications Commission (FCC) (47 CFR 1.1307) in its procedures to implement the National Environmental Policy Act of 1969 (NEPA). Details of the NEPA review are outlined in Trileaf’s NEPA, dated March 31, 2014. The NEPA review identified one NEPA item,
which was answered in the affirmative. A NEPA summary checklist is provided in Appendix 7.2.

This EA has been conducted to address 47 CFR 1.1307(a)(6), which states that an environmental assessment must be prepared for facilities that will be located in a floodplain. The facility is within the 100-year floodplain. However, the effect on potential flood waters is small, given the small size of the lease area.

Trileaf recommends that a Finding of No Significant Impact be given to this project.
5. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

This Environmental Assessment was performed in accordance with the generally accepted practices in the field of environmental consulting. The analysis and recommendations indicated in this report are based upon the best current available information that could be obtained in the specified time frame. TRILEAF assumes no liability for unauthorized, independent conclusions or recommendations made by others in conjunction with the data presented in this report.

Respectfully submitted,

TRILEAF Corporation

Brian Brandon
Project Scientist

Doug N. Butler
Group Manager
6. QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

Douglas N. Butler, Group Manager

Mr. Butler holds a B.S. Degree in Fisheries and Wildlife from the University of Missouri with a minor in Biology. Mr. Butler has extensive expertise conducting Phase I and II Environmental Site Assessments, NEPA site reviews and EAs, and NPA site reviews. Mr. Butler has conducted and overseen architectural reviews and Tribal consultations in accordance with Section 106 of the National Preservation Act on over 300 projects while at Trileaf. He also has experience conducting soil characterization and testing, threatened and endangered species and migratory bird surveys, remediation activities, and wetland delineation. Mr. Butler has 40-hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response training, U.S. Army Corp of Engineers Wetland Delineation and Management training, and ASTM Environmental Site Assessment training for Commercial Real Estate.

Brian Brandon, Project Scientist

Mr. Brandon holds a B.S. Degree in Biology from the University of Central Florida. Mr. Brandon has experience performing migratory bird evaluations, Gopher Tortoise surveys and relocations, NEPA reviews, Environmental Assessments, and Phase I and Phase II Environmental Site Assessments (ESAs) for commercial and wireless communications projects. He also has conducted historical reviews and tribal consultations in accordance with Section 106 of the National Historic Preservation Act. Mr. Brandon also has 40-hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response training.
Appendix 7.1
Site Maps
Satsuma, FL Quad (Current DeLorme)
NW ¼ of SW ¼ of Section 39, Township 11 S, Range 26 E
Contour Interval = 5 Feet

Scale
1 Inch = 2,000 Feet

Historical Topographic Map
AT&T – CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189
Satsuma, FL Quadrangle

USFWS – National Wetland Inventory Map

Property Location

National Wetlands Inventory Map
AT&T – CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189
Appendix 7.2
NEPA Report
Environmental Assessment Required

NEPA Report

CSX Fish Camp
AW Solutions #109943-A
FA # 10138249
248 Whitney Street
Satsuma, Florida 32189

Prepared For:
AT&T Mobility, LLC
1101 Greenwood Boulevard, 4th Floor
Lake Mary, Florida 32746

As Requested By:
AW Solutions, Inc.
300 Crown Oak Centre Drive
Longwood, Florida 32750

Trileaf No. 608796

Prepared By:

TRILEAF
ENVIRONMENTAL & PROPERTY CONSULTANTS

April 1, 2014
Site Name/Address: AT&T Mobility - CSX Fish Camp FA10138249
248 Whitney Street, Satsuma, Putnam County, Florida 32189
Latitude: 29.537852° N        Longitude: 81.695290° W

Proposed Project Description: Proposed construction of a 27' tall wood pole communications tower, and the placement of associated equipment within a 42 square foot lease area.

1. Is the facility located in an officially designated wilderness area? [47 CFR 1.1307 (a)(1)]
   - Yes ☐ No ☑ Data Sources: Review of 7.5 Minute USGS Topographic Map titled "Satsuma, FL" (attached)
     Review of National Wilderness Preservation System website (www.wilderness.net)

2. Is the facility located in an officially designated wildlife preserve? [47 CFR 1.1307 (a)(2)]
   - Yes ☐ No ☑ Data Sources: Review of 7.5 Minute USGS Topographic Map titled "Satsuma, FL" (attached)
     Review of National Wildlife Refuge System website (www.fws.gov/refuges)

3. Will the facility: (i) affect listed threatened or endangered species or designated critical habitats; or (ii) jeopardize the continued existence of any proposed endangered or threatened species; or is it likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973? [47 CFR 1.1307 (a)(3)]
   - Yes ☐ No ☑ Data Sources: Review of Florida Fish and Wildlife Conservation Commission GIS data
     Informal Biological Assessment (attached)

4. Will the facility be located in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places? [47 CFR 1.1307 (a)(4)]
   - Yes ☐ No ☑ Data Sources: Florida State Historic Preservation Office Section 106 Review (attached)
     Review of National Park Service National Trails System (www.nps.gov)
     Review of National Wild and Scenic Rivers System (www.rivers.gov)

5. Will the facility affect an Indian religious site? [47 CFR 1.1307 (a)(5)]
   - Yes ☐ No ☑ Data Sources: Florida State Historic Preservation Office Section 106 review (attached)
     Correspondence with Native American Tribes via TCNS (attached)

6. Will the facility be located in a "floodplain"? [47 CFR 1.1307 (a)(6)]
   - Yes ☑ No ☐ Data Sources: Review of FEMA Flood Map panel #12107C0315C, dated February 2, 2012 (attached)

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)? [47 CFR 1.1307 (a)(7)]
   - Yes ☐ No ☑ Data Sources: Review of 7.5 Minute USGS Topographic Map titled "Satsuma, FL" (attached)
     Review of USFWS National Wetlands Inventory map (attached)
     Review of USDA Soil Survey of Putnam County, Florida
     Site Reconnaissance

Signature: Brian Brandon
Date: 4/1/2014
Name: Brian Brandon
Company: Trileaf Corporation
Trileaf Corporation (Trileaf) completed a NEPA Land Use Checklist for the above-referenced AT&T Mobility (AT&T) site. The purpose of a NEPA Land Use Checklist is to comply with the National Environmental Policy Act (NEPA) of 1969. Trileaf performed extensive research by consulting with appropriate state and federal agencies and reviewing readily available published lists, files, data, and maps to provide our clients with a complete NEPA document. The following summarizes the scope of work Trileaf performed in accordance with the Federal Communications Commissions (FCC) rules implementing NEPA (47 CFR Section 1.1307 (a) (1) through (8)) to determine whether any of the below listed FCC special interest items would be affected by the proposed action. If the proposed action is determined to fall within one of the special interest items within Section 1.1307, Section 1.1308(a) requires that an Environmental Assessment (EA) be prepared to address such item(s) and subsequently filed with the FCC for review. Referenced materials are included as attachments, where applicable and available.

AT&T is proposing to construct a 27’ wood pole communications tower and place associated equipment within an approximately 42 square foot lease area; hereinafter referred to as the “Project Site”. All associated facilities will be housed within the approximately 42 square foot leased area. Utilities will be brought to the site underground via an existing utility pole. Access to the site is from an existing access easement to the south.

1. Will the facility be located in an officially designated wilderness area?

Trileaf reviewed the relevant USGS 7.5 minute topographic map titled Satsuma, Florida Quadrangle, available hard copy street maps, and information from National Wilderness Preservation System (NWPS) (http://www.wilderness.net/NWPS) to determine if the site is located within an officially designated wilderness area.

There are currently 17 officially designated wilderness areas in the State of Florida. The closest wilderness area to the project site is the Little Lake George Wilderness Area, which is located approximately 5 miles south of the project site.

Based on this review, the project site is not located within an officially designated wilderness area. A copy of the topographic map showing the project site location is attached and included in Appendix A.

2. Will the facility be located in an officially designated wildlife preserve?

Trileaf reviewed the relevant USGS 7.5 minute topographic map titled Satsuma, Florida Quadrangle, available hard copy street maps, and information from National Wildlife Refuge System (NWRS) (http://www.fws.gov/refuges) to determine if the site is located within an officially designated wildlife preserve/refuge.
There are currently 29 officially designated wildlife preserves/refuges in the State of Florida. Lake Woodruff National Wildlife Reserve is located approximately 32 miles southeast of the project site.

Based on this review, the project site is not located within an officially designated wildlife preserve/refuge. A copy of the topographic map showing the project site location is attached and included in Appendix A.

3. Will the facility (i) affect listed threatened or endangered species or designated critical habitat; or (ii) likely jeopardize the continued existence of any proposed endangered or threatened species or likely result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973?

The Endangered Species Act (ESA) of 1973 (16 U.S.C. §§ 1536), as amended, protects endangered and threatened species and the ecosystems upon which they depend. As interpreted and implemented by 50 CFR 402, Section 7 of the ESA directs Federal agencies, in consultation with and with the assistance of the Secretary of the Interior, to utilize their authorities to further the purposes of the ESA. It also requires every Federal agency to insure that any action it authorizes, funds or carries out, is not likely to jeopardize the continued existence of any endangered or threatened species or results in the destruction or adverse modification of critical habitat.

FEDERAL
In accordance with the United States Department of Interior, United States Fish & Wildlife Service (USFWS), Jacksonville Ecological Services Field Office letter dated March 12, 2010, titled Clearance to Proceed with Communication Towers Projects, the project site is categorically excluded from further consultation with the USFWS. A copy of the March 12, 2010 USFWS clearance letter is attached and included in Appendix B.

STATE
In a letter dated January 9, 2014, the Florida Fish and Wildlife Conservation Commission (FWC) informed Trileaf that FWC does not have the resources to provide consultation on communications tower projects. Consequently, the FWC provided Trileaf with Geographic Information System (GIS) files containing all information available in the FWC database regarding known locations of threatened and endangered species and critical habitat. Trileaf determined through review of the FWC database, that no records of listed species occurrences or critical habitats are located on the project site. A copy of January 9, 2014 FWC letter is attached and included in Appendix B.

IBA
On December 26, 2013, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or
critical habitats resulting from the proposed action are not anticipated. A copy of the IBA and project site photograph template are attached and included in Appendix B.

4. Will the facility affect 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?

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is contained in, on, or within the viewshed of a building, site, district, structure, or object, significant in American history, architecture, archeology, engineering, or culture, that is listed, or eligible for listing on the National Registers of Historic Places, or located in or on an Indian Religious Site.

The National Register of Historic Places (NRHP) for listed Florida properties, the Florida Division of Historical Resources (DHR), and the Florida Master Site Files (FMSF), were examined by Mr. Richard Geidel, qualified archaeologist for Johnson, Mirmiran, and Thompson (JMT), to identify any cultural resources within the Area of Potential Effects (APE), a 0.50 mile radius, that could be affected by the project.

It was determined that no historic properties were identified within APE for direct or visual effects. Additionally, the identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to DHR via Form 620 on January 21, 2014. The DHR concurred that the proposed undertaking would have no direct effects and no visual effects on historic properties. A copy of the DHR concurrence letter is attached and included in Appendix C.

NATIONAL SCENIC TRAILS

On October 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic or Historic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System (http://www.nps.gov/nts/nts_trails.html) created by the National Trails System

There is one (1) National Scenic Trail located in the State of Florida. The Florida National Scenic Trail courses primarily from Escambia County, FL to Collier County, FL beginning Big Cypress National Preserve and ending at Gulf Islands National Seashore, including the loop around Lake Okeechobee, the loop in the center of the state, the trail from Lake Okeechobee to the Atlantic Ocean, and the spur trail from Harold, FL to the Alabama State line.

According to the information obtained from the NPS and Florida Trail Association, the project site is not located within one mile of Florida National Scenic Trail.

**NATIONAL WILD AND SCENIC RIVERS**

The National Wild and Scenic Rivers Act of 1968 protects designated free-flowing rivers that have "outstanding remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural and other similar values."

In order to determine if the project site is located within one mile of a National Wild or Scenic River, Trileaf reviewed information from the National Wild and Scenic Rivers System (http://www.rivers.gov/wildriverslist.html).

There are two (2) National Wild and Scenic Rivers located in the State of Florida, the Wekiva and Loxahatchee Rivers. The Wekiva River, which consists of its confluence with the St. Johns River to Wekiwa Springs, Rock Springs Run from its headwaters at Rock Springs to the confluence with the Wekiwa Springs Run, and Black Water Creek from the outflow from Lake Norris to the confluence with the Wekiva River, for a total of 41.6 miles. The Loxahatchee River courses from Riverbend Park to Jonathan Dickinson State Park, for a total of 7.6 miles.

According to the information obtained from the National Wild and Scenic River System, the project site is not located within one mile of a National Wild and Scenic River.

5. **Will the facility affect any Indian religious sites?**

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is located in or on an Indian Religious Site.

On December 20, 2013, Trileaf entered project site information into the Federal Communications Commission (FCC) Tower Construction Notification System (TCNS)
who initiated contact with the Indian tribes on December 27, 2013. Trileaf subsequently submitted requested documentation and/or fees as required by interested Indian tribes.

Upon completion of the Tribal consultation process, it was determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that AT&T suspend all construction activities immediately and notify the appropriate persons. Tribal consultation documentation and associated correspondence is attached and included in Appendix D.

6. Will the facility be located in a floodplain?

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel # 12107C0315C, dated February 2, 2012, obtained from the FEMA Map Service Center website (http://msc.fema.gov), in addition to the FEMA Google Earth™ layer (FEMA_NFHL_v2.4.kmz), to determine if the project site was located within the one percent annual-chance flood plain.

Trileaf determined that the project site is located in Zone AE, areas subject to inundation by the 1-percent-annual-chance flood event. The base flood elevation (BFE) for this site is 5’. Therefore, the project site is located within a 100-year floodplain. Based on the findings of the review, “yes” was marked on the NEPA checklist. A copy of the FIRM showing the project site location is attached and included in Appendix A.

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)?

The Clean Water Act (40 CFR § 230.3) defines wetlands as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil condition. Wetlands generally include swamps, marshes, bogs, and similar areas.”

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5 minute topographic map titled Satsuma, Florida Quadrangle, and the USFWS National Wetlands Inventory (NWI) map (http://www.fws.gov/wetlands/Wetlands-Mapper.html) that the project site is located south and east adjacent of a Palustrine forested Broad-leaved deciduous/needle-leaved deciduous semipermanently flooded (PFO1/2F) wetland, and north adjacent of a Riverine tidal unconsolidated bottom permanent-tidal (R1UBV) wetland.

Trileaf’s site assessment did not reveal any evidence of hydrology or hydrophytic vegetation located on the project site. A review of the United States Department of Agriculture (USDA), Soil Survey of Putnam County, Florida (1975), determined that
soils beneath the project site are classified as Astor mucky fine sand and are designated as being hydric; however, the project site is located within and immediately adjacent to an existing developed gravel-covered compound and therefore no wetlands are anticipated to be disturbed as a result of the AT&T installation.

The project site consists of an unutilized gravel-covered portion of an existing AST compound, and a gravel-covered area south adjacent to the compound. Therefore, the proposed undertaking will not result in significant deforestation.

Based on review of the referenced information, significant change in surface features resulting from the proposed action are not anticipated. A copy of the NWI map showing the project site location is attached and included in Appendix A.

8. High Intensity White Lights/Radio Frequency

As a standard practice, AT&T does not construct facilities requiring high intensity white lights that are to be located in residential neighborhoods, as defined by applicable zoning law. According to AT&T, high intensity white lights will not be used for towers less than 500 feet in height. In the event that the FAA requires high intensity white lights to be utilized on such a facility, AT&T will request a dual mode lighting system consisting of red lights for night and medium intensity white lights for daylight and twilight hours.

As specified in 47 CFR § 1.1307(b) the FCC Requires an EA if a particular facility, operation, or transmitter would cause human exposure to levels of radiofrequency (RF) radiation in excess of limits in 47 CFR §§ 1.1310 and 2.1093. It is the responsibility of AT&T to ensure that their facilities, operations, or transmitters comply with the established RF exposure standards outlined in 47 CFR §§ 1.1310 and 2.1093.
Appendix A
Site Vicinity Maps
Putnam County, FL
February 2, 2012
Community Panel # 12107C0315C
Zone AE – Areas inside the 1% annual chance flood plain

FEMA Flood Insurance Rate Map
AT&T – CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189
Appendix B
Threatened and Endangered Species,
Designated Critical Habitat
United States Department of the Interior  
U. S. FISH AND WILDLIFE SERVICE  
7915 BAYMEADOWS WAY, SUITE 200  
JACKSONVILLE, FLORIDA 32256-7517

CLEARANCE TO PROCEED WITH COMMUNICATION TOWER PROJECTS

Revised and Updated: March 12, 2010 (Updated external internet site links only)

Background

The U.S. Fish and Wildlife Service is the lead Federal Agency charged with the protection and conservation of Federal Trust Resources, such as threatened and endangered species and migratory birds, in accordance with section 7 of the Endangered Species Act of 1973, as amended (ESA) (87 Stat. 884; 16 U.S.C. 1531 et seq.), the Bald and Golden Eagle Protection Act, (16 U.S.C. 668-668d) (Eagle Act), and the Migratory Bird Treaty Act (40 Stat. 755; 16 U.S.C. 701 et seq.). Included in this mandate is the review of projects involving communication towers. The Federal Communications Commission (FCC) authorizes such projects, and as part of its authorization and obligations under the ESA and National Environmental Policy Act (NEPA), requires a project environmental impact review. Such projects primarily involve new tower construction, co-location of antennas on existing communication towers or other structures, and the repair, maintenance or relicensing of existing structures.

With the recent and continuing advances in cellular communication technology, and resulting widespread consumer demand for this service, the Jacksonville Ecological Services Field Office has experienced a significant increase in the number of requests for review of these projects. To fulfill our ESA statutory obligations in a timely and consistent manner, and to assist communication companies in addressing FCC and NEPA environmental impact review requirements, we provide the following guidance and clearance. The guidance is largely based on our agency’s Interim Guidelines for Recommendations on Communication Tower Siting, Construction, Operation, and Decommissioning. This document is posted on our national web site, and may be reviewed and downloaded by accessing http://www.fws.gov/migratorybirds/issues/towers/comtow.html.

Federally Listed Species Assessment

For new tower construction and related activities, applicants are responsible for conducting an initial assessment and possible site survey to determine if any federally listed species occur within, or in proximity to, the project footprint.

Our office web site, http://www.fws.gov/northflorida contains information on such species, including the location of wood stork (Mycteria americana) nesting colonies, as well as survey protocols for scrub-jays (Aphelocoma coerulescens) and sand skinks (Neoseps reynoldsi).
Information on known bald eagle (Haliaeetus leucocephalus) nests is available via a link on our web site or through http://myfwc.com/eagle/Eagle_Index.htm.

For projects located in suitable nesting or foraging habitat for the red-cockaded woodpecker (Picoides borealis) that are on public lands, contact the land owner/manager for location information. On private lands, go to http://www.fws.gov/rcwrecovery/recovery_plan.html for the survey protocol.

To further assist you with project analysis, we recommend that you consult the following additional electronic sources of information.

- The Florida Natural Areas Inventory website provides information on major feeding sites and congregations of large numbers of migratory and resident birds (http://www.fnai.org/);

- The Service’s migratory bird website provides useful information concerning migratory birds, and for bald eagles - the National Bald Eagle Management Guidelines (http://www.fws.gov/migratorybirds); and

- Locations of wading bird breeding colonies can be obtained at http://myfwc.com/waders/.

If the site assessment and/or survey reveals listed species within the project footprint, the project should be forwarded to our office for further evaluation and possible consultation.

Project Design & Maintenance

If an assessment or survey does not detect federally-listed species within the project footprint, we have determined that the following types of projects and project specifications are not likely to adversely affect federally listed species or have significant adverse impacts on migratory birds. For projects that meet the criteria listed below, NO further coordination with the Service is necessary. This guidance may also be used as a general clearance for all future projects meeting these criteria.

1. **The construction of lattice or monopole design communication towers less than 200 feet in total height that do not contain guy wires.** The tower must be located in previously disturbed, urbanized or developed areas or areas that do not represent potential habitat for federally listed species. In addition, the tower must be located at least 2500 feet from any known active wood stork or other wading bird nesting colony.

2. **The construction of guyed communication towers between 200 and 400 feet tall, located as in (a) above, and provided the guy wires are equipped with bird diverter devices and the tower is lighted with a white or red strobe light operating at the minimum allowable intensity.** This type of lighting is far less attractive to migratory birds than continuous or pulsating, incandescent red or white lights, regardless of
their intensity or frequency or duration of pulsation. The same provisions in (a) regarding bald eagle nests and wood stork and other wading bird breeding colonies, applies.

3. The co-location of a new antenna on an existing communication tower or mounting of a new antenna on an existing structure (e.g., light pole, billboard, water tower, building). Such work shall not increase the tower height above 400 feet, require the construction of a new access road, nor result in additional disturbance of the site; and

4. The repair, maintenance, or replacement of an existing communication tower, provided that the activity does not increase the height of the tower above 400 feet or increase its footprint into natural vegetative communities, and is conducted outside of the October 15 – May 1 nesting season of any bald eagle nesting on the structure. Please Note: The bald eagle was removed from the protections of the ESA (delisted) in August 2007; however, a final Rule that implements a permit program designed to protect bald and golden eagle populations in the future was published in the Federal Register on September 11, 2009. These final regulations authorize the limited take of bald and golden eagles through the issuance of permits under the Eagle Act where the take to be authorized is associated with otherwise lawful activities. These regulations also establish permit provisions for intentional take of eagle nests where necessary to ensure public health and safety, and in other limited circumstances. Please refer to the following website link for more information and application procedures: http://www.fws.gov/migratorybirds/baldeagle.htm. For any questions regarding this rule or bald eagle protection issues, please contact Migratory Birds Division at the number referenced below. Note: Ospreys (Pandion haliaetus) frequently nest on communication towers, and the nesting in Florida may extend throughout all months of the year. Confirmed nests that are inactive (no eggs or young in nesting) have no special protections under the Migratory Bird Treaty Act, and although nest removal is allowed, we recommend nest removal only be undertaken if there are no alternatives to the required work. Where the proposed work is associated with an existing tower supporting an active osprey nest, refer to our national migratory bird website, and/or contact our Southeastern Regional Division of Migratory Birds in Atlanta, GA at (404)-679-7049 for further guidance prior to any work.

For existing towers that do not include any modification, footprint expansion or construction, and meet the criteria below, no further coordination with the Service is necessary. This includes those projects for relicensing of existing towers. Therefore, this guidance may also be used as a general clearance for all existing projects meeting these criteria.

1. The existing lattice or monopole design communication towers less than 200 feet in total height that do not contain guy wires.

2. The existing lattice communication towers or guyed communication towers between 200 and 400 feet tall provided the guy wires are equipped with bird diverter devices and the tower is lighted with white strobe lights with the maximum off period
between flashes (3 seconds is current maximum allowable). This type of lighting is far less attractive to migratory birds than continuous or pulsating, incandescent red or white lights, regardless of their intensity or frequency or duration of pulsation.

For those projects that do not meet these criteria our only available recommendations are:

1. Reduce the height of the tower,

2. Light the tower with a white or red strobe light operating at the minimum allowable intensity: as noted in item 2 above.

Our agency appreciates your cooperation in the protection of Federally-listed species in Florida.

Sincerely,

[Signature]

David L. Hankla
Field Supervisor
January 29, 2014

Dear All:

This letter is in response to your requests for information regarding FCC NEPA screening. Our section (Information Science and Management within Fish and Wildlife Research Institute) of the Florida Fish and Wildlife Conservation Commission (FWC) does not provide assessments of potential impact to threatened and/or endangered species. The FWC Fish and Wildlife Research Institute, GIS and Mapping web page (http://www.myfwc.com/research/gis/) provides links and access to frequently requested data sets, species location data, as well as FWC project specific data and base data layers. This web page provides downloads of the data in both shapefile and KML format. The FWC Quick Map page (http://atoll.floridamarine.org/Quickmaps/KMZ_download.htm) provides easy access to many of our frequently requested data sets via a Google Earth viewer. You may also request a CD/DVD of the data by submitting a data request via GISrequests@myfwc.com.

Ordinarily, if another agency wishes to get our input on the potential effects of a proposed project on fish and wildlife resources, that request is sent to the FWC’s Office of Policy and Stakeholder Coordination. I’ve spoken with the Director of that office, Ms. Mary Ann Poole, and she has indicated that the number of such requests coming in far outweigh FWC’s staff resources to provide input. Consequently, it is likely that the only input that the FWC will be able to provide on requests such as yours will be the information we have in our GIS system, as opposed to specific analyses of potential impacts.

I hope you find this information useful. If you have any questions regarding the data, please feel free to contact me at 850-488-0588.

Sincerely,

Jan Stearns
Staff Assistant/Records Tech.

cc: Jennifer Goff, FWCC, Conservation Planning Services Section
     Scott Sanders, FWCC, HSC
April 1, 2014

RE: Informal Biological Assessment
Site Name: CSX Fish Camp
Trileaf Project #608796

TRILEAF performed an Informal Biological Assessment (IBA) on the referenced site. The purpose of this assessment is to determine if the proposed undertaking will (i) affect listed threatened or endangered species or designated critical habitat; or (ii) likely jeopardize the continued existence of any proposed threatened or endangered species or likely result in the destruction or adverse modification of proposed critical habitats.

The project site includes a proposed 27’ wood pole communications tower and associated 42 square foot lease site located at 248 Whitney Street, Satsuma, Putnam County, Florida 32189. The project site currently consists of an approximately 42 square foot gravel-covered lease area, associated with an existing gravel-covered compound. During Trileaf’s onsite assessment on December 26, 2013 the current use of the surrounding properties was observed. North of the site is an existing fenced compound which houses two (2) diesel AST’s and an associated generator, followed by a freshwater stream, followed by Whitney Street. East of the site is a storage shed, followed by an asphalt covered parking area, followed by wooded land. South of the site is an asphalt-covered parking area, followed by apartment buildings associated with CSX, followed by the St. John’s River. West of the site is a grass-covered area and tennis courts, followed by Whitney Street, followed by wooded land. A copy of the topographic map showing the project site location is attached.

ENDANGERED AND THREATENED SPECIES
In order to determine if the project site is located in an area documented to have occurrences of listed or proposed, threatened and endangered species or designated critical habitat, Trileaf researched the following available resources to assist in our assessment:

- U.S. Fish & Wildlife Endangered species website

- U.S. Fish & Wildlife Services Critical Habitat Portal

- U.S. Fish & Wildlife Services (USFWS) Migratory Bird Program website

- The Florida Natural Areas Inventory Website, searched August 23, 2013
The below table represents a list of listed or proposed, threatened and endangered species that potentially, likely, or have been documented to occur in Putnam County, Florida. The proposed lease area is not located within an aquatic environment; therefore any obligate aquatic species should not be directly impacted by the proposed development and are not included in the table below. Additionally, due to the high disturbance and the developed use of the lease area it is unlikely that any natural vegetation remains; therefore, plant species are not included in the table below. The list of remaining species and site observations are summarized in the following table:

<table>
<thead>
<tr>
<th>Species</th>
<th>Species observed?</th>
<th>Habitat observed?</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bald Eagle (Haliaeetus leucocephalus)</td>
<td>No</td>
<td>Yes</td>
<td>Requires riparian habitat with mature trees adjacent to a stream, lake or reservoir.</td>
</tr>
<tr>
<td>Eastern Indigo Snake (Drymarchon couperi)</td>
<td>No</td>
<td>No</td>
<td>Found in high pine, tropical hardwood hammock, scrubby high pine, mesic temperate hammock, pine rockland, dry prairie, seepage swamp, flowing water swamp and mangrove, thus site is not suitable.</td>
</tr>
<tr>
<td>Florida Black Bear (Ursus americanus floridanus)</td>
<td>No</td>
<td>No</td>
<td>Requires wide variety of forested communities to support varied season diet. Forested wetlands are particularly important for diurnal cover; baygalls are important for cover and dens; site is not suitable.</td>
</tr>
<tr>
<td>Species</td>
<td>Species observed?</td>
<td>Habitat observed?</td>
<td>Comments</td>
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<tr>
<td>----------------------------------------</td>
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</tr>
<tr>
<td>Florida Sandhill Crane (&lt;i&gt;Grus Canadensis pratensis&lt;/i&gt;)</td>
<td>Yes</td>
<td>No</td>
<td>Found in prairies, freshwater marshes, and pasturelands. Avoids forest and deep marshes but uses transition zones and edges between these and prairies or pasture lands. Also found in agricultural, commercial, and residential areas. Site is not suitable.</td>
</tr>
<tr>
<td>Florida Scrub Jay (&lt;i&gt;Aphelocoma coerulescens&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Found in fire-dominated oak scrub underlain by well-drained sandy soils, normally with low density vegetation, thus site is not suitable.</td>
</tr>
<tr>
<td>Gopher Tortoise (&lt;i&gt;Gopherus polyphemus&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Typically found in dry upland habitats, including sandhills, scrub, xeric oak hammock, and dry pine flatwoods; also commonly uses disturbed habitats such as pastures, old fields, and road shoulders; site is not suitable.</td>
</tr>
<tr>
<td>Red-cockaded Woodpecker (&lt;i&gt;Picoides borealis&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Found in open, mature pine woodlands that have a diversity of grass, forb, and shrub species, thus site is not suitable.</td>
</tr>
<tr>
<td>Sand Skink (&lt;i&gt;Noeseps reynoldsi&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Found in various scrub habitats, and requires large patches of ground with no canopy or groundcover, thus habitat is not suitable.</td>
</tr>
<tr>
<td>Southeastern American Kestrel (&lt;i&gt;Falco sparverius paulus&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Requires open pine habitat, woodland edges, prairies, and pastures throughout Florida. Nests in tall dead trees or power poles with unobstructed view of surroundings; sandhill preferred, thus site is not suitable.</td>
</tr>
<tr>
<td>Wood Stork (&lt;i&gt;Mycteria americana&lt;/i&gt;)</td>
<td>No</td>
<td>No</td>
<td>Found in cypress and mangrove swamps, thus site is not suitable.</td>
</tr>
</tbody>
</table>

During the site assessment, Trileaf observed the project site was located within Bald Eagle habitat. However, no Bald Eagle nests were observed to be located on or within 660’ of the project site, and the project site is located on previously disturbed land. Therefore, the proposed
development should not affect any Bald Eagle habitat or nests. No other above-listed species or potentially suitable habitat was observed on the project site or immediate surroundings. Potentially suitable foraging habitat was observed for the Florida Sandhill Crane (\textit{Grus canadensis pratensis}); however, neither suitable nesting habitat nor the species was observed on the project site or the immediate surroundings.

Trileaf reviewed the FWC database of documented Bald Eagle (\textit{Haliaeetus leucocephalus}) nests (https://public.myfwc.com/FWRI/EagleNests/nestlocator.aspx). According to the database, there was one (1) Bald Eagle nest located approximately 0.90 miles south of the project site. The nest (PU159) was last known to be active in 2003. A copy of the database search results is attached and included in Appendix B.

Trileaf reviewed the FWC database of documented waterbird colonies (http://atoll.floridamarine.org/waterBirds/). According to the database, there were no known waterbird colonies located within 2,500 feet of the project site. A copy of the database search results is attached and included in Appendix B.

During site assessment activities, the project site was evaluated for the presence of the gopher tortoise (\textit{Gopherus polyphemus}). Upon evaluation of the project area and surroundings, no gopher tortoises or associated burrows were observed.

Based on our assessment of the project site and its immediate surroundings, the proposed site development will not affect any listed or proposed, threatened and endangered species.

**MIGRATORY BIRDS**

On December 9, 2011, the Federal Communications Commission (FCC) released an Order on Remand, effective June 18, 2012, that includes interim procedural measures to ensure that environmental effects of proposed communications towers, including their effects on migratory birds, are fully considered prior to tower construction. This interim procedure subjects towers requiring notification to the Federal Aviation Administration (FAA) be registered in the FCC’s Antenna Structure Registration (ASR) system and are subsequently subjected to additional environmental review. Notification to the FAA is generally required for any antenna structure that is over 200 feet in height above ground level or that meets certain other criteria, such as proximity to an airport runway.

Based on review of the FCC’s TOWAIR Determination System (http://wireless2.fcc.gov/UlsApp/AsrSearch/towairSearch.jsp), the subject tower does not require registration and as a result is not lawfully required to be registered and subjected to additional environmental review.

Migratory birds have been documented to occur within the State of Florida and the project site is located within the Atlantic Flyway; however, based on the project information provided by
AT&T, consideration has been given to the USFWS voluntary guideline titled *2013 U.S. Fish and Wildlife Service (USFWS) Revised Voluntary Guidelines for Communications Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning Dated September 27, 2013.* AT&T has proposed a tower to be built without guy wires, less than 200 feet in height, and will not require any marking or lighting, unless installed voluntarily. Additionally, this tower will be constructed to accept future colocations, thus reducing the need to build additional towers within the immediate project area. Furthermore, it was determined that the project will not affect listed, proposed, or candidate threatened or endangered species or their habitats, the project site is not located in or near a large waterway, native grassland or forest area, ridge-line, mountain top, coastline or area commonly known to have high incidences of fog, mist or low clouds, where migratory birds may be located.

**DESIGNATED CRITICAL HABITAT**

Designated Critical Habitat is defined by the ESA as “geographic areas that contain the physical or biological features that are essential to the conservation of the species and that may need special management or protection.”

Trileaf reviewed 50 CFR, Wildlife and Fisheries, Parts 17.95, 17.96 and Part 226 as well as the information available in the U.S. Fish & Wildlife Services Critical Habitat Portal (http://criticalhabitat.fws.gov/crithab/), to determine if the proposed action would result in the destruction or adverse modification of proposed critical habitats. According to both sources, there is no terrestrial designated critical habitat on the project site or immediate surroundings. According to the USFWS Critical Habitat Portal, approximately 300’ south and west of the project site is designated critical habitat for the West Indian Manatee (*Trichechus manatus*). A copy of the portal search results is attached and included in Appendix B.

Based on the efforts undertaken during our IBA, project specifications and the current data made available, we have concluded that there is minimal potential for the proposed project to have a significant effect on listed or proposed, threatened and endangered species, their designated critical habitat, or migratory birds.
Site Photograph 1, Looking North at the Property

Site Photograph 2, Looking South at the Property

Site Photographs
AW Solutions - CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189

Photographed: 12-26-2013
Photographs

AW Solutions - CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189

Photographed: 12-26-2013

TRILEAF™
ENVIRONMENTAL & PROPERTY CONSULTANTS
Site Photograph 5, Looking North Away From Property

Site Photograph 6, Looking South Away From Property
Site Photograph 7, Looking West Away From Property

Site Photograph 8, Looking East Away From Property

Photographs
AW Solutions - CSX Fish Camp
248 Whitney St.
Satsuma, FL 32189

Photographed: 12-26-2013

TRILEAF
ENVIRONMENTAL & PROPERTY CONSULTANTS
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<tr>
<td>TRILEAF™ ENVIRONMENTAL &amp; PROPERTY CONSULTANTS</td>
<td></td>
</tr>
</tbody>
</table>

Site Photograph 9, Waterway North of Property

Site Photograph 10, Shrubs on the Property to be removed
This report was generated using the bald eagle nest locator at https://public.myfwc.com/FWRI/EagleNests/nestlocator.aspx on 2/6/2014 1:55:06 PM.

Search Entered: Within 1 miles of latitude 29.537852 and longitude -81.69529; All Search Results
1 record(s) were found; 1 record(s) are shown

Bald Eagle Nest Map:

Bald Eagle Nest Data Search Results:

<table>
<thead>
<tr>
<th>Letter</th>
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<th>Longitude</th>
<th>Town -ship</th>
<th>Range</th>
<th>Section</th>
<th>Gaz Page</th>
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<th>Last Surveyed</th>
<th>Act 08</th>
<th>Act 09</th>
<th>Act 10</th>
<th>Act 11</th>
<th>Act 12</th>
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<tbody>
<tr>
<td>A</td>
<td>PU159</td>
<td>Putnam</td>
<td>29 31.50</td>
<td>81 41.60</td>
<td>11S</td>
<td>26E</td>
<td>44</td>
<td>67</td>
<td>2003</td>
<td>2010</td>
<td>*</td>
<td>*</td>
<td>U</td>
<td>*</td>
<td>*</td>
<td>0.90</td>
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</table>

*"Y" denotes an active nest
*"N" denotes an inactive nest
*"U" denotes a nest that was visited but status was undetermined
*"* denotes a nest that was not surveyed
CSX Fish Camp

Critical Habitat Map

Property Location
Appendix C
Section 106 Review
Mr. Douglas Butler  
Trileaf Corporation  
2700 Westhall Lane, Suite 200  
Maitland, Florida 32751  

RE: DHR Project File No.: 2014-0309  
Received by DHR: January 27, 2014  
Federal Communication Commission  
New Tower Site Assessment by JMT  
Trileaf Project # 608796 (CSX Fish Camp)  
248 Whitney Street, Satsuma, Putnam County, Florida

February 27, 2014

Dear Mr. Butler:

Our office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places. The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, 36 CFR Part 800: Protection of Historic Properties, and the National Environmental Policy Act of 1969, as amended.

Based on the information provided, and a review of our records, it is the opinion of this office that the proposed undertaking will have no direct effects and no visual effects on historic properties.

For any questions concerning our comments, please contact Robin Jackson, Historic Sites Specialist, by electronic mail at robin.jackson@dos.myflorida.com, or at 850.245.6333, or 800.847.7278.

Sincerely

[Signature]

Robert F. Bendus, Director  
Division of Historical Resources  
and State Historic Preservation Officer

Division of Historical Resources  
R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399  
850.245.6300 • 850.245.6436 (Fax) flheritage.com  
Promoting Florida's History and Culture  
VivaFlorida.org
### General Information

1) **(Select only one)**
   - 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.

### Applicant Information

3) FCC Registration Number (FRN): 0004122032

4) Name: AT&T Mobility, LLC

### Contact Name

5) First Name: Doug
6) MI:
7) Last Name: Butler
8) Suffix:
9) Title: Group Manager

### Contact Information

10) P.O. Box:
11) Street Address: 2700 Westhall Lane, Suite 200
12) City: Maitland
13) State: FL
14) Zip Code: 32751
15) Telephone Number: (407) 660-7840
16) Fax Number: (407) 660-7394
17) E-mail Address: D.Butler@Trileaf.com

### Consultant Information

18) FCC Registration Number (FRN): 0023068646
19) Name: Johnson, Mirmiran & Thompson

### Principal Investigator

20) First Name: Richard
21) MI:
22) Last Name: Geidel
23) Suffix: R.P.A.
24) Title: Archaeologist

### Principal Investigator Contact Information

25) P.O. Box:
26) Street Address: 1600 Market Street, Suite 520
27) City: Philadelphia
28) State: PA
29) Zip Code: 19103
30) Telephone Number: (267) 256-0300
31) Fax Number: (267) 256-0395
32) E-mail Address: D.Butler@Trileaf.com
### Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior’s Professional Qualification Standards?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>(X)</td>
<td></td>
</tr>
</tbody>
</table>

34) Areas of Professional Qualification:

- (X) Archaeologist
- (   ) Architectural Historian
- (   ) Historian
- (   ) Architect
- (   ) Other (Specify) ______

### Additional Staff

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(X)</td>
<td></td>
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</tbody>
</table>

If “Yes”, complete the following:

<table>
<thead>
<tr>
<th>Name</th>
<th>First Name</th>
<th>MI</th>
<th>Last Name</th>
<th>Suffix</th>
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<tbody>
<tr>
<td>Lindsey Allen</td>
<td>Lindsey</td>
<td></td>
<td>Allen</td>
<td></td>
</tr>
<tr>
<td>Melissa Walsh</td>
<td>Melissa</td>
<td></td>
<td>Walsh</td>
<td></td>
</tr>
</tbody>
</table>

40) Title: Architectural Historian

41) Areas of Professional Qualification:

- (   ) Archaeologist
- (X) Architectural Historian
- (   ) Historian
- (   ) Architect
- (   ) Other (Specify) ______

This page may be copied to include additional staff.

Consultant Information Attachments required – See instructions for details.

If “Yes”, complete the following:

<table>
<thead>
<tr>
<th>Name</th>
<th>First Name</th>
<th>MI</th>
<th>Last Name</th>
<th>Suffix</th>
</tr>
</thead>
<tbody>
<tr>
<td>Melissa Walsh</td>
<td>Melissa</td>
<td></td>
<td>Walsh</td>
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</tbody>
</table>

40) Title: Archaeological Technician

41) Areas of Professional Qualification:

- (   ) Archaeologist
- (   ) Architectural Historian
- (   ) Historian
- (   ) Architect
- (X) Other (Specify) Archaeological Technician

This page may be copied to include additional staff.

Consultant Information Attachments required – See instructions for details.
### Site Information

1) TCNS Notification Number: 103798

2) Site Name: CSX Fish Camp

3) Site Address: 248 Whitney Street

4) City: Satsuma

5) State: FL

6) Zip Code: 32189

7) County/Borough/Parish: Putnam County

8) Nearest Crossroads: Whitney Street and Sumter Road

9) **NAD 83** Latitude (DD-MM-SS.S): 29-32-16.3
   - (X) **N** or ( ) **S**

10) **NAD 83** Longitude (DD-MM-SS.S): 81-41-43.0
    - ( ) **E** or (X) **W**

### Tower Information

11) Tower height above ground level (include top-mounted attachments such as lightning rods): 27 (X) Feet ( ) Meters

12) Tower Type (Select One):
   - ( ) Guyed lattice tower
   - ( ) Self-supporting lattice
   - ( ) Monopole
   - (X) Other (Describe): Wooden pole

### Project Status

13) 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: ___ / ___ / ___

Site Information Attachments required – See instructions for details.
Determination of Effect

14) Direct Effects (Select One):

(X) 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):

(X) 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

Determination of Effect Attachments required – See instructions for details.
### 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? 

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>X</td>
<td></td>
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</table>

2a) Tribes/NHOs contacted through TCNS Notification Number: 103798

Number of Tribes/NHOs: 6

2b) Tribes/NHOs contacted through an alternate system: ______

Number of Tribes/NHOs: ______

### Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN: ______

4) Tribe/NHO Name: Coushatta Indian Tribe

### Contact Name

5) First Name: Linda

6) MI: P

7) Last Name: Langley

8) Suffix: ______

9) Title: THPO

### Dates & Response

10) Date Contacted ______/_____/______

11) Date Replied ______/_____/______

(   ) No Reply

(   ) Replied/No Interest

(   ) Replied/Have Interest

(   ) Replied/Other ______

This page may be copied to include additional Tribes/NHOs contacted.

Tribal/NHO Involvement Attachments may be required – See instructions for details.
### Other Tribes/NHOs Contacted

#### Tribe/NHO Information

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1)</td>
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</tr>
<tr>
<td>2)</td>
<td>Name: Miccosukee Tribe of Indians of Florida</td>
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#### Contact Name

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<tr>
<td>7)</td>
<td>Title: NAGPRA and Section 106 Representative</td>
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#### Contact Information

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#### Dates & Response

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<td>(     )</td>
<td>Replied/Other ____</td>
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</table>

This page may be copied to include additional Tribes/NHOs.
### Other Tribes/NHOs Contacted

#### Tribe/NHO Information

1) FCC Registration Number (FRN):

2) Name: Seminole Tribe of Florida

#### Contact Name

3) First Name: Alison  
4) MI: E  
5) Last Name: Swing  
6) Suffix:

7) Title: Compliance Analyst

#### Contact Information

8) P.O. Box:  
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:  
(     ) E-mail  
(     ) Letter  
(     ) Both

#### Dates & Response

17) Date Contacted _____ / _____ / _____  
18) Date Replied _____ / _____ / _____

(     ) No Reply  
(     ) Replied/No Interest  
(     ) Replied/Have Interest  
(     ) Replied/Other _____

This page may be copied to include additional Tribes/NHOs.
### Tribe/NHO Information

1) FCC Registration Number (FRN):

2) Name: Seminole Nation of Oklahoma

### Contact Name

3) First Name: Seminole  
4) MI:  
5) Last Name: Nation  
6) Suffix:  

7) Title: Historic Preservation Officer

### Contact Information

8) P.O. Box:  
9) Street Address:  

And  

10) City:  
11) State:  
12) Zip Code:  

13) Telephone Number: (    )  
14) Fax Number: (    )

15) E-mail Address:

16) Preferred means of communication:  
   (    ) E-mail  
   (    ) Letter  
   (    ) Both

### Dates & Response

17) Date Contacted ______ / ______ / ______  
18) Date Replied ______ / ______ / ______

(    ) No Reply  
(    ) Replied/No Interest  
(    ) Replied/Have Interest  
(    ) Replied/Other ______

This page may be copied to include additional Tribes/NHOs.
# Other Tribes/NHOs Contacted

## Tribe/NHO Information

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<td>2)</td>
<td>Name: Muscogee Creek Nation</td>
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## Contact Name

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<td>4)</td>
<td>MI:</td>
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<td>5)</td>
<td>Last Name: Spain</td>
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<td>Suffix:</td>
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<tr>
<td>7)</td>
<td>Title: Deputy THPO</td>
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## Contact Information

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</table>

## Dates & Response

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<td></td>
<td>( ) Replied/Other</td>
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</table>

This page may be copied to include additional Tribes/NHOs.
Other Tribes/NHOs Contacted

**Tribe/NHO Information**

1) FCC Registration Number (FRN):

2) Name: Eastern Shawnee Tribe of Oklahoma

**Contact Name**

3) First Name: Rebecca

4) MI:

5) Last Name: Hawkins

6) Suffix:

7) Title: Archaeologist

**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:

   (   ) E-mail

   (   ) Letter

   (   ) Both

**Dates & Response**

17) Date Contacted  / / 18) Date Replied  / /

   (   ) No Reply

   (   ) Replied/No Interest

   (   ) Replied/Have Interest

   (   ) Replied/Other _____

This page may be copied to include additional Tribes/NHOs.
### Historic Properties

#### Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?  
   - ( ) Yes (X) No

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?  
   - ( ) Yes (X) No

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.  
   - ( ) Yes (X) No

#### 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: _____  
   - ( ) Yes ( ) No

12) Is this property eligible for listing on the National Register?  
   - Source: _____  
   - ( ) Yes ( ) No

13) Is this property a National Historic Landmark?  
   - ( ) Yes ( ) No

14) Direct Effects (Select One):
   - ( ) No Effect on this Historic Property in APE
   - ( ) No Adverse Effect on this Historic Property in APE
   - ( ) Adverse Effect on this Historic Property in APE

15) Visual Effects (Select One):
   - ( ) No Effect on this Historic Property in APE
   - ( ) No Adverse Effect on this Historic Property in APE
   - ( ) Adverse Effect on this Historic Property in APE

This page may be copied to include additional Historic Properties.  
Historic Property Attachments required – See instructions for details.
## Local Government Involvement

### Local Government Agency

1) FCC Registration Number (FRN): 

2) Name: Putnam County Department of Planning and Development

### Contact Name

3) First Name: Brian
4) MI: 
5) Last Name: Hammons
6) Suffix: 
7) Title: Senior Planner

### Contact Information

8) P.O. Box: 

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: 
   (     ) E-mail 
   (     ) Letter 
   (     ) Both

### Dates & Response

17) Date Contacted      /      / 
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):

This page may be copied to include additional local government agencies. 
Local Government Attachments required – See instructions for details.
### Other Consulting Parties

**Other Consulting Parties Contacted**

1) Has any other agency been contacted and invited to become a consulting party?  
   - Yes (X)  
   - No

#### 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):

---

This page may be copied to include additional consulting parties.  
Consulting Parties Attachments required – See instructions for details.
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.

<table>
<thead>
<tr>
<th>SHPO/THPO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: Florida Division of Historical Resources</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>SHPO/THPO Name:</th>
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Designation of SHPO/THPO Attachments may be required – See instructions for details.

Certification

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

<table>
<thead>
<tr>
<th>Party Authorized to Sign</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Richard</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Signature:</td>
</tr>
</tbody>
</table>

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 1. Consultant Information

Provide a current copy of the resume or curriculum vitae for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.

A current copy of the resume for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.
Richard Geidel, RPA
Archaeologist

Education:
Historic Preservation Certificate, Harrisburg Area Community College, 1998
MA, Anthropology, Pennsylvania State University, 1981
BA, Anthropology, University of Pittsburgh, 1976

Years with JMT: <1
Total Years Experience: 38

Mr. Geidel is a Registered Professional Archaeologist with extensive experience conducting and managing cultural resources projects and Section 106 consultation in the Mid-Atlantic region. Mr. Geidel has completed Section 106 training through the SRI Foundation and advanced Section 4(f) training through the Federal Highways Administration. He is a member of the Archaeological Society of Maryland, the Council for Maryland Archaeology, the National Trust for Historic Preservation, the Pennsylvania Historical Association, Preservation Action, Preservation Pennsylvania, the Register of Professional Archaeologists, the Society for American Archaeology, the Society for Pennsylvania Archaeology, and is President of the Pennsylvania Archaeological Council. Selected recent experience includes:

**Preliminary Reconnaissance**
- Marion School No. 9 Site, 18Ce293, Cecil County Maryland. York Building Products Company, Inc., 1997.
- Goddard Space Flight Center Greenbelt Campus, Prince George’s County, Maryland. National Aeronautics and Space Administration, 1996.

**Identification and Location Survey (Phase I)**
- South Hanover Township Municipal Complex, South Hanover Township, Dauphin County, Pennsylvania. South Hanover Township, 2013.
- Haines Homestead Wetland Mitigation Project, Frederick County, Maryland. Lehigh Portland Cement Company, Inc.
- T-572, County Bridge No. 54, Fannett Township, Franklin County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 8-0, 2012.

**National Register Eligibility and Effect Evaluation (Phase II)**
- Finland Mill, S.R. 4033, Section UCB (Eligibility), Milford Township, Bucks County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 6-0, 2012.
- Cedar Creek Bridge, S.R. 2009, Section 01B (Eligibility), Lehigh County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 5-0, 2009.
- Nazareth Steel Fabricators (Eligibility), Lehigh County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 5-0, 2009.
- Saint John’s Union Cemetery (Eligibility), Lehigh County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 5-0, 2009.
- Jacob Knetz House (Eligibility), Berks County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 5-0, 2009.
- Harpers Ferry Road Bridge (Effect), Washington County, Maryland. Washington County Engineering Department, 2007.
**Data Recovery/Mitigation Planning (Phase III)**


**Early Archaic through Late Woodland Valley Creek Quartz Quarry Reduction Site, 36Ch721**, Chester County, Pennsylvania. The Rubenstein Company, 2001.


**Historic Preservation Consultation/Public Involvement**


**Scudder Falls Bridge Replacement**, Bucks County, Pennsylvania and Mercer County, New Jersey. Pennsylvania Department of Transportation, Engineering District 6-0. Representing Pennsylvania Archaeological Council, 2008.

**Accokeek Emergency Services Tower**, Prince George’s County, Maryland. Prince George’s County Department of Public Safety, 2008.

**Trap and Skeet Emergency Services Tower**, Prince George’s County, Maryland. Prince George’s County Department of Public Safety, 2008.


**Henson’s Creek Emergency Services Tower**, Prince George’s County, Maryland. Prince George’s County Department of Public Safety, 2008.

**Soils and Geological Analysis**


**Muddy Creek Bridge**, York County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 2-0, 1989.

**Chambers Creek Bridge**, Huntingdon County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 2-0, 1989.

**Reports and Publications**

2013  
**Negative Survey Form: S.R. 0416, Section 004**, Peters Township, Franklin County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 8-0.

**Negative Survey Form: T-572**, County Bridge 54, Fannett Township, Bedford County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 9-0.

**Negative Survey Form: South Hanover Township Municipal Complex, South Hanover Township, Dauphin County, Pennsylvania. South Hanover Township.**

2012  

**Negative Survey Form: Nekoranik to Ayers Natural Gas Pipeline**, Pike Township, Bradford County, Pennsylvania. Talisman Energy USA, Inc.

**Negative Survey Form: S.R. 7206, Section 397**, East Providence Township, Bedford County, Pennsylvania. Pennsylvania Department of Transportation, Engineering District 9-0.
Ms. Allen is a project manager with a successful track record of completing a variety of Cultural Resource Management projects and exceeds the qualifications for Architectural Historian under the standards set forth by the Secretary of the Interior. She has a wide range of professional and academic experiences relating to architectural history, transportation planning, public consultation, and neighborhood planning. She has prepared a variety of Environmental Review documents including Historic Resource Surveys, Determination of Eligibility Reports, Determination of Effect Reports, Section 4(f) Evaluations, and Memoranda of Agreement. She also has experience in facilitating public involvement and preservation planning. Her experience in architectural history and surveying is thorough. She has conducted both reconnaissance-level and intensive-level surveys and assessments, which have included a wide variety of resources including farmsteads; urban and rural historic districts; commercial, industrial, and residential properties; and transportation resources. Ms. Allen’s responsibilities have included project management, historic and archival research, report writing, and analysis.

Ms. Allen has completed Section 106 training through the Advisory Council on Historic Preservation and through PennDOT. She is currently training to be delegated by PennDOT and the Federal Highway Administration to serve as a Cultural Resource Professional for PennDOT. Relevant experience includes:

**Telecommunications Projects, Nationwide:** *Project Manager, Architectural Historian.* Ms. Allen has managed and conducted Section 106 compliance of telecommunications projects throughout the United States, including Puerto Rico. She is skilled in the completion of 620 and 621 Forms in compliance with the Federal Communications Commission’s Programmatic Agreement for collocations and raw land sites. Ms. Allen is also familiar with the requirements and process for the completion of FCC e-106 submissions. Ongoing.

**I-78 Section 12M Improvement Project, Berks County, PA:** *Project Manager, Architectural Historian.* This highway improvement project consists of conforming I-78 Section 12M to current design criteria by reconstructing the highway pavement, adding truck climbing lanes, widening shoulders, improving drainage systems, and replacing guiderail. Cultural Resource Management and Section 106 compliance was extensive and involved numerous surveys and significant public involvement. Ms. Allen was responsible for reevaluating four resources – the Wee Cottages, the Grimville Historic District, the Maiden Creek Furnace, and the Knittle Farm – for their eligibility for listing in the National Register. Ms. Allen provided support during consulting party and public consultation, and contributed to the Determination of Effect Report. Project Ongoing; Ms. Allen worked project 2012-2013.

**Edmunds County Surveys, SD:** *Project Manager.* This project was carried out for the South Dakota State Historic Preservation Office. The work consisted of the comprehensive architectural survey of Edmunds County. The end result was a final report, including a regional and local context that evaluated resources for eligibility for listing in the National Register of Historic Places. The report further analyzed architecture by trends and provided recommendations for additional work in the area. Ms. Allen assisted in the survey, background research, and National Register eligibility evaluations of the surveyed properties. She coordinated and reviewed the final report writing, and managed client correspondence. 2012-2013.
Craighead Bridge Project, Cumberland County, PA: Project Manager. Ms. Allen was responsible for the fieldwork, research and writing of the Pennsylvania Historic Resource Survey Form for the Coyle House. Ms. Allen also wrote the Determination of Effects Report for this project, which entails the replacement of the National Register listed Craighead Bridge. 2012-2013.

Historic Resource Impact Study – Joseph Price House, Chester County, PA: Project Manager. Ms. Allen provided preservation services for a private developer who proposed new construction near a locally-designated historic property in West Whiteland Township. As mandated by the local preservation ordinance, due to the proximity of the historic property a Historic Resource Impact Study must be completed in order to submit a project for review to the local zoning board. Ms. Allen completed the field work, finalized the report, and managed all client relations. 2012.

I-95 Section AFC Highway Reconstruction Project, Philadelphia, PA: Architectural Historian. This large scale PennDOT transportation improvement project involves surveying and documenting historic resources along I-95 Section AFC, located in the Port Richmond neighborhood of Philadelphia. Numerous historic resources will be surveyed and evaluated through this project. Ms. Allen was responsible for all research, documentation, and analysis for the Pennsylvania Historic Resource Survey Form for the Port Richmond Historic District. 2012.

S.R. 0071 Transportation Improvements Project in the village of Red Lion, New Castle County, DE: Project Manager. This Delaware Department of Transportation project is to redesign the intersection of five roads in the village of Red Lion. As part of this project a total of twenty-four resources were surveyed and evaluated for eligibility for listing in the National Register of Historic Places. The majority of these resources are vernacular, mid-twentieth century residential properties. Ms. Allen was responsible for all survey and documentation work, as well as client coordination and report writing. 2011-2012.

Marian Anderson House and Museum National Register Nomination, Philadelphia, PA: Architectural Historian. Ms. Allen revised a previously prepared National Register nomination, including updating the history and significance section, as well as the physical description. Ms. Allen completed the appropriate National Register form and worked with the Pennsylvania State Historic Preservation Office staff to ensure all documentation was prepared and delivered. The Marian Anderson House and Museum was successfully listed in the National Register of Historic Places in April 2011. 2010-2011.

Sanborn and Jerauld County Surveys, SD: Architectural Historian. This project was carried out for the South Dakota State Historic Preservation Office. The work consisted of the comprehensive architectural survey of both Sanborn and Jerauld Counties. The end result was a final report, including a regional and local context that evaluated resources for eligibility for listing in the National Register of Historic Places. The report further analyzed architecture by trends and provided recommendations for additional work in the area. Ms. Allen assisted in the survey, background research, and National Register eligibility evaluations of the surveyed properties. 2010-2011.

Database Management, National Park Service Alaska Regional Office, Anchorage, AL: Facility Management Intern. Ms. Allen assisted the Facility Management Department of the regional NPS office to update and manage their parks inventories database. Ms. Allen traveled to five Alaskan National Parks to verify and update the inventory of assets and equipment integral to the functioning of the park, took GPS coordinates of specific assets for GIS mapping, and placed work orders for assets needing improvement. 2008.

Policy Research, National Trust for Historic Preservation, Washington, D.C.: Public Policy Intern. Ms. Allen assisted Policy staff on a variety of topics and tasks. She researched preservation policy issues for inclusion in a weekly policy update newsletter and updated the state preservation tax credit spreadsheet which was posted on the organization’s website for public reference. Ms. Allen also researched successful examples of rehabilitated vacant and abandoned properties for a nationwide traveling exhibition on successful rehabilitation and reuse projects. 2006.
Melissa A. Walsh
Archaeological Technician

Education:
BA, Anthropology, University of Central Florida, 2012
AA, Anthropology, Valencia Community College, 2010

Years with JMT: <1
Total Years Experience: 3

Organizations:
American Archaeological Association
Archaeological Institute of America
Hominids Anonymous
Indian River Anthropological Association

Melissa A. Walsh is an archaeological technician with over three years of experience in preliminary reconnaissance surveys and identification and locations surveys (Phase I). She is experienced in a wide range of investigatory techniques including subsurface testing, geophysical feature documentation using gradiometer, ground resistivity, and ground penetrating radar.

Preliminary Reconnaissance and Identification and Location Survey (Phase 1) Experience

2013 Pittsburgh, PA: Cultural Resource Cell Phone Tower Survey
Archaeological Technician
Agency: Johnson, Mirmiran & Thompson, Lake Mary, FL

2013 Gulf Islands National Seashore
Archaeological Aid
Agency: National Park Service, Pensacola, Florida

2013 Chickasaw Village Site Natchez Trace Parkway
Archaeological Aid
Agency: National Park Service, Tupelo, Mississippi

2013 Horseshoe Bend National Military Park
Archaeological Aid
Agency: National Park Service, Daviston, AL

2013 Osceola National Forest
Archaeological Aid
Agency: National Park Service and Forest Service, Lake City, FL

2013 Southeast Archeological Center
Archaeological Aid
Agency: National Park Service, Tallahassee, Florida

2013 GeoProbe, Cape Canaveral Air force Station, Florida
Geoprobe Technician
Agency: Florida State University Anthropology Department, Tallahassee, Florida

2013 Fox Lake Sanctuary Archaeological Project Season 4, Brevard County, Florida
Crew Chief

2013 Land Management Unit 50 Archaeological Survey, Cape Canaveral Air Force Station, Florida
Crew Chief
Agency: 45th Space Wing, United States Air Force, Cape Canaveral Air Force Station, Florida

2012 Fox Lake Sanctuary Archaeological Project Season 3, Brevard County, Florida
Archaeology Field Technician
Attachment 2. Site Information – Photographs

You are required to provide photographs and maps as part of this filing. Additional site information can be provided in an optional attachment.

Photograph Requirements:

Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map or text, and dated; the focal length of the lens and the height of the camera 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.

a. Photographs taken from the site should show 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 site.

Please see attached Photographs, which were taken by Melissa Walsh, Archaeological Technician of JMT, on January 3, 2013, unless otherwise noted.

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

Please see attached Photographs, which were taken by Melissa Walsh, Archaeological Technician of JMT, on January 3, 2013, unless otherwise noted.

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

Please see attached Photographs, which were taken by Melissa Walsh, Archaeological Technician of JMT, on January 3, 2013, unless otherwise noted.
Attachment 2. Site Information – Photographs

You are required to provide photographs and maps as part of this filing. Additional site information can be provided in an optional attachment.

Photograph Requirements:
Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map or text, and dated; the focal length of the lens and the height of the camera 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.

a. Photographs taken from the site should show 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 site.

Please see attached Photographs, which were taken by Melissa Walsh, JMT Archaeological Technician, on January 4, 2014, unless otherwise noted.

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

Please see attached Photographs, which were taken by Melissa Walsh, JMT Archaeological Technician, on January 4, 2014, unless otherwise noted.

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

Please see attached Photographs, which were taken by Melissa Walsh, JMT Archaeological Technician, on January 4, 2014, unless otherwise noted.
Photograph 1: View of proposed tower location, facing northeast.

Photograph 2: View of the surrounding area, facing northwest.
Photograph 3: View of the surrounding area, facing east.

Photograph 4: View of the surrounding area, facing northeast.
Attachment 3. Site Information – Map Requirements

Include one or more 7.5-minute quad USGS topographical maps that:

a. Identify the Areas of Potential Effects for both Direct and Visual Effects. If a map is copied from the original, include a key with the name of quad and date.
b. Show the location of the proposed site and any access roads or other easements including excavations.
c. Show the locations of each property listed.
d. Include keys for any symbols, colors, or other identifiers.
e. Submit color maps whenever possible.

The following map has been attached to this report:

- Project Location Map – Aerial Map with 0.5-mile Area of Potential Effect
- Project Location Map – Street Map with 0.5-mile Area of Potential Effect
- Project Location Map – USGS Topographic map with 0.5-mile Area of Potential Effect
Project Location Map

Trileaf Corporation Project #608796 (CSX Fish Camp)
Attachment 4. Site Information – Additional Site Information

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site.

The proposed project is located at 248 Whitney Street, Satsuma, Putnam County, Florida 32189. The coordinates for the proposed project are 29° 32’ 16.3”N, 81° 41’ 43.0” W.

AT&T Mobility, LLC is proposing construct a 27-foot wood pole and support facilities within a small addition to an existing fenced diesel compound. The existing diesel compound will be expanded by an area measuring 2 feet by 10 feet. The proposed lease area will be accessible via an existing adjacent paved area. The lease area is located within a commercial property which includes recreational fields and buildings. The surrounding area consists of modern residential development and wetland areas.

The construction drawings provided by AT&T Mobility, LLC are included in this attachment.
Attachment 5. Area of Potential Effects

You are required to provide two attachments regarding the Determination of Effect: Areas of Potential Effect and Mitigation of Effect (if applicable).

Areas of Potential Effect Guidelines:

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

   The APE for direct effects is defined as the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the undertaking. The proposed project consists of constructing a 27-foot wood pole and support facilities within a small addition to an existing fenced diesel compound. The existing diesel compound will be expanded by an area measuring 2 feet by 10 feet. The proposed lease area will be accessible via an existing adjacent paved area. Total acreage of the project area is approximately 0.02 acres.

b. **Describe the APE for visual effects and explain how this APE was determined.**

   The APE for visual effects is the geographic area in which the Project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP). The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible. Due to the height of the proposed project (27 feet), the presumed APE for visual effects for this project is a 0.5-mile radius from the tower site.
Attachment  5.  Continued

Mitigation of Effect Guidelines:

In the case of where an Adverse Visual Effect or Adverse Direct Effect has been determined you must provide the following:

a. Copies of any correspondence and summaries of any oral communication with the SHPO/THPO and any consulting parties.
   N/A

b. Describe any alternatives that have been considered that might avoid, minimize, or mitigate any adverse effects. Explain the Applicant’s conclusion regarding the feasibility of each alternative.
   N/A

For each property identified as a Historic Property in the online e-106 form:

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.

Based on the results of field investigations, a finding of No Historic Properties within the APE for Direct Effects is recommended. No cultural resources were observed at this location and no artifacts or archaeological sites were identified during the archaeological testing. Please see the attached Archaeological Survey.

The results of a file search conducted by the staff at the Florida State Historic Preservation Office disclosed no previously recorded historic resources within the APE for Visual Effects. A finding of No Historic Properties within the APE for Visual Effects is recommended.
PHASE 1 ARCHAEOLOGY SURVEY LETTER
FOR TRILEAF CORPORATION

Project #608796 (CSX Fish Camp)
Satsuma, Putnam County, Florida

By
Melissa Walsh
And
Richard Geidel, R.P.A.
Johnson, Mirmiran & Thompson
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Produced for
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Project Manager
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Maitland, FL  32751

January 2014