APPENDIX F HISTORIC RESOURCE REVIEW DOCUMENTATION

Communications FCC > Wireless > Section 106 Filings Logged In: 0016385759 (Log Out) My Filings New Filing TCNS File Number: 0005110510 Notification Date: Current Status: Completed Received On: 03/09/2012 Siler must close by: 10/27/2012, 11:59 PM	
My Filings New Filing TCNS File Number: 0005110510 Notification Date: Current Status: Completed Status: Completed Filer must close by: Form 620: Original Filing 03/12/2012 Received On: 03/09/2012 10/27/2012, 11:59 PM	
File Number: O005110510 Notification Date: Current Status: Completed Status Filer must close by: Form 620: Original Filing 03/12/2012 Received On: 03/09/2012 10/27/2012, 11:59 PM	Help Technical Support
Form 620: Original Filing 03/12/2012 Received On: 03/09/2012 10/27/2012, 11:59 PM	
Update Withdraw Close	Email Filing
Overview Transaction Log Comments Documents History	Return to My Filings
The comments entered here may be viewed by all consulting parties to this filing. Please ensure that comments do not contain information of a con	fidential nature.

Confidential information should be added in a separate document labeled "CONFIDENTIAL" at the top of the document. You must select "Confidential" [] or "Confidential Tribal Data" [] as the attachment type when uploading the document.

Post Your Comme	ent	
Submit Clear		
There are 3 TCNS		S
Showing 1 to 15 of 1	15	1 Show 100 - per page (1 pages)
Date Posted 💌	Associated Action	Posted By 💌
09/19/2012	A new comment was added to the filing	Pennsylvania Historical & Museum Commission Bureau for Historic Preservation Comment: The additional graphic material provided helps to demonstrate the visibility of the lighting on the tower and the distance of the tower from the trail. While the setting is different, it clarifies that the tree cover along the trail will help screen the tower from the Appalachian Trail. Therefore, the Pennsylvania State Historic Preservation Office wishes to change thier previous opinion of adverse effect to no adverse effect on the Appalachian Trail.
08/24/2012	A new comment was added to the filing	EnviroBusiness, Inc. dba EBI Consulting, Inc. Comment: EBI Consulting has been working with the County to find a way to clearly demonstrate the minimal impact that the FAA-required lighting system is going to have on the visual setting of the Appalachian Trail at the distance where there is a break in the veg etation that permits the views of the proposed tower. On August 5, 2012, EBI uploaded a graphic created by the County of Berks that demonstrates the brightness of the required lighting as it will be perceived by a hiker along the trail in the area where the tower will be visible through the branches of the trees. In summary, manufacturers focus the light emitted from the beacon at the top of the tower so that the maximum brightness will be visible to oncoming planes in line with the top of the tower and minimize the brightness of the beacon to anything below the level of the beacon. Through the analysis provided in the document uploaded on 8/5, it is shown that a hiker would perceive light approximately equal to (5) 100 wait bulbs long the portion of the trail in question. Then we wanted to be able to demonstrate what (5) 100 wait bulbs looks like to someone at the distance in question so, the County of Berks found a tower of similar design with a pulsating beacon (same lighting kit as what is curr ently proposed at Blue Mountain) and they made a video to show the visual impact. The link below takes you to the website with the video as well as a map. The map shows that the distance to the tower was adjusted to insure that the visual representation of the brightness of the light emitted to a ground-level viewer was accurately depicted in the video. Please note that what we were not able to reproduce was the vegetation conditions that exist at the Blue Mountain site. This video has a clear, unobst ructed view toward the tower whereas the Blue Mountain site does not have any clear, unobstructed views - all views are through the intervoven branches of deciduous trees during leaf off seasons and will have no vi

Suzanne Derrick EBI Consulting

08/05/2012

A new EnviroBusiness, Inc. dba EBI Consulting, Inc. comment was

	added to the filing	Comment: Please see the document uploaded 8/5/2012 for an analysis of the FAA-required lighting for the Blue Mountain Tower.
06/25/2012	A new comment was	EnviroBusiness, Inc. dba EBI Consulting, Inc.
	added to the filing	Comment: On behalf of the County of Berks, EBI Consulting has submitted a request for the FCC to review the finding of effects for this submission. Please see the document uploaded on 6/25/2012 by EBI Consulting.
06/12/2012	A new comment was	Hawk Mountain
	added to the filing	Comment: On the lighting issue: The Audio Visual Warning System sounds like a great solution that could reduce tower lighting impacts on birds in this situation. Other steps that can be taken are to deflect lighting of buildings associated with every tower downw ard to ground not to sky and put lights on timer so not ever-present. The second suggestion of focused beam LED I am not familiar with but for birds we would want less lighting skyward as that is what confuses and attracts avian migrants. I appreciate t he need to reduce lighting at ground level for hikers as well. So, the AVWS could achieve both objectives.
06/08/2012	A new comment was	Nat'l Park Service, Appalachian National Scenic Trail
	added to the filing	Comment: With regard to potential lighting impacts at this location, we suggest that the county investigate using an active Audio Visual Warning System to reduce light on time and/or focused beam LED technology to reduce light visibility from ground level as a pos sible way to avoid/minimize effects of this type.
06/08/2012	A new comment was	Nat'l Park Service, Appalachian National Scenic Trail
	added to the filing	Comment: We had technical difficulties uploading our most recent correspondence into the system resulting in duplicate submissions. Please disregard and delete the earlier of the two submissions from the document library. Sorry for the confusion.
04/24/2012	A Reviewer did not concur	Pennsylvania Historical & Museum Commission Bureau for Historic Preservation
	with the filing	Comment: While the proposed tower will only minimally visible from the Appalachian Trail, the strobe light required on the tower will adversely affect the the qualities that make the Appalachian Trail eligible for the National Register. The Trail was developed as a wilderness trail. The feeling of being in the wilderness will be seriously disrupted by a strobe light in close proximity to the Trail.
04/16/2012	A new comment was	EnviroBusiness, Inc. dba EBI Consulting, Inc.
	added to the filing	Comment: In regard to Hawk Mountain's comment: Please note that Section 106 of the National Historic Preservation Act of 1966 requires Federal agencies to take into account the effects of their undertakings on historic properties, the Appalachian Trail in this par ticular case. This comment appears to be unrelated to impacts on this property.
04/16/2012	A new comment was	EnviroBusiness, Inc. dba EBI Consulting, Inc.
	added to the filing	Comment: The FAA requires that this structure is marked/lighted in accordance with FAA Advisory circular 70/7460-1 K Change 2, Obstruction Marking and Lighting, a med-dual system - Chapters 4, 8(M-Dual), & 12.
		Per Chapter 8 of this document, this dual lighting system includes red lights (L-864) for nighttime and medium intensity flashing white lights (L-865) for daytime and twilight use.
		Per Chapter 12 of this document, the tower must be equipped with an L-864/L-865 Flashing Dual (White/Red) Strobe on the ti p of the tower and L-810 Obstruction Lights at approximately the midpoint.
		Per Appendix I:
		An L-864 is defined as a dual warning light: Red flashing obstruction light 20-40 flashes/minute; white flashing obstruction light (40 flashes per minute).
		An L-810 is defined as: Red steady burning obstruction light.
04/16/2012	A new comment was	Pennsylvania Historical & Museum Commission Bureau for Historic Preservation
	added to the filing	Comment: When you say a pulsating light at the top of the tower, does that mean a strobe light?
04/16/2012	A new comment was	Hawk Mountain
	added to the filing	Comment: Towers that are lit will have least impact on birds if they do not have steady lights anywhere on tower, including mid level.
04/16/2012	A new comment was	EnviroBusiness, Inc. dba EBI Consulting, Inc.
	added to the	Comment:

	filing	The proposed tower will require lights for aviation safety per FAA regulations. Required lighting will include medium intensity, LED lighting which will be white during the day and red at night. The top-mounted light will be a pulsating beacon, and a second light located at the mid-way point on the tower will be a solid light. The portion of the Appalachian Trail that has a view of the tower is extremely limited and the views of the tower are through tree branches during leaf off seasons (please see Phot o 20 in the FCC Form 620). Although the tower will be lit, it is still the opinion of EBI Consulting that the visibility of the proposed tower from the Appalachian Trail is so limited that even with the lighting, the tower will still not constitute an ad verse effect on the trail.
03/29/2012	The SHPO/THPO requested additional information	Pennsylvania Historical & Museum Commission Bureau for Historic Preservation Comment: Please explain if the tower will include a light and what type of light.
03/12/2012	The SHPO/THPO requested additional information	Pennsylvania Historical & Museum Commission Bureau for Historic Preservation Comment: Please provide a U.S.G.S. map of the project site that also includes the nearest place name.

Federal Communications Commission 445 12th Street SW Washington, DC 20554 Phone: 1-877-480-3201 TTY: 1-717-338-2824 Submit Help Request



August 24, 2012

This is a copy of the Comment that has been posted to the FCC's e-106 system for Filing # 0005110510. The referenced materials are also appended to the end of this document.

EBI Consulting has been working with the County to find a way to clearly demonstrate the minimal impact that the FAA-required lighting system is going to have on the visual setting of the Appalachian Trail at the distance where there is a break in the vegetation that permits the views of the proposed tower. On August 5, 2012, EBI uploaded a graphic created by the County of Berks that demonstrates the brightness of the required lighting as it will be perceived by a hiker along the trail in the area where the tower will be visible through the branches of the trees. In summary, manufacturers focus the light emitted from the beacon at the top of the tower so that the maximum brightness will be visible to oncoming planes in line with the top of the tower and minimize the brightness of the beacon to anything below the level of the beacon. Through the analysis provided in the document uploaded on 8/5, it is shown that a hiker would perceive light approximately equal to (5) 100 watt bulbs along the portion of the trail in question.

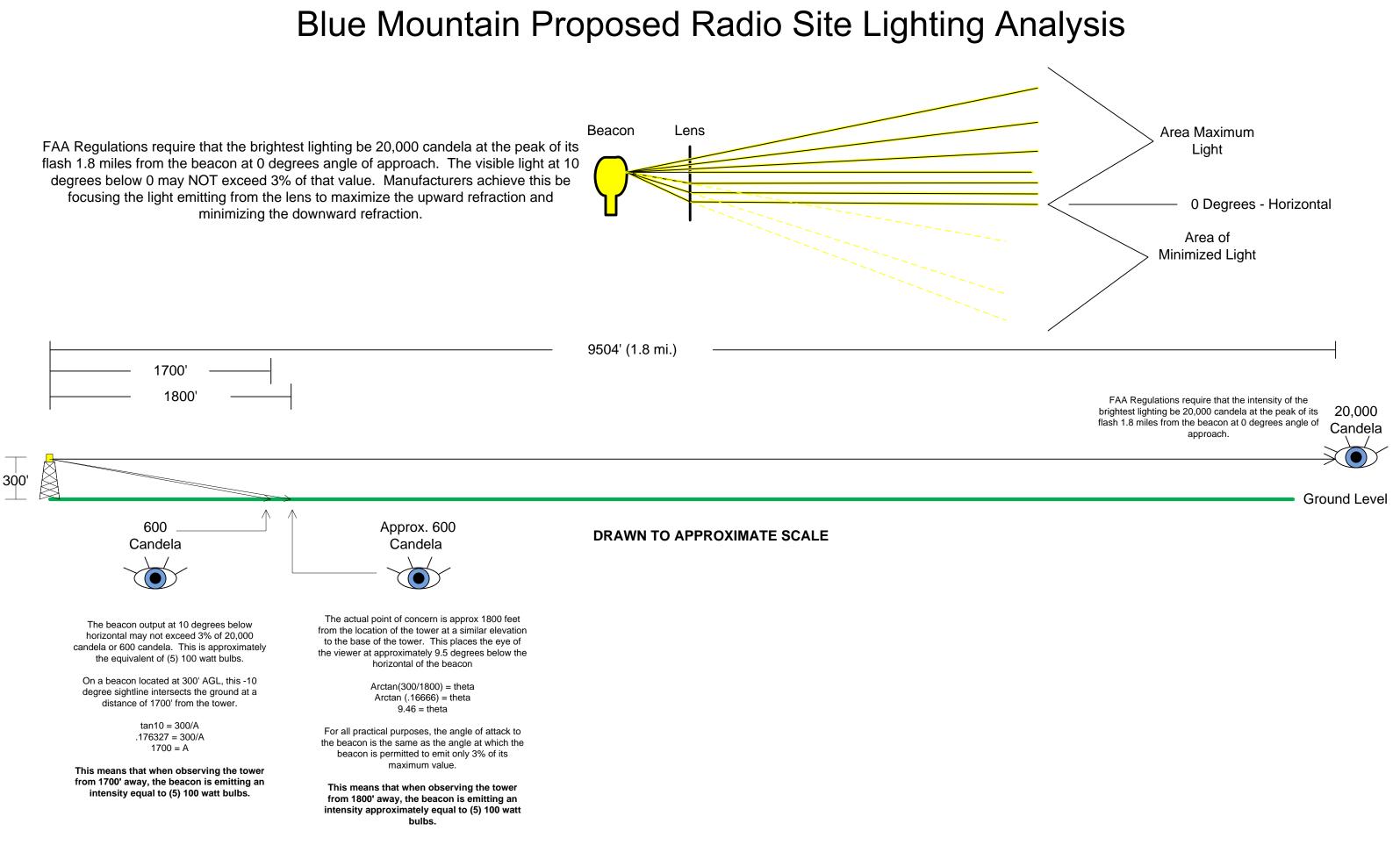
Then we wanted to be able to demonstrate what (5) 100 watt bulbs looks like to someone at the distance in question so, the County of Berks found a tower of similar design with a pulsating beacon (same lighting kit as what is currently proposed at Blue Mountain) and they made a video to show the visual impact. The link below takes you to the website with the video as well as a map. The map shows that the distance to the tower was adjusted to insure that the visual representation of the brightness of the light emitted to a ground-level viewer was accurately depicted in the video. Please note that what we were not able to reproduce was the vegetation conditions that exist at the Blue Mountain site. This video has a clear, unobstructed view toward the tower whereas the Blue Mountain site does not have any clear, unobstructed views – all views are through the interwoven branches of deciduous trees during leaf off seasons and will have no views of the tower during the leaf on seasons.

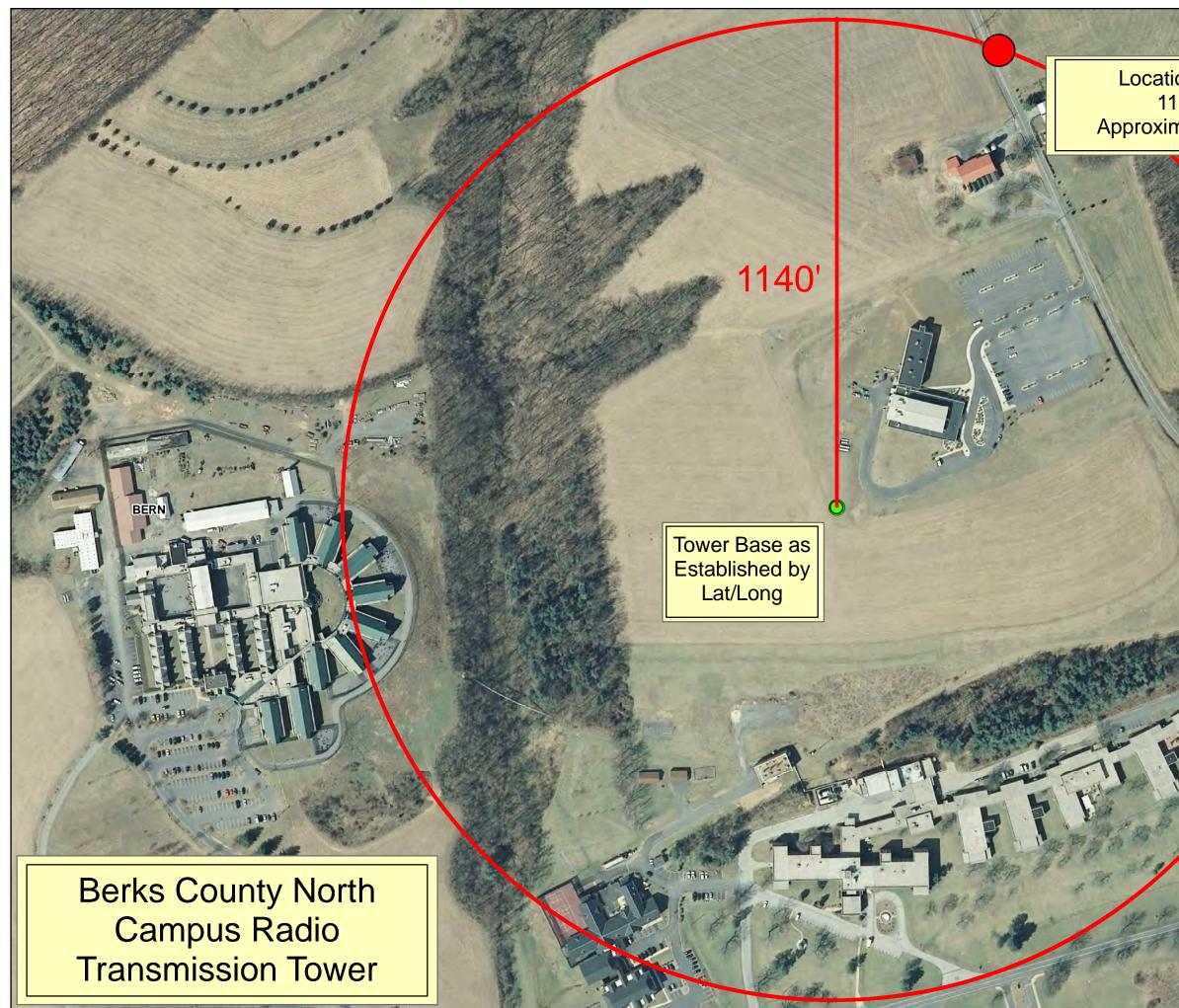
Link to video and mapping: https://www.dropbox.com/sh/d0vfkin01y9l2qs/8LENKToHuN

It is the opinion of EBI Consulting that this video, combined with the document uploaded on 8/24/2012 which provides the mathematical calculations and the pertinent images of the existing vegetation and the photo simulations of the tower, support a finding of No Adverse Effect. Therefore, we request a reconsideration of the finding of effect by the Pennsylvania Historical and Museum Commission based on this supplementary documentation.

Thank you,

Suzanne Derrick EBI Consulting





Location of Video Camera 1140' From Tower Approximately Same Elevation

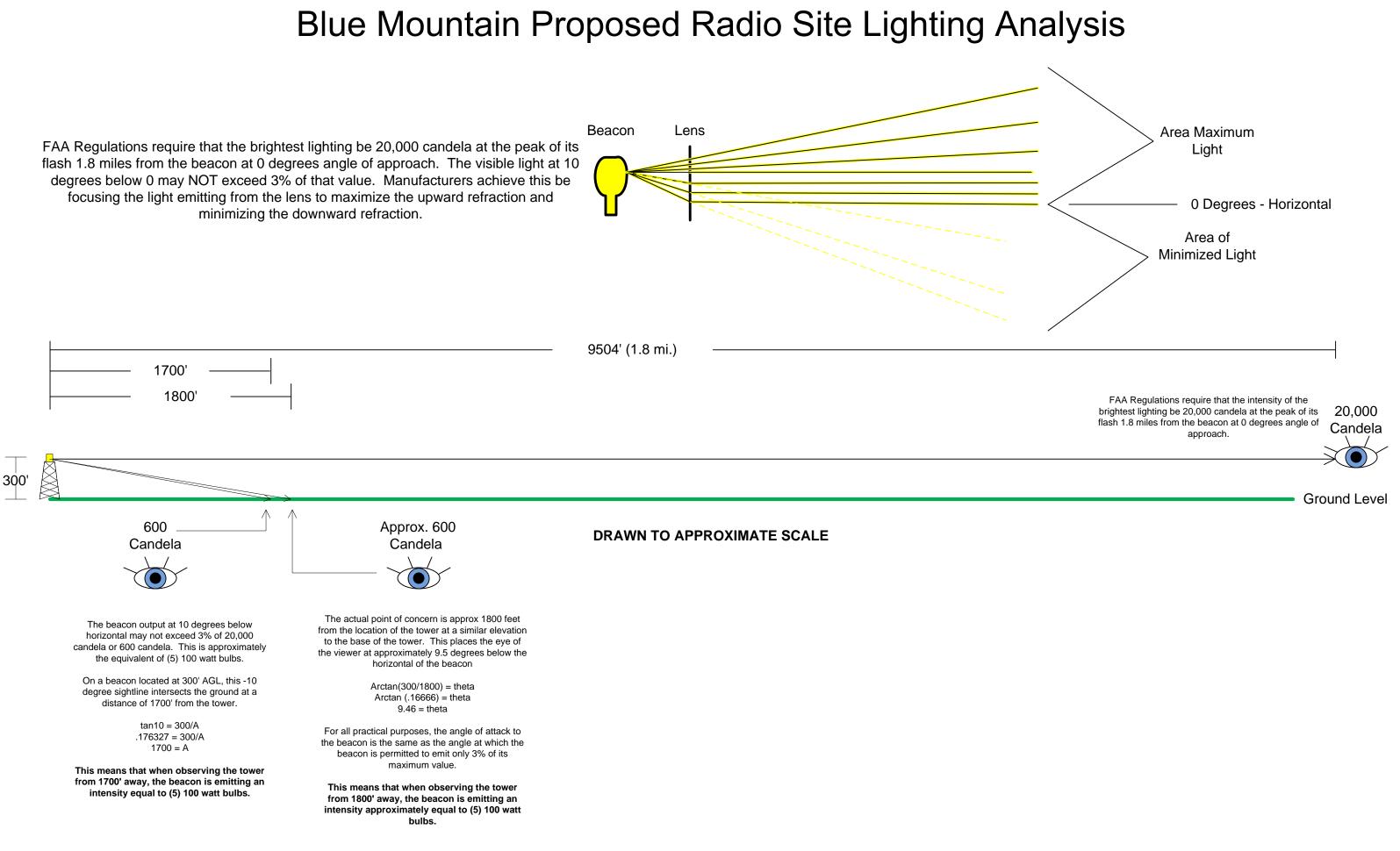


View 20 – This is the only location along the portion of the trail within the $\frac{3}{4}$ mile prescribed APE-VE where the balloon was visible through the trees.

The red arrow indicates the location of the balloon. The view will not be salient enough to have an adverse effect on the visual setting of the Appalachian Trail.



View 20 Photosimulation





United States Department of the Interior

NATIONAL PARK SERVICE Appalachian National Scenic Trail P.O. Box 50 / Deliveries: 252 McDowell St Harpers Ferry, WV 25425



IN REPLY REFER TO: Berks County Radio System (APPA)

June 8, 2012

Suzanne B. Derrick Technical Director – Cultural Resources EBI Consulting 6876 Susquehanna Trail South York, PA 17403

Re: Options for Mitigation Discussion

Dear Ms. Derrick:

We have received and reviewed the county's letter regarding "Options for Mitigation Discussion" at the Albany, Bethel, and Exit 19/Blue Mountain Sites. As requested, we offer the following assessment of the options grouped by site, alternative recommendations, and response to the proposed in-person meeting.

Albany and Bethel Sites

The regulations implementing section 106 of the National Historic Preservation Act and the Commission's rules on Practice and Procedure instruct the agency/applicant to resolve a finding of adverse affect by developing ways to "avoid, minimize, or mitigate" the adverse effects on historic properties. 36 CFR 800.6(a), (b); 47 CFR 1.1307(a). The proposed measures for the Albany and Bethel sites do not achieve this because either they do not avoid, minimize, or mitigate the adverse effect identified (Measures 1 & 2), or they do not go far enough to sufficiently offset the effects (Measure 3).

I. Measures 1 & 2 proposed for the Albany and Bethel do not qualify as "mitigation" in the sense of resolving adverse effects because there is virtually no relationship or nexus between the benefit the measures create and the damage the undertaking causes.

As the regulations explain, "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." 36 CFR 800.5(a)(1). It logically follows that for "mitigation measures" to be effective in avoiding,

reducing, or mitigating impacts, that they must also somehow affect the characteristics of the historic property that are at issue. That is, the remedy must demonstrate a direct relationship to the harm that it is trying to reduce to be considered proper mitigation.

The adverse effect in this instance is to the integrity (location, design, setting, feeling, and association) of historically significant scenic areas of the Appalachian National Scenic Trail (AT). Yet measures 1 & 2 do nothing to protect or enhance the Trail's scenic integrity at these locations or any others. Rather, the measures are apparently intended to address hiker safety, which while a laudable objective, is not germane to the Trail's historic characteristics. Thus, the measures would produce a benefit in a unrelated area and address a concern/need that the consulting parties do not raise. Moreover, NPS and ATC maintain very robust hiker safety and GIS mapping programs —the products of which we would be happy to share with the county's first responders— that are not in need of the type of assistance the county has offered.

II. Measure 3 proposed for the Albany and Bethel sites is proper mitigation but is insufficient to meaningfully offset or compensate for the adverse effects the undertaking will have.

We consider the third measure the county proposes as a form of compensation to offset the adverse effects identified, and is included in the category of "mitigate," as opposed to "avoid" or "minimize" with regard to resolving adverse effects. It seeks to offset the direct adverse effects of the undertaking by providing related benefits elsewhere in the form of better information and protection for historic resources of the AT. While we prefer to avoiding and minimizing effects instead, we are open to this type of mitigation in the event that other options are not possible. However, the amount offered by the county is not proportionate the magnitude of the harm inflicted and thus will not create a benefit capable of meaningfully offsetting it. Nor are we yet convinced that other less damaging alternatives could not be implemented that will still in some measure meet the county's basic objectives for an improved radio system.

III. Negotiating mitigation at the Albany site should be suspended while unresolved legal issues pertaining the lease of the site to the county are still pending.

We are aware of an unresolved dispute between our cooperative management partner, ATC, and the Borough of Hamburg related to the legality of the lease the county secured from the borough for its proposed tower site. Until this matter is resolved, we believe that it is premature and potentially futile to negotiate tower specifications and mitigation at this location. It is also a possibility, if litigation ensues, that the National Park Service would be joined as an indispensible party, which would affect negotiations over this site. We request that negations for the Albany and Bethel sites be kept separate and that the former be put on hold until such time as the underlying legal issues are resolved.

Exit 19/Blue Mountain Site

With regard to the Exit 19/Blue Mountain site, we did not identify an adverse effect to the AT based on the balloon simulations performed. This does not mean that the actual tower won't have an adverse effect when constructed, such as visibility of tower lighting, but at this time we have no direct evidence to suggest so. Nonetheless, we have no objections to either of the mitigation measures suggested by the county for this site, and they may offer some level of protection/prevention in the event that an adverse effect occurs. Although we note that implementation of Measure 1 may prove complicated and ineffectual considering the density of vegetative cover already in place. We can discuss the technicalities of the measures in greater detail when we next meet.

Alternative Measures

In addition to comments on the mitigation measures the county suggested, you also asked for our input on alternative measures. As stated previously, our preference is for measures that avoid or minimize effects rather than compensate for or offset them.

In our opinion, further reducing tower height or building in a more inconspicuous location are the best ways to avoid and minimize impacts to the historic property. However, to date, the county has been rather inflexible in this respect, placing the coverage it wants from its system above all else, and applying narrow criteria and limitations that all but preordain the result it prefers. As a last attempt to identify measures to avoid or minimize effects, we suggest that the Commission (FCC) prepare or requisition from an unbiased third party expert an independent analysis of construction options to identify feasible alternative location or designs for the applicant and consulting parties to discuss. It is ultimately the Commission's responsibility to ensure compliance with section 106, and the National Park Service believes that the Commission should assume a more proactive role in ensuring the protection of nationally significant historic properties in this case. Moreover, the Commission, and not the consulting parties, has the technical expertise to evaluate the veracity of the county's analysis and the true feasibility of any alternatives. We will forward this recommendation directly to the Commission as well and request you also make them aware of it.

If the independent analysis is unable to identify any suitable alternative options to avoid or reduce impacts, and verifies the county's assertions, NPS is willing to explore additional options for offsetting or compensating for unavoidable adverse effects, such as eliminating other comparable towers from the affected viewshed, or permanent protection (fee or easement acquisition) of substitute viewshed or protective corridor lands. As part of our ongoing park planning, we maintain a database of potentially suitable properties that we could discuss when the time is appropriate.

Meeting

We would be happy to accept your offer for an in person meeting, however due to preexisting conflicts we propose the afternoon of July 3rd instead. Please let us know if this is agreeable to your schedules.

We thank you very much for your letter and for your continued efforts to find a solution acceptable to all affected parties. We look forward to meeting with you again in the near future and continuing our consultations.

Sincerely,

melaludahill

Pamela Underhill Superintendent Appalachian National Scenic Trail

Cc:

Mr. Stephen Del Sordo, Federal Preservation Officer Federal Communications Commission

Ms. Ann Safley, Pennsylvania Historical & Museum Commission



June 6, 2012

EBI Consulting Attn: Susan B Derrick Technical Director – Cultural Resources 6876 Susquehanna Trail South York, PA 17403

Subject: Options for Mitigation Discussion Albany, Bethel and Exit 19/Blue Mountain Sites Berks County Public Safety Radio Project Berks County, PA

Dear Ms. Derrick:

We are in receipt of your May 23, 2012 letter regarding *Options for Mitigation* for the proposed Berks County communications towers cited above. We look forward to working cooperatively with the county to find a mutually agreeable resolution to this issue. However, we do not feel that any of the mitigation measures suggested by the county are sufficient to avoid, reduce or mitigate the adverse impacts that the proposed towers will have on the Appalachian National Scenic Trail. Our first preference would be that the county provide *avoidance* of, or reduction in, adverse impacts to the Trail rather than offering *compensation* that is not directly related to the impacts of the tower.

We appreciate the county's offer to assist with the development of safety measures for the A.T. and its users. However, we think that much of what the county has suggested in this regard is already in place. The Appalachian Trail Conservancy works cooperatively with its Trail-maintaining clubs, the National Park Service and other partners to promote safe use of the Trail and to educate its users. Many of our guidebooks and other Trail-related literature, as well as our website, provide information on safety. Additionally, A.T. related maps and guidebooks provide detailed information about features and landmarks that help the user know their location and find their way along the Trail.

Furthermore, in the last several years, ATC and associated partners have employed the use of professional grade GPS units to collect digital geographic information on the Trail including the A.T. center line, shelters and overnight sites, springs, road crossings, parking areas and many other features. We would be happy to share any pertinent information with Berks County emergency responders in order to facilitate their safe and timely response to reported emergencies along the A.T. Additionally, we would welcome a meeting with county safety officials, appropriate National Park Service and other partners to discuss and improve Trail related emergency response.

The county has invited us to provide alternative mitigation measures for consideration. Our general suggestions are to:

- Co-locate on existing towers.
- Reconstruct towers/support facilities at existing sites that do not currently meet the county's needs, but could be modified to do so.
- Facilitate the removal/co-location of existing towers of similar magnitude within the A.T. viewshed in exchange for a new tower at a proposed location.
- Reduce the height of the proposed towers to the height of the surrounding forest canopy or to heights that eliminate their visibility from the A.T.

Join the Journey"

Mid-Atlantic Regional Office, 4 East First St., P.O. Box 625, Boiling Springs, PA 17007-0625 Phone: 717.258-5771 Fax: 717.258.1442 www.appalachiantrail.org

A volunteer-based nonprofit organization responsible for the conservation and protection of the Appalachian Trail since 1925

Please note that we do not consider the last two options listed above to be applicable in the case of the Albany (Pulpit Rock) site. We believe that construction of a tower at that location is not a valid option due to the existing deed restrictions.

Lastly, although this correspondence relates only to historic resources, we would like to note that any alternatives adopted to protect historic resources should also mitigate impacts to migrating birds along the Kittatinny flyway.

There may be other mitigation options that we are not aware of and we would welcome any additional suggestions from the county. Our ultimate goal is to ensure that any new towers will result in no-net-loss to the visual and other resources of the Appalachian National Scenic Trail.

Sincerely,

Kana L. Kitz

Karen L. Lutz Regional Director

Cc: Mr. Stephen Del Sordo, Federal Communications Commission Ms. Ann Safley, Pennsylvania Historical and Museum Commission Mr. Michael Yarnall, Blue Mountain Eagle Climbing Club Pamela Underhill, National Park Service

Sarah Farley

From:	towernotifyinfo@fcc.gov
Sent:	Tuesday, April 24, 2012 4:15 PM
То:	Sarah Farley
Subject:	Section 106 Notification of SHPO/THPO Non-Concurrence- Email ID #258910
Attachments:	6607832_04242012161503.pdf

This is to notify you that the Lead SHPO/THPO has not concurred with the following filing:

Date of Action: 04/24/2012

Direct Effect: No Effect on Historic Properties in APE

Visual Effect: Adverse Effect on one or more Historic Properties in APE

Comment Text: While the proposed tower will only minimally visible from the Appalachian Trail, the strobe light required on the tower will adversely affect the the qualities that make the Appalachian Trail eligible for the National Register. The Trail was developed as a wilderness trail. The feeling of being in the wilderness will be seriously disrupted by a strobe light in close proximity to the Trail.

File Number: 0005110510 Purpose: New Tower Submission Packet Notification Date: 7AM EST 03/12/2012 Applicant: The County of Berks, Pennsylvania (EBI 61114599) Consultant: EnviroBusiness, Inc. dba EBI Consulting, Inc. Site Name: Exit 19 / Blue Mountain Site Address: 1553 State Route 183 Site Coordinates: 40-31-52.1 N, 76-12-0.8 W City: Wayne Township County: SCHUYLKILL State:PA Lead SHPO/THPO: Pennsylvania Historical & Museum Commission Bureau for Historic Preservation

NOTICE OF FRAUDULENT USE OF SYSTEM, ABUSE OF PASSWORD AND RELATED MISUSE Use of the Section 106 system is intended to facilitate consultation under Section 106 of the National Historic Preservation Act and may contain information that is confidential, privileged or otherwise protected from disclosure under applicable laws. Any person having access to Section 106 information shall use it only for its intended purpose. Appropriate action will be taken with respect to any misuse of the system.

FCC Form 620

File Number: 0005110510

Notification Date: 7AM EST 03/12/2012

FCC Wireless Telecommunications Bureau

New Tower ("NT") Submission Packet

Approved by OMB 3060 – 1039 See instructions for public burden estimates

General Information

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

Applicant Information

3) FCC Registration Number (FRN): 0003233665

4) Name: The County of Berks, Pennsylvania (EBI 61114599)

Contact Name

5) First Name: Brian	6) MI:	7) Last Name: Gottschall	8) Suffix:
9) Title: Director - EMC			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 633 Court Street			
12) City: Reading			13) State: PA	14) Zip Code: 19603	
15) Telephone Number: (610)374-4800			16) Fax Nu	umber:	
17) E-mail Address: bgottschall@countyofberks.com					

Consultant Information

18) FCC Registration Number (FRN): 0016385759
19) Name: EnviroBusiness, Inc. dba EBI Consulting, Inc.

Principal Investigator

20) First Name: Sarah	21) MI: L	22) Last Name: Farley	23) Suffix:

24) Title: Architectural Historian

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 6876 Susquehanna Trail South			
27) City: York 28) State: PA				28) State: PA	29) Zip Code: 17403
30) Telephone Number: (717)449-4085			31) Fax Nu	umber: (717)428-0403	
32) E-mail Address: sfarley@ebiconsulting.com					

Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	(X) <u>Y</u> es () <u>N</u> o
34) Areas of Professional Qualification:	
() Archaeologist	
(X) 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?	(X) <u>Y</u> es () <u>N</u> o
--	---

If "YES," complete the following:

36) First Name: S. Lorraine	37) MI:	38) Last Name: Norwood	39) Suffix:	
40) Title:				
 41) Areas of Professional Qualification: (X) Archaeologist () Architectural Historian () Historian () Architect () Other (Specify)				
36) First Name: Suzanne	37) MI:	38) Last Name: Derrick	39) Suffix:	
36) First Name: Suzanne 40) Title: Technical Director- Cultural Resourc		38) Last Name: Derrick	39) Suffix:	

36) First Name: Kara	37) MI:	38) Last Name: Briggs	39) Suffix:
40) Title:			
41) Areas of Professional Qualification:			
() Archaeologist			
(X) Architectural Historian			
() Historian			
() Architect			
() Other (Specify)			

Site Information Source Site Information		
1) TCNS Notification Number: 80964		
Site Information		
2) Site Name: Exit 19 / Blue Mountain		
3) Site Address: 1553 State Route 183		
4) City: Wayne Township	5) State: PA	6) Zip Code: 17972
7) County/Borough/Parish: SCHUYLKILL		•
8) Nearest Crossroads: State Route 183 and Appalachian Trail Service Road		
9) NAD 83 Latitude (DD-MM-SS.S): 40-31-52.1	(X) <u>N</u> or () <u>S</u>
10) NAD 83 Longitude (DD-MM-SS.S): 076-12-00.8	() <u>E</u> or (X) <u>W</u>
Tower Information		
11) Tower height above ground level (include top-mounted attachments such as lightn	ing rods): 92.7	() Feet (X) Meters
12) Tower Type (Select One):		
() Guyed lattice tower		
(X) Self-supporting lattice		
() Monopole		
() Other (Describe):		
Project Status		
13) Current Project Status (Select One):		

()	() Construction has not yet commenced	
() Construction has commenced, but is not completed	Construction commenced on:
() Construction has been completed	Construction commenced on:
	Construction completed on:	

Determination of Effect

14) Direct Effects (Select One):

- (${\bf X}$) 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):

- () No Historic Properties in Area of Potential Effects (APE)
- () No Effect on Historic Properties in APE
- (${\rm X}$) No Adverse Effect on Historic Properties in APE
- () Adverse Effect on one or more Historic Properties in APE

 Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may a significance to historic properties which may be affected by the undertaking within the A effects? 	(X) <u>Y</u> es () <u>N</u> o	
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:11 Number of Tribes/NHOs:0		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Absentee-Shawnee Tribe of Indians of Oklahoma

Contact Name

5) First Name: Henryetta	6) MI:	7) Last Name: Ellis	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:	
4) Tribe/NHO Name: Cayuga Nation	

Contact Name

L

5) First Name: Clint	6) MI: C	7) Last Name: Halftown	8) Suffix:
9) Title: Cayuga Nation Representative			

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

 Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may significance to historic properties which may be affected by the undertaking within the effects? 	(X) <u>Y</u> es () <u>N</u> o	
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:11		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Delaware Nation

Contact Name

5) First Name: Tamara	6) MI:	7) Last Name: Francis	8) Suffix:
9) Title: Cultural Preservation Director			

Dates & Response

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:	
4) Tribe/NHO Name: Delaware Tribe of Indians of Oklahoma	

Contact Name

5) First Name: Dr. Brice	6) MI:	7) Last Name: Obermeyer	8) Suffix:
9) Title:			

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

 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?) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:11 Number of Tribes/NHOs:0		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Eastern Shawnee Tribe of Oklahoma

Contact Name

5) First Name: Jo Ann	6) MI:	7) Last Name: Beckham	8) Suffix:
9) Title: Administrative Assistant			

Dates & Response

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Keweenaw Bay Indian Community

Contact Name

5) First Name: Juliet	6) MI: K	7) Last Name: Goyen	8) Suffix:
9) Title: THPO/NAGPRA Technician			

10) Date Contacted	11) Date Replied
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
(X) Replied/Other	

 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?) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:1 Number of Tribes/NHOs:0		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Onondaga Indian Nation

Contact Name

5) First Name: Anthony	6) MI:	7) Last Name: Gonyea	8) Suffix:
9) Title: Faithkeeper			

Dates & Response

10) Date Contacted 11/17/2011	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Seneca-Cayuga Tribe of Oklahoma

Contact Name

5) First Name: Paul	6) MI:	7) Last Name: Barton	8) Suffix:
9) Title: THPO/NAGPRA REP.			

10) Date Contacted	11) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

 Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may a significance to historic properties which may be affected by the undertaking within the A effects? 	(X) <u>Y</u> es () <u>N</u> o	
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:1 Number of Tribes/NHOs:0		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Shawnee Tribe

Contact Name

5) First Name: Kim	6) MI:	7) Last Name: Jumper	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted	11) Date Replied
()No Reply	
() Replied/No Interest	
() Replied/Have Interest	
(X) Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Tuscarora Nation

Contact Name

5) First Name: Leo	6) MI: R	7) Last Name: Henry	8) Suffix:
9) Title: Chief			

Dates & Response		
10) Date Contacted	11) Date Replied	
(X)No Reply		
() Replied/No Interest		
() Replied/Have Interest		
() Replied/Other		

 Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may a significance to historic properties which may be affected by the undertaking within the A effects? 	(X) <u>Y</u> es () <u>N</u> o	
2a) Tribes/NHOs contacted through TCNS Notification Number: 80964 2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs:1 Number of Tribes/NHOs:0		

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: Wyandotte Nation

Contact Name

5) First Name: Sherri	6) MI:	7) Last Name: Clemons	8) Suffix:
9) Title: THPO			

10) Date Contacted	11) Date Replied 02/02/2012
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
(X) Replied/Other	

Other Tribes/NHOs Contacted

Tribe/NHO Information

1) FCC Registration Number (FRN):	
2) Name:	

Contact Name

3) First Name:	4) MI:	5) Last Name:	6) Suffix:
7) Title:			

Contact Information

8) P.O. Box:	And /Or	9) Street Address:			
10) City:		11) State: 12) Zip Code:			12) Zip Code:
13) Telephone Number: 14) Fax Number:					
15) E-mail Address:					
16) Preferred means of communication:					
() E-mail					
() Letter					
() Both					

17)	Date Contacted	18) Date Replied
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Historic Properties

Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?	(X) <u>Y</u> es () <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	() <u>Y</u> es (X) <u>N</u> o
 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. 	() <u>Y</u> es (X) <u>N</u> o

Historic Property

4) Property Name:	Appalachian Trail
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5) SHPO Site Number: Key 144291

Property Address

6) Street Address: Delaware Water Gap, Monroe Cty to Pen Mar Franklin Cty, along the Applachian Ridgeline			
7) City: Multi-Townships	8) State: PA	9) Zip Code: 17972	
10) County/Borough/Parish: SCHUYLKILL			

Status & Eligibility

11) Is this property listed on the National Register? Source:	() <u>Y</u> es (X) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: PHMC CRGIS	(Ⅹ) <u>Y</u> es() <u>N</u> o
13) Is this property a National Historic Landmark?	() <u>Y</u> es (X) <u>N</u> o

14) Direct Effects (Select One):

(${\ensuremath{X}}$) 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

(${\bf \chi}~$) No Adverse Effect on this Historic Property in APE

() Adverse Effect on this Historic Property in APE

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):	
2) Name: Wayne Township Board of Supervisors	

Contact Name

3) First Name: Larry	4) MI:	5) Last Name: Luckenbill	6) Suffix:
7) Title: Chairperson			

Contact Information

8) P.O. Box: 97	And /Or	9) Street Address:			
10) City: Friedensburg			11) State: PA	12) Zip Code: 17972	
13) Telephone Number: (570)739-2629	Ð		14) Fax Nu	umber:	
15) E-mail Address:					
16) Preferred means of communication:					
() E-mail					
(X) Letter					
() Both					

Dates & Response

17) Date Contacted 12/01/2011	18) Date Replied
(X) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

19) Information on local government's role or interest (optional):

1) Has any other agency been contacted and invited to become a consulting party?	(X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN):	
3) Name: National Park Service- Northeast Region	

Contact Name

4) First Name: Dennis	5) MI:	6) Last Name: Reidenbach	7) Suffix:		
8) Title: Regional Director					

Contact Information

9) P.O. Box:	And /Or	10) Street Address: US Custom House 200 Chestnut Street, Fifth Floor			
11) City: Philadelphia				12) State: PA	13) Zip Code: 19106
14) Telephone Number: (215)597-7013	5		15) Fax Nu	umber:	
16) E-mail Address:					
17) Preferred means of communication:					
() E-mail					
(X) Letter					
() Both					

Dates & Response

18) Date Contacted 12/01/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

1) Has any other agency been contacted and invited to become a consulting party?	(X) <u>Y</u> es () <u>N</u> o
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Consulting Party

3) Name: Historical Society of Berks County	2) FCC Registration Number (FRN):	
	3) Name: Historical Society of Berks County	

Contact Name

4) First Name: To Whom It	5) MI:	6) Last Name: May Concern	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 940 Centre Avenue			
11) City: Reading				12) State: PA	13) Zip Code: 19601
14) Telephone Number: (610)375-4375	;		15) Fax Nu	umber:	
16) E-mail Address:					
17) Preferred means of communication:					
() E-mail					
(X) Letter					
() Both					

Dates & Response

18) Date Contacted 12/01/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

1) Has any other agency been contacted and invited to become a consulting party? (X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN):	
3) Name: Historical Society of Schuylkill County	

Contact Name

4) First Name: To Whom	5) MI:	6) Last Name: It May Concern	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 305 North Centre Street			
11) City: Pottsville			12) State: PA	13) Zip Code: 17901	
14) Telephone Number: (570)622-7540 15) Fax Number:					
16) E-mail Address:	16) E-mail Address:				
17) Preferred means of communication:					
() E-mail					
(X) Letter					
() Both					

Dates & Response

18) Date Contacted 12/01/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party? (2)	(X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN):	
3) Name: Berks County Conservancy	

Contact Name

4) First Name: To Whom	5) MI:	6) Last Name: It May Concern	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 25 North 11th Street			
11) City: Reading			12) State: PA	13) Zip Code: 19601	
14) Telephone Number: (610)372-4992 15) Fax Number:					
16) E-mail Address:					
17) Preferred means of communication:					
() E-mail					
(X) Letter					
() Both					

Dates & Response

18) Date Contacted 12/01/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

1) Has any other agency been contacted and invited to become a consulting party?	(X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN):

3) Name: APPALACHIAN TRAIL CONFERENCE

Contact Name

4) First Name: David	5) MI:	6) Last Name: Startzell	7) Suffix:
8) Title: Executive Director			

Contact Information

9) P.O. Box: 807	And /Or	10) Street Address: 799 Washington Street				
11) City: Harpers Ferry				12) State: WV	13) Zip Code: 25425	
14) Telephone Number: (304)535-6331			15) Fax Number:			
16) E-mail Address:						
17) Preferred means of communication:						
() E-mail						
(X) Letter						
() Both						

Dates & Response

18) Date Contacted 12/02/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

Other Consulting Parties Contacted

Consulting Party

2) FCC Registration Number (FRN): 0021354493	
3) Name: The Appalachian Trail Conservancy	

Contact Name

4) First Name: Michele	5) MI:	6) Last Name: Miller	7) Suffix:
8) Title: Resource Program Manager			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 4 East First Street			
11) City: Boiling Springs			12) State: PA	13) Zip Code: 17007	
14) Telephone Number: (717)258-5771		15) Fax Number:			
16) E-mail Address: mmiller@applachaintrail.org					
17) Preferred means of communication:					
(X)E-mail					
() Letter					
()Both					

Dates & Response

18) Date Contacted 01/01/2011	19) Date Replied 01/01/2011
())No Reply	
() Replied/No Interest	
() Replied/Have Interest	
(X) Replied/Other The Appalachian Trail Conservancy (ATC) has re	quested to be included on all filings adjacent to the Appalachian Trail.

Additional Information

20) Information on other consulting parties' role or interest (optional):

Please note: The ATC participated in consultation meetings with the County of Berks and Hawk Mountain prior to EBI's involvement; consequently, the group did not receive an Invitation to Consult letter.

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party? (X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN): 0021351176
3) Name: Nat'l Park Service, Appalachian National Scenic Trail

Contact Name

4) First Name: W. Brent	5) MI:	6) Last Name: Allen	7) Suffix:
8) Title: Environmental Protection Specialist			

Contact Information

9) P.O. Box: 50	And /Or	10) Street Address:		
11) City: Harpers Ferry			12) State: WV	13) Zip Code: 25425
14) Telephone Number: (304)535-4003		15) Fax Number:		
16) E-mail Address: william_b_allen@nps.gov				
17) Preferred means of communication:				
(X)E-mail				
() Letter				
() Both				

Dates & Response

18) Date Contacted 12/02/2011	19) Date Replied
(X)No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

20) Information on other consulting parties' role or interest (optional):

The NPS has requested consulting party status on the three sites along the Appalachian Trail.

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	(X) <u>Y</u> es () <u>N</u> o
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Consulting Party

2) FCC Registration Number (FRN): 0021546783
3) Name: Hawk Mountain

Contact Name

4) First Name: Laurie	5) MI:	6) Last Name: Goodrich, Ph.D.	7) Suffix:
8) Title: Senior Monitoring Biologist			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 410 Summer Valley Road				
11) City: Orwigsburg			12) State: PA	13) Zip Code: 17961		
14) Telephone Number: (570)943-3411 15) Fa			15) Fax Nu	ax Number:		
16) E-mail Address: goodrich@hawkmtn.org						
17) Preferred means of communication:						
(X)E-mail						
() Letter						
() Both						

Dates & Response

18) Date Contacted 01/01/1900	19) Date Replied 01/01/1900			
()No Reply				
() Replied/No Interest				
() Replied/Have Interest				
(X) Replied/Other Dr. Goodrich has indicated that she would like to be kept informed about the sites along the Appalachian Trail.				

Additional Information

20) Information on other consulting parties' role or interest (optional):

Please note: Hawk Mountain participated in consultation meetings with the County of Berks and the Appalachian Trail Conservancy prior to EBI's involvement; consequently, the group did not receive an Invitation to Consult letter.

Designation of SHPO/THPO

1) Designate the Lead State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) based on the location of the tower.

SHPO/THPO

Name: Pennsylvania Historical & Museum Commission Bureau for Historic Preservation

2) You may also designate up to three additional SHPOs/THPOs if the APEs include multiple states. If the APEs include other countries, enter the name of the National Historic Preservation Agency and any state and provincial Historic Preservation Agency.

SHPO/THPO Name:	
SHPO/THPO Name:	
SHPO/THPO Name:	

Certification					
I certify that all representations on this FCC Form 620 St	ubmission Pack	et and the accompanying attachments are true,	correct,	and complete.	
Party Authorized to Sign					
First Name: Suzanne	MI: B	Last Name: Derrick		Suffix:	
Signature: Suzanne B Derrick				03/09/2012	
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 I. Consultant Information

Provide a current copy of the résumé 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.

Résumés are attached 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.



Architectural Historian 6876 Susquehanna Trail South York, PA 17403 Mobile: 215.908.9207

SUMMARY OF EXPERIENCE

Ms. Briggs has both practical and academic experience in the field of historic preservation and meets the requirements as an architectural historian as specified in 36CFR61 by the Department of the Interior. She received a Masters degree in Urban Affairs and Public Policy with a concentration in Historic Preservation from the University of Delaware. She has professional experience in architectural history conducting cultural resource surveys, assessing National Register eligibility of historic resources, and ensuring Section 106 compliance. Ms. Briggs has also completed Historic American Building Survey (HABS) documentation of historic buildings and Determination of Eligibility (DOE) forms for State Historic Preservation Offices (SHPOs).

Ms. Briggs's responsibilities at EBI include performing architectural field surveys, evaluating eligibility of historic properties, and visual effects assessments in order to complete Section 106 and NEPA compliance documentation necessary to ensure client compliance with Federal Communications Commission (FCC) requirements under the National Environmental Policy Act (NEPA).

EDUCATION

M.A. Urban Affairs and Public Policy University of Delaware Concentration in Historic Preservation Certificates in Museum Studies, and Human Subjects Training

B.A. Interior Design

Savannah College of Art & Design



Program Manager Office/Mobile: 770.630.5171

SUMMARY OF EXPERIENCE

13 years experience in archaeology and historic preservation, NEPA, telecommunications environmental compliance, client portfolios for Sprint, Verizon, AT&T, Nextel Communications, T-Mobile, Crown Castle, SBA, American Tower and many others.

RELEVANT PROJECT EXPERIENCE

National Environmental Policy Act (NEPA) Reviews

NEPA Manager/Author, NEPA reviews for telecommunications towers in Alabama, Florida, Georgia, North Carolina, and South Carolina including completion of FCC Form 620/621/E-106, with additional cultural resource reports for history and archaeology, tower construction notification system (TCNS) submittal, tribal communications, and assessment for potential wetland-related and flood plain issues.

Georgia Department of Transportation (GDOT)

Project Manager for archaeology and historic structure surveys for GDOT projects: SR 11/US 129 Blairsville, Hall and Forsyth Counties: SR 369, Fulton County: East Point Sidewalk Project, Fulton County: SR 400/ I-85 Connector Ramps, Fayette County: East Fayetteville Bypass, Dawson County: Intersection Improvement: GA 400, and SR 133 Corridor, Albany to Moultrie, GA.

Historic Structure Surveys

Project Manager, Historic Structure Surveys for Columbia County, Georgia; the cities of Albany, Norcross, and Yatesville. Georgia; and Barbour County, Alabama. Author, Centerville, Georgia Attrition Study Mitigation Project.

Authorized Project Reviewer, Manager

Archaeological reconnaissance survey of proposed wind turbine facilities in Comanche County, Oklahoma; 16 miles of turbine lines and 50 turbine locations for cultural resources. Archaeological reconnaissance survey of proposed wind turbine facilities in Ford County, Kansas; 62 miles of turbine lines and approximately 275 turbine locations for cultural resources

National Register Nomination, The Blake House, Arden, North Carolina

Conducted historic and architectural research on a c. 1850 Gothic Revival structure. Completed Nomination Form for the National Register of Historic Places. Form and narrative description accepted by the North Carolina State Historic Preservation Office for submittal to the National Register Board.

Archaeological Surveys – Principal Investigator

Trumann, Arkansas: Archaeological survey of 14-acre site for large retail chain Tuskegee, Alabama: Historical research and archaeological investigation of Moton Air Field, National Park Service site in advance of the Tuskegee Airmen interpretive site and museum.

EDUCATION

BA ENGLISH AND CREATIVE WRITING BA ANTHROPOLOGY MA ARCHAEOLOGY

PROFESSIONAL COURSES

Georgia Department of Transportation: Environmental Impacts Analysis: Understanding Indirect and Cumulative Effects-January 2011 National Preservation Institute: Section 106: An Introduction-June 2010 Advisory Council on Historic Preservation: The Section 106 Advanced Seminar-August 2010 FHWA-NHI-142005 NEPA & Transportation Decisionmaking, Atlanta, Georgia, 2007 Comprehensive NEPA Training, Denver, Colorado, August 2006 Speaker, PCIA National Conference, Nashville, Tennessee, September 2006

PROFESSIONAL REGISTRATIONS

REGISTERED PROFESSIONAL ARCHAEOLOGIST

PUBLICATIONS

DULUTH (A HISTORY OF DULUTH, GA 2011, ARCADIA PUB LISHING)

SUMMARY OF EXPERIENCE

Ms. Farley has completed her formal education in historic preservation and meets the requirements for architectural historian as specified in 36CFR61 by the Department of the Interior. She received a Masters degree in Historic Preservation from the University of Vermont. Ms. Farley has more than 7 years of professional experience specializing in architectural history and Section 106 Compliance. She has conducted and participated in surveys on a variety of historic property types including rural, urban, commercial, residential, and industrial sites. She has successfully completed project assignments including architectural surveys and eligibility reports for the Federal Highway Administration, the Federal Communications Commission, and the Navy.

Ms. Farley's responsibilities at EBI include helping clients navigate the environmental review process to ensure compliance with Federal Communications Commission (FCC) requirements under the National Environmental Policy Act (NEPA) and the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA). Ms. Farley has also been instrumental in developing and maintaining relationships with various state agencies and the Federal Communications Commission, whose comments on telecommunications projects are critical for timely installation.

EDUCATION

2001 MS, Historic Preservation, University of Vermont

1997 B.A., History, College of Wooster

TELECOMMUNICATIONS PROJECT EXPERIENCE

516 G.A. Miller Road, Falling Waters, West Virginia

This project involves construction of a new monopole within the boundary of the National Registereligible Falling Waters Battlefield (Civil War). Ms. Farley is working with the State Historic Preservation Office, the National Park Service- American Battlefield Protection Program, and the Falling Waters Battlefield Association to develop a mitigation plan to address the effects of the proposed project on the historic resource.

3800 Bunch of Walnuts Road, Chesapeake, Virginia

This project involved the collocation of antennas on an existing 490-foot tower that did not undergo Section 106 review with the Virginia Department of Historic Resources prior to its construction. Ms. Farley worked directly with the Federal Communications Commission and the City of Chesapeake to bring the existing tower into compliance with the NPA in order to facilitate the installation of antennas on the tower.

5208 Dogwood Road, Baltimore, Maryland

This project involves the construction of a monopole adjacent to the boundary of the National Registerlisted Franklintown Historic District. Ms. Farley conducted historical research, site visits, public meetings and a crane test in order to produce a Determination of Eligibility form for the property as required by the Maryland Historical Trust. Ms. Farley worked directly with the Federal Communications Commission, the Maryland Historical Trust, the Historic Franklintown Association, Maryland House of Delegates members, and the public to assess the effects of the proposed project on historic properties. Additionally, Ms. Farley was certified as an expert witness in Historic Preservation by the Baltimore County Zoning Board and testified before the Board regarding the methodology and effects associated with the proposed project.

PROFESSIONAL EXPERIENCE

- April 2004-Present, EBI Consulting Architectural Historian (see above for details)
- 2001-2004, A.D. Marble & Company, Inc.

Architectural Historian In her position as architectural historian, Ms. Farley conducted architectural surveys and historic research, and completed determinations of eligibility and effects documentation.

2001, John Milner Associates

Architectural Historian Ms. Farley worked as an architectural historian with John Milner Associates for several months in 2001. In this capacity, she was responsible for conducting historical research and field visits, preparing assessments of effect, determinations of National Register eligibility, and surveys of historic architectural resources.

2001, Wyoming State Historic Preservation Office

Review and Compliance Historian Ms. Farley reviewed all project reports for effects on linear resources, historic landscapes, and the built environment. In this position she evaluated reports for compliance with 36CFR800 (as amended), conducted field visits with federal agencies, and provided mitigation and resource evaluation recommendations. Additionally, she assisted with drafting Memoranda of Agreement for projects with adverse effects to cultural resources.

RELEVANT PROJECT EXPERIENCE

In addition to Ms. Farley's work at EBI, she has conducted and participated in surveys on a variety of historic property types including rural, urban, commercial, residential, and industrial sites. She has participated in numerous research and teaching projects in which she conducted field investigations of historic structures and wrote conditions assessment reports. She has also worked as a review and compliance historian for the Wyoming State Historic Preservation Office, reviewing cultural resource reports for Section 106 compliance.

2002 MAGLEV: Findlay, Moon, and Robinson Townships, McKees Rocks Borough, and City of Pittsburgh, Allegheny County, PA., Port Authority of Allegheny County, PA.

Project involved cultural resource studies associated with the proposed installation of a highspeed magnetic levitation train. Assisted with preparation of Historic Structures Survey/Determination of Eligibility Report.

2002 S.R. 2006, Section 001, Lower Oxford Township, Chester County, and Little Britain Township, Lancaster County, PA., PENNDOT District 8-0.

Project involved the rehabilitation of the Pine Grove Covered Bridge over Octoraro Creek. Conducted property surveys and recordation, historical research, and prepared Pennsylvania Historic Resource Survey forms and Determination of Eligibility Report. 2003 Wilkes-Barre/Scranton International Airport, Lackawanna and Luzerne Counties, PA, Acker Associates, Inc.

Project involved architectural surveys in association with proposed runway safety area improvements. Defined the Area of Potential Effect and prepared associated letter report. Delineated, researched, and documented an historic district and prepared Pennsylvania Historic Resource Survey form.

PUBLICATIONS

2000 Heritage Walking Tour of Downtown Swanton, Vermont. Prepared for the Swanton Historical Society. Researched, designed and created a brochure and map of the walking tour route through the village of Swanton.

SUMMARY OF EXPERIENCE

Ms. Derrick has more than 11 years of professional experience specializing in architectural history and Section 106 Compliance. She has conducted and managed surveys on a variety of historic property types including rural, urban, commercial, residential, and industrial sites as well as linear transportation corridors. She has successfully completed project assignments including architectural surveys and eligibility reports for private developers, municipalities, the New Jersey Department of Transportation, and the Federal Communications Commission.

Ms. Derrick's responsibilities at EBI include managing the quality and productivity of the Cultural Resource Management team, providing technical assistance and helping clients navigate the environmental review process to ensure compliance with Federal Communications Commission (FCC) requirements under the National Environmental Policy Act (NEPA) and the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA).

EDUCATION

- 1995-1997 M.S. Candidate, Historic Preservation, School of the Art Institute
- 1988-1992 B.S., Psychology, Lawrence University

TELECOMMUNICATIONS PROJECT EXPERIENCE

I State Home Road, Monroe Township, Middlesex County, New Jersey

This project involves construction of a new wireless telecommunication facility contained inside a proposed faux lookout tower within the boundary of the National Register-eligible New Jersey Training School For Boys Historic District. Ms. Derrick supervised the survey to identify the historic resource and then worked with the State Historic Preservation Office and the project proponent to develop a mitigation plan to address the effects of the proposed project on the historic resource.

5 Hewitt Road, Stockton (Delaware Township), Hunterdon County, New Jersey

This project involved the construction of a monopole adjacent to an eligible rural historic district. Ms. Derrick worked with the project proponent to exhaust all alternatives for re-location of the site further away from the historic district. When no other sites were available Ms. Derrick coordinated the continued consultation between the New Jersey Historic Preservation Office, the Delaware Township Historic Preservation Commission and the project proponent that resulted in a Conditional No Adverse Effect Finding.

24 Conifer Drive, Mendham Township, Morris County, New Jersey

This project involves the construction of a wireless telecommunications facility onn a tree-type monopole adjacent to the boundary of the National Register-eligible Brookside Historic District. Ms. Derrick completed historical research, site visits, public meetings and a balloon test in order to assess the effects of the proposed project on historic properties. Ms. Derrick coordinated the negotiations associated with the Memorandum of Agreement process between the local consulting parties, the municipality, New Jersey Historic Preservation Office, the Federal Communications Commission and the project proponent.

PROFESSIONAL EXPERIENCE

July 2008-Present, EBI Consulting

Technical Director – Cultural Resources (see above for details)

April 2007- July 2008, E2 Project Management, Inc.

Division Manager – Cultural Resources Management In her position as Division Manager-Cultural Resources, Ms. Derrick developed a cultural resources compliance program for an engineering and environmental consulting company, marketed the new services, built and maintained client relationships and managed more than 450 wireless telecommunication projects.

January 2001 – February 2007, Richard Grubb & Associates

Architectural Historian/Wireless Telecom Projects Manager Ms. Derrick worked as an architectural historian with Richard Grubb & Associates and then was promoted to a position developing and managing a regulatory compliance program for the wireless telecommunications industry. As an architectural historian, Ms. Derrick was responsible for conducting historical research and field visits, preparing assessments of effect, determinations of National Register eligibility, and surveys of historic architectural resources. As the Wireless Telecom Projects Manager, Ms. Derrick developed and marketed compliance survey products tailored to the wireless telecommunications industry and managed the successful completion of more than 1400 compliance documents for all the major carriers and tower builders.

March 2000 – January 2001, New Jersey Historic Trust

Historic Preservation Specialist Ms. Derrick reviewed grant applications, conducted site visits and prepared presentations for the grant selection committee. Once grantees were awarded, Ms. Derrick reviewed and recommended for approval/denial grantees reimbursement requests.

November 1998 – December 1999, Carol Yetken Landscape Design

Research Assistant Ms. Derrick completed archival research, conducted field survey and condition assessments and completed report writing for historic landscape surveys and historic landscape restoration projects.

May 1997 – November 1998, Pleasant Home Foundation Assistant Director Ms. Derrick's responsibilities included raising funds for the restoration of the historic home, working with the historic architect to prepare a Preservation Plan and then a Historic Structures Report and to manage the volunteer program.

RELEVANT PROJECT EXPERIENCE

In addition to Ms. Derrick's work at EBI, she has conducted or supervised surveys on a variety of historic property types including rural, urban, commercial, residential, and industrial sites. She has been the principal investigator for numerous research projects in which she conducted field investigations of historic structures and made determinations of eligibility.

2003 Cultural Resources Investigation of the Replacement of NJ Route 70 Bridge over Bispham's Mill Creek (Structure No. 0311-150), Pemberton and Woodland Townships, Burlington County, NJ. Project included an archaeological survey and intensive-level architectural survey for the replacement of Structure No. 0311-150 over Bispham's Mill Creek. Ms. Derrick served as the principal investigator and completed the survey of historic resources within the Areal of Potential Effects. As a result of the survey, one historic resource was identified – The Rockefeller Memorial Highway (NJ Route 70) Historic District. While the entire length of the Rockefeller Memorial Highway was found to have historical significance, only a 10-mile section was determined eligible for listing. Mitigation measures included the full survey of the historic district and replication of significant design features in the new structure.

2004 Cultural Resources Investigation of the Replacement of the West Brook Road Bridge over the Wanaque Reservoir, Wanaque Borough, Passaic County, NJ.

Project included an archaeological survey and an intensive-level architectural survey for the replacement of the West Brook Road Bridge over the Wanaque Reservoir. Ms. Derrick served as the principal investigator and completed the survey of historic resources within the Area of Potential Effects. As a result of the survey, one historic resource was identified. – The Wanaque Reservoir Historic District. Mitigation measures included full survey of the historic district, HABS/HAER documentation of the existing bridge, and replication of significant design features in the new structure.

2004 Cultural Resources Investigation of the Replacement of Paterson-Hamburg Turnpike Bridge over the Pequannock River, Borough of Butler, Morris County and Borough of Bloomingdale, Passaic County, New Jersey.

Cultural Resources Investigation including alternatives analysis, archaeological survey and intensive-level architectural survey for the replacement of the Paterson-Hamburg Turnpike Bridge over the Pequannock River. Ms. Derrick served as the principal investigator and completed the survey of historic resources within the Area of Potential Effects. The survey included the identification of two potential resources, the White's Paper Mill Historic District and the Paterson-Hamburg Turnpike. Of the two, only the White's Paper Mill was considered to possess enough integrity to warrant listing on the National Register of Historic Places. An assessment of effects on the identified White's Paper Mill Historic District determined that the Paterson-Hamburg Turnpike Bridge was not a contributing element to the historic district.

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 collocation 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 communications tower or non-tower structure.

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

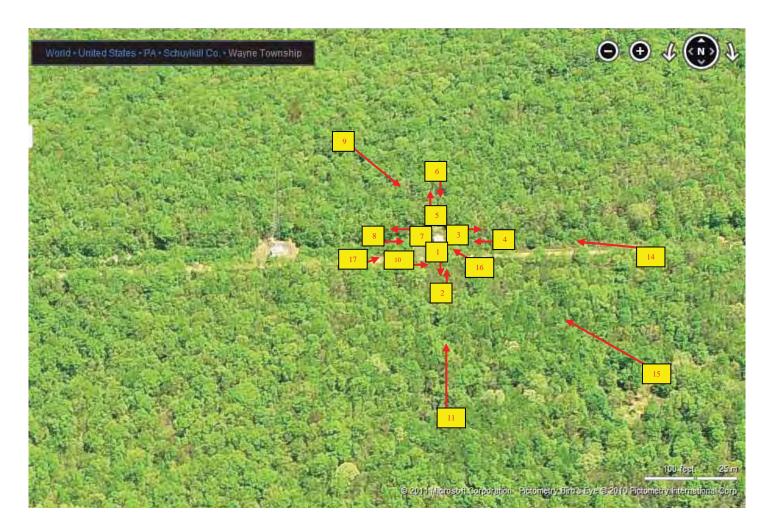
c. If any listed or eligible properties are visible from the proposed collocation site, photographs looking at the site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included. If any listed or eligible properties are within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

Include aerial photos of the APE for visual effects, if available. There are a variety of publicly available websites that provide aerial photographs.

Please see the attached Photographs, which were taken by Ms. Kara A. Briggs, Architectural Historian with EBI Consulting on December 1, 2011, unless otherwise noted. A photograph location map is included within this attachment.

A balloon test was conducted by Network Building & Construction December 12, 2011. The balloon test and photo simulation are also appended to this Attachment.

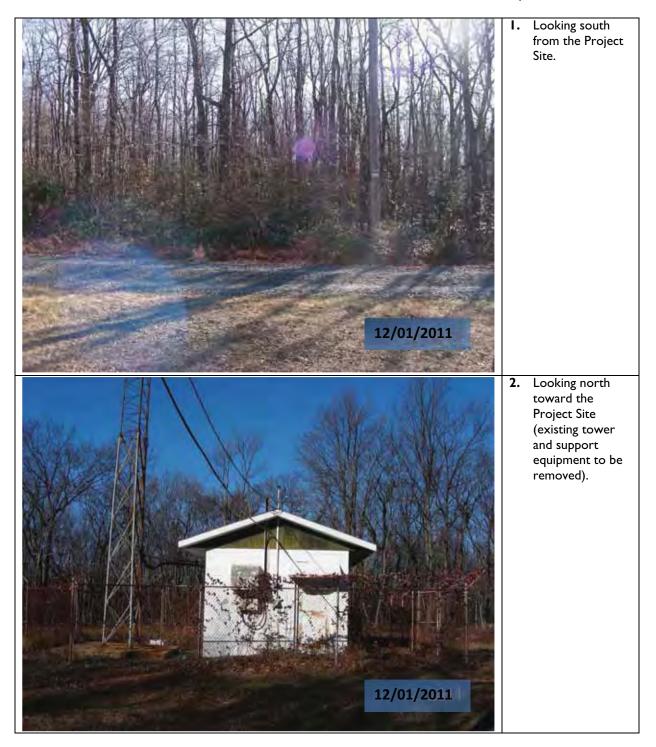
Approved by OMB 3060-1039 See instructions for public burden estimates



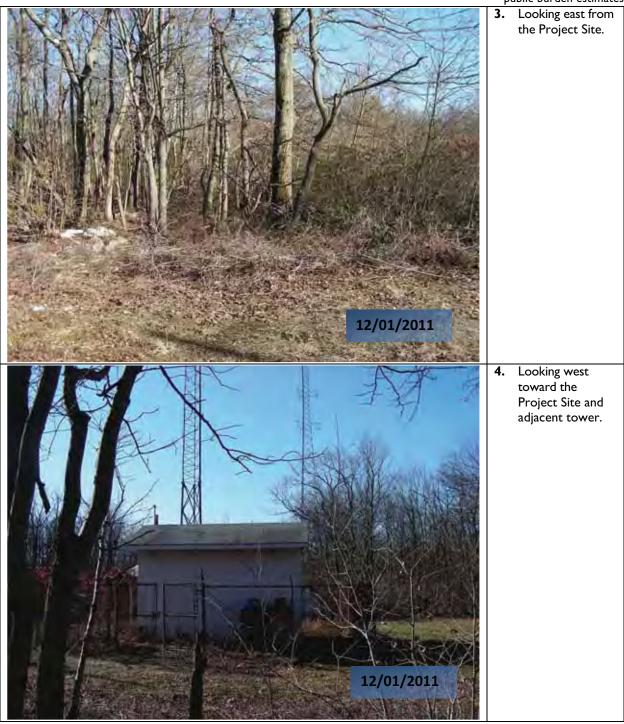
Site Location Map and Photo Location Map I

Arrow indicates the approximate location and direction in which the photograph was taken

Approved by OMB 3060-1039 See instructions for public burden estimates



Approved by OMB 3060-1039 See instructions for public burden estimates

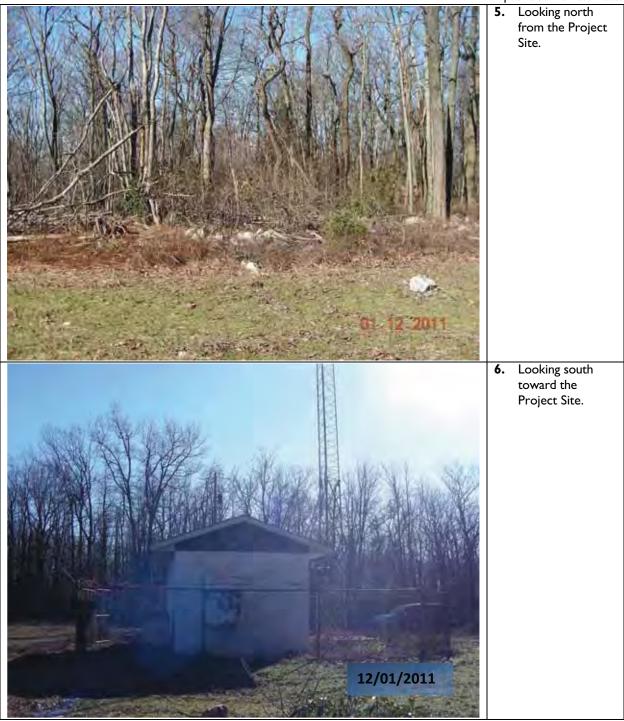


 Applicant's Name:
 The County of Berks

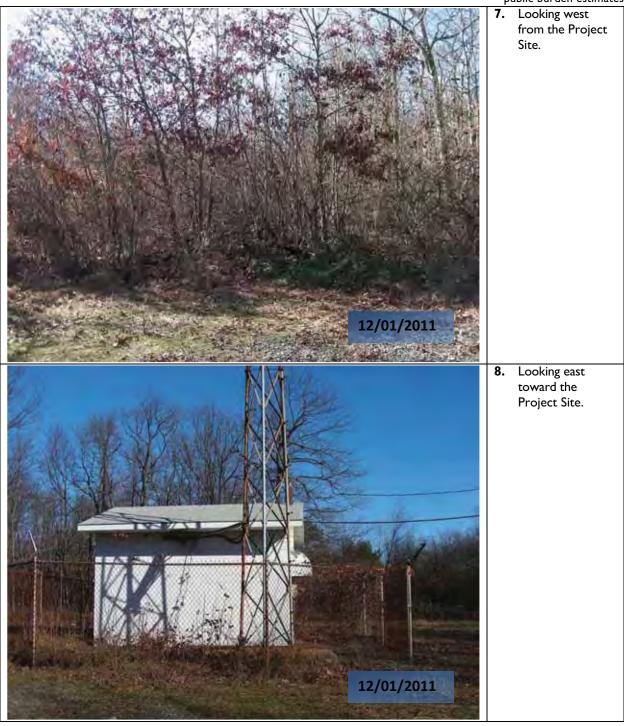
 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599

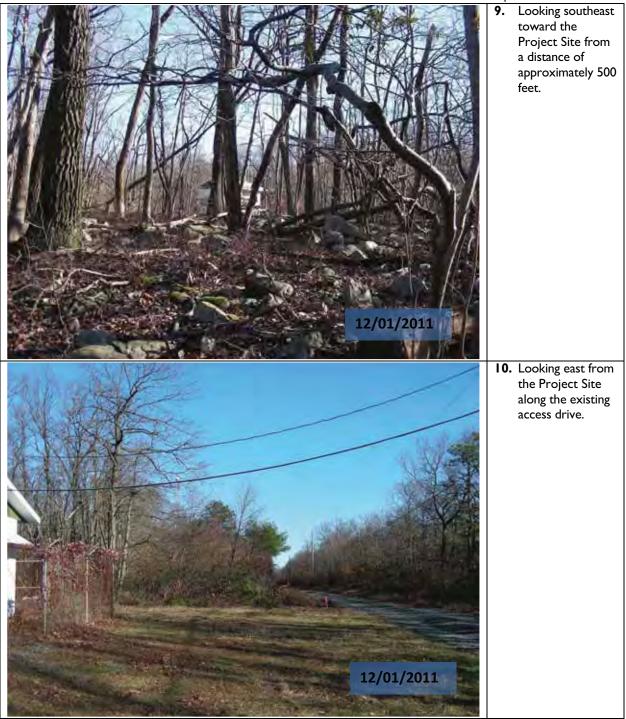
Approved by OMB 3060-1039 See instructions for public burden estimates



Approved by OMB 3060-1039 See instructions for public burden estimates



Approved by OMB 3060-1039 See instructions for public burden estimates

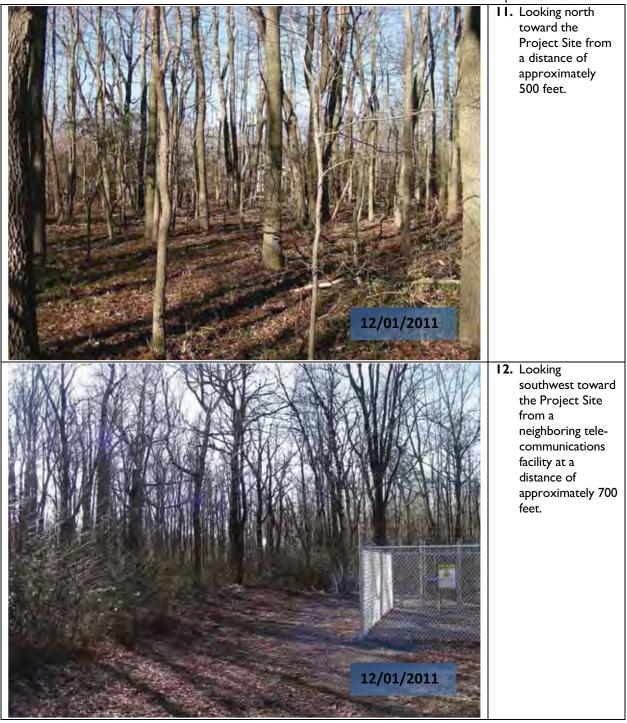


 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
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Approved by OMB 3060-1039 See instructions for public burden estimates

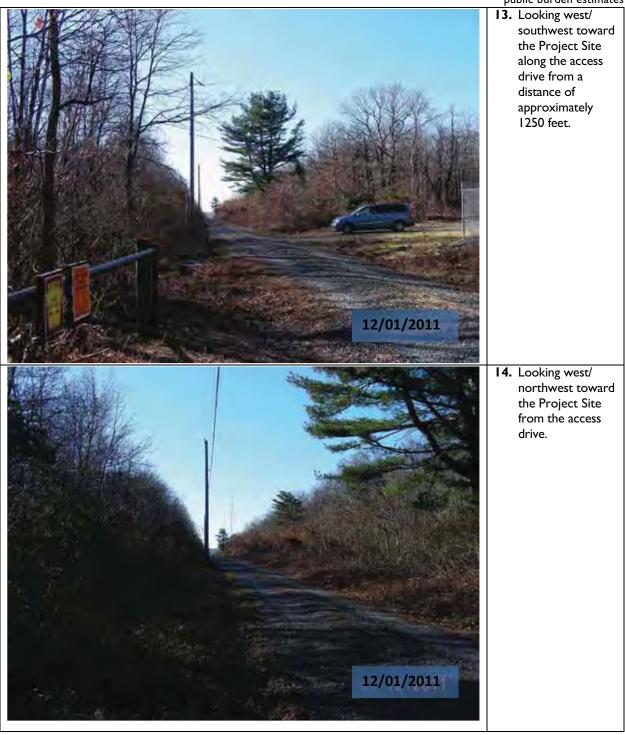


 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

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Approved by OMB 3060-1039 See instructions for public burden estimates

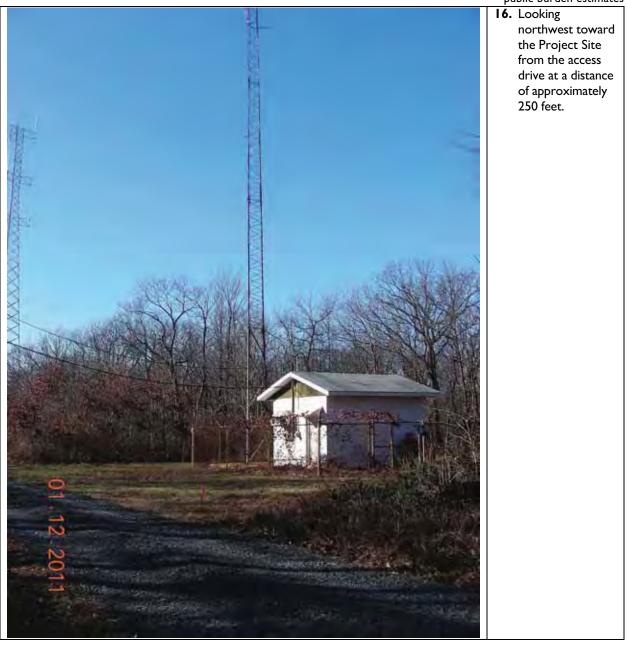


 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599

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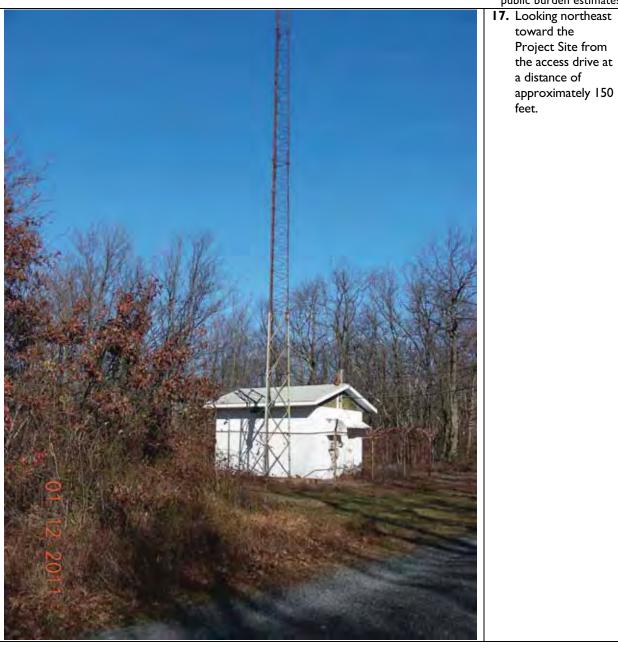


 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599

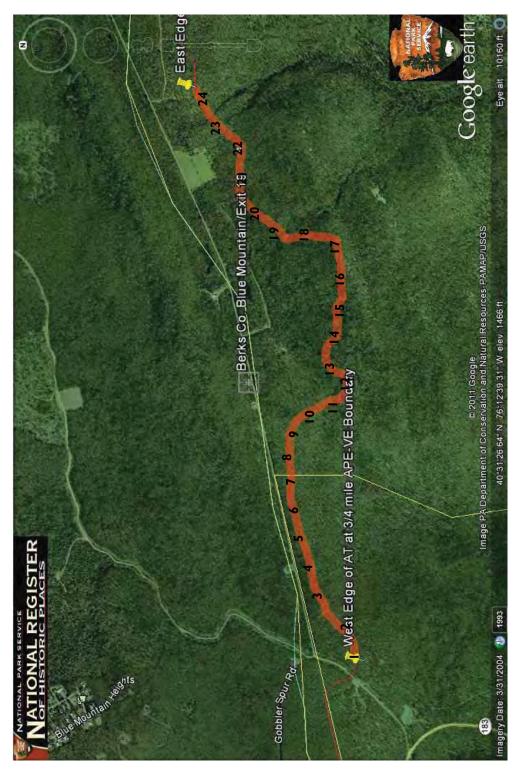
Approved by OMB 3060-1039 See instructions for public burden estimates toward the Project Site from the access drive at a distance of approximately 150 feet.



Applicant's Name: The County of Berks Project Name: <u>Exit 19/Blue Mountain</u> Project Number: EBI #61114599

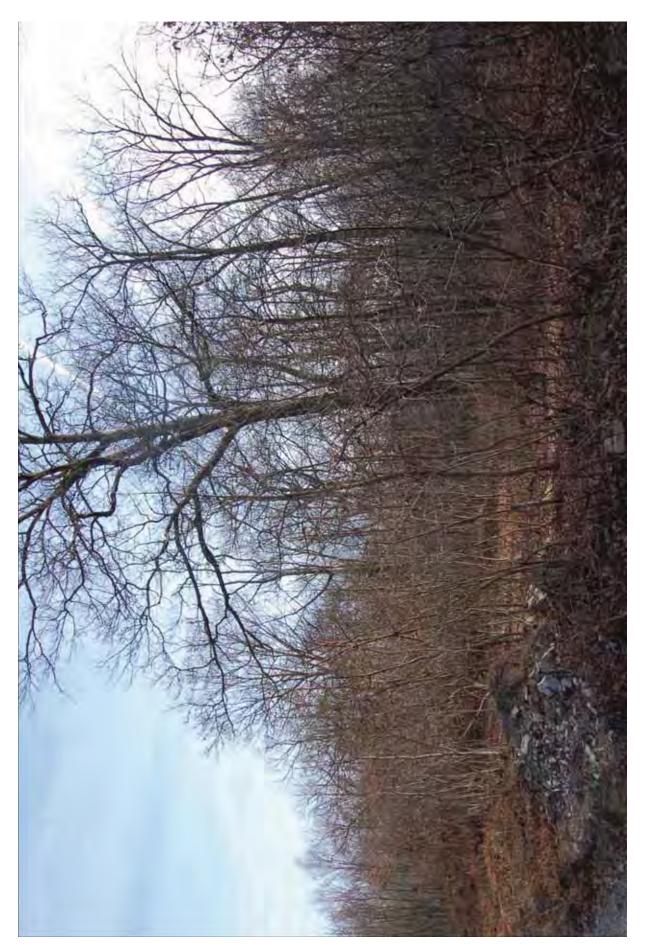
61114599 - Exit 19 / Blue Mountain

Overview image from Google Earth showing project site and the Appalachian Trail



Key: Red line = Appalachian Trail (AT)

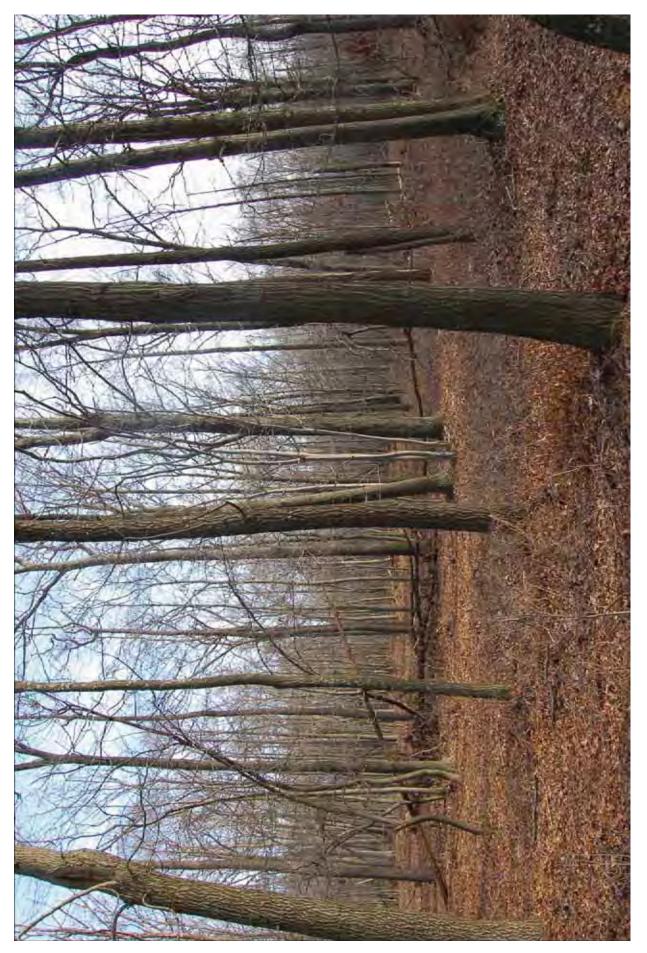
Orange Highlighting over Red line = potential affected area on AT



View 1-. The balloon is not visible due to the intervening vegetation.



View 2 –. The balloon is not visible due to the intervening vegetation.



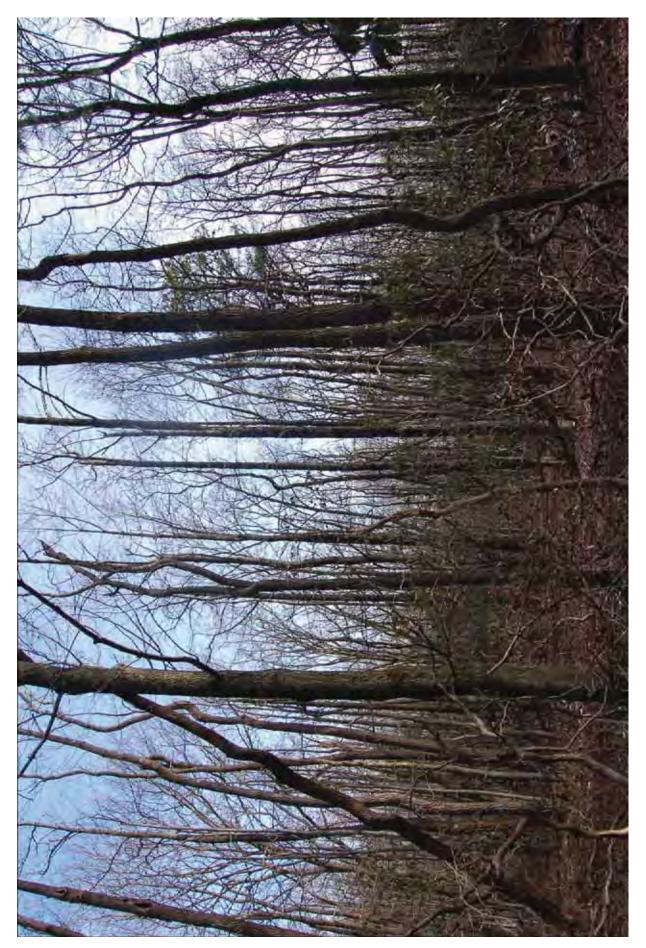
View 3 – The balloon is not visible due to the intervening vegetation.



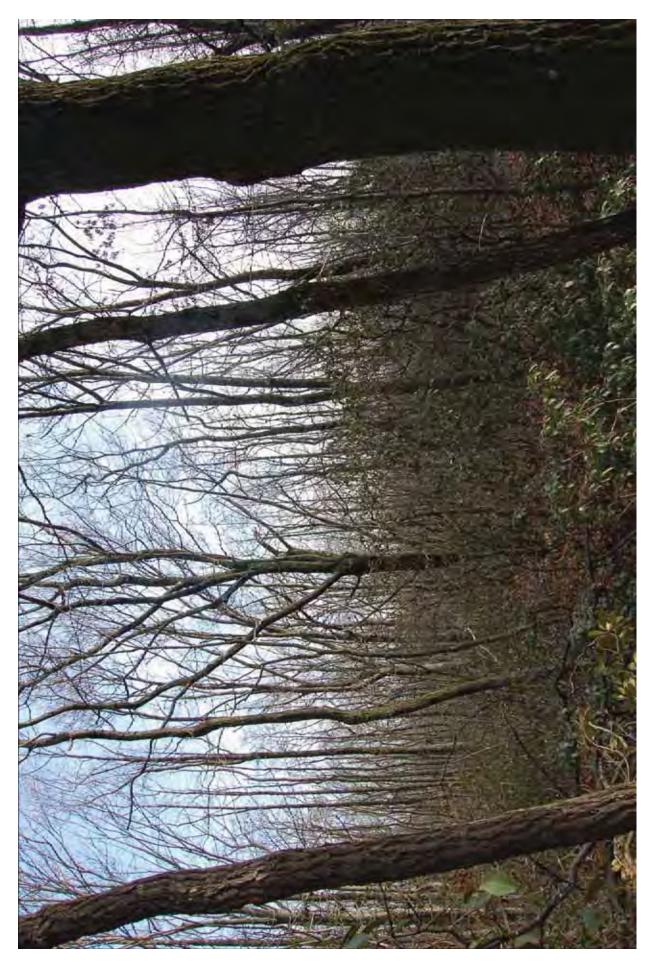
View 4 – The balloon is not visible due to the intervening vegetation.



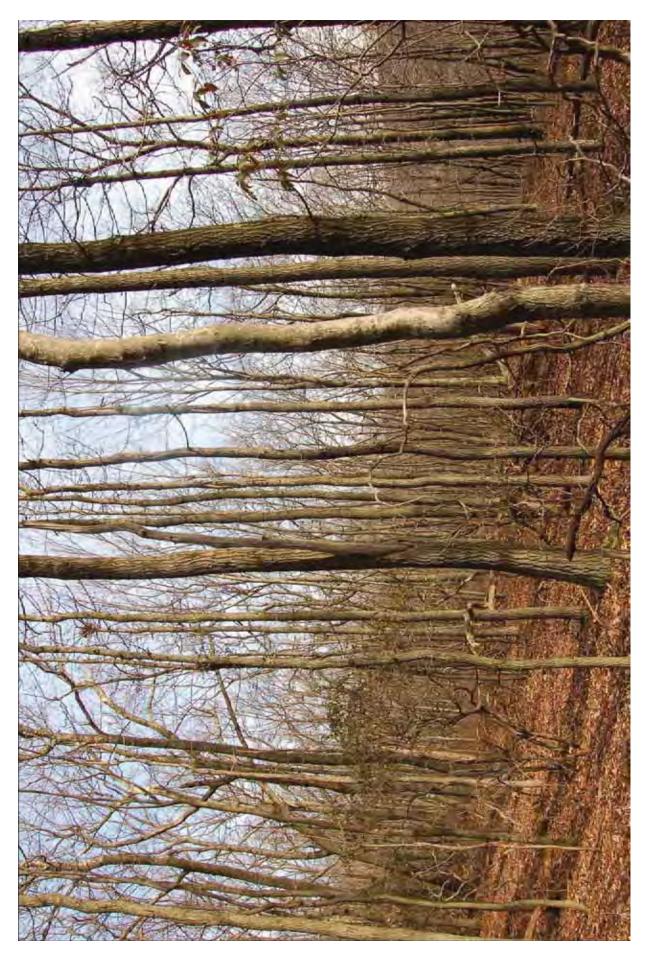
View 5 – The balloon is not visible due to intervening vegetation.



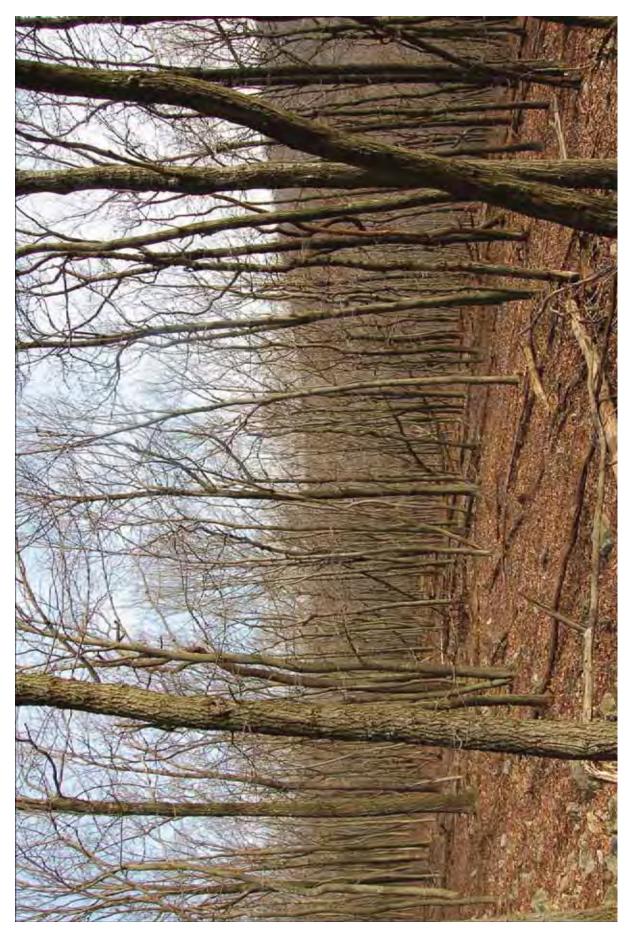
View 6-The balloon is not visible due to intervening vegetation.



View 7 – The balloon is not visible due to intervening vegetation.



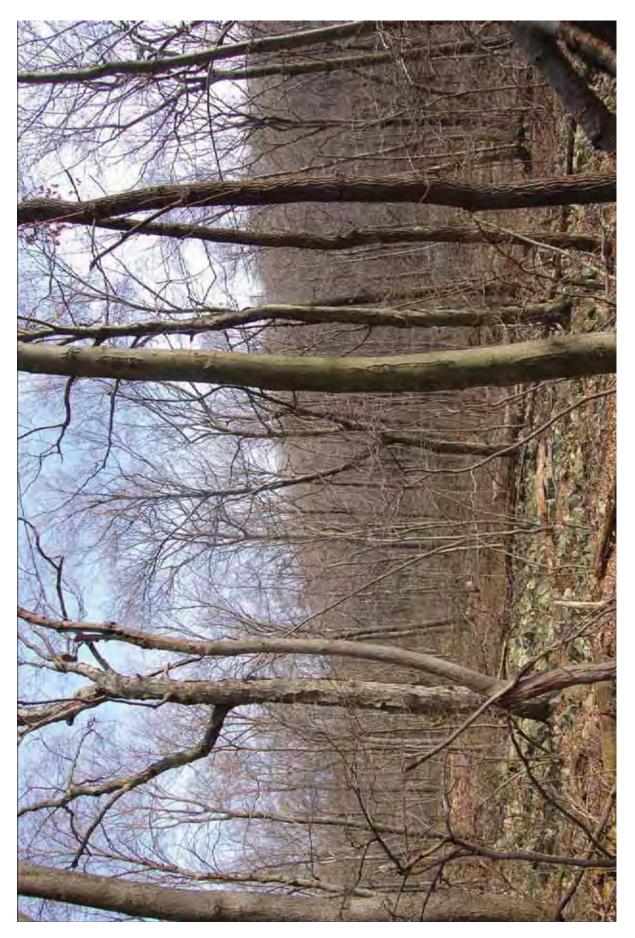
View 8 – The balloon is not visible due to intervening vegetation.



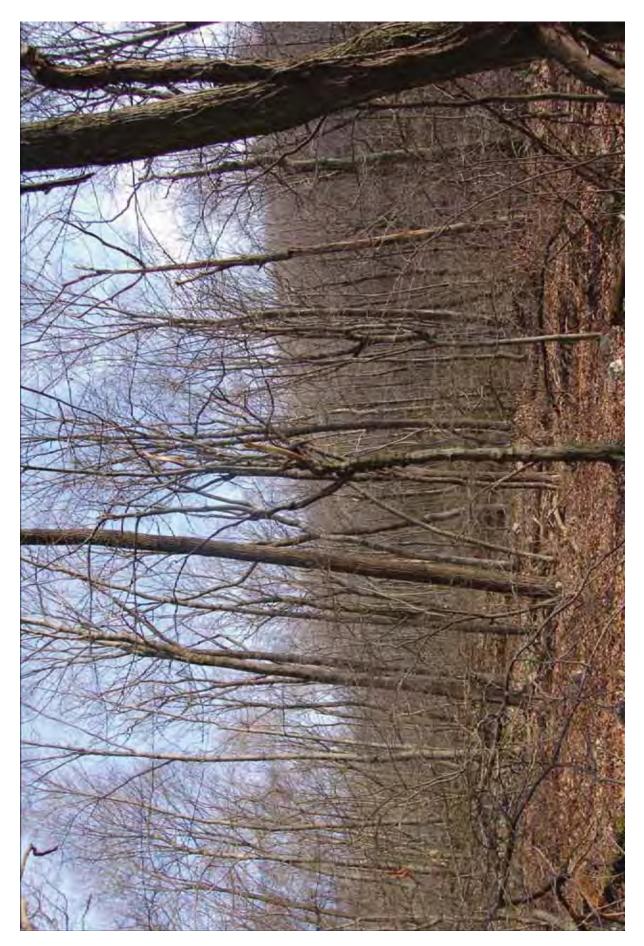
View 9 – The balloon is not visible due to intervening vegetation.



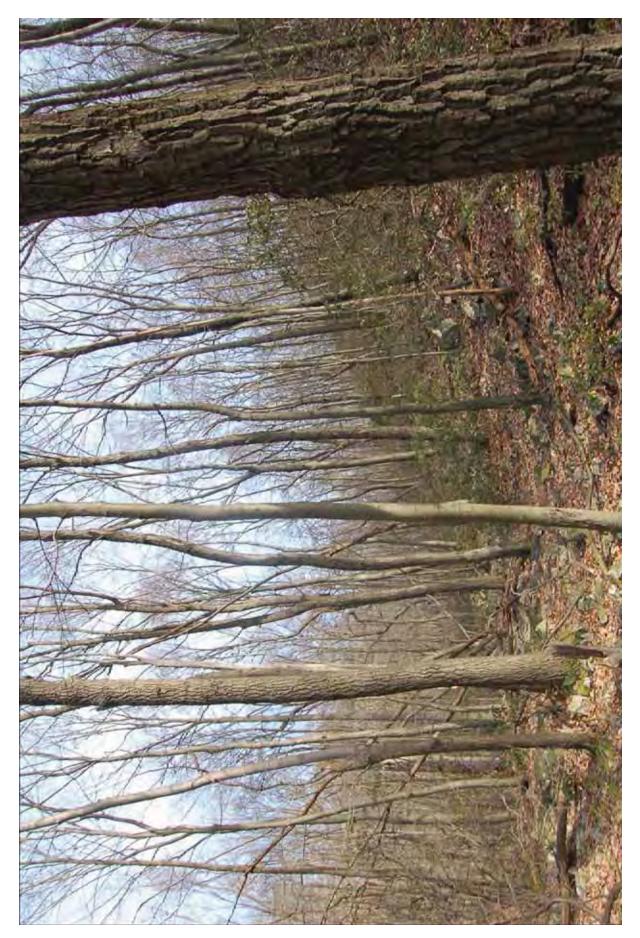
View 10 – The balloon is not visible due to intervening vegetation.



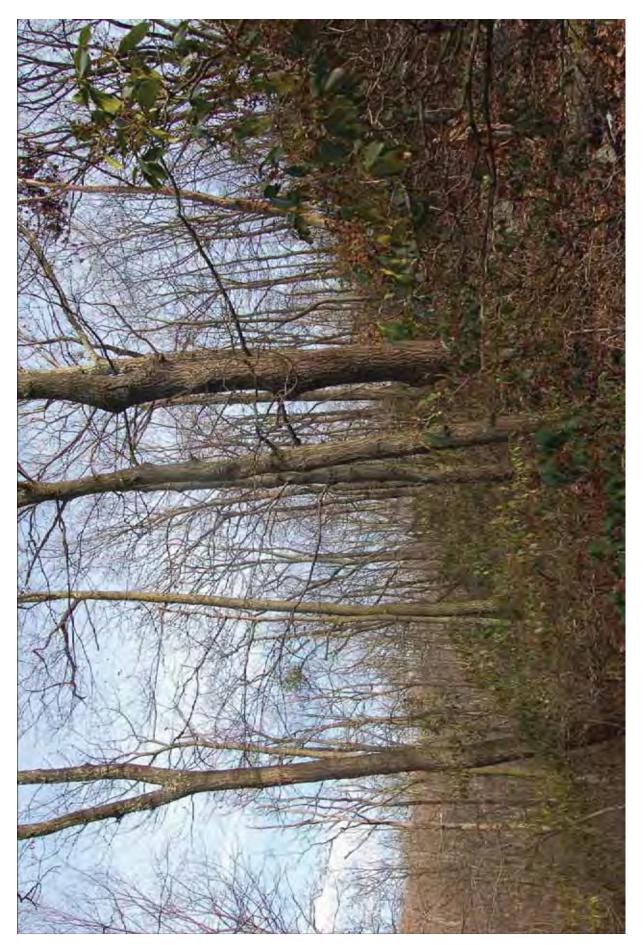
View 11 – The balloon is not visible due to intervening vegetation.



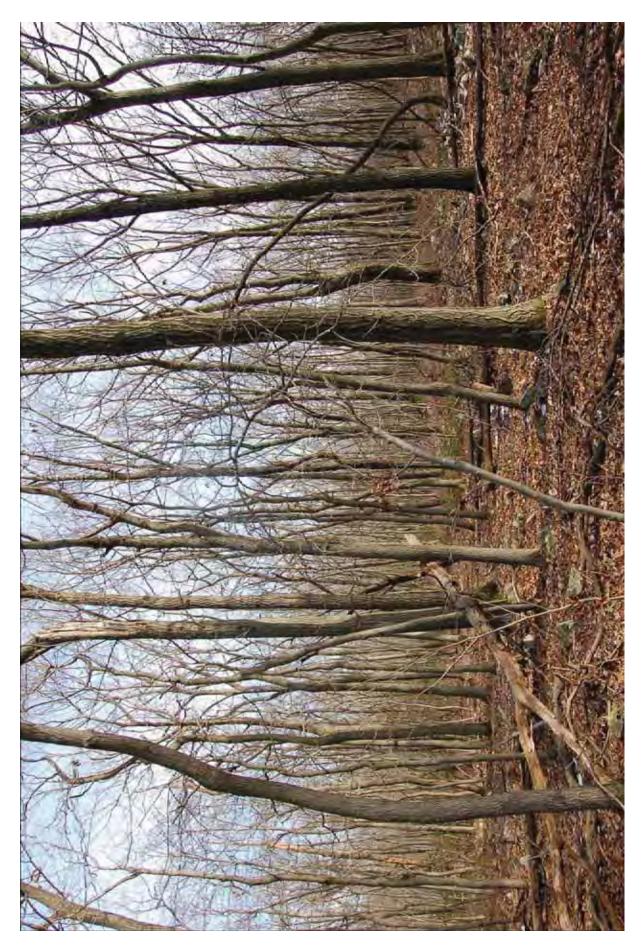
View 12 – The balloon is not visible due to intervening vegetation.



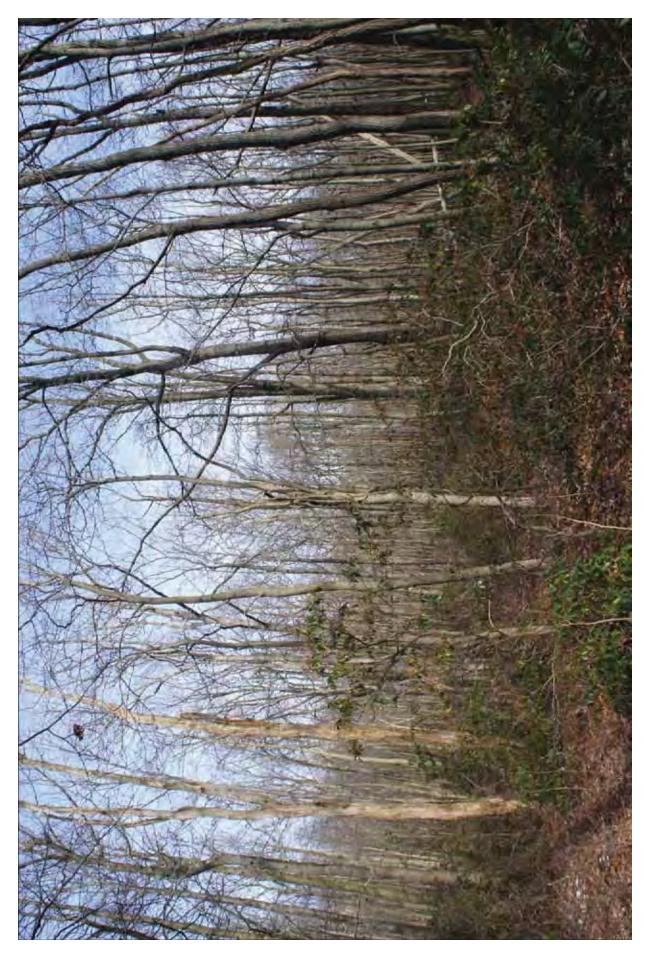
View 13 – The balloon is not visible due to topography and intervening vegetation.



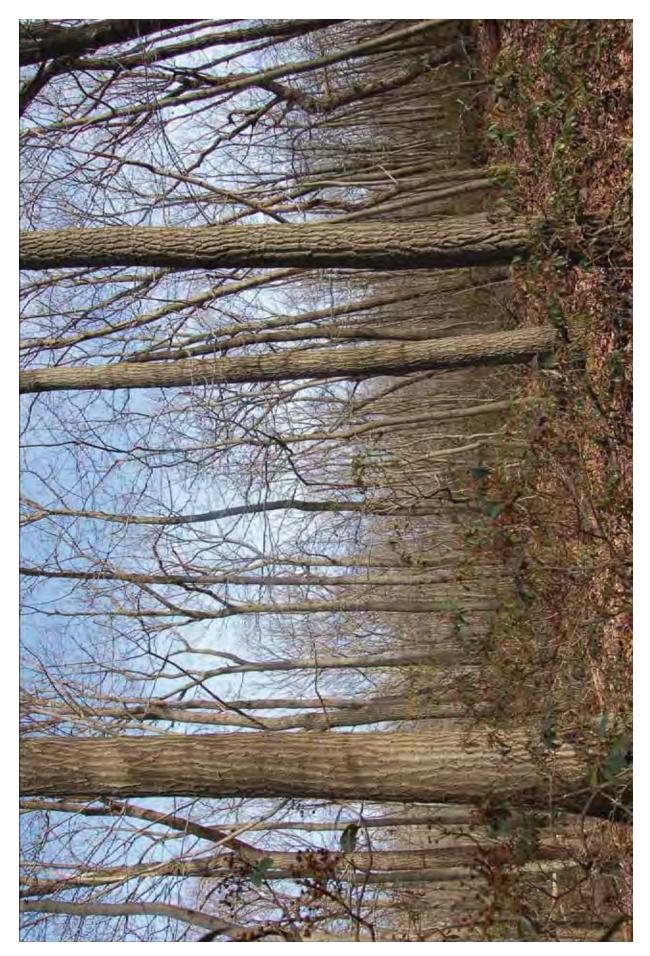
View 14 – The balloon is not visible due to intervening vegetation.



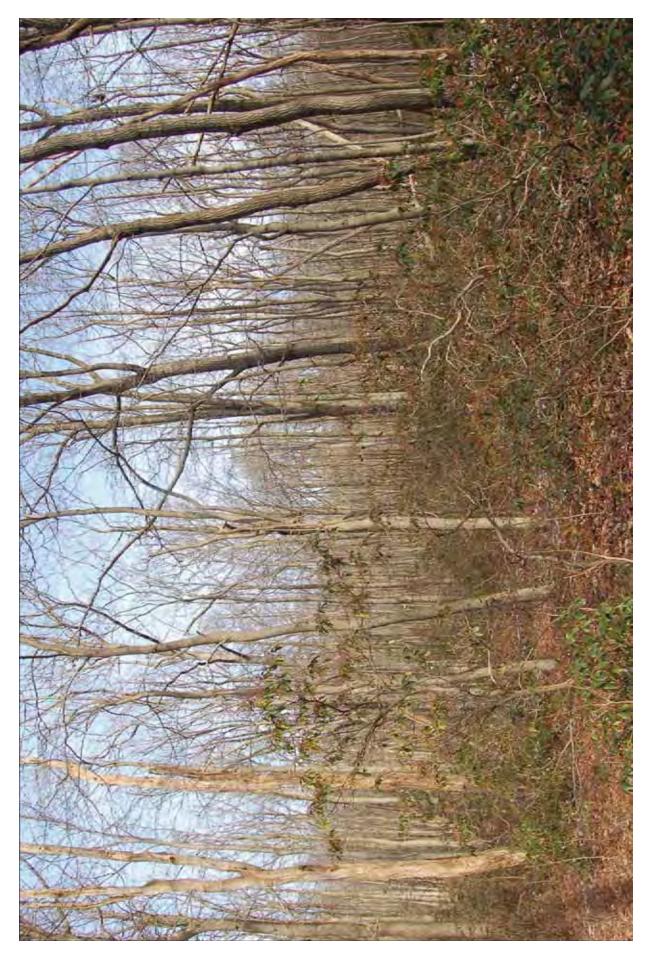
View 15 –The balloon is not visible due to intervening vegetation.



View 16 – The balloon is not visible due to intervening vegetation.



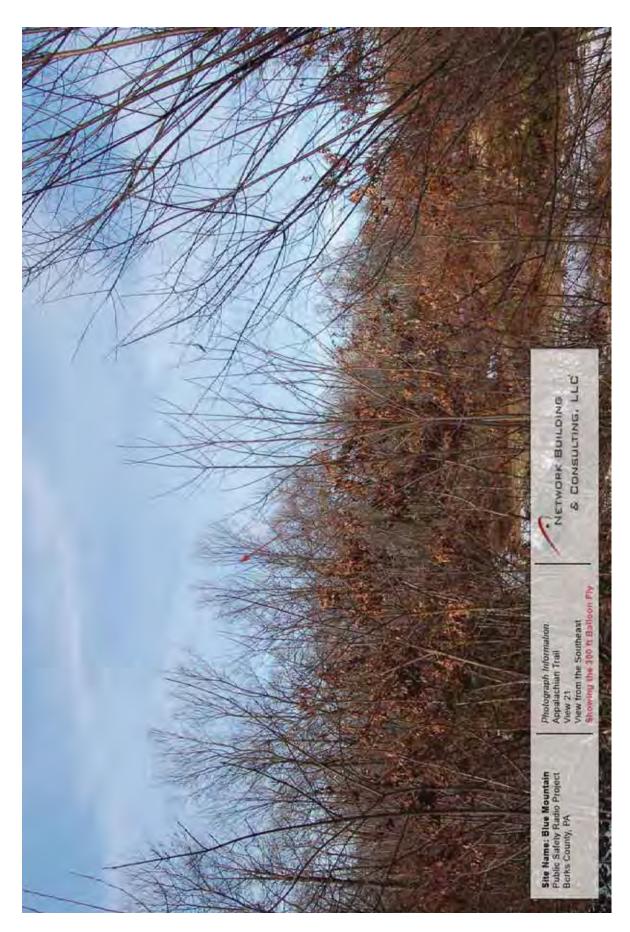
View 17 – The balloon is not visible due to intervening vegetation.



View 18 – The balloon is not visible due to intervening vegetation.

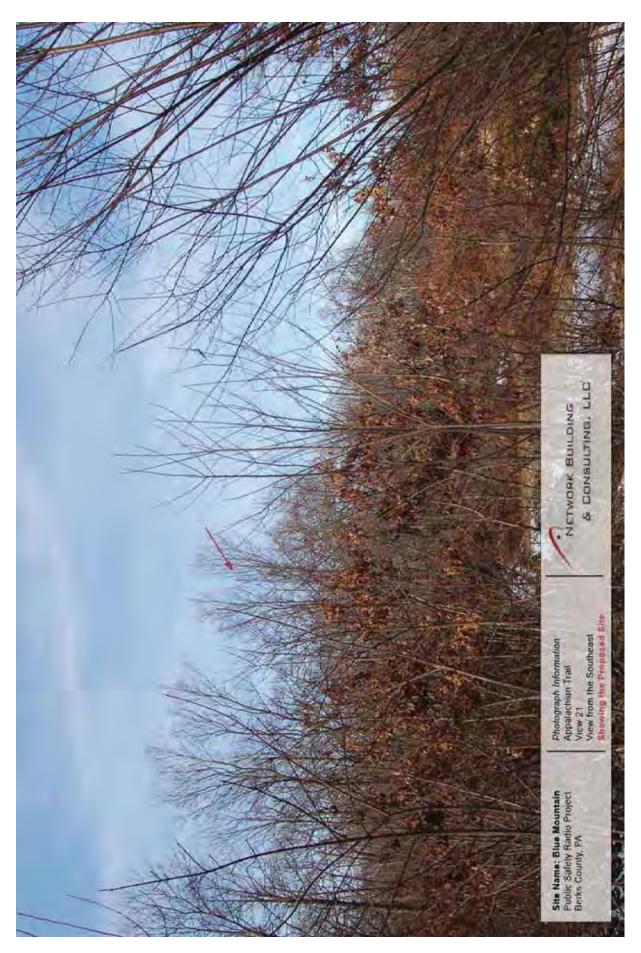


View 19 –The balloon is not visible due to intervening vegetation.

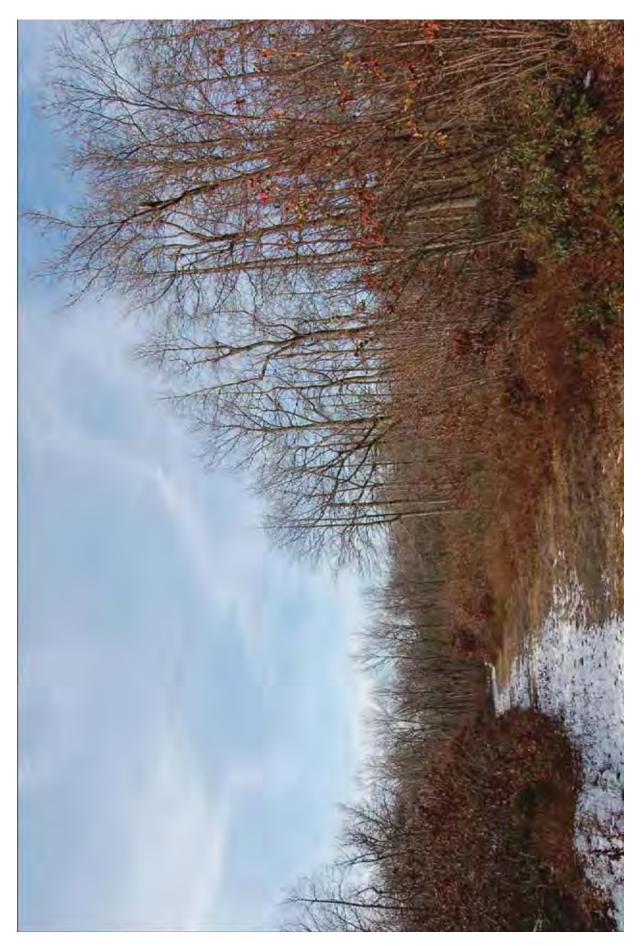


View 20 – This is the only location along the portion of the trail within the ¾ mile prescribed APE-VE where the balloon was visible through the trees.

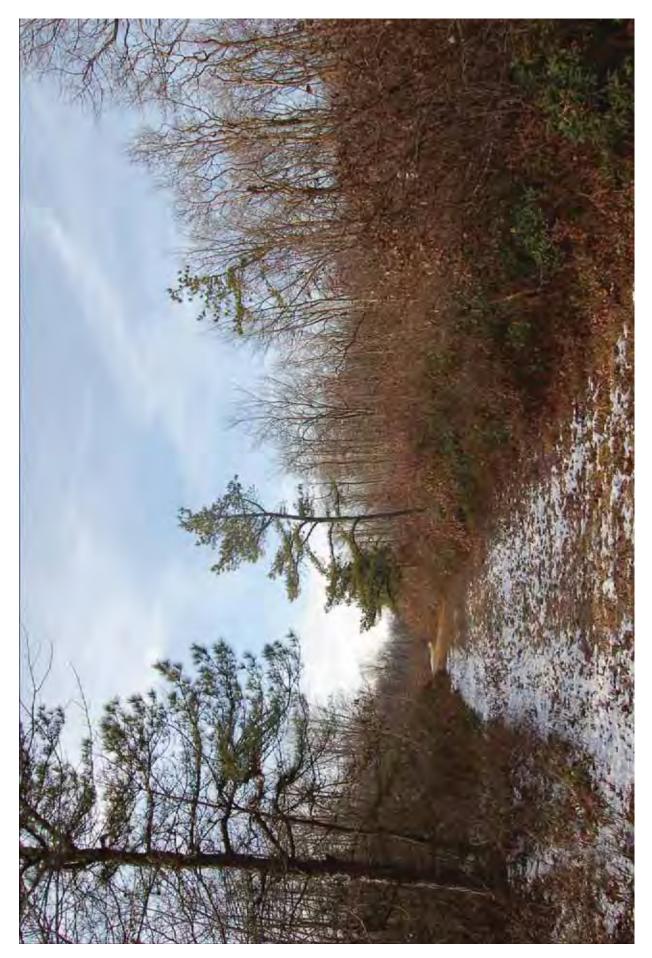
The red arrow indicates the location of the balloon. The view will not be salient enough to have an adverse effect on the visual setting of the Appalachian Trail.



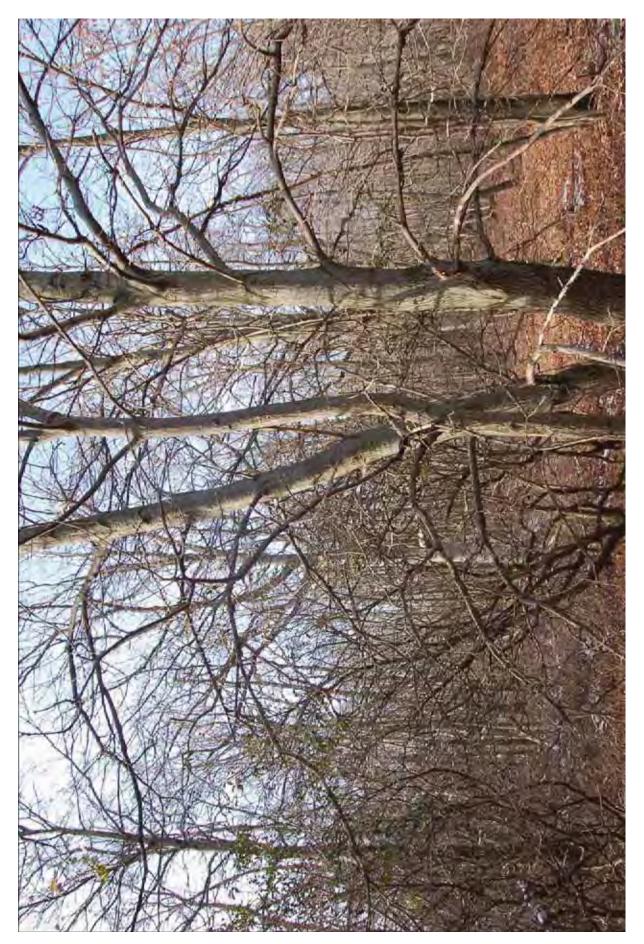
View 20 Photosimulation



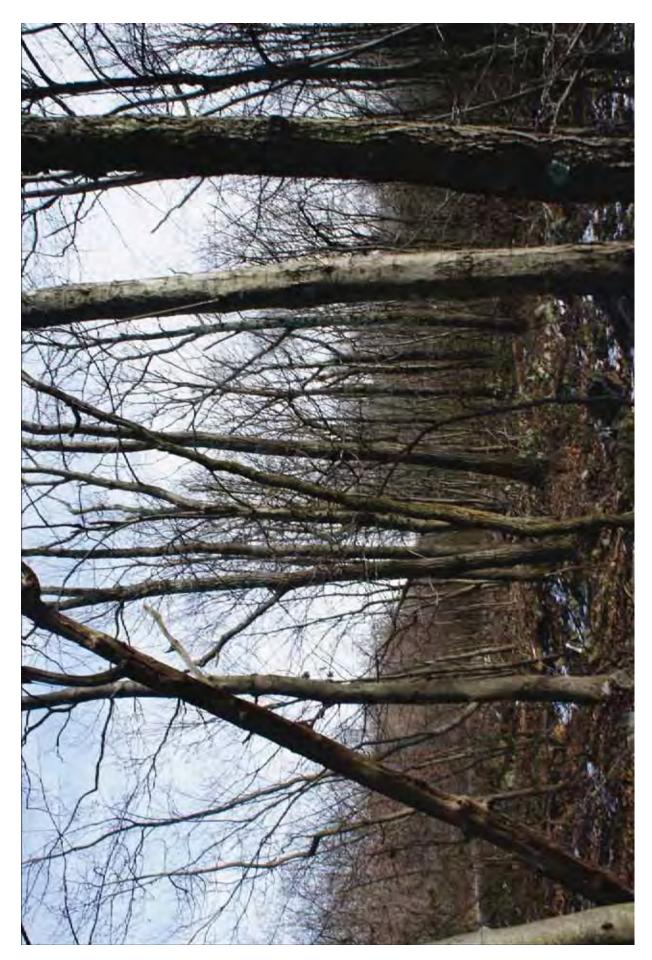
View 21 – The balloon is not visible due to intervening vegetation.



View 22 –The balloon is not visible due to intervening vegetation.



View 23 – The balloon is not visible due to intervening vegetation.



View 24 – The balloon is not visible due to intervening vegetation.

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Approved by OMB 3060-1039 See instructions for public burden estimates

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 name of quad and date.

b. Show the location of the proposed collocation site and any new 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 maps are attached to this report:

Street Map (Figure 1)

Topographic Map (Figure 2)

Historic Resources Map

Applicant's Name:	The County of Berks
Project Name:	Exit 19/Blue Mountain
Project Number:	EBI #61114599
•	



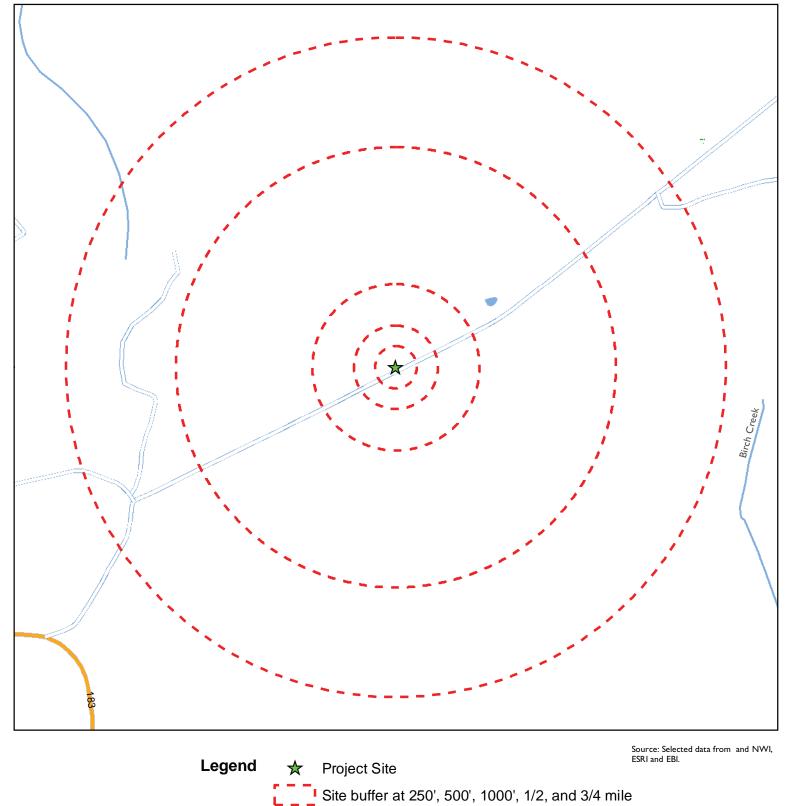


Figure I: Location Map

EXIT 19 / BLUE MOUNTAIN 1553 STATE ROUTE 183 WAYNE TOWNSHIP, PA 17972

400 800

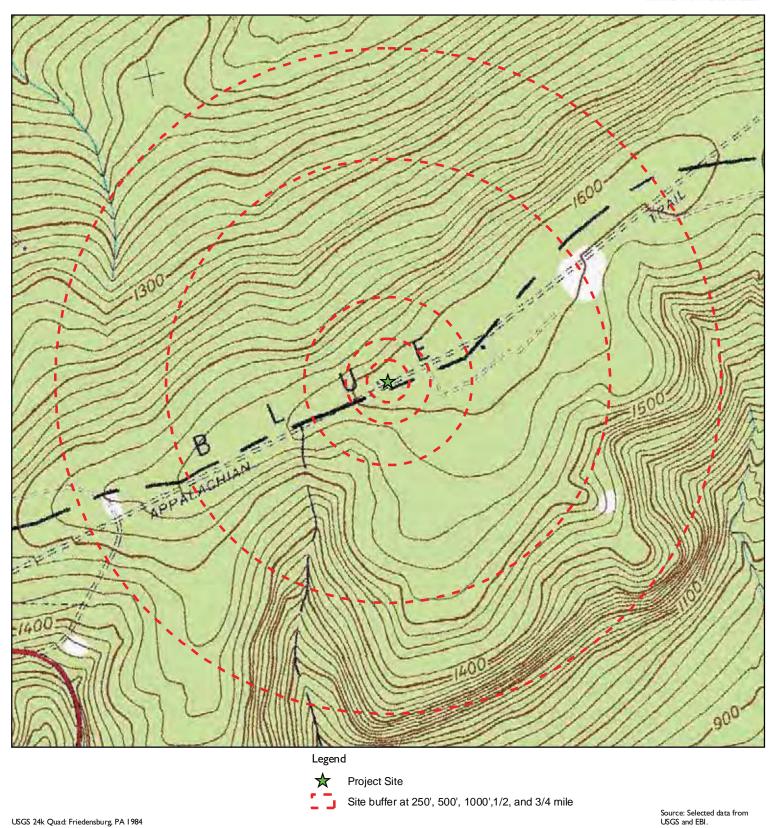


400

0

800

⊐ Feet

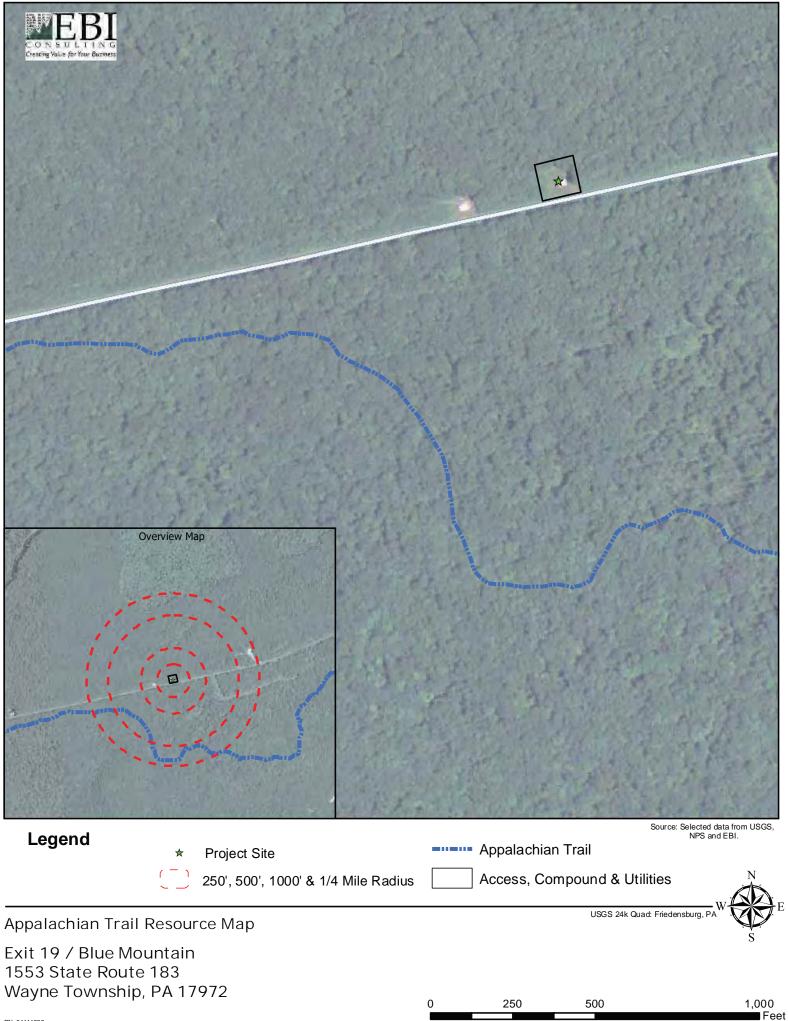


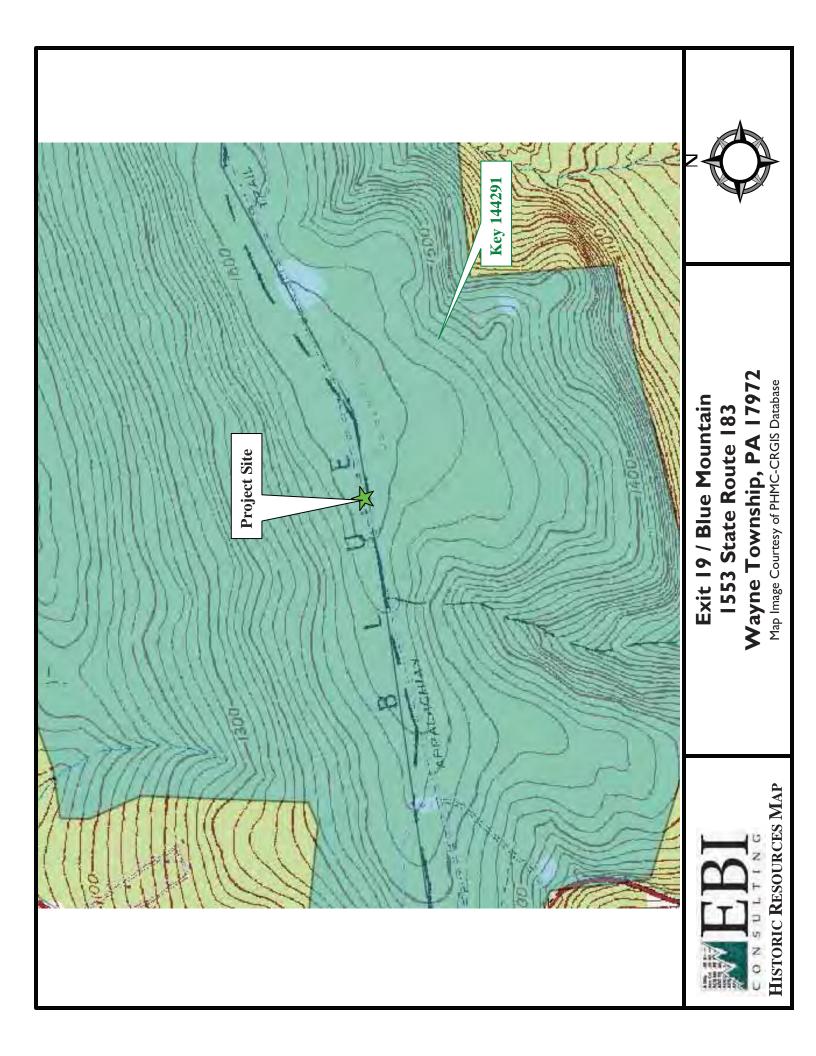
USGS 24k Quad: Friedensburg, PA 1984

Figure 2 - USGS Quad Location Map

EXIT 19 / BLUE MOUNTAIN 1553 STATE ROUTE 183 WAYNE TOWNSHIP, PA 17972







NT SUBMISSION PACKET -- FCC FORM 620

Attachment 4. Site Information – Additional Site Information

Additional Site Information Recommendations:

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site in conjunction with the proposed wireless telecommunication facility. Use this attachment to provide additional details needed to present a full and accurate description of any construction activities that will take place to complete the installation.

The proposed tower site is located at 1553 State Route 183, Wayne Township, Schuylkill County, PA and is situated within a densely wooded context. The area surrounding the proposed tower site within the Visual APE includes densely forested, mountainous land owned by the Pennsylvania Game Commission and is utilized for hunting. A leveled, gravel surface service road runs from northeast to southwest and cuts through the center of the presumed APE-VE radius. This service road is dotted with five self-support and guyed towers of varying heights and their associated support equipment.

The Subject Property consists of an approximately 100-foot by 100-foot lease area that is presently occupied by a self-support lattice tower, a concrete block equipment shelter, and a propane tank (all of which will be removed as part of the proposed project) located within a squared clearing and enclosed within a chain link fence.

The County of Berks proposes to construct a public safety radio system in compliance with the Federal Communications Commission's Narrow Banding Mandate. Please see the attached System Overview description for information on the overall system. The proposed tower at the Exit 19/ Blue Mountain site is one site within the proposed system. At the Exit 19/Blue Mountain Site, the County of Berks proposes to demolish and replace the existing telecommunications facility (identified on the project drawings as the "Existing Exit 19- Game Commission Self Support Tower") at the Project Site. Additionally, the County of Berks proposes to demolish a second existing self-supporting tower (identified on the drawings as the "Sunoco Logistics Guyed Tower") located southwest of the Project Site along the same ridgeline (see the vicinity map in the upper right corner on Page 1 of the attached plans). The County of Berks proposes to construct a new 300-foot tall self-supporting tower with a four-foot, top-mounted lightning rod (for an overall height of 304 feet) on the site of the demolished facility and install new support equipment within a new 100-foot by 100-foot fenced lease area. Access to the Project Site will be obtained via an existing access drive from Route 183 and a proposed 15-foot by 15-foot driveway and parking area.

Site Plans/Lease Exhibits provided by the County of Berks are included in this attachment.

 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599



6876 Susquehanna Trail South York, PA 17403 Tel: (717) 428-0401

January 31, 2012

Stephen G. Del Sordo, AICP Federal Preservation Officer Wireless Telecommunications Bureau Federal Communications Commission 445 I2th Street, SW Washington, DC 20554

Subject: Additional Information on System Design County of Berks Public Safety Radio Project County of Berks, Pennsylvania EBI Project #61115089

Dear Mr. DelSordo,

EBI Consulting is working on behalf of the County of Berks (Pennsylvania) on a public safety radio project. This public safety radio project is mandated by the FCC to improve the efficient use of radio frequency spectrum by Public Safety Radio Systems in the UHF and VHF ranges through a process called "narrow banding." The County of Berks has commenced Section 106 review and consultation on the proposed sites within the system.

You have requested a system-wide discussion including additional information regarding the locations of the proposed sites within the system as well information on the proposed system's interoperability. Per your request, we have attached documentation regarding the system's design and interoperability from a document created by Motorola in response to the County of Berks' Request for Proposals for the design and implementation of the system. Please see the attached document. Additionally, several maps have been appended that show the "High-Level System Diagram, " the "Microwave Bandwidth Loop Map," and a Google Earth map showing the locations of each project site relative to major highways and municipalities. Lastly we have appended a table with location information for each site location including address (when available), latitude and longitude and the Section 106 Review status.

We hope that this information meets your needs. Please let us know if you require any additional information.

Regards,

Amanu PS Denick

Suzanne B. Derrick Technical Director – Cultural Resources EBI Consulting Office: (908) 837-9449 Fax: (717) 428-0403 sderrick@ebiconsulting.com

Attachments: System Overview Documentation High-Level System Diagram Microwave Bandwidth Loop Map Google Earth Map showing project locations Table with site locations

6.1 System Overview

In response to the County of Berks' RFP request, Motorola is pleased to recommend our ASTRO[®] 25 IP Trunked Radio Integrated Voice & Data System. ASTRO 25 is our APCO Project 25 Phase 1/Phase 2 compliant technology. A description of the features and benefits of the proposed ASTRO 25 system architecture are contained in this section. Recommended system configuration and components of the proposed ASTRO 25 system are provided in Section 7.1 Detailed Equipment Descriptions.

The system release for this system will be Motorola's P25 release 7.11.

6.1.1 Compliant Coverage Approach

This single zone system uses 19 of the radio sites listed County's Request for Proposal. The sites are arranged over two simulcast cells (North Cell and South Cell, Table **Error! No text of specified style in document.**-1). The proposed design does not require the use of any standalone ASTRO Site Repeater (ASR) sites, making more efficient use of the County's available spectrum.

North Simulcast Cell	South Simulcast Cell
 North Campus (Prime Site) Kutztown (Redundant Prime Site) Albany Bethel Blue Mountain Hamburg Longswamp West Penn N. Heidelberg 	 Courthouse 19th (Prime Site) Mt. Penn II (Redundant Prime Site) Bally Earl Alsace Cumru Union Robeson Ontelaunee Turnpike

Table Error! No text of specified style in document.-1: System Primary sites

The system design with 1% GOS requires a 10-site South Simulcast Cell with a minimum of 15 voice talk paths and one control channel. This cell will primarily cover the City of Reading and its immediate suburban areas, as well as the southern and southeastern areas of the County. A 9-site North Simulcast Cell requires a minimum of 11 voice talk paths and one control channel and primarily serves the northern and northwestern areas of the County. Main and redundant prime sites for each simulcast cells are identical and are switched manually. After analysis, this 19-site approach will provide reliable coverage to portables on hip in at least 95% of the Service Areas as defined in the RFP (12 dB and 20 dB in-building Service Areas and Countywide in street). Motorola's design is licensable in 700MHz under the Region 28 plan with compliant operational and protected Service Area contours along with non-impinging interference contours based on current co- and adjacent channel users.

Currently there are only 20 channels (12.5 KHz) are available to the county. The County is discussing the possibility of obtaining more channels with Region 28.

The system as designed includes equipment and services to deploy a maximum of 30 TDMA voice talk paths with control channel in the south cell and 22 TDMA voice talk paths with control channel in the north cell.

Full details of the coverage predictions plus coverage maps with percentage coverage predictions can be found in Section 8.8 Coverage and Guarantees/Coverage Maps.

6.1.2 Compliant Grade of Service (GOS)

Based on the loading requirements put forth in the RFP, Motorola's 16-channel South Cell and 12-channel North Cell provide for a calculated $GOS \le 1\%$ with average wait time for queued calls ≤ 1 second. Full details can be found in Section 8.8 Coverage and Guarantees/Coverage Maps.

6.1.3 700 MHz Trunked Simulcast System

The 700 MHz trunked system proposed to Berks County, PA will be an ASTRO 25 system release 7.11 consisting of two simulcast cells. The primary Master site will be located at the Berks County Dispatch Center, called BCCC. A fully redundant second Master site will be located at County Courthouse. The Prime site for the South Cell will be located at the Courthouse on the 19th floor. The Prime site for North Cell will be located at North Campus. The redundant prime site for the North cell is located at Kutztown site, and for South cell is located at Mt. Penn II site. The proposal also includes manually switched redundant Prime site equipment for the South and the North Cells.

This system offering is Project 25 Phase 1 FDMA/Phase 2 TDMA ready. Motorola is implementing a Phase 2 TDMA network. The system release will be Motorola P25 release 7.11.

For the purposes of Master site redundancy as required by the RFP, the system is proposed with Dynamic System Resilience (DSR). The primary Master site will be located at the BCCC Site and the redundant DSR Master site will be located at the Courthouse 19th Floor site.

ASTRO text messaging, Programming over P25 (POP25) and Integrated Voice and Data (IV&D) are proposed and are redundant at both Master sites. A Customer Network Interface (CNI) will be provided at both Master sites.

Ethernet site links will be used for site connectivity via digital microwave. Dual gateways (site and MW service) and switches are proposed at each remote site. Trak9100 time standards will be located at each site and serve as the time and frequency reference for simulcast timing.

The remote sites will use Expandable Site Subsystems (ESS) base stations, each capable of housing up to six channels. Two transmit combiners, and transmit antenna networks will be required to support the number of channels at each site and are capable of handling the required expansion as stated in the RFP. Motorola's proposal

includes diversity Tower Top Amplifiers required for P25 Phase 2 TDMA operation. The Pre-amplifiers (TTAs) used in our design to equalize coverage within our Phase1/2 network are redundant. A spare antenna is also provided at each of the remote RF sites.

Eight NM clients are provided on the equipment list. These NM clients will be located at the following locations:

- One at the BCCC supervisor position
- One at BCCC System manager office
- One at the Directors office at BCCC
- One at the BCCC's equipment room
- One at 18th floor of Courthouse in the dispatch room
- One at 19th floor of Courthouse in the equipment room
- One at City Hall supervisor's office
- One at the RMI radio shop

The NM clients located at the Master sites will be local clients, connecting directly to the master cores. The NM client located the City Hall dispatch site will be connected to the MCC 7500 LAN.

The NM client located at RMI will be interfaced to the Courthouse master site through Canopy links.

The Courthouse site also houses the existing Console Electronics Bank (CEBs) currently in use by the County. Several circuits will require that they be punched down in parallel with the resources controlled by the existing CEBs during cutover. In the final configuration, all conventional resources will be disconnected from the CEB and will only be controlled by the new MCC 7500 consoles as desired by the County. The existing CEB is not proposed for reuse in the new system.

Full details of the700 MHz Trunking System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions, Section 6.2 ASTRO 25 System Features, 6.3 Network Management, and 6.4 Fixed RF Equipment.

All standalone computers supplied within this network will be Hewlett Packard (HP). Motorola will provide hard copies of all documentation as per RFP Section 2, 1.11, F, 4 through 6. Full sets of documentation will be provided for every site in the system (Remote sites, Courthouse, City Hall, BCCC) along with five file copies.

6.1.4 ISSI/CSSI

Motorola has included an ISSI/CSSI gateway with the proposed P25 system. This gateway provides the features and benefits of a CSSI/ISSI interface. Three licenses to interface to other P25 systems have been included. The ISSI equipment is located at the BCCC master site.

6.1.5 Over-the-Air Programming

Motorola's included over-the-air programming feature is called Programming over P25 (POP25). POP25 allows radios to be remotely configured via the Customer Programming Software (CPS) from your network by sending a sequence of commands over-the-air via the IV&D transport layer. POP25 enables reconfiguration of user's radio functionality codeplug without physically touching the radio.

POP25 allows end users and radio users to stay in the field during the reconfiguration process, thus saving valuable time and resources.

Other substantial benefits include:

- No loss of communications while reprogramming occurs.
- Programming resumes automatically after interruption.
- Quicker network optimization.
- Eliminates time spent tracking assets for reprogramming.

Voice traffic preempts data traffic on the Motorola system. After any interruption to a data transfer by voice preemption, the POP25 process will resume automatically where it left off. Motorola's POP25 provides for batch programming for larger amounts of radios. There would be no impact to grade of service by using POP25.

6.1.6 Dispatch Console System

The proposed Berks County console system will consist of three dispatch centers.

The BCCC dispatch center will house 15 17 MCC 7500 operator positions. Eleven (11) Thirteen (13) operator positions will be used for dispatch operations, with the four remaining positions configured as training positions. Gooseneck microphones will be installed at all dispatch console locations. Three speakers will be provided for each op positions, one select and two unselect. NICE logging solutions will provide IRR for these positions; therefore, Motorola Dual IRR will be removed from these operator positions. The console can be interfaced to a Zetron M2200 paging encoder as well.

A backup dispatch center, consisting of 6 MCC 7500 operator positions, will be located on the 18th floor of the Courthouse in downtown Reading. Three speakers will be provided for each op positions, one select and two unselect. NICE logging solutions will provide IRR for these positions, therefore Motorola Dual IRR will is removed from these operator positions. The connection to the Master site will be via microwave backhaul. Dual-site gateways will be used to support dual links to the Master sites.

Both BCCC and Courthouse sites will also house the 15 comparators each used in the conventional interoperability overlay (described later in this document). Five CCGWs will allow control of these conventional resources at each location. These comparators are referred to as the main and backup prime sites for the conventional interoperability layers and are manually switched.

The third console location, consisting of six MCC 7500 operator positions, will be located at the City of Reading's dispatch center. The connection to the Master core will be via microwave backhaul. Dual site gateways will be used to support dual links to the Master site.

This location will be linked to the system via the proposed looped microwave network.

Full details of the Dispatch Console System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions and Section 6.6 Dispatch Consoles.

During the CDR process, the interface between paging subsystem and CAD was discussed. The two options are interfacing the New World CAD to paging subsystem, either through a Zetron 2200 unit, or directly through Motorola's MCC7500 subsystem. The MCC7500 interface needs to be developed by New World. Motorola worked with New World and Kimball and provided the information needed to develop the interface between CAD and MCC7500 subsystem.

6.1.7 Logging Recorder

A Motorola/NICE IP logging recorder solution will be proposed to record IP based traffic.

Two AISs and two 120-channel IP loggers will be provided in the system. Each master site will house one AIS and one IP logger and the loggers will be configured in a main and parallel configuration for redundancy. In addition to trunked traffic, the IP loggers will record IP conventional traffic presented to the AIS via Conventional Channel Gateways (CCGWs).

Complementary to the IP logging recorders, an analog recording system is proposed. The analog recorder will be capable of recording 144 analog tracks and 96 PRI digital circuits (96 channels). This logger will record the operator position audio, E911 phone lines, and administrative phones as well as the incoming PRI trunks. The main analog logging recorder equipment will be located at the BCCC's equipment room. There will be an additional parallel 144 analog tracks and 96 PRI digital circuits logging recorders for redundancy; located at the QA office. A separate 100-track logging recorder will record administrative VOIP phones via a Passive VoIP Recording Solution connecting to the VoIP phone network via a SPAN or Mirrored port(s).

Motorola is proposing four logging recorders. The proposed loggers are not capable of combining VOIP and analog recording on the same chassis. The analog recorders are doubled for redundancy purposes to comply with the RFP. (to be deletyed)

Quality assurance servers, NP CLS server, and ANI/ALI servers will be located at the primary Master site. Playback will be conducted with NICE's Inform solution with capacity for 9 simultaneous playback (Reconstruction) sessions, and 39 IRR (Verify) sessions.

A total of 10 QA/QC client licenses and 10 Inform playback licenses have been included. Perform QA will provide a quality management solution covering up to 50

positions (channels). Any number of users (supervisors) can run the Perform QA solution. Additionally, the Inform suite includes 9 concurrent Monitor/Recent Call Replay users and 9 concurrent Organizer (incident management) user licenses. Additionally, one playback workstation for City Hall will be provided.

Full details of the Logging Recorder System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions and Section 6.6 Dispatch Consoles.

6.1.8 Microwave System

The proposed digital microwave system will provide 150 Mbps bandwidth throughout the system to support the ASTRO 25 system. The microwave system has been designed with channel bank functionality to provide 4-wire circuits required to carry analog conventional traffic. The channel bank functionality is included in the 7705 SAR-8. No channel banks are proposed. The microwave system will be of a loop configuration for improved availability.

The proposed microwave system provides an additional 150 Mbps of capacity from the Courthouse to BCCC to the North Campus site via a hot standby non-looped system.

Motorola has provided ice shields over all dishes where applicable. Ice Shields Bridges will not be provided or installed at the following sites: Court House, City Hall and BCCC (main dispatch).

Full details of the Microwave System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions and Section 6.10 Microwave System Description.

6.1.9 Interoperability Overlay

The RFP requires an interoperability overlay consisting of the following bands:

- Low band Two simplex frequencies
- VHF high band Five simplex frequencies (except only 3 channels at W. Penn)
- UHF Three frequency pairs
- 800 MHz Five frequency pairs

In order to cover the large area occupied by Berks County adequately, transmitters for each of these bands will be simulcasted at several sites throughout the system. Analog comparators (conventional prime sites) located at the BCCC and Courthouse sites will provide the comparator/voting functionality for these resources. Access to these channels will be via CCGWs located at the BCCC and Courthouse sites. The comparator monitor and control functionality will be provided at all MCC7500 consoles for these conventional resources.

The simulcast interoperability overlay networks will provide the County with 95%, in street coverage to a portable radio at hip level.

Two low band frequencies (33.94 MHz and 45.88 MHz) will be located the 11 sites. Sinclair filters will be used at each site. Transport will be via IP backhaul provided by the microwave.

The five VHF high band simplex frequencies will be located at 10 sites throughout the system. A Sinclair combining system will be used for filtering and combining. Three frequencies will be connected to one antenna. The remaining two frequencies will be on another antenna. West Penn site will have only three VHF high band channels due to the presence of interfering frequencies. Transport will be via IP backhaul provided by the microwave.

The three UHF frequency pairs will be located at eight sites throughout the system. A Sinclair combiner will be used to connect to a single transmit antenna. A Sinclair multicoupler will be used to connect to a single receive antenna. Transport will be via IP backhaul provided by the microwave.

The five 800 MHz frequency pairs will be located at 11 sites throughout the system. A Sinclair combiner will be used to connect to a single transmit antenna. A Sinclair multicoupler will be used to connect to a single receive antenna. Transport will be via IP backhaul provided by the microwave.

Full details of the Interoperability Overlay System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions and Section 6.8 Interoperability Radio Network.

6.1.10 Redundant Conventional Prime Site

Motorola is providing a redundant manually switched Prime site for the conventional interoperability overlay. The main conventional prime site will be located at the BCCC and the redundant Conventional prime will be at the Courthouse.

6.1.11 Smartphone to Project 25 Radio System Special Interoperability Interface

Motorola is providing our MOTOBRIDGE IP interoperability solution to meet the County's special interoperability requirements. The solution will enable users on the radio network to connect to Android smart phone and Berks County administrative phone users, for interoperable communication and coordination.

The system as proposed includes three control stations for the County's use.

Also included are 10 MOTOBRIDGE client licenses for Android devices.

6.1.12 Network Fault Management

MOSCAD Network Fault Management (NFM) will be provided to monitor the system. NFM will monitor the following:

- Trunked radio system
- Antenna systems

- Shelter alarms.
- Microwave network

One SDM3000 RTU will be located at each Master, Prime, and remote site. Four Graphical Work Station (GWS) clients will be located at BCCC. Two additional GWS clients will be located at the backup dispatch center located at the Courthouse.

- One at the BCCC supervisor position
- One at BCCC System manager office
- One at the Directors office at BCCC
- One at the BCCC's equipment room
- One at 18th floor of Courthouse in the dispatch room
- One at 19th floor of Courthouse in the equipment room

Network Fault Management services will be available via a remote desktop and no additional expense is anticipated to accomplish this.

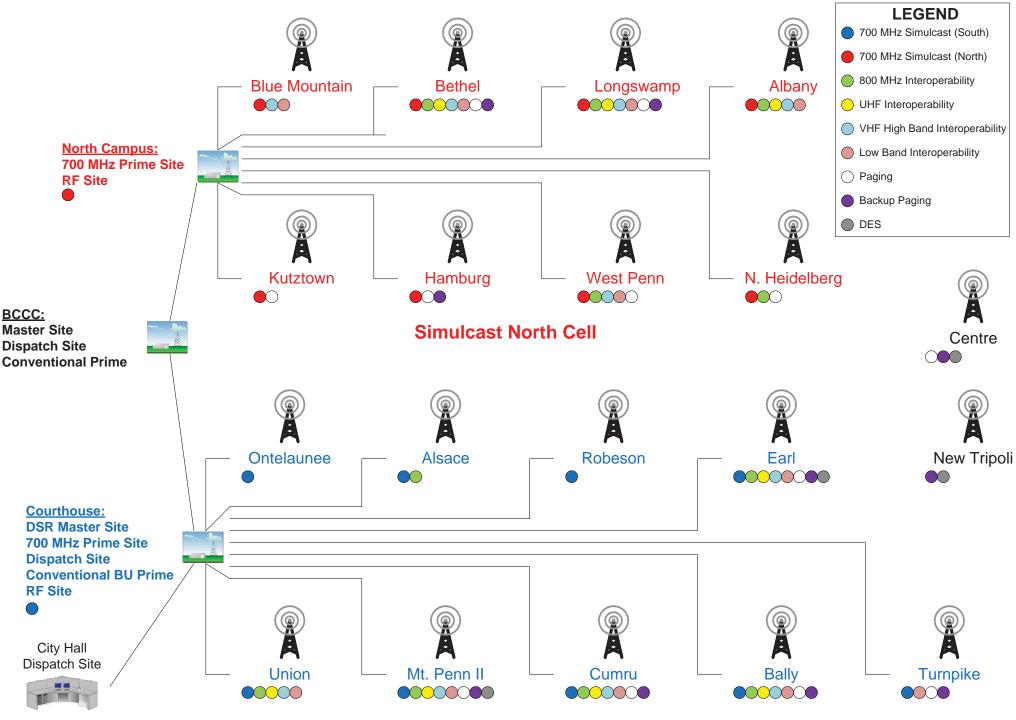
In addition to fault monitoring, a site surveillance system will be provided. This system will consist of one pan/tilt/zoom outdoor camera at each remote RF site. one pan/tilt/zoom camera on the 18th floor of the Courthouse, and one pan/tilt/zoom camera on the 19th floor of the Courthouse. Additional internal cameras will be installed at all remote sites, Courthouse and BCCC equipment rooms and dispatch rooms. No cameras will be provided at the BCCC and City Hall sites.

At all remote sites there will be three cameras, two outdoor and one indoor camera. City Hall and BCCC equipment room will have one indoor camera each. Courthouse will have three outdoor and two indoor cameras.

Two One DVRs will be provided for recording site surveillance footage at the BCCC Master site. Transport from sites back to the main dispatch BCCC site will be via microwave.

Full details of the Network Fault Management System design and equipment can be found in Section 7.1 Detailed Equipment Descriptions and Section 6.3 Network Management.

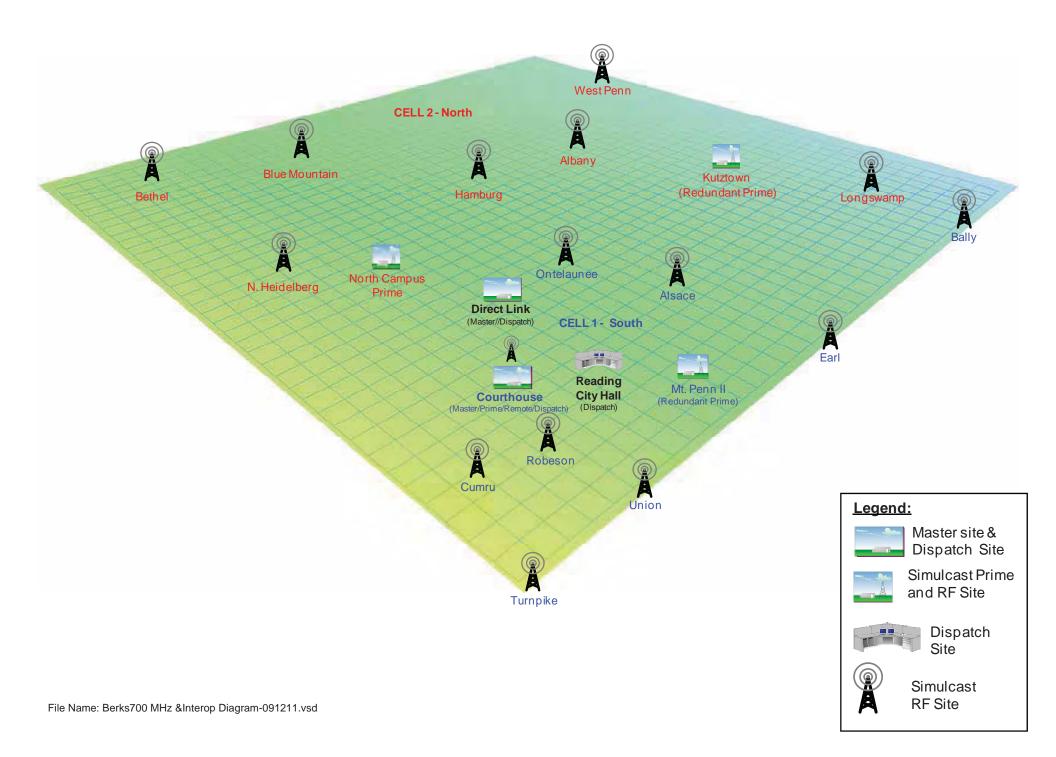
High Level System Diagram – 700 MHz Trunked and Interoperability Systems

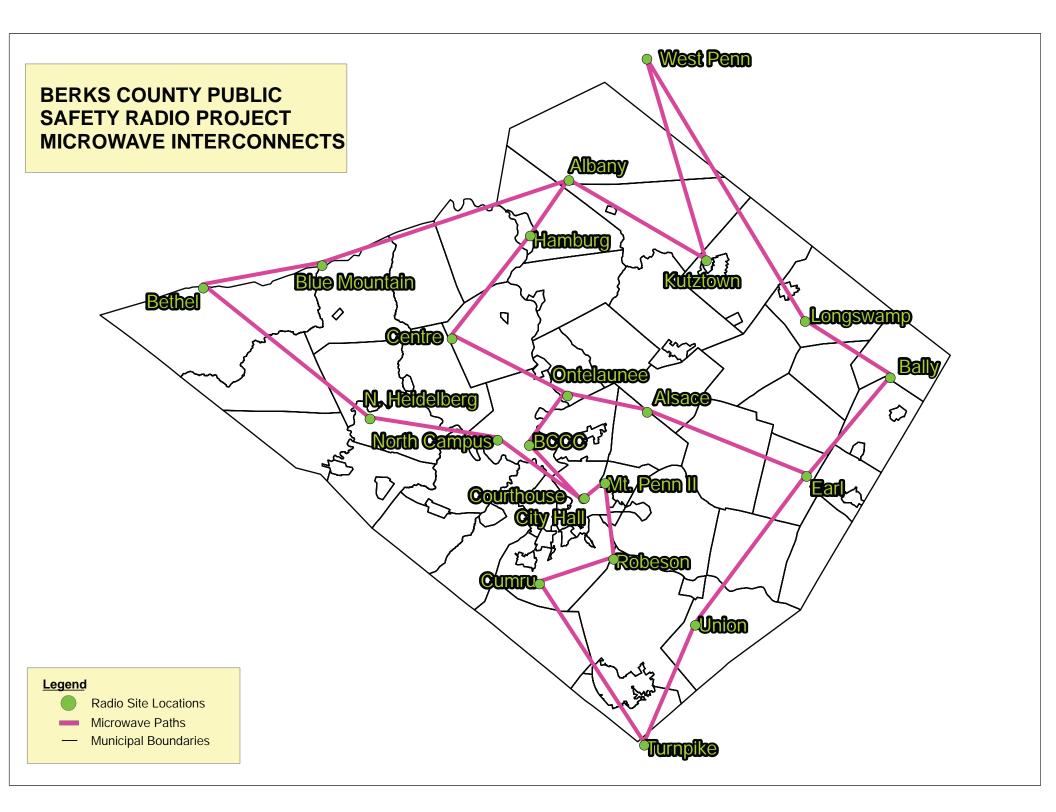


File Name: Berks700 MHz &Interop Diagram-091211.vsd

Simulcast South Cell

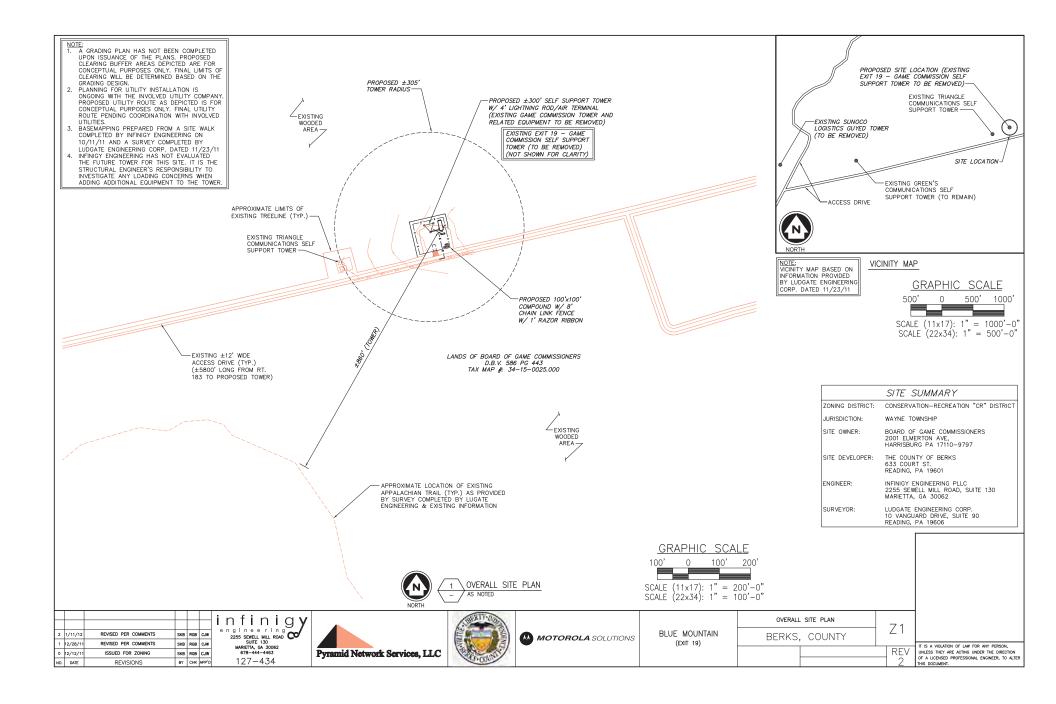
High Level System Diagram – 700 MHz Trunked System

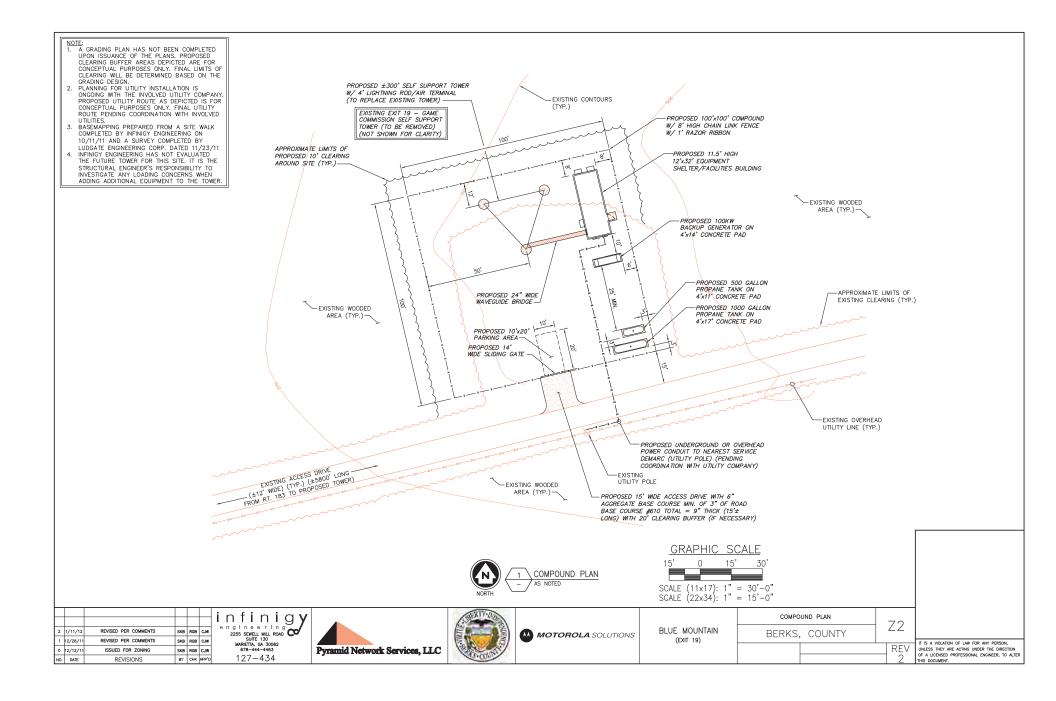


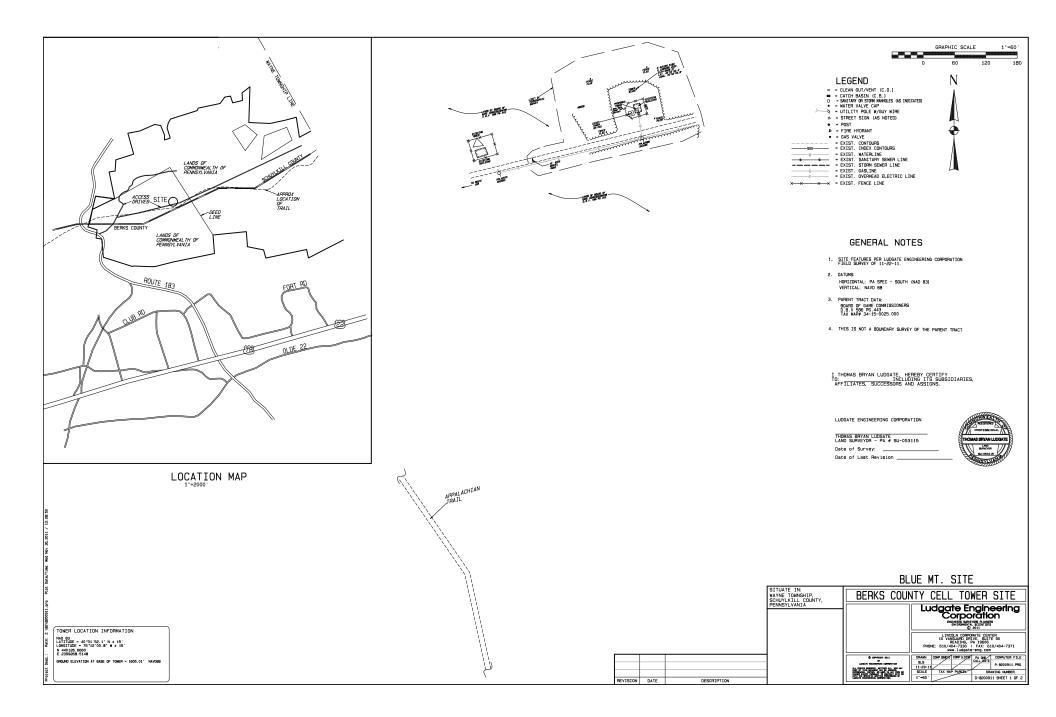


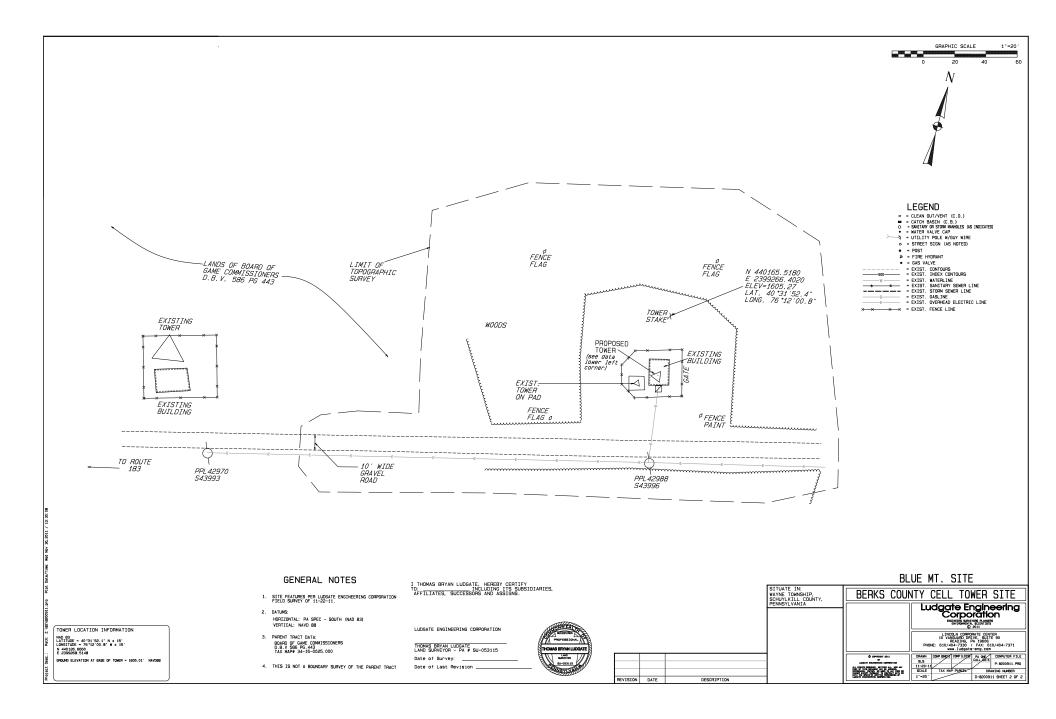
EBI Project Number	Client Site Number	Address	Service Type	Coordinates	Project Status
61113978	Albany (Pulpit Rock)	Reservoir Road, Albany Township, PA 19526	Full NEPA / SHPO	40°35'48.8", -75°56'1.6"	Active
61113979	Bally	32 Woods Lane, Hereford Township, PA 19504	Full NEPA / SHPO	40°25'46.8", -75°35'39.7"	Active
61113980	Bethel	Hill Road, Bethel Township, PA 19507	Full NEPA / SHPO	40°30'51.6", -76°19'40.4"	Active
61113981	Cumru	2387 Welsh Road, Cumru Township, PA 19540	Full NEPA / SHPO	40°16'3", -75°58'26.6"	Active
61113982	Earl	Pine Road, Earl Township, PA 19512	Full NEPA / SHPO	40°21'2.5", -75°41'11.1"	Active
61113983	Hamburg	701 Windsor Street, Borough of Hamburg, PA 19526	Full NEPA / SHPO	40°33'7.9", -75°58'35.1"	Active
61113984	Kutztown	671 Krumsville Road, Maxatawny Township, PA 19530	Full NEPA / SHPO	40°31'44.1", -75°47'17.8"	Active
61113985	Mt. Penn II	619 Skyline Drive, Lower Alsace Township, PA 19606	Full NEPA / SHPO	40°20'55.1", -75°54'6.1"	Active
61113986	N. Heidelberg	Kricks Mill Road, North Heidelberg Township, PA 19551	Full NEPA / SHPO	40°24'18.3", -76°9'6.6"	Active
61113988	North Campus	1300 Hilltop Road, Bern Township, PA 19533	Full NEPA / SHPO	40°23'8.3", -76°00'55.7"	Active
61113990	Ontelaunee	Tube Drive, Ontelaunee Township, PA 19605	Full NEPA / SHPO	40°25'14.6", -75°56'24.2"	Active
61113992	Robeson	Ridgeway Road, Robeson Township, PA 19508	Full NEPA / SHPO	40°17'11", -75°53'39.7"	Active
61113994	Turnpike	Morgantown Road, Honeybrook Township, PA 19344	Full NEPA / SHPO	40°8'1.9", -75°51'57"	Active
61114491	Centre	Bootleg Road, Centre Township, PA 19506	NEPA Screen	40°28'9.6", -76°3'44.9"	Tower collo - meets NPA; NEPA complete
61114772	Alsace	326 Freeman Drive, Alsace Township, PA	NEPA Screen	40°24'21.7", -75°51'18.9"	On hold, tower owner to complete NEPA/SHPO for tower extension
61114599	Exit 19 / Blue Mountain	1553 State Route 183, Wayne Township, PA 17972	Full NEPA / SHPO	40°31'52.1", -76°12'0.8"	Active
61114600	Longswamp	Tower Road (North of Woodside Avenue), Longswamp Township, PA 18011	Full NEPA / SHPO	40°28'38.6", -75°41'2.2"	Active

61114601	Union	Geigertown Road (Southwest of Chestnut Street), Union Township, PA 19508	Full NEPA / SHPO	40°13'51.8", -75°48'31.5"	Active
61114773	Courthouse	633 Court Street, Reading, PA 19601	NEPA Screen / SHPO	40°20'10.63", -75°55'32.03"	Active
61114946	City Hall	815 Washington Street, Reading, PA 19601	NEPA Screen / SHPO	40°20'14", -75°55'16.5"	Active
61114945	BCCC - Direct Link	2561 Bernville Road, Reading, PA 19605	NEPA Screen	40°22'51.2", -75°58'55.2"	Building collo - meets NPA; NEPA complete
61115078	West Penn	Fort Franklin Road, West Penn Township, PA	NEPA Screen	40°41'41.3", -75°50'50.5"	Tower collo - meets NPA; NEPA complete









Attachment 5. Determination of Effect

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 limited to the area of potential ground disturbance and any property, or any portion thereof, that will be physically altered or destroyed by the Undertaking. On November 24, 2008, the FCC further clarified that the APE-Direct Effects is limited to the proposed lease area including the access route and utility corridor. Ms. Kara A. Briggs, Architectural Historian with EBI Consulting, completed a field survey on December 1, 2011 and determined that the APE for direct effects is limited to the existing 5800-foot long access/utility route and the proposed 100-foot by 100-foot lease area.

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 Undertaking 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. The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible: a. Within a half mile from the tower site if the proposed Tower is 200 feet or less in overall height; b. Within $\frac{3}{4}$ of a mile from the tower site if the proposed Tower is more than 200 but no more than 400 feet in overall height; or c. Within I $\frac{1}{2}$ miles from the proposed tower site if the proposed Tower is more than 400 feet in overall height.

Due to the height of the proposed tower, the presumed APE for visual effects for this project is a ³/₄-mile radius around the Project Site.

Mitigation of Effect Guidelines:

In the case 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 communications with the SHPO/THPO and any consulting parties.

On January 23, 2012, the County of Berks hosted a meeting and conference call with representatives of the National Park Service – Appalachian National Scenic Trail, the Appalachian Trail Conservancy, Hawk Mountain, the Pennsylvania Historical and Museum Commission (PHMC), and the FCC. The balloon test photos were presented to each of the parties and Suzanne Derrick of EBI Consulting presented information regarding the extremely limited nature of the views from the Appalachian Trail. The balloon test revealed that there is only one discreet location from along the Trail within the ³/₄ mile APE-Visual Effects from which there is a view of the proposed tower. The view from this location on the Trail would be between the interwoven branches of young trees and during the leaf on seasons, the view would be blocked by the leaves.

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.

 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599

No adverse effects are expected as a result of the proposed facility; therefore, alternatives that might avoid, minimize, or mitigate any adverse effects need not be considered.

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.

The review of the Pennsylvania Historical and Museum Commission's (PHMC) Cultural Resources Geographic Information System (CRGIS) indicates that there is one historic property within the $\frac{3}{4}$ mile APE-Visual Effects – the Appalachian Trail (Key # 144291).

The Appalachian Trail is in the APE – VE, and at its closest point, is located approximately 825 feet from the Project Site. The County of Berks proposes to remove and replace an existing telecommunications facility at the Project Site. The proposed tower and support equipment will be constructed in the same location as the existing facility and access to the site will be obtained via an existing gravel driveway.

Based on a balloon test and photo simulation completed by Network Building & Construction on December 12, 2012 the visibility of the proposed replacement tower from the Appalachian Trail will be limited to one location approximately 2200 feet east of the Project Site (please see photos in Attachment 2). As illustrated in the photo simulation, the proposed tower will be minimally discernible through the trees during the leaf-off season and will not be visible during the leaf-on season.

Per Section 800.5 of 36 CFR 800, "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."

The FCC has provided further guidance in the determination of visual adverse effects in Section VI.E.3 stating that "An Undertaking will have a visual adverse effect on a Historic Property if the visual effect from the Facility will noticeably diminish the integrity of one or more of the characteristics qualifying the property for inclusion in or eligibility for the National Register. Construction of a Facility will not cause a visual adverse effect except where visual setting or visual elements are character-defining features of eligibility of a Historic Property located within the APE."

As demonstrated in the included balloon test and photo simulation, the proposed facility will be not be sufficiently salient to detract from the Trail's historical significance and character-defining features. Specifically, the proposed installation will not directly or visually impact the Trail's location (including its alignment), design, workmanship or materials.

Further, the Trail's woodland setting will not be diminished by the proposed replacement tower's very limited visibility as a result of the intervening tree growth together with the meandering nature of the Trail. The existing trees will obscure the tower's appearance from the vast majority of the Trail and minimize the tower's appearance from the one location from which it is partially visible from the Trail. Consequently, the proposed undertaking will not adversely affect the Trail's feeling or association within the natural landscape. Therefore the proposed tower will not adversely effect the Appalachian Trail.

 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19/Blue Mountain

 Project Number:
 EBI #61114599

Attachment 6. Tribal and NHO Involvement

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

EBI Consulting filed the proposed undertaking on the FCC's Tower Construction Notification System (TCNS) on November 15, 2011. The attached FCC Notification email dated November 18, 2011 lists the Tribes identified through the TCNS process. Follow up correspondence, when necessary, will be completed via the methods listed on the attached email considered acceptable to each Tribe.

Applicant's Name:	The County of Berks
Project Name:	Exit 19/Blue Mountain
Project Number:	EBI 61114599
•	FCC Form 620

Talia Gilmore

From:	towernotifyinfo@fcc.gov
Sent:	Friday, November 18, 2011 3:01 AM
То:	Talia Gilmore
Cc:	kim.pristello@fcc.gov; diane.dupert@fcc.gov
Subject:	NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #2917595

Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribes and in making further contacts, the City and State of the Seat of Government for each Tribe and NHO, as well as the designated contact person, is included in the listing below. We note that Tribes may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribes and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribe or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribes and NHOs who have set their geographic preferences on TCNS. If the information you provided relates to a proposed antenna structure in the State of Alaska, the following list also includes Tribes located in the State of Alaska that have not specified their geographic preferences. For these Tribes and NHOs, if the Tribe or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribe or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event such a Tribe or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribe or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

 Cultural Preservation Director Tamara Francis - Delaware Nation - Anadarko, OK - regular mail
 Details: The Delaware Nation located in Anadarko, Oklahoma charges a \$400 administrative fee for the review of ALL projects. (Change Effective 6/30/2010).
 Send fee payable to the Delaware Nation in the form of a check or money order.
 All projects for review by the Delaware Nation must pay the \$400 fee.
 Please note that the Delaware Nation and the Delaware Tribe of Indians ARE NOT the same enitity.
 Send all correspondence for the Delaware Nation to The Delaware Nation 31064 State Hwy 281 Anadarko, OK 73005.

2. THPO Henryetta Ellis - Absentee-Shawnee Tribe of Indians of Oklahoma - Shawnee, OK electronic mail and regular mail Details: If the ground of the proposed project area has been previously disturbed, or if there will be no ground disturbing activity, then we request no further project notification.

For all other proposed projects, please send a copy of the cultural resources/archeological survey for the proposed site, and the response letter from the respective SHPO. Please Include the county of the proposed project location and also include the TCNS number on your correspondence to us.

For all projects, we do request to be notified upon the discovery of American Indian remains and related and/or unrelated funerary objects anywhere within the state.

If the applicant/tower builder receives no response from the Absentee-Shawnee Tribe of Indians of Oklahoma within 30 days after notification through TCNS, the Absentee-Shawnee Tribe of Indians of Oklahoma has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Absentee-Shawnee Tribe of Indians of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

3. Faithkeeper Anthony Gonyea - Onondaga Indian Nation - Via Nedrow, NY - electronic mail and regular mail Details: The Onondaga Indian Nation will not be commenting on projects that involve colocation with no ground disturbance.

4. Cayuga Nation Representative Clint C Halftown - Cayuga Nation - Seneca Falls, NY - regular mail

Details: If the Applicant receives no response from the Cayuga Nation within 30 days after notification through TCNS, the Cayuga Nation has no interest in participating in preconstruction review for the site. The Applicant, however, must notify the Cayuga Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Chief Leo R Henry - Tuscarora Nation - Via: Lewiston, NY - regular mail Details: If the Applicant/tower builder receives no response from the Tuscarora Nation within 30 days after notification through TCNS, the Tuscarora Nation has no interest in participating in pre-construction review for the site. The Applicant/tower builder, however, must IMMEDIATLY notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction.

6. THPO/NAGPRA Technician Juliet K Goyen - Keweenaw Bay Indian Community - Baraga, MI electronic mail Details: The KBIC THPO reviews all projects within historic homelands for the presence of cultural resources with significance to the Anishinaabe. Your request will go through a preliminary review by our THPO/NAGPRA Technician, the review consists of relevant studies submitted by the applicant regarding cultural resources documentation, in house literature search, database search and GIS search for further information. If any cultural resources are identified during this process, the file will be turned over to the Tribal Historic Preservation Officer in order to make a determination of effects. Information required in order to complete this process are as follows: Project Name Project Location Physical Address Latitude and Longitude State, County,Township, Range, Section quarters Brief Project Description Existing studies for archaeological sites, and cultural resources.

As of October 1, 2011, the KBIC THPO will be charging a fee of \$150.00 per review unless the review covers more than one section of land in which case the fee is \$150.00 per section. Fees in this process cover the research and other activities required to provide you with a timely response so your project can stay on track. Please submit payment of \$150.00 for each project application submitted, checks should be made payable to KBIC THPO, 16429 Beartown Road, Baraga, Michigan 49908. Any questions can be directed to Christopher J. Chosa, Tribal Historic Preservation Officer or Juliet K. Goyen, THPO/NAGPRA Technician via email: cchosa@kbic-nsn.gov, jgoyen@kbic-nsn.gov or thpo@kbic-nsn.gov or by phone: 906-353-6272 or 906-353-6278.

7. THPO/NAGPRA REP. Paul Barton - Seneca-Cayuga Tribe of Oklahoma - Grove, OK - electronic mail

Details: Thank you for contacting the Seneca-Cayuga Tribe of Oklahoma. The Seneca Cayuga Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects. Please note changes in our procedures. As of November 1, 2011, the Seneca Cayuga Tribe will be charging a \$150 review fee for all proposed projects with ground disturbing activities, projects as co-location sites which DO NOT require ground disturbance will be exempt from any fees. Please send a check or money order with Project Notice in the amount of \$150, made payable to Seneca-Cayuga Tribe, to the following address:

Seneca-Cayuga NAGPRA Office c/o Paul Barton, NAGPRA Rep. 23701 South 655 Road Grove, OK 74344

If the applicant/tower builder receives no response from the Seneca-Cayuga Tribe of Oklahoma within 30 days AFTER sending theNotice and \$150 review fee, the Seneca-Cayuga Tribe of Oklahoma has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Seneca-Cayuga Tribe of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

If the applicant/tower builder receives no response from the Seneca-Cayuga Tribe of Oklahoma within 30 days after notification through TCNS, the Seneca-Cayuga Tribe of Oklahoma has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Seneca-Cayuga Tribe of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

8. Administrative Assistant Jo Ann Beckham - Eastern Shawnee Tribe of Oklahoma - Seneca, MO - electronic mail

Details: If you, the Applicant and/or tower constructor, do not receive a response from us, the Eastern Shawnee Tribe of Oklahoma, within 30 days from the date of the TCNS notification, then you may conclude that we do not have an interest in the site. However, if archeological resources or remains are found during construction, you must immediately stop construction and notify us of your findings in accordance with the FCC's rules. (See 47 C.F.R. § 1.1312(d))

9. THPO Sherri Clemons - Wyandotte Nation - Wyandotte, OK - electronic mail and regular mail Details: Greetings We are interested in consulting on this and all towers in our geographic areas of interest.

The Wyandotte Nation has adopted new procedures for Section 106 consultation on cell tower construction projects. These procedures are effective as of 4-20-2010 and were UPDATED ON 12-1-2010. Procedures and updates are available by e-mailing algonquin@neok.com.

With any questions, please e-mail our Cell Tower Program archaeologist at algonquin@neok.com, or call 918-541-0782 (alternate phone 918-533-2212).

Thank you.

10. THPO Kim Jumper - Shawnee Tribe - Miami, OK - regular mail Details: THIS IS YOUR OFFICIAL NOTICE THAT THE SHAWNEE TRIBE IS INTERESTED IN CONSULTING ON ALL PROJECTS BUILT IN OUR AREAS OF GEOGRAPHIC INTEREST.

ATTENTION, NEW INFORMATION: Our procedures were updated on 14 January 2008. Please call Kim Jumper, THPO, at 918-542-2441, so that she can send you a copy.

If your tower is a co-location, please fax us this information to let us know. We cannot always tell from the TCNS web site that a tower is a co-location. We require a written response from you to let us know that it is a co-location. If a co-location project includes some new ground disturbance (such as from an expanded compound or access road, or construction of an ancillary structure), the Shawnee Tribe treats such a project the same as any other non co-location project.

Our correct mailing/physical address is: 29 South Highway 69A. Our correct phone number is (918-542-2441) and our historic preservation fax line is (918-542-9915). THPO Kim Jumper manages all cell tower consultation.

As of 26 June2006, all of the faxed responses of our final comments on a tower site will contain an original Shawnee Tribe signature. Each final comment fax is signed individually. Copies may be compared, for authentication, against the original in our files.If afinal comment fax does not contain a signature, it is not valid. ALL FINAL COMMENTS FROM THE SHAWNEE TRIBE ARE WRITTEN; FINAL COMMENTS ARE NEVER PROVIDED VERBALLY. IF THE SHAWNEE TRIBE IS CREDITED WITH HAVING GIVEN A VERBAL RESPONSE, THAT RESPONSE IS NOT VALID.

If you receive notification through the TCNS listing the Shawnee Tribe, that is an indication that the Shawnee Tribe is interested in consulting on the tower for which that notification was received. Please consider that our official indication of interest to you. The Shawnee Tribe considers the Tower Construction Notification System's weekly e-mail to be the first notification that we receive that a tower will be constructed in an area of our concern. We do not view the TCNS notificationas completion of 106 consultation obligations. The Shawnee Tribe has developed streamlined consultation procedures for cell tower developers and their subcontractors. If you do not have a copy of the procedures - most recently updated on 14 January2008 - please contact us, as you must follow these procedures to consult with us on cell tower projects. Call us at 918-542-2441 or fax us at 918-542-9915. It is the tower builder's responsibility to make sure that you have our most recent consultation procedures.

PLEASE DO NOT SEND US INFORMATION, QUERIES, OR COMMENTS ELECTRONICALLY. SINCE 1 DECEMBER 2005, WE HAVE NOT HANDLED ANY CELL TOWER CONSULTATION, INQUIRIES, OR CORRESPONDENCE VIA E-MAIL.

11. Dr. Brice Obermeyer - Delaware Tribe of Indians of Oklahoma - Emporia, KS - electronic mail Details: The Delaware Tribe of Indians of Oklahoma has had their federal recognition reinstated, and has been added to the listing of federally recognized Tribes maintained by the Bureau of Indian Affairs. Please refer to the Federal Register Notice dated August11, 2009, to view the notice stating that federal relations have been reestablished with this Tribe. See 74 FR 40218 (Aug. 11, 2009).

In order to receive a formal response, please provide a consultation fee of \$200 payable to: Delaware Tribe of Indians. The fee should be included with the mailed notification packet. Notification should include a cover letter describing the project and a topographic map depicting the project's location.

The Delaware Tribe is not interested in receiving notifications for projects that do not include ground disturbance.

Thank you.

Sincerely, Dr. Brice Obermeyer Delaware Tribe Historic Preservation Office 1420 C of E Drive, Suite 190 Emporia, Kansas 66801 620-340-0111 bobermeyer@delawaretribe.org

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States. For these Tribes and NHOs, you are required to use reasonable and good faith efforts to determine if the Tribe or NHO may attach religious and cultural significance to historic properties that may be affected by its proposed undertaking. Such efforts may include, but are not limited to, seeking information from the relevant SHPO or THPO, Indian Tribes, state agencies, the U.S. Bureau of Indian Affairs, or, where applicable, any federal agency with land holdings within the state (NPA, Section IV.B). If after such reasonable and good faith efforts, you determine that a Tribe or NHO may attach religious and cultural significance to historic properties in the area and the Tribe or NHO does not respond to TCNS notification within a reasonable time, you should make a reasonable effort to follow up, and must seek guidance from the Commission in the event of continued non-response or in the event of a procedural or substantive disagreement. If you determine that the Tribe or NHO is unlikely to attach religious and cultural significance to historic properties within the area, you do not need to take further action unless the Tribe or NHO indicates an interest in the proposed construction or other evidence of potential interest comes to your attention.

None

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

12. Department Head Mark J Epstein - Ohio Historic Preservation Office - Columbus, OH - electronic mail and regular mail

13. Deputy SHPO Franco Ruffini - Ohio Historic Preservation Office - Columbus, OH - electronic mail

14. SHPO Ann Safley - Pennsylvania Historical & Museum Commission Bureau for Historic Preservation - Harrisburg, PA - electronic mail

15. Deputy SHPO Susan Pierce - West Virginia Division of Culture & History, Historic Preservation Office - Charleston, WV - electronic mail

16. Department Head, Res. Protect. & Rev. Mark Epstein - Ohio Historic Preservation Office - Columbus, OH - electronic mail and regular mail

17. SHPO Barbara Franco - Pennsylvania Historical and Museaum Commission - Harrisburg, PA - electronic mail

If you are proposing to construct a facility in the State of Alaska, you should contact Commission staff for guidance regarding your obligations in the event that Tribes do not respond to this notification within a reasonable time.

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/15/2011 Notification ID: 80964 Tower Owner Individual or Entity Name: The County of Berks Consultant Name: Talia C Gilmore Street Address: 6876 Susquehanna Trail South City: York State: PENNSYLVANIA Zip Code: 17403 Phone: 717-428-0401 Email: tgilmore@ebiconsulting.com

Structure Type: UTOWER - Unguyed - Free Standing Tower Latitude: 40 deg 31 min 52.1 sec N Longitude: 76 deg 12 min 0.8 sec W Location Description: 1553 State Route 183 City: Wayne Township State: PENNSYLVANIA County: SCHUYLKILL Ground Elevation: 486.8 meters Support Structure: 91.4 meters above ground level Overall Structure: 92.7 meters above ground level Overall Height AMSL: 579.5 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

http://wireless.fcc.gov/outreach/notification/contact-fcc.html.

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8 a.m. to 7:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you, Federal Communications Commission

Attachment 7. Historic Properties Direct Effects

a. List all properties within the APE for direct effects.

On February 6, 2012, Suzanne Derrick of EBI Consulting spoke with Keith Heinrich of the Pennsylvania Historical and Museum Commission regarding the results of the CRGIS mapping (included in Attachment 3 of this FCC Form 620). Mr. Heinrich stated that the data used to create the CRGIS mapping came from the National Park Service and incorporates adjacent state-owned lands as well as the boundaries of the easements taken on privately-owned land and not just the historic property itself.

Per Section 510 of the Wayne Township Zoning Ordinance, a distance of 100 yards on either side of the trail is treated as a protected buffer for the preservation of the views and the elimination of direct impacts to the trail and states "In order to meet the objectives and purpose of the Pennsylvania Appalachian Trial Act, no buildings, accessory building or structures shall be permitted within one hundred (100) yards of the Appalachian Trail." Additionally, the New Jersey Historic Preservation Office has delineated a boundary of 400-feet on either side of the trail centerline as the edge of the historic resource in the SHPO Opinion for the eligibility of the trail (ID# 2778 – SHPO Opinion 6/14/1978).

After a review of the .kmz dataset provided by the National Park Service for use in Google Earth, the route of the Appalachian Trail is approximately 825 feet away from the project site at its nearest point. The current path of the Appalachian Trail is not within the APE-Direct Effects for the project as defined by the FCC in Section VI.C.2 of the FCC's 2004 NPA.

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

The Subject Property, located at 40° 31' 52.1"N -76° 12' 0.8"W with an address of 1553 State Route 183, Wayne Township, Schuylkill County, PA, is situated within a densely forested area and presently consists of an approximately 100-foot by 100-foot lease area that is presently improved and occupied with a Pennsylvania State Game Commission self support tower, a concrete block equipment shelter, and a propane tank; located within a squared clearing and enclosed within a chain link fence. The existing self-support lattice tower and ground level telecommunications equipment do not meet the age criteria for consideration for listing on the National Register of Historic Places.

c. Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.¹ If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates

Applicant's Name:	The County of Berks
Project Name:	Exit 19 / Blue Mountain
Project Number:	EBI #61114599

¹ Pursuant to Section VI.D.2.a. of the Nationwide Agreement, Applicants shall make a reasonable and good faith effort to identify above ground and archeological Historic Properties, including buildings, structures, and historic districts, that lie within the APE for direct effects. Such reasonable and good faith efforts may include a field survey where appropriate.

NT SUBMISSION PACKET -- FCC FORM 620

that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.²

Ms. Vanessa Sullivan, Field Archaeologist with EBI Consulting, working under the direct supervision of Ms. S. Lorraine Norwood, M.A., RPA with EBI Consulting, completed an evaluation of the proposed Project Site for the likelihood of containing archeological Historic Properties. Please refer to the attached report documenting the findings of this project review, including a description of the techniques and the methodology used to identify Historic Properties within the APE for direct effects. This report concludes that archeological resources are not expected to be impacted by the construction of the proposed tower and installation of associated support equipment at the Project Site.

 Applicant's Name:
 The County of Berks

 Project Name:
 Exit 19 / Blue Mountain

 Project Number:
 EBI #61114599

² Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if none of these conditions applies, if an Indian tribe or NHO provides evidence that supports a high probability of the presence of intact archeological Historic Properties within the APE for direct effects.



Pennsylvania Historical & Museum Commission Bureau for Historic Preservation • State Historic Preservation Office Archaeological Report Summary Form

12/6/2011	
	12/6/2011

PROJECT CHECKLIST: Please fill out a copy of this checklist and include it with your initial report submission, (including with management summaries or draft reports). This form may be downloaded and expanded as needed, but please do not eliminate any fields.

1. Report Title Archaeological Sensitivity Assessment of Exit 19/Blue Mountain

1553 State Route 183, Wayne Township, Schuylkill County, PA

- 2. **PI** <u>S. Lorraine Norwood</u> (🛛 MA, 🗌 PhD) **/Firm** or Institution <u>EBI Consulting</u>
- 3. **Report Date** (Month/Day/Year) <u>December 7th, 2011</u>
- 4. Number of Pages <u>17</u>
- 5. Agency Name <u>FCC</u> Federal \square State \square
- 6. **Project Area County/Municipality** (list all)

County	Municipality
Schuylkill	Wayne Township

7. Project Area Drainage(s), (list all)

Sub-basin	Watershed
Lower Delaware River (C)	Watershed 3

8. **Project Area Physiographic Zone(s)** (list All) (Use DCNR Map 13 compiled by W.D.

Sevon, Fourth Edition, 2000.)

Physiographic Zone Ridge and Valley Province, Blue Mountain Section

9. **Report Type** (some reports are combinations, check as many as apply to this report)

\boxtimes	Phase	IA/Sensitivity St	udy
	Phase	I	-
	Phase	II	
	Phase	III	

Historic Structures
 Geomorphology
 Determination of Effects
 Other _____

- 10. Total Project Area <u>1.71</u>hectares
- 11. Low Probability/Disturbed Areas 1.71 hectares = 100 % of project area
- 12. Phase I Methods used for total project (check as many as apply)

Archaeological Report Summary Form ER#	DATE 12/6/2011
\Box shovel tests, \Box controlled test units/deep te \boxtimes surface survey, \boxtimes informant interview, \Box othe	ests, er:
13. Total Number of Sites Encountered/Phase I <u>N/A</u>	
Total Sites Tested/Phase II	
Total Sites Excavated/Phase III	

14. Updated PASS Information: Please complete an updated PASS form **for each site** reported by this report. Updated forms need only include the new information and the site number and name.

15. PASS Site Specific Information: In addition, the following pages must also be completed **for each site**. Complete only the portions that pertain to the current report. If the report is a stand-alone Phase II, you do not need to fill in the Phase I methods, since they should have been included in the summary form for the previous report.

15. PASS Site Specific Information

Please complete the following **for each site** reported by this report.

PASS NUMBER

A. Phase I Methods (how the site was located - check as many as apply)

shovel tests,	controlled test units/deep	tests,
surface survey,	informant interview,	🗌 other:

B. Phase II Methods

controlled surface collection	
controlled excavation w. scree	ening of plowzone, > 5 units
mechanical stripping of plowz	one (%)
deep excavation units	
remote sensing	
🗌 other	
square meters of site tested:	sq. m

square meters or site tested.	sq.
% of site area tested:	%

C. Phase III Methods

controlled surface collection
controlled excavation w. screening of plowzone, > 5 units
mechanical stripping of plowzone%
deep excavation
block excavations
remote sensing
environmental reconstruction (soils, floral, pollen)
dietary reconstruction (floral, faunal)
intensive lithic analysis (functional)
intensive lithic analysis (technological)
raw material sourcing
ceramic analysis (seriation)
ceramic analysis (functional)
blood residue
other

square meters of site tested: _____ sq. m %

Archaeo	logical	Report	Summary	Form	ER#
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Recommendations (normally completed only after Phase II):

NR	Eligibility recor	nmendation	
	eligible,	ineligible,	undetermined

-- reasons for determination (check as many as apply; expand as needed)

 eligible: Criterion A. Explain eligible: Criterion B. Explain eligible: Criterion C. Explain eligible: Criterion D:
 settlement patterning (intersite patterning) intrasite artifact patterning features radiocarbon dating
 organic preservation evidence of culture change through time stratified temporally discrete clusters burials/human remains technological economics ethnicity dietary
 other(specify): ineligible disturbed ephemeral occupation redundant information undatable other (specify):

E. Artifacts/Collections

will be donated to the State Museum of Pennsylvania

gift agreement from private owner enclosed

- or -

transfer of responsibility from State Agency enclosed

election of repository from Federal Agency enclosed

artifacts washed/marked/cataloged following State

Museum guidelines

-- collection will be submitted by ____(date)

will be donated to other approved repository (this option must			
be negotiated with the BHP and State Museum or stated as			
stipulation in MOA)			
curation agreement enclosed			
artifacts washed/marked/cataloged following host			
guidelines			
collection will be submitted by(date)			
\Box will be retained by land owner (\Box whole or \Box partial collection)			
expanded documentation enclosed for items retained			
proof enclosed that owner was notified of the option to			
donate the collection to the State Museum and chose to retain the collection:			
letter from owner indicating desire to retain collection			
- or -			
agency or representative discussed donation option with			
owner on(date)			
- and -			
copy of letter and certified letter receipt indicating that			
the owner was offered this option in writing.			

Phase I Cultural Resources Reconnaissance Survey



Prepared for: The County of Berks C/o Pyramid Network Services, LLC 6519 Towpath Road East Syracuse, NY, 13057

> Exit 19 / Blue Mountain 1553 State Route 183 Wayne Township Schuylkill County, PA 17972 EBI Project No. 61114599

December 2011



EBI CONSULTING 21 B STREET BURLINGTON, MASSACHUSETTS 01803 (800) 786-2346 PROJECT NO. 61114599

Abstract

The Project Site is located at 1553 State Route 183 in Wayne Township, Schuylkill County, Pennsylvania (Figure 1). The County of Berks proposes to replace the existing Game Commission tower with a 300' (91.4m) self support lattice tower on the western end of the Subject Property. Including its highest appurtenance, the overall height of the tower will be 304' (92.7m) above ground level (AGL). The lattice tower and all associated support equipment will be placed within a 100' by 100' (30.5m by 30.5m) fenced compound over the existing footprint. Utilities are to be routed underground from the fenced compound, south to an existing utility source along the existing access road. Access to the site will be via a proposed 15' (4.6m) wide access road that extends north from an existing access road which runs parallel to the Appalachian Trail (Figures 2 and 3).

The Area of Potential Effects for Direct Effects (APE-DE) consists of the 18'x37'100' by 100' (30.5m by 30.5m) fenced compound, the proposed 15' (4.6m) wide and 15' (4.6m) long access easement, and the existing access road that runs parallel to the Appalachian Trail.

The archaeological potential of the APE-DE for prehistoric archaeological resources is low. Although the environmental factors are somewhat favorable, subsequent development of the radio tower facility, and Appalachian Trail access road would have seriously disturbed any subsurface contexts in the vicinity of the Project Site. It is unlikely that any intact subsurface resources are located on or adjacent to the proposed Project Site. The potential for historic resources is also low—no structures are observed on or adjacent to the Project Site on historic maps or historic aerial photographs.

In light of available information, it is my professional opinion that the APE-DE for the present project is not sensitive for the presence of archaeological resources due to disturbance from construction of the existing radio tower and associated utilities on the Subject Property. The likelihood of encountering archaeological deposits is negligible. In addition, the limited extent of the excavation associated with this project mitigates the disturbance of any sub-surface historic resources. Accordingly, I recommend that no further archaeological work be conducted in conjunction with the present project.



Introduction:

The Federal Communications Commission (FCC) requires licensees and their representatives to consider the effects of their actions on historic properties, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and the National Environmental Policy Act of 1969 (NEPA) (Federal Communications Commission 1996). Historic properties include Native American or European-American archaeological sites, architectural resources (historic districts and standing structures), objects, and traditional cultural properties. Applicants are required to assess and report all potential environmental effects as part of the Section 106 process, prior to construction.

This Phase IA reconnaissance survey and literature assessment was completed by Vanessa P. Sullivan under the direct supervision of Lorraine Norwood, M.A., RPA Program Manager with EBI Consulting, on December 6th, 2011, in accordance with state guidelines (Pennsylvania Historical and Museum Commission). It is intended to provide information that will enable the Office of the State Archaeologist and the Pennsylvania Historical and Museum Commission (PHMC) to review the subject project. Background research was conducted online via the Cultural Resources Geographic Information System (CRGIS), and other cited resources.

The Project and Project Site

The Project Site is located at 1553 State Route 183 in Wayne Township, Schuylkill County, Pennsylvania (Figure 1). The County of Berks proposes to replace the existing Game Commission tower with a 300' (91.4m) self support lattice tower on the western end of the Subject Property. Including its highest appurtenance, the overall height of the tower will be 304' (92.7m) above ground level (AGL). The lattice tower and all associated support equipment will be placed within a 100' by 100' (30.5m by 30.5m) fenced compound over the existing footprint. Utilities are to be routed underground from the fenced compound, south to an existing utility source along the existing access road. Access to the site will be via a proposed 15' (4.6m) wide access road that extends north from an existing access road that runs parallel to the Appalachian Trail (Figures 2 and 3).

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Subject Property

The Subject Property consists of a 1398.4-acre (565.91ha) tract of land that is owned by the Pennsylvania Game Commission, known as State Game Lands No. 110. The property extends along the Blue Mountain ridgeline between State Route 61 to the east and State Route 183 to the west. The land is predominantly undeveloped wooded land. The Subject Property is also developed with an existing Game Commission radio tower, an equipment shelter, and a propane tank located in a fenced compound, which is to be removed and replaced by the proposed project.



Environmental Setting

According to 1984 Friedensburg, PA 7.5-Minute Topographic Quadrangle (USGS; Figure 1), the Project Site is located in a mountainous, rural area on the Blue Mountain ridgeline along the Appalachian Trail. The site is at approximately 1,600' (487.7m) above mean sea level (amsl). The Geologic Map of Pennsylvania (DCNR 2000) indicates that the Project Site is located in the Blue Mountain Section of the Ridge and Valley Physiographic Province, which is underlain by Devonian and Silurian era deposits of sandstone, shale, limestone, and conglomerate. The closest water resource to the Project Site is a small creek, which is located 1,200' (365.7m) south/southwest of the APE-DE.

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS) website, the dominant soil type in the vicinity of the Project Site is Hazleton-Clymer association, gently sloping (HGB). Hazleton soils consist of well drained very channery sandy loam, over very channery sandy loam, over very channery sandy loam, underlain by bedrock to a depth of 53" (1.3m). Clymer soils consist of well drained very gravelly sandy loam, over very gravelly sandy clay loam, over extremely gravelly sandy loam, underlain by bedrock to a depth of 74" (1.9m). The parent material of these soil groups is residuum weathered from sandstone (WSS 2011).

Historic Overview

Prior to European arrival, the area of Schuylkill County was settled by the Delaware, who referred to the river now known as the Schuylkill as the Ganshohawanee, which means rushing water. Dutch traders who explored the area renamed it Schuylkill River, which means hidden river. The first European settlers in the area arrived by 1750. This German speaking population expanded during the 18th and 19th centuries, from 500 people to 6,000. The county was officially incorporated in 1811. During the 19th century, anthracite coal was the driving economic force of development in the region. It was mined in the county then shipped via canal to major markets in New York, Philadelphia, and Baltimore. By 1844, railroads eclipsed the canal in terms of tonnage of coal transported to other regions. Passenger rail service soon followed. Demand for workers in the mines, on the canals, and on railroads attracted immigrants from Ireland, Wales, and later from Italy and Eastern Europe. At the end of the 19th century and beginning of the 20th century, textile manufacturing became an important industry in the county. Demand for anthracite coal declined, especially following World War II, and the coal industry experienced a serious recession. The county is currently committed to a diversified economic base (Schuylkill Chamber of Commerce 2006).

Known Archaeological Sites

An archaeological site file search was conducted via the online CRGIS system by Sara Ayers-Rigsby, MA, RPA, Project Archaeologist with EBI Consulting. No archaeological site have been identified within a 1 mile (1.6km) radius of the Project Site.



Prior Cultural Resource Surveys

According to the files available via the CRGIS system, no cultural resource surveys have covered the vicinity of the Project Site and there have been no cultural resource surveys conducted within a I mile (1.6km) radius of the Project Site.

National/State Register Files

According to the site files held online at CRGIS, no Historic Properties listed on or determined eligible for listing on the National Register of Historic Places are on or adjacent to the Project Site.

Archaeological Potential of the APE-DE

The archaeological potential of the APE-DE for historic resources is low. By the third quarter of the 19th century, development was concentrated along the roads and railway to the north. No structures are depicted in the vicinity of the Project Site (Beers 1875). Few changes occur by 1984 with the exception of the development of the Appalachian Trail access road (USGS 1984).

Review of historic aerial photographs from 1992 to 2008 indicates that the radio tower facility at the Project Site, as well as the Appalachian Trail service road, were present prior to 1992 (Google Earth 2011). Construction activities associated with the facility and service road would have likely disturbed subsurface contexts in the vicinity of the Project Site. The Project Site is currently shown as a cleared lot improved with a radio tower facility (Google Earth 2011, Figure 5).

The archaeological potential of the APE-DE for prehistoric archaeological resources is low. Although the environmental factors are somewhat favorable, subsequent development of the radio tower facility, and Appalachian Train access road would have seriously disturbed any subsurface contexts in the vicinity of the Project Site. It is unlikely that any intact subsurface resources are located on or adjacent to the proposed Project Site. The potential for historic resources is also low—no structures are observed on or adjacent to the Project Site on historic maps or historic aerial photographs.

Site Visit and Recommendations

A site visit of the APE-DE was completed by EBI on December 1, 2011, with the aim of assessing surface conditions and the archaeological sensitivity of the Project Site. The APE-DE is situated in a cleared area improved with a radio tower facility and surrounded by woodlands (Photos 1-6). The APE-DE has likely been significantly disturbed by construction activities associated with the existing tower and utilities. The access easement will proceed from the proposed lease area (Photos 1-4) east to Route 183 (Photos 5 and 6).

No features were observed that were indicative of historic use of the site. No bedrock outcrops that would have made the site attractive for use by Native American groups were observed.

In light of available information, it is my professional opinion that the APE-DE for the present project is not sensitive for the presence of archaeological resources due to disturbance from



construction of the existing radio tower and associated utilities on the Subject Property. The likelihood of encountering archaeological deposits is negligible. In addition, the limited extent of the excavation associated with this project mitigates the disturbance of any sub-surface historic resources. Accordingly, I recommend that no further archaeological work be conducted in conjunction with the present project.

Sincerely, EBI Consulting

the P. Sull

Ms. Vanessa. P. Sullivan Author / Field Archaeologist EBI Consulting Tel: 617-715-1813 vsullivan@ebiconsulting.com

S. Lorraine Norwood, M.A., RPA Program Manager EBI Consulting Phone: (770) 630-5171 Email: Inorwood@ebiconsulting.com



References

Beers, F.W.

- 1875 Atlas of Schuylkill Co., Pennsylvania, From Actual Surveys by and under the Direction of F. W. Beers. Accessed December 5th, 2011 at http://collection1.libraries.psu.edu/u?/digitalbks2,54128.
- Commonwealth of Pennsylvania, Department of Conservation and Natural Resources (DCNR) 2000 Geologic Map of Pennsylvania. Accessed December 5th, 2011 at http://www.dcnr.state.pa.us/topogeo/maps/map7.pdf.

Cultural Resources Geographic Information System (CRGIS)

2011 https://www.dot7.state.pa.us/ce/SelectWelcome.asp. Accessed November 18th, 2011.

Google Earth

2011 http://earth.google.com. Accessed December 5th, 2011.

Schuylkill Chamber of Commerce

2006 "History" Accessed June 3rd, 2010 at http://www.schuylkillchamber.com/history.htm.

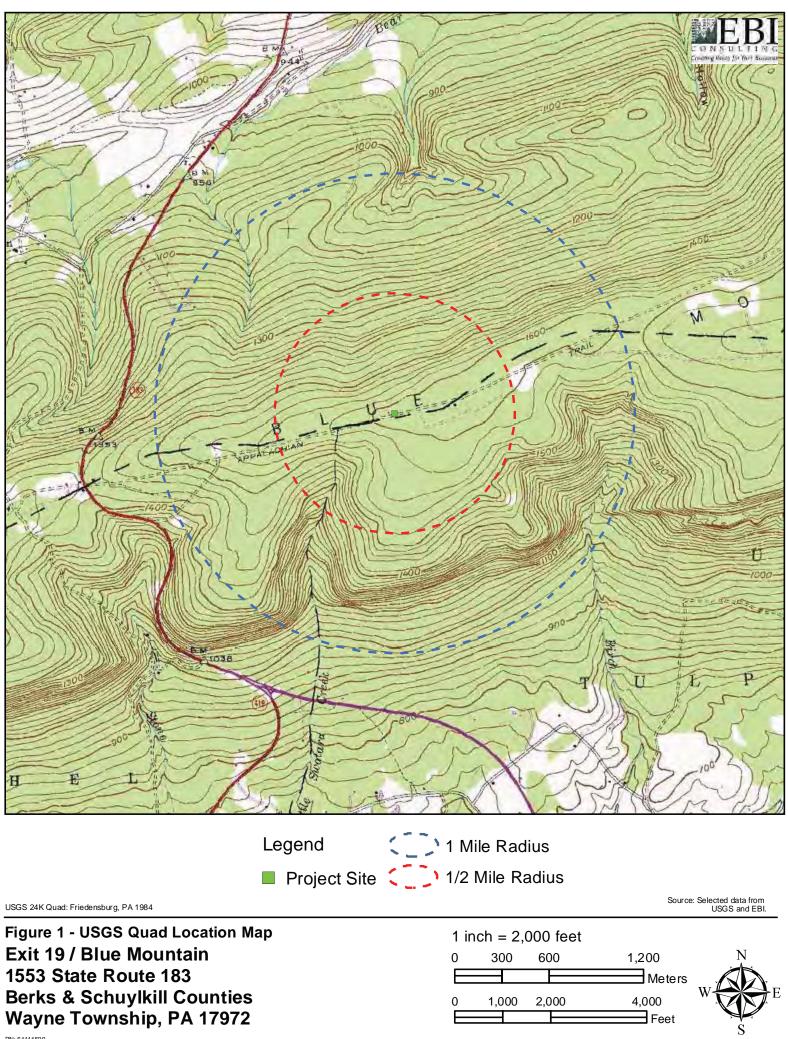
United States Geological Service (USGS)

1984 Friedensburg, PA 7.5' Topographic Quadrangle. USGS, Reston, VA.

Web Soil Survey

2011 United States Department of Agriculture soils website. Accessed December 5th, 2011 at http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.





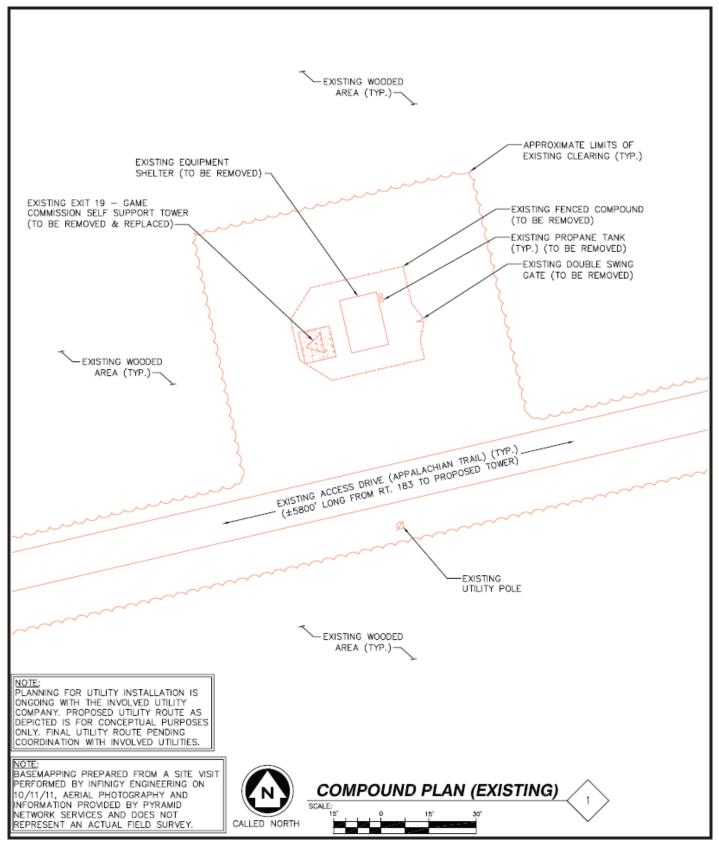


Figure 2: Existing Compound Plan



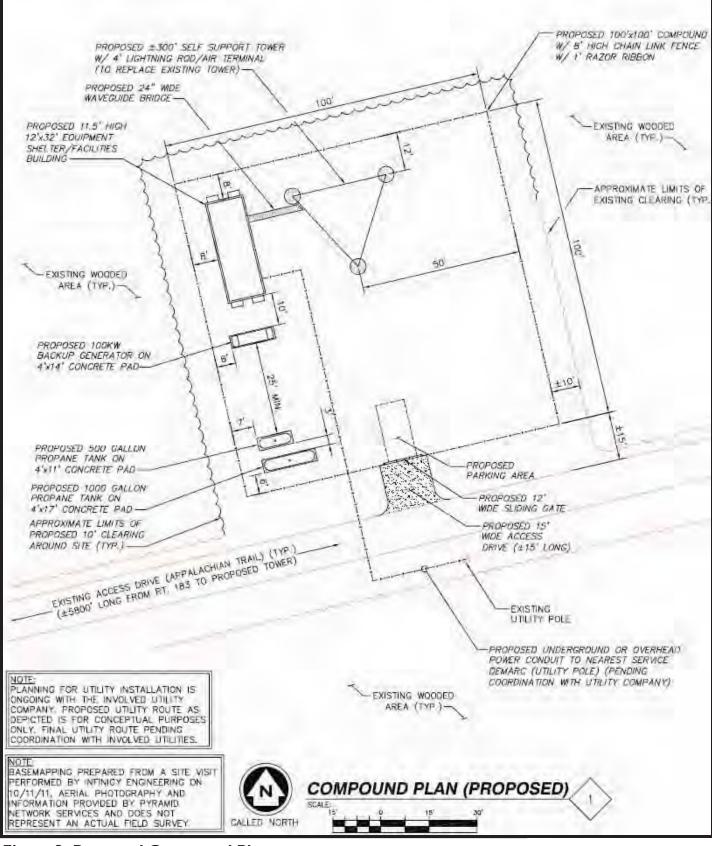


Figure 3: Proposed Compound Plan



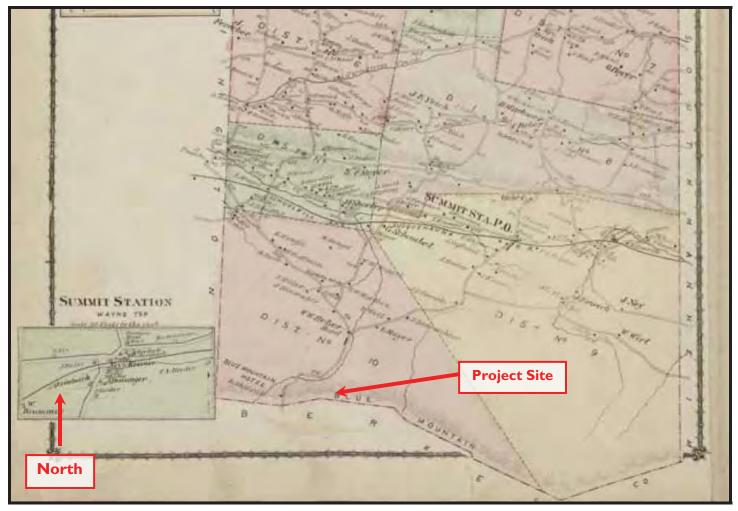


Figure 4: 1875 Atlas of Schuylkill Co., Pennsylvania, From Actual Surveys by and under the Direction of F. W. Beers





Figure 5: Google Earth Aerial of Project Site Facing North



Photographs





Photo Angle Map





Photo I: Facing North to the Proposed Telecommunications Compound Area/Existing Radio Tower Compound



Photo 2: Facing West to the Proposed Telecommunications Compound Area/Existing Radio Tower Compound





Photo 3: Facing South from the Proposed Telecommunications Compound Area/Existing Radio Tower Compound to existing access road



Photo 4: Facing East from the Proposed Telecommunications Compound Area/Existing Radio Tower Compound





Photo 5: Facing west to the Project Site (from 0.5 miles away) along the existing access road/Appalachian Trail service road



Photo 6: Facing east from the Project Site along the existing access road/Appalachian Trail service road



NT SUBMISSION PACKET -- FCC FORM 620

Attachment 8. Historic Properties Visual Effects

Historic Properties Identified for Visual Effects Guidelines

a. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.I.a. of the Nationwide Agreement.

Ms. Farley's review of the PHMC's CRGIS on November 30, 2011 revealed that the Appalachian Trail historic district is within the presumed $\frac{3}{4}$ mile APE-Visual Effects.

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

As of the date of this report, EBI has not received comments from Indian Tribes, NHOs, local governments, or members of the public that identify Historic Properties in the APE for visual effects that are not listed in the above list of Historic Properties.

c. For any properties listed in the above Historic Properties list, that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

N/A

Applicant's Name: <u>The County of Berks</u> Project Name: <u>Exit 19 / Blue Mountain</u> Project Number: <u>EBI #61114599</u>

Attachment 9. Local Government

a. If any local government been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Programmatic Agreement, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (e.g., correspondence or notices).

The Wayne Township Board of Supervisors has been invited to comment on the proposed project's potential effects on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. A copy of EBI's correspondence with the local government office is attached. As of the date of this submission packet, no comments from the Wayne Township Board of Supervisors have been received by EBI. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

The Pennsylvania Game Commission sent a letter of support for the project to the Wayne Township Zoning Hearing Board. The letter has been appended to this attachment.

b. If a local government agency will be contacted but has not been to date, explain why and when such contact will take place. $N\!/\!A$

•		
Project Number:	EBI #61114599	
Project Name:	Exit 19 / Blue Mountain	
Applicant's Name:	The County of Berks	



December 2, 2011

Mr. Larry L. Luckenbill, Chairperson Wayne Township Board of Supervisors P.O. Box 97 Friedensburg, PA 17933

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

Dear Mr. Luckenbill:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc., on behalf of The County of Berks, provides this notice of a proposed telecommunications facility installation at the address listed above.

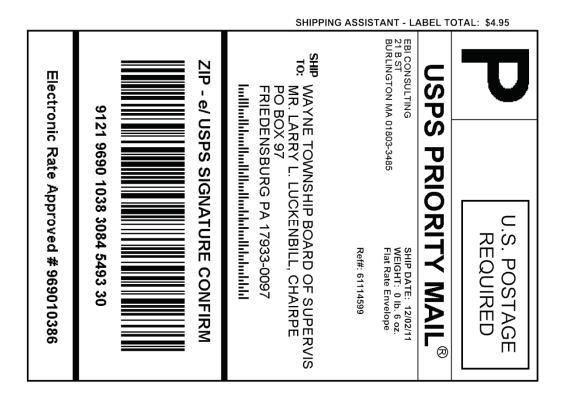
EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached maps and drawings for complete details regarding the project.

Please note that we are requesting your review of the attached information as part of the Section 106 process only and not as part of the local zoning process. We are only seeking comments related to the proposed project's potential effects on historic properties.

Please submit your comments regarding the proposed project's potential effects on historic properties to my attention c/o EBI Consulting, 6876 Susquehanna Trail South, York, PA 17403 or contact me via telephone at the number listed below. Please reference the EBI project number in all correspondence. I would appreciate your comments as soon as possible within the next 30 days. Please do not hesitate to contact me if you have any questions or concerns about the proposed project.

Respectfully Submitted,

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com



Cut on dotted line

Instructions

- 1. Please use a laser or laser-quality printer.
- Adhere shipping label to package with tape or glue
 DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
- 3. Place label so that it does not wrap around the edge of the package.
- 4. Affix Priority Mail service postage. Electronic option Signature Confirmation service fee required.
- Stamped packages weighing 13 ounces or more may not be placed in Postal Service collection boxes. For information on pickup options, go to the Pickup page on www.usps.com.
- 6. Each shipping label number is unique and can be used only once DO NOT PHOTOCOPY.
- 7. Please use this shipping label on the "ship date" selected when you requested the label.

Online e-Label Record



UNITED STATES POSTAL SERVICE Thank you for shipping with the United States Postal Service! Check the status of your shipment on the Track & Confirm page at www.usps.com



WILDLIFE HABITAT MANAGEMENT REAL ESTATE DIVISION 717-787-6568

COMMONWEALTH OF PENNSYLVANIA

Pennsylvania Game Commission

2001 ELMERTON AVENUE HARRISBURG, PA 17110-9797

"To manage all wild birds, mammals and their habitats for current and future generations."

January 30, 2012

ADMINISTRATIVE BU	JREAUS:
PERSONNEL	717-787-7836
ADMINISTRATION	717-787-5670
AUTOMOTIVE AND PROCUREMENT DIVISION	717-787-6594
LICENSE DIVISION	717-787-2084
WILDLIFE MANAGEMENT INFORMATION & EDUCATION	
WILDLIFE PROTECTION	717-787-5740
MANAGEMENT	
AUTOMATED TECHNOLOGY SERVICES	717-787-4076

www.pgc.state.pa.us

Wayne Township Attn: Zoning Hearing Board P.O. Box 97 Friedensburg, PA 17933-0097

Re: Berks County Emergency Response System Expansion Project ("Project"), Wayne Township, Schuylkill County, PA

Dear Ladies and Gentlemen:

Please be advised that the Pennsylvania Game Commission ("PGC") does support Berks County's proposed communication tower site project to be located on State Game Land No. 110, partially in Wayne Township, Schuylkill County, PA ("Township"). The proposed project is for public safety purposes and will benefit the general public and residents of the Township, and Berks County, as well as emergency/first-responders (e.g., fire, police, EMS and PGC Wildlife Conservation Officers). We understand that Berks County either already has filed – or is preparing to file – its zoning relief application with the Township, and has already received a waiver for land development approvals from the Township for the proposed project.

It is our opinion that this project will <u>not</u> significantly affect the Commonwealth's wildlife resources, the general character of the property, neighborhood, nor the neighborhood's property values. The PGC believes that the County has taken sufficient steps to mitigate for any impacts that <u>may</u> arise from the proposed project; and in fact, the County (at its own cost) is removing two other towers currently located on the State Game Lands and are consolidating that communications equipment onto their own new tower. The County has expressed their desire to continue to cooperate with the PGC should any unforeseen problems arise.

We appreciate the importance of this project, as it should be very beneficial to the citizens of the Commonwealth and may ultimately save lives. Please feel free to contact me directly with any questions, comments or concerns you may have.

Sincerely,

plennin Jacobigh

Dennis Neideigh Chief, Division of Real Estate

cc: James G. Caravan, Esquire Ronald L. Williams, Esquire

Attachment 10.

Other Consulting Parties and Public Notice

List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.

The following consulting parties have been invited to comment on the proposed project's effects on Historic Properties:

- The Berks County Conservancy
- Historical Society of Schuylkill County
- Historical Society of Berks County
- The Nation Park Service, Northeast Region (NPS)
- Appalachian Trail Conference (ATC)

Attached, please find copies of relevant correspondence to date with these parties. As of the date of this submission packet, no comments from the above listed consulting parties, with exception of the Appalachian Trail Conservancy (ATC), have been received by EBI. The ATC response enumerates criteria that should be met in order to avoid ATC opposition to telecommunications facilities that could potentially adversely impact the viewshed of the Appalachian Trail. Please see the attached ATC response for further details.

Additionally, please find a copy of the legal notice regarding the proposed telecommunications installation that was posted in the *Reading Eagle* on December 3, 2011. As of the date of this submission packet, no comments regarding this notice have been received by EBI. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name:	The County of Berks
Project Name:	Exit 19 / Blue Mountain
Project Number:	EBI #61114599



December 1, 2011

Reading Eagle Press Reading Eagle Company 345 Penn Street Reading, PA 19603 Tel.: 610.371.5000

Subject: Request for Public Notice

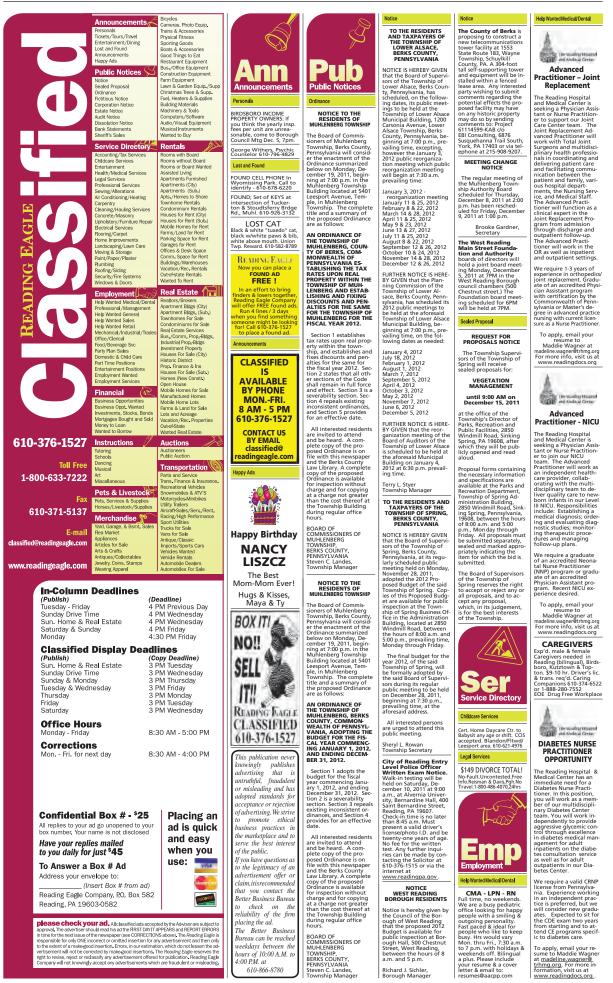
EBI Consulting (EBI), on behalf of the County of Berks, would like to place the following ad in your paper for print on the next available day. Please send a tear sheet (not an affidavit) of the ad for confirmation to the address noted on the letterhead. The following is the text of the Public Notice:

The County of Berks is proposing to construct a new telecommunications tower facility at 1553 State Route 183, Wayne Township, Schuylkill County, PA. A 304-foot tall self-supporting tower and equipment will be installed within a fenced lease area. Any interested party wishing to submit comments regarding the potential effects the proposed facility may have on any historic property may do so by sending comments to: Project 61114599-KAB c/o EBI Consulting, 6876 Susquehanna Trail South, York, PA 17403 or via telephone at 215-908-9207.

Please e-mail or call me with any questions or concerns regarding this publication. Thank you for your time.

Sincerely,

Kara Briggs Architectural Historian 215-908-9207 kbriggs@ebiconsulting.com





December 2, 2011

Northeast Region Mr. Dennis Reidenbach, Regional Director National Park Service U.S. Custom House 200 Chestnut Street, Fifth Floor Philadelphia, PA 19106

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

Dear Mr. Reidenbach:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc., on behalf of The County of Berks, provides this notice of a proposed telecommunications facility installation at the address listed above.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached maps and drawings for complete details regarding the project.

Please note that we are requesting your review of the attached information as part of the Section 106 process only and not as part of the local zoning process. We are only seeking comments related to the proposed project's potential effects on historic properties.

Please submit your comments regarding the proposed project's potential effects on historic properties to my attention c/o EBI Consulting, 6876 Susquehanna Trail South, York, PA 17403 or contact me via telephone at the number listed below. Please reference the EBI project number in all correspondence. I would appreciate your comments as soon as possible within the next 30 days. Please do not hesitate to contact me if you have any questions or concerns about the proposed project.

Respectfully Submitted,

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com

From: (800) 872-4004 ebi EBI Consulting 21 B Street	Ship Date: 02DEC11 ActWgt: 1.0 LB CAD: 100863325/WSXI2250
Burlington, MA 01803	Invoice # Reference # 61114599 PO # Dept #
SHIP TO: 1 Mr. Dennis Reidenbach, Regional Dir National Park Service	Ship ID
200 Chestnut Street, 5th Floor U.S. Custom House Philadelphia, PA 19106	
	(9612019) 0020378 15097756 GND 019 1
	Prepaid 0f



December 2, 2011

Mr. David Startzell, Executive Director APPALACHIAN TRAIL CONFERENCE 799 Washington Street, P.O. Box 807 Harpers Ferry, WV 25425-0807

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

Dear Mr. Startzell:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc., on behalf of The County of Berks, provides this notice of a proposed telecommunications facility installation at the address listed above.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached maps and drawings for complete details regarding the project.

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Respectfully Submitted,

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com

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Burlington, MA 01803	Invoice # Reference # 61114599 PO # Dept #
SHIP TO: 1	Ship ID
Mr. David Startzell, Executive Dire Appalachian Trail Conference	
799 Washington Street Box 807	
Harpers Ferry, WV 25425	
	(9612019) 0020378 15097718
	GND 019 1
	Prepaid of 1



November 28, 2011

Ms. Maureen A. Taylor, Architectural Historian EBI Consulting 6876 Susquehanna Trail South York, PA 17403

Subject Invitation to Comment Proposed Berks County Public Safety Tower at Pulpit Rock Albany Reservoir Road, Albany, Berks County, PA EBI Project #61113978

Dear Ms. Taylor.

am writing on behalf of the Appalachian Trail Conservancy (ATC) regarding your October 28, 2011 Invitation to Comment and the above referenced tower proposal.

Before offering comments on the proposed tower, let me first explain a bit about the Appalachian National Scenic Trail (Trail, A.T.) and who we are. As you may be aware, the 2,170-mile long A.T. was designated as the first national scenic trail with the passage of the National Trails System Act in 1968. Although formally recognized by the Act, the Trail was actually conceived well before then by planner and conservationist Benton MacKaye in 1921. He envisioned the A.T. as a path for foot travel across the remote and scenic high ndges of the Appalachian Mountains—a place where people could seek respite from the rapidly developing landscape of the eastern seaboard. Over the years the Trail has become recognized as a world renowned greenway and recreational resource and is visited each year by some 2 million people. It is also considered a historic resource and has been determined to be eligible for listing on the National Register of Historic Places by the Pennsylvania Historical and Museum Commission.

The Appalachian Trail Conservancy is dedicated to protecting this important resource. As a private nonprofit organization, our mission is to preserve and manage the Appalachian Trail – ensuring that its vast natural beauty and priceless cultural heritage can be shared and enjoyed today, tomorrow, and for centuries to come. This has proven to be quite a challenge as development pressures from a variety of utility and communications infrastructure continue to increase in the vicinity of the A.T.

To help us protect the A.T. and meet this challenge, ATC has adopted policy regarding development and utility infrastructure near the Trail. This policy states that ATC opposes telecommunications towers and other utilities where these facilities will adversely impact the viewshed of the Trail unless they meet all of the following criteria:

- The proposed development represents the only prudent and feasible alternative to meet an
 over-riding public need, as demonstrated in a thorough and detailed analysis of alternatives.
- Any new impacts associated with the proposed development shall coincide with existing major impacts to the Trail experience.
- Any adverse impacts of a proposed development shall be sufficiently mitigated so as to result in no
 net loss of recreational values or the quality of the recreation experience provided by the
 Appalachian Trail. To the extent practicable, mitigation shall occur on site.

Join the Journey

Mbl-Atlantic Regional Office, a East First St., P.O. Box 625, Boiling Springs, FA 17007-0625, Phone: 717.258-5771 Fax: 717.258.1441 Www.appalachiantralLorg Furthermore, ATC requests that governmental agencies take steps to encourage shared use of existing communications facilities, development of multi-user facilities, and removal of structures that are no longer needed, as solutions to the problem of proliferating communications towers and other structures dotting the landscape.

From a technical standpoint we understand why the county finds some attributes of this proposed site desirable for construction of a communications tower. However, when considering its proximity to the Trail and its associated resources, it is difficult to imagine a worse location. As proposed the tower would be within an estimated 300-400 feet of the A.T. as it traverses the Kittatinny Ridge near Pulpit Rock and The Pinnacle. This area is one of the most scenic and popular destinations along the Trail in Pennsylvania. Based on our participation in the balloon test conducted by the county on October 26. 2011, we have confirmed that the tower would have significant adverse impacts on the scenic resources of the Trail in the immediate vicinity of Pulpit Rock and at locations northeast of the site between Pulpit Rock and the Pinnacle.

It should be noted that The Appalachian Trail Conservancy has been working proactively for several years with a coalition of partners including PA DCNR, Pennsylvania Audubon, Berks County Conservancy, Hawk Mountain Sanctuary, Blue Mountain Eagle Climbing Club, National Park Service and others not only to preserve the character of the Appalachian National Scenic Trail in this part of Pennsylvania, but also the overall landscape and natural resources associated with the Kittatinny Ridge as a whole. In addition to providing a land base and protective corridor for the A.T., the Kittatinny Ridge is recognized as a world renowned flyway for migrating raptors, songbirds and other species. Special consideration should be given to the potential impacts any new towers might have on these species and mitigation should be provided to the fullest extent possible.

Lastly, it should be noted that this is just one of three new towers proposed by Berks County along the Kittatinny Ridge near the Appalachian Trail. Two other proposals include a 250 foot tower off Hill Road in Bethel Township, Berks County, PA and a 300 foot tower on PA State Game Lands 110 east of State Route 183. Impacts from these towers should be considered collectively as well as individually and mitigation should be required which results in no-net-loss to the natural, scenic and historic resources mentioned herein.

Thank you for the Invitation to comment on this important matter. We look forward to working with the county to resolve this issue and protect the Appalachian National Scenic Trail.

Sincerely.

Karen L. Lutz (Regional Director

DC

Ann Safley, PHMC Katry Harris, ACHP Brent Allen, NPS Janice Reich, BMECC Laura Belleville, ATC



December 2, 2011

Berks County Conservancy 25 North 11th Street Reading, PA 19601

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

To Whom It May Concern:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc., on behalf of The County of Berks, provides this notice of a proposed telecommunications facility installation at the address listed above.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached maps and drawings for complete details regarding the project.

Please note that we are requesting your review of the attached information as part of the Section 106 process only and not as part of the local zoning process. We are only seeking comments related to the proposed project's potential effects on historic properties.

Please submit your comments regarding the proposed project's potential effects on historic properties to my attention c/o EBI Consulting, 6876 Susquehanna Trail South, York, PA 17403 or contact me via telephone at the number listed below. Please reference the EBI project number in all correspondence. I would appreciate your comments as soon as possible within the next 30 days. Please do not hesitate to contact me if you have any questions or concerns about the proposed project.

Respectfully Submitted,

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com





December 2, 2011

Historical Society of Berks County 940 Centre Avenue Reading, PA 19601

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

To Whom It May Concern:

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Respectfully Submitted,

ane N. Duco

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com

From: (800) 8/2-4004 ebi EBI Consulting 21 B Street Consulting Crowned FeedExc, Growned Crowned Growned Crowned	
Burlington, MA 01803 Invoice #	
Historical Society of Berks County	
90 Centre Avenue	
Reading, PA 19601 IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	
(9612019) 0020378 15097749	
GND 019 1	
Prepaid of 1	



December 2, 2011

Historical Society of Schuylkill County 305 North Centre Street Pottsville, PA 17901

Subject: Invitation to Comment EXIT 19 / BLUE MOUNTAIN 1553 State Route 183 Wayne Township, Schuylkill County, PA 17972 EBI Project #61114599

To Whom It May Concern:

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Respectfully Submitted,

Ms. Kara A. Briggs Architectural Historian Tel.: 215-908-9207 Fax: 717-428-0403 kbriggs@ebiconsulting.com



Federal

Section 106 - Filing Confirmation Communications Commission FCC > Wireless > Section 106 Filings Logged In: 0016385759 (Log Out) Help | Technical Support FCC Form 620 Current Status: Submitted View/Print Submission Packet New Tower Submission Date of Submission: 03/12/2012 Common Questions << Return To My Filings **Filing Confirmation** Your filing has been Submitted. File Number: 0005110510

Notification of this filing will be sent to the following Lead SHPO/THPO:

Pennsylvania Historical & Museum Commission Bureau for Historic Preservation Attn: Ann Safley 400 North St, 2nd Flr Harrisburg, PA 17120-0093

Some SHPO/THPOs may have state specific archiving requirements. You should check with the above agency to determine if they need all or part of this filing submission in paper format.

•View all other parties notified of this filing

A printable submission packet is generated for your manual records. Please make a note of this file number and print out this page for your records. A confirmation of this submitted filing will be emailed to the email address specified in your filing.

This system is intended to facilitate filing of Section 106 of the National Historic Preservation Act and use of this system in itself does not satisfy parties' obligations with respect to historic preservation review under the Commission's rules. Failure to receive automated notifications generated by this system does not relieve parties of legal responsibilities and/or justify failure to meet deadlines.

This notification is NOT an actual submission for Antenna Structure Registration. Tower Structures that require antenna structure registration based on FCC Rules 47 C.F.R. Part 17 must complete FCC Form 854 after FAA clearance is obtained.

Federal Communications Commission 445 12th Street SW Washington, DC 20554

Phone: 1-877-480-3201 TTY: 1-717-338-2824 Submit Help Request