

TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM:

**LOWERSOURCE**

1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL 678-990-2338  
 FAX 678-990-2342

ENGINEER: ELIZABETH B. USHER

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A&E PROJECT #:

DRAWN BY: WCG

CHECKED BY: EBU

NO.	DATE	DESCRIPTION
A	06/24/15	ISSUED FOR REVIEW
0	07/15/15	ISSUED FOR CONSTRUCTION
1	10/1/15	ISSUED FOR CONSTRUCTION



SITE NAME: PCT SE

PAPER GA

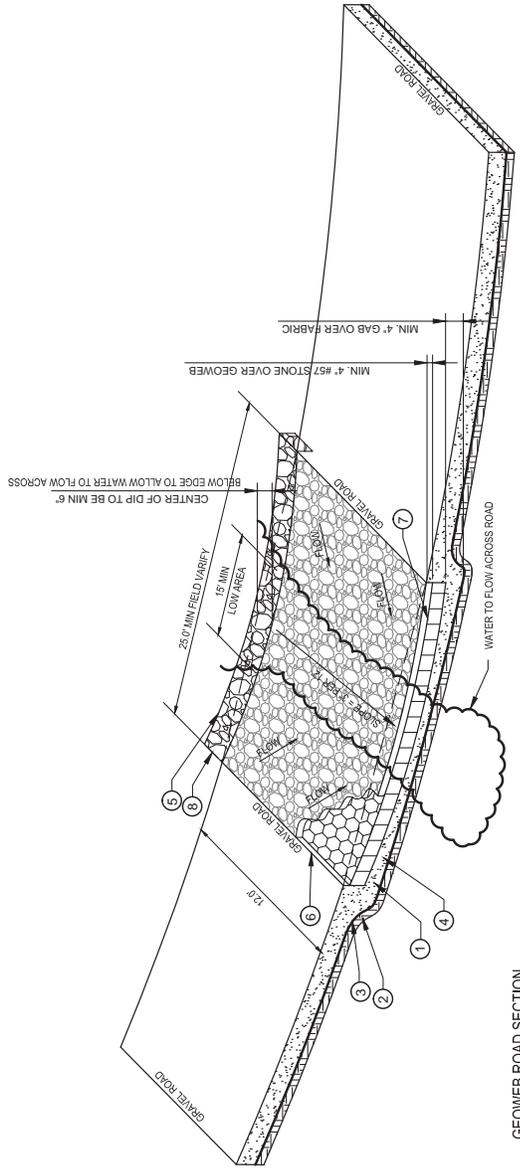
TOWER OWNER / SITE NUMBER: AMERICAN TOWER

DESIGN TYPE: GREENFIELD

SHEET TITLE: GRADING & EROSION CONTROL PLAN

DRAWING NO. C5B

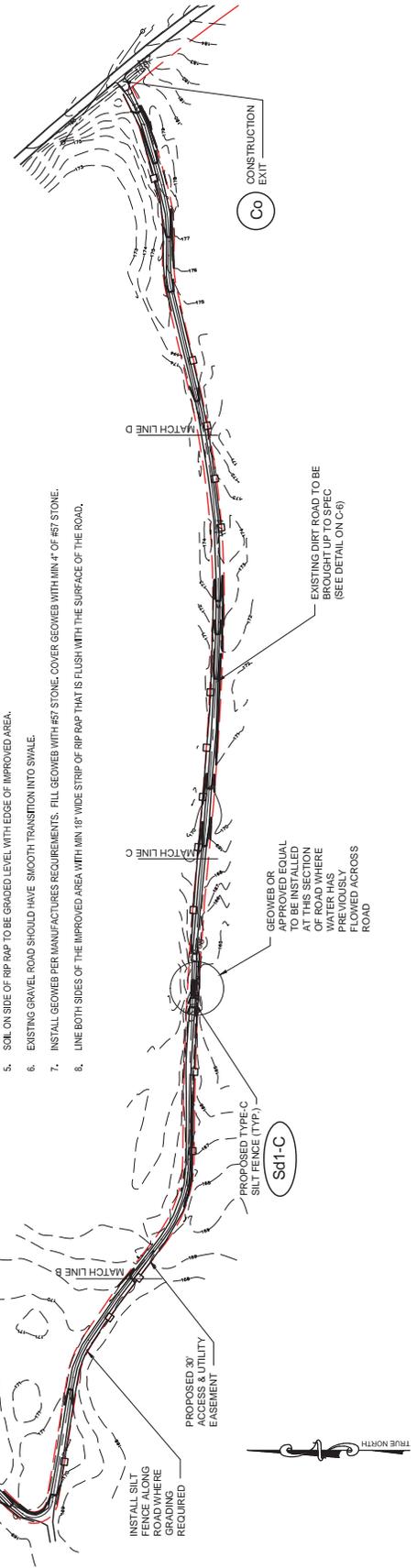
REVISION NO. 1



**GEOWEB ROAD SECTION**

\*\*FOLLOW MANUFACTURERS REQUIREMENTS FOR INSTALLING GEO WEB.\*\*

1. REMOVE ALL ORGANIC MATERIAL (STUMPS, ROOTS, LEAVES, ETC.) A MIN. 12" OF SOIL TO BE REMOVED.
2. LEVEL AND COMPACT SUBGRADE TO A 95% COMPACTION.
3. INSTALL GEOTEXTILE FABRIC (AND/OR OTHER STABILIZATION METHOD) OVER SUBGRADE ON ALL ROADS.
4. INSTALL MIN. 4" OF GRADED AGGREGATE BASE (GAB/CRUSHER RUN), ALL GAB SHALL BE COMPACTED TO A MAXIMUM DRY DENSITY AS DETERMINED BY ASTM D-1557 OR WITHIN PLUS OR MINUS 3% OF OPTIMUM MOISTURE CONTENT.
5. SOIL ON SIDE OF RIP RAP TO BE GRADED LEVEL WITH EDGE OF IMPROVED AREA.
6. EXISTING GRAVEL ROAD SHOULD HAVE SMOOTH TRANSITION INTO SWALE.
7. INSTALL GEOWEB PER MANUFACTURERS REQUIREMENTS. FILL GEOWEB WITH MIN. 4" OF #57 STONE. COVER GEOWEB WITH MIN. 4" OF #57 STONE.
8. LINE BOTH SIDES OF THE IMPROVED AREA WITH MIN. 18" WIDE STRIP OF RIP RAP THAT IS FLUSH WITH THE SURFACE OF THE ROAD.



GRAPHIC SCALES



SCALE: 1" = ###'-0"

**GROUNDING AND EROSION CONTROL PLAN**

SCALE: 1" = ###'-0"

TOWER OWNER:  


DEVELOPER:  
 TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM:  
  
 1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL 678-990-2338  
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 ENGINEER: ELIZABETH B. USHER

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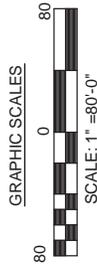
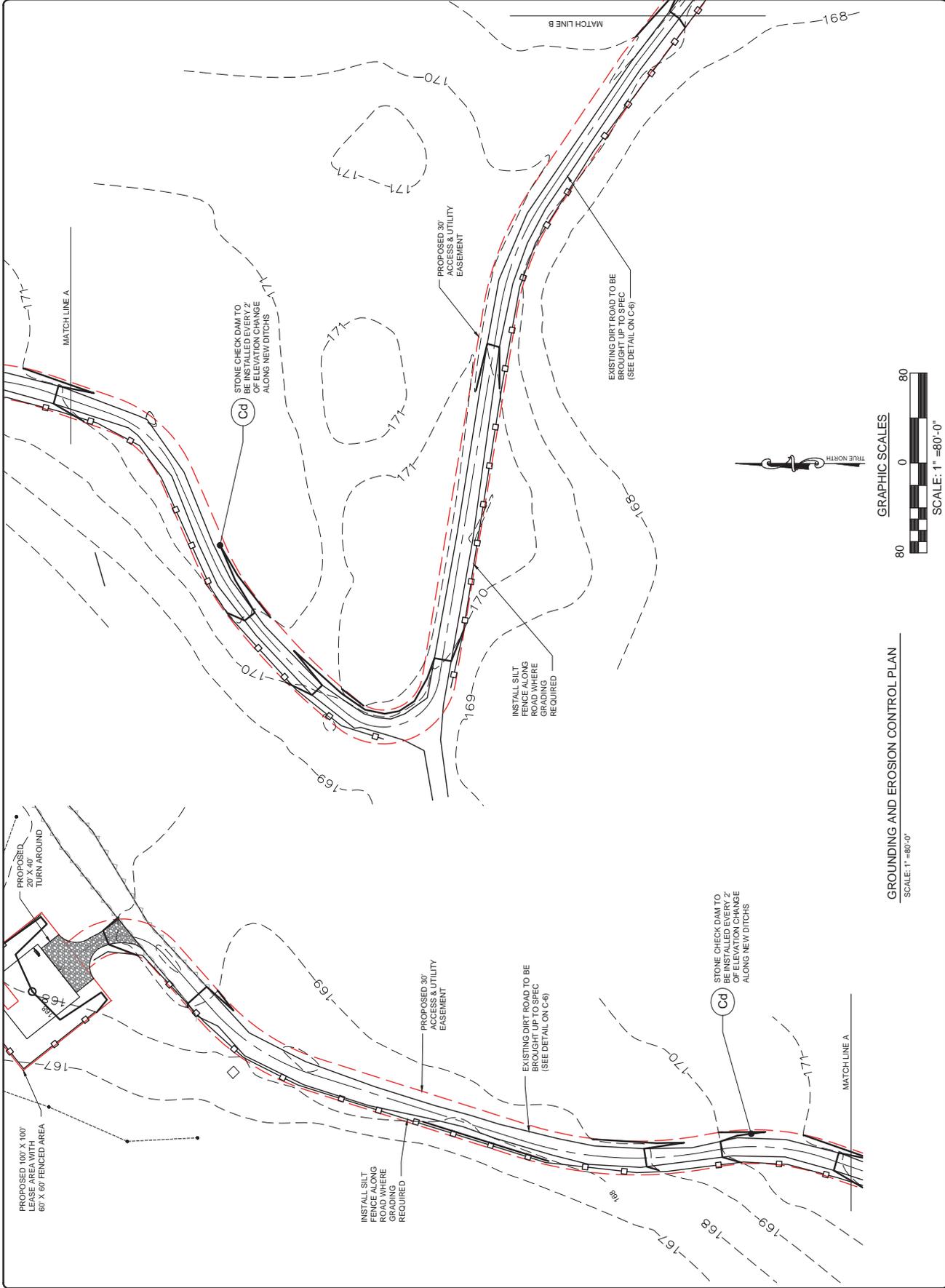
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Professional Engineer Seal for Elizabeth B. Usher, State of Georgia, License No. 10-6715

SITE NAME:  
**PCT SE PAPER GA**  
 TOWER OWNER / SITE NUMBER:  
 AMERICAN TOWER  
 DESIGN TYPE:  
 GREENFIELD

SHEET TITLE:  
**GRADING & EROSION CONTROL PLAN**

DRAWING NO. **C5C**  
 REVISION NO. **1**



GRADING AND EROSION CONTROL PLAN  
 SCALE: 1" = 80'-0"

TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM:

**TOWERSOURCE**

1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
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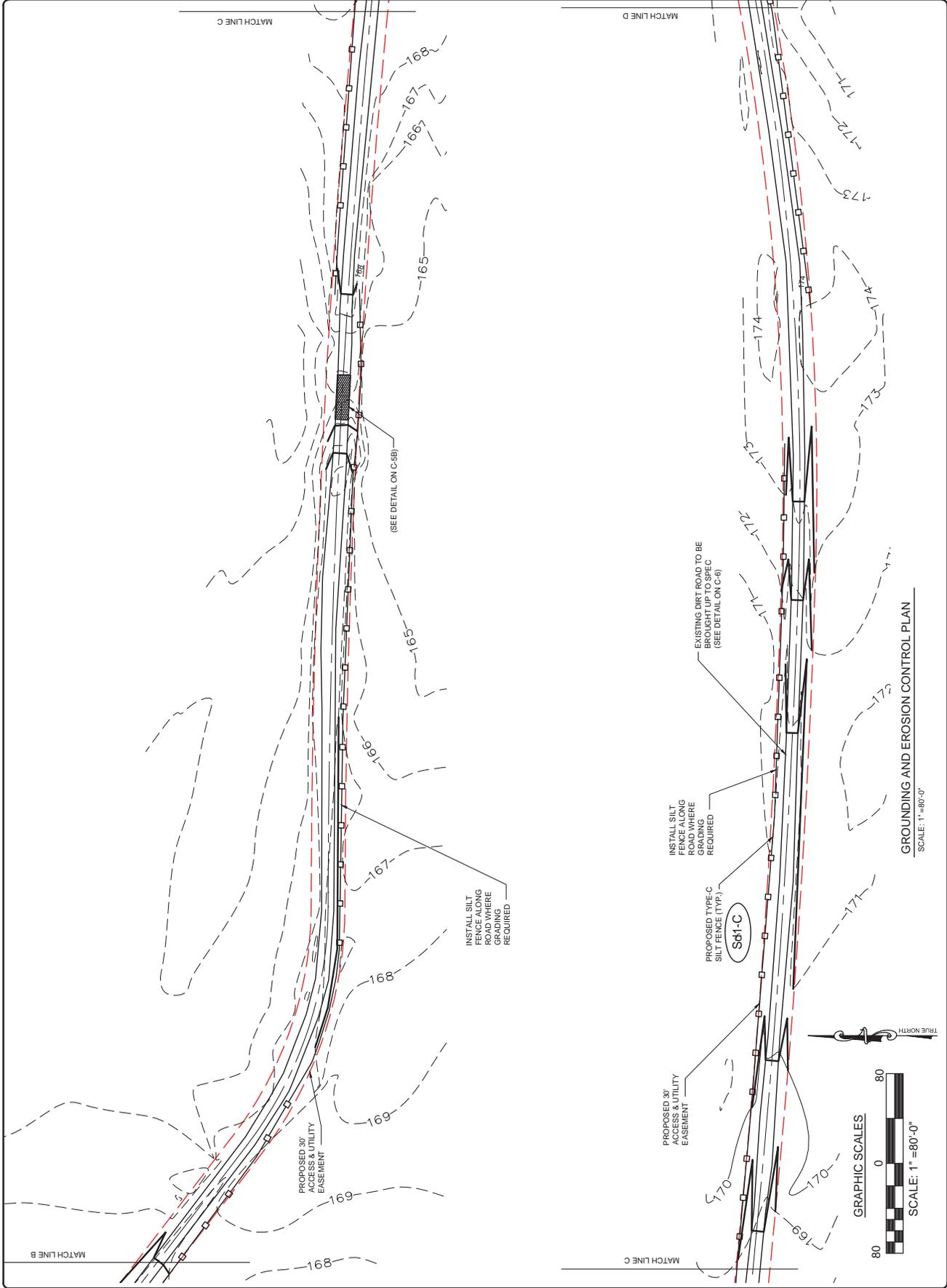
TOWER OWNER / SITE NUMBER: AMERICAN TOWER

DESIGN TYPE: GREENFIELD

SHEET TITLE: GRADING & EROSION CONTROL PLAN

DRAWING NO. C5D

REVISION NO. 1



TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC



A&E FIRM:  
**A&E SOURCE**  
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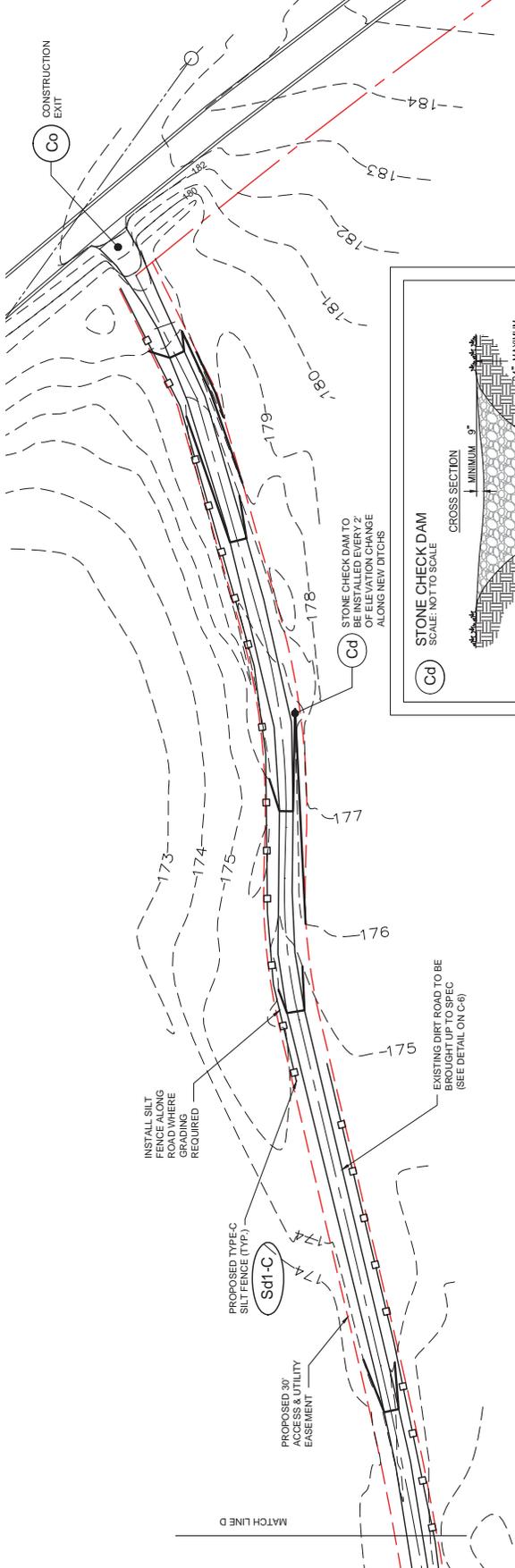
**PCT SE  
PAPER GA**

TOWER OWNER/SITE NUMBER:  
AMERICAN TOWER

DESIGN TYPE:  
GREENFIELD

SHEET TITLE:  
GRADING & EROSION CONTROL PLAN

DRAWING NO. **C5E**  
REVISION NO. **1**



**GROUNDING AND EROSION CONTROL PLAN**  
SCALE: 1" = 80'-0"

**(Cd) STONE CHECK DAM**  
SCALE: NOT TO SCALE

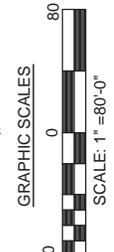
**CROSS SECTION**  
MINIMUM 9"  
MAXIMUM 24"

**PROFILE VIEW**  
MAXIMUM 24"

**NOTES:**  
1. CHECK DAMS ARE TO BE USED ONLY IN SMALL OPEN CHANNELS (THEY ARE NOT TO BE USED IN LIVE STREAMS).  
2. STONE CHECK DAMS SHALL NOT EXCEED TWO ACRES.  
3. THE CENTER OF THE CHECK DAM MUST BE AT LEAST 9 INCHES LOWER THAN THE TOP OF THE BANK.  
4. THE DAM HEIGHT SHOULD BE A MAXIMUM OF 2 FEET FROM CENTER TO RIM EDGE.  
5. THE SIDE SLOPES OF THE CHECK DAM SHALL NOT EXCEED A 2:1 SLOPE.  
6. CHECK DAMS SHALL BE CONSTRUCTED USING 1/2" TO 2" STONES.  
7. PARTICLES INTO THE STONES (REFER TO ANSI/AWS M288-96, SECTION 7.3, TABLE 3).

**SPACING BETWEEN CHECK DAMS**

A = THE TOE OF THE UPSTREAM CHECK DAM  
B = TOP OF THE DOWNSTREAM CHECK DAM  
L = THE DISTANCE SUCH THAT POINTS A AND B ARE OF EQUAL ELEVATION.



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**A&E SOURCES**

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PAPER GA**

TOWER OWNER / SITE NUMBER:

AMERICAN TOWER

DESIGN TYPE:

GREENFIELD

SHEET TITLE:

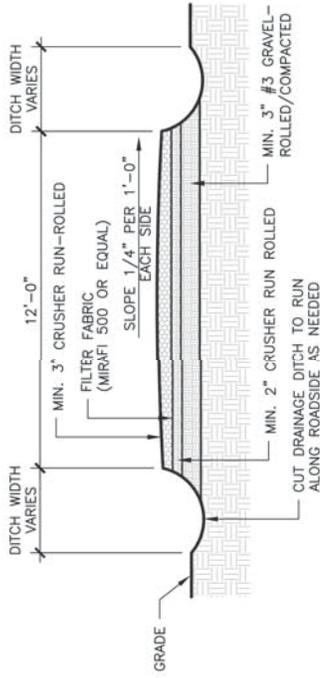
ROAD PROFILE  
DETAILS

DRAWING NO.

**C6**

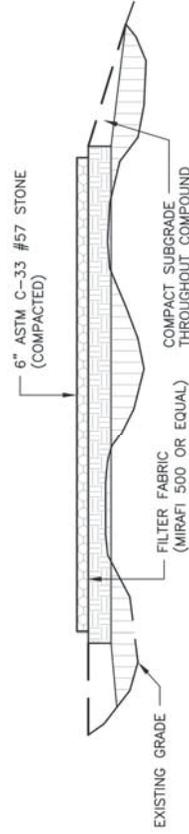
REVISION NO.

**1**



**ACCESS ROAD DETAIL**

SCALE: N.T.S.



**COMPOUND DETAIL**

SCALE: N.T.S.

TOWER OWNER:



DEVELOPER:

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SITE NAME:

PCT SE  
PAPER GA

TOWER OWNER / SITE NUMBER:

AMERICAN TOWER

DESIGN TYPE:

GREENFIELD

SHEET TITLE:

MAINTENANCE NOTES

DRAWING NO.

C7

REVISION NO.

1

MAINTENANCE NOTES:

Southeast Paper Maintenance Plan:

3 months after the construction completion a comprehensive follow-up visit and inspection will be required. Once the inspection occurs notification to the PE of the completion of the inspection is required. If any of the issues outlined below are identified as a concern then the PE is required to address mitigation of issues.

1. Inspect disturbed areas and inspect for compaction issues which alter the contour as specified in the design.
2. Re-apply DSS (permanent seeding) to all disturbed areas where initial application was not successful or signs of de-stabilization appear.
3. Inspect road to verify that there is no erosion within the road. Insure gravel on road has not eroded or become displaced. If gravel has eroded or become displaced identify if it has created issues with any of the ditches, inlets or other improvements.

Once the inspection is completed provide notice to the PE that the inspection is complete and provide details (if any) where issues have been identified or if there are any on site condition or variances to the site design. If any of the issues outlined below are identified as a concern then notification of the PE is required to address mitigation of issues.

After initial inspection and in subsequent intervals not to exceed 6 months\* a follow up visit will be required.

1. Inspect road to verify that there is no erosion or displacement within the road.
2. Apply DSS (permanent seeding) to all disturbed areas not otherwise stabilized.
3. Inspect for encroachment of vegetation to the improvements and eliminate potential impact due to shedding of foliage or root displacement.

\* With regard to the timing of the follow-up visits it is highly recommended one of the inspection be scheduled the first week of November. The site is surrounded by deciduous trees and blockages are at highest risk during the period just after the leaves drop.

**EXCAVATION & GRADING NOTES:**

- ALL EXCAVATIONS ON WHICH CONCRETE IS TO BE PLACED SHALL BE SUBSTANTIALLY FREE FROM FROZEN SOIL, AND BE FREE FROM LOOSE MATERIAL AND EXCESS GROUNDWATER. DEWATERING FOR EXCESS GROUNDWATER SHALL BE PROVIDED IF REQUIRED.
- CONCRETE FOUNDATIONS SHALL NOT BE PLACED ON ORGANIC MATERIAL. IF SOUND MATERIAL IS REACHED THE RECOMMENDED EXCAVATION DEPTH AND EITHER BE UNSATISFACTORY, SHALL BE EXCAVATED TO THE REQUIRED DEPTH AND EITHER BE REPLACED WITH MECHANICALLY COMPACTED GRANULAR MATERIAL OR THE EXCAVATION BE FILLED WITH CONCRETE OF THE SAME QUALITY SPECIFIED FOR THE FOUNDATION.
- ANY EXCAVATION OVER THE REQUIRED DEPTH SHALL BE FILLED WITH EITHER UNSATURATED GRANULAR FILL OR CRUSHED STONE. CRUSHED STONE MAY BE USED TO STABILIZE THE BOTTOM OF THE EXCAVATION. STONE, IF USED, SHALL NOT BE USED AS COMPILING CONCRETE THICKNESS.
- AFTER COMPLETION OF THE FOUNDATION AND OTHER CONSTRUCTION BELOW GRADE, AND BEFORE BACKFILLING, ALL EXCAVATIONS SHALL BE CLEAN OF UNSUITABLE MATERIAL SUCH AS VEGETATION, TRASH, DEBRIS, AND SO FORTH.
- BACKFILLING SHALL:
  - USE APPROVED MATERIALS CONSISTING OF EARTH, LOAM, SANDY CLAY, SAND AND GRAVEL OR SOFT SHALE;
  - BE FREE FROM CLODS OR STONES OVER 2-1/2" MAXIMUM DIMENSIONS
  - BE PLACED IN 6" LAYERS AND COMPACTED TO 95% STANDARD PROCTOR DENSITY FOR UNPAVISED LANDSCAPED AREAS, WHERE 80% STANDARD PROCTOR IS REQUIRED.
- FILL PREPARATION:
  - REMOVE ALL VEGETATION, TOPSOIL, DEBRIS, WET AND UNSATISFACTORY SOIL MATERIALS, OBSTRUCTIONS, AND DELETERIOUS MATERIALS FROM GROUND SURFACE.
  - REMOVE ALL EXISTING GRASS AND WEEDS TO A MINIMUM OF 10 FEET FROM ANY THAN 1 VERTICAL TO A HORIZONTAL SO FILL MATERIAL WILL BOND WITH EXISTING SURFACE.
  - WHEN SUBGRADE OR EXISTING GROUND SURFACE TO RECEIVE FILL HAS A DENSITY LESS THAN THAT REQUIRED FOR FILL, BREAK UP GROUND SURFACE TO DEPTH REQUIRED, PULVERIZE, MOISTURE CONDITION OR AERATE SOIL AND RECOMPACT TO REQUIRED DENSITY.
- PROTECT EXISTING GRAVEL SURFACING AND SUBGRADE IN AREAS WHERE EQUIPMENT LOADS WILL OPERATE. USE PLANKING OR OTHER SUITABLE MATERIALS DESIGNED TO SPREAD EQUIPMENT LOADS. REPAIR DAMAGE TO EXISTING GRAVEL SURFACING OR SUBGRADE WHERE SUCH DAMAGE IS DUE TO THE CONTRACTOR'S OPERATIONS. DAMAGED GRAVEL SURFACING SHALL BE RESTORED TO MATCH THE ADJACENT UNDAUNAGED GRAVEL SURFACING AND SHALL BE OF THE SAME THICKNESS.
- REPLACE EXISTING GRAVEL SURFACING ON AREAS FROM WHICH GRAVEL SURFACING IS REMOVED DURING CONSTRUCTION OPERATIONS. GRAVEL SURFACING SHALL BE REPLACED TO MATCH EXISTING ADJACENT GRAVEL SURFACING AND SHALL BE OF THE SAME THICKNESS. SURFACES OF GRAVEL SURFACING SHALL BE FREE FROM CORRUGATIONS AND WAVES. EXISTING GRAVEL SURFACING MAY BE EXCAVATED SEPARATELY AND REUSED IF INJURIOUS TO THE SUBGRADE. FURNISH ALL ADDITIONAL GRAVEL RESURFACING MATERIAL AS REQUIRED BEFORE GRAVEL SURFACING IS REPLACED. SUBGRADE SHALL BE GRADED TO CONFORM TO REQUIRED SUBGRADE ELEVATIONS, AND LOOSE OR DISTURBED MATERIALS SHALL BE THOROUGHLY COMPACTED. DEPRESSIONS IN THE SUBGRADE SHALL BE FILLED AND COMPACTED WITH APPROVED SELECTED MATERIAL. GRAVEL SURFACING MATERIAL MAY BE USED FOR FILLING DEPRESSIONS IN THE SUBGRADE, SUBJECT TO ENGINEER'S APPROVAL.
- DAMAGE TO EXISTING STRUCTURES AND UTILITIES RESULTING FROM CONTRACTOR'S NEGLIGENCE SHALL BE REPAIRED/REPLACED TO OWNER'S SATISFACTION AT CONTRACTOR'S EXPENSE.
- CONTRACTOR SHALL COORDINATE THE CONSTRUCTION SCHEDULE WITH PROPERTY OWNER SO AS TO AVOID INTERRUPTIONS TO PROPERTY OWNER'S OPERATIONS.
- ENSURE POSITIVE DRAINAGE DURING AND AFTER COMPLETION OF CONSTRUCTION.
- ALL CUT AND FILL SLOPES SHALL BE 2 HORIZONTAL TO 1 VERTICAL MAXIMUM.
- REMOVE ALL ORGANICS, ROCKS GREATER THAN 3", UNUSED FILL AND OTHER DEBRIS TO AN AREA OFF-SITE IN A LEGAL MANNER.

**A. SEEDING WITH MULCH (CONVENTIONAL SEEDING ON SLOPES LESS THAN 3:1) (HYDRAULIC SEEDING EQUIPMENT ON SLOPES 3:1 AND STEEPER)**

AGRICULTURAL LIMESTONE	4000 LBS./acre
FERTILIZER 5-10-15	1500 lbs./acre
MULCH STRAW OR HAY	5000 lbs./acre

SEED SPECIES	APPLICATION RATE/ACRE	PLANNING DATES
HULLED COMMON BERNUDA GRASS	10lbs.	31 - 6/15
FESCUE	50lbs.	9/1 - 10/31
FESCUE	50lbs.	1/11 - 2/28
RYE GRASS	50lbs.	
HAY MULCH FOR TEMPORARY COVER	5000lbs.	6/15 - 8/31

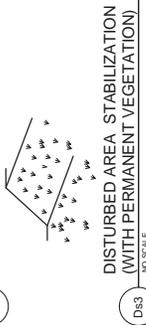
B. TOPDRESSING: APPLY WHEN PLANTS ARE 2 TO 4 INCHES TALL  
 FERTILIZER (AMMONIUM NITRATE 33.5%) 300 lbs./acre

C. SECOND-YEAR FERTILIZER: (5-10-15 OR EQUIVALENT) 800 lbs./acre

**HYDRAULIC SEEDING EQUIPMENT:**  
 SEEDING AND MULCHING EQUIPMENT IS USED. NO GRADING AND SHAPING OR SEEDBED PREPARATION ARE REQUIRED. THE FERTILIZER, SEED AND WOOD CELLULOSE FIBER MULCH WILL BE MIXED WITH WATER AND APPLIED IN A SLURRY. ALL SLURRY INGREDIENTS MUST BE COMBINED TO FORM A HOMOGENEOUS MIXTURE, AND SPREAD UNIFORMLY OVER THE AREA WITHIN ONE HOUR AFTER MIXTURE IS MADE. STRAW OR HAY MULCH AND ASPHALT EMULSION BE APPLIED TO BLEND WITH SPREADING EQUIPMENT WITHIN 24 HOURS AFTER SEEDING. THE MULCH IS SPREAD UNIFORMLY OVER THE AREA, LEAVING ABOUT 75 PERCENT OF THE GROUND SURFACE EXPOSED.

**CONVENTIONAL SEEDING EQUIPMENT:**  
 GRADE, SHAPE AND SMOOTH WHERE NEEDED TO PROVIDE FOR SAFE EQUIPMENT OPERATION AT SEEDING. SEEDING SHALL BE UNIFORM OVER THE AREA IMMEDIATELY BEFORE SEEDBED PREPARATION. A SEEDBED WILL BE PREPARED BY SCARIFYING TO A DEPTH OF 1 TO 4 INCHES AS DETERMINED ON SITE. THE SEEDBED MUST BE WELL PULVERIZED, SMOOTHED AND FIRMED. SEEDING WILL BE DONE WITH CULTIPACKER-SEEDER, DRILL, ROTARY SEEDER OR OTHER MECHANICAL OR HAND COVERED LIGHTLY. WITHIN 24 HOURS AFTER SEEDING, STRAW OR HAY MULCH WILL BE SPREAD UNIFORMLY OVER THE AREA, LEAVING ABOUT 25 PERCENT OF THE GROUND SURFACE EXPOSED. MULCH WILL BE SPREAD WITH BLOWER-TYPE MULCH EQUIPMENT OR BY HAND AND ANCHORED IMMEDIATELY AFTER IT IS SPREAD. A DISK-HARROW WITH THE DISK SET STRAIGHT OR A SPECIAL PACKER DISK MAY BE USED TO PRESS THE MULCH INTO THE SOIL.

- CONTRACTOR SHALL REMOVE ALL EROSION & SEDIMENT CONTROL MEASURES AFTER COMPLETION OF CONSTRUCTION AND ESTABLISHMENT OF PERMANENT GROUND COVER.
- CONTRACTOR SHALL MAINTAIN EROSION CONTROL MEASURES AND PRACTICES PRIOR TO, OR CONCURRENT WITH, LAND-DISTURBING ACTIVITIES.
- ALL CUT AND FILL SLOPES MUST BE SURFACED ROUGHENED AND VEGETATED WITHIN SEVEN (7) DAYS OF THEIR CONSTRUCTION.
- ALL FILL SLOPES WILL HAVE SILT FENCE AT TOE OF SLOPES.
- ALL EROSION CONTROL MEASURES SHALL BE CHECKED DAILY AND ANY DEFICIENCIES NOTED WILL BE CORRECTED BY THE END OF EACH DAY. ADDITIONAL EROSION AND SEDIMENT CONTROL MEASURES WILL BE INSTALLED IF DEEMED NECESSARY AFTER ON-SITE INSPECTION BY THE ISSUING AUTHORITY.
- THE ONLY MATERIAL TO BE BURIED ON-SITE IS VEGETATIVE MATERIAL. CONSTRUCTION WASTE MAY NEITHER BE BURNED NOR BURIED AND MUST BE TAKEN TO A STATE APPROVED LANDFILL.
- ALL EROSION CONTROL MEASURES SHALL BE MAINTAINED UNTIL ALL CONSTRUCTION MEASURES WILL BE LEFT AND MAINTAINED.



ACTIVITY SCHEDULE	WORKING DAYS
INSTALLATION OF EROSION CONTROL MEASURES	3-5
MAINTAINING EROSION CONTROL MEASURES	6-8
SEEDING AND MULCHING	13-15
FINAL LANDSCAPING, GRASSING	20-23
REMOVING EROSION CONTROL MEASURES	24-26

THE INSTALLATION OF EROSION CONTROL MEASURES AND PRACTICES SHALL TAKE PLACE PRIOR TO OR CONCURRENT WITH LAND DISTURBING ACTIVITIES.

**GENERAL EROSION & SEDIMENT CONTROL NOTES:**

- ADDITIONAL EROSION CONTROL MEASURES WILL BE EMPLOYED WHERE DETERMINED NECESSARY BY ACTUAL SITE CONDITIONS.
- ALL EROSION CONTROL MEASURES SHALL BE CLEARLY AND ACCURATELY DEMARCATED WITH STAKES, RIBBONS, OR OTHER APPROPRIATE MEANS.
- INSTALLATION OF EROSION CONTROL MEASURES SUFFICIENT TO CONTROL SEDIMENT DEPOSITS AND EROSION. CONTRACTOR SHALL CALL APPROPRIATE COUNTY FOR AN INSPECTION OF SOIL EROSION CONTROL MEASURES PRIOR TO BEGINNING GRADING ACTIVITIES. EROSION CONTROL MEASURES SHALL BE MAINTAINED UNTIL ALL UPSTREAM GROUND WITHIN THE CONSTRUCTION AREA HAS BEEN COMPLETELY STABILIZED.
- THE LOCATION OF SOME OF THE EROSION CONTROL MEASURES MAY HAVE TO BE ALTERED FROM THAT SHOWN ON THE DRAWING TO ACCOMMODATE THE PROPOSED DRAINAGE PATTERNS. ANY DIFFICULTY IN CONTROLLING EROSION DURING ANY PHASE OF CONSTRUCTION SHALL BE REPORTED TO THE ENGINEER.
- EROSION CONTROL MEASURES WILL BE MAINTAINED AT ALL TIMES. IF FULL IMPLEMENTATION OF THE APPROVED PLAN DOES NOT PROVIDE FOR EFFECTIVE EROSION CONTROL, ADDITIONAL EROSION AND SEDIMENT CONTROL MEASURES SHALL BE IMPLEMENTED AS NECESSARY.
- THE CONTRACTOR SHALL REMOVE ACCUMULATED SILT WHEN THE SILT IS WITHIN 12" OF THE TOP OF THE SILT FENCE.
- FAILURE TO INSTALL, OPERATE OR MAINTAIN ALL EROSION CONTROL MEASURES WILL RESULT IN ALL CONSTRUCTION OPERATIONS ON THE JOB SITE UNTIL SUCH MEASURES ARE CORRECTED.
- SILT BARRIERS TO BE PLACED AT DOWNSTREAM TOE OF ALL CUT AND FILL SLOPES.
- ANY EROSION CONTROL MEASURES LEFT EXPOSED FOR A PERIOD GREATER THAN 7 DAYS SHALL BE STABILIZED WITH SEEDING.

**TOWER OWNER:**

**DEVELOPER:**

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**PCT SE PAPER GA**

TOWER OWNER / SITE NUMBER: AMERICAN TOWER

DESIGN TYPE: GREENFIELD

STREET TITLE: GRADING & SEDIMENT CONTROL NOTES

DRAWING NO. **C8** REVISION NO. **1**

TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC



**A&E FIRM:**  
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0	07/15/15 ISSUED FOR CONSTRUCTION
1	10/1/15 ISSUED FOR CONSTRUCTION

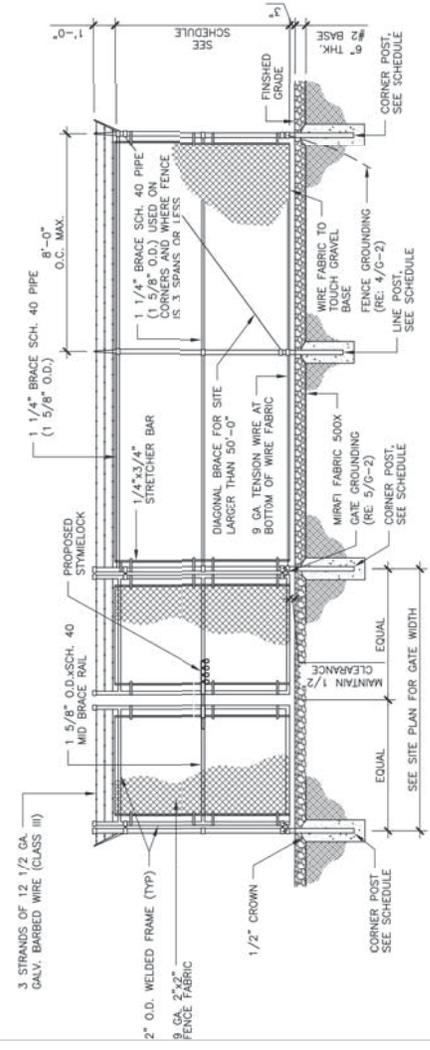


SITE NAME: **PCT SE PAPER GA**  
 TOWER OWNER / SITE NUMBER: AMERICAN TOWER

DESIGN TYPE: GREENFIELD

STREET TITLE: FENCE DETAILS

DRAWING NO. **C9** REVISION NO. **1**



TYPICAL FENCING SIZES

8" HIGH FENCE	SIZE	POST FOOTING
LINE POST	2 - 3/8" x 12" x 30" DP	
CORNER POST	3" x 12" x 42" DP	
GATE POST	4" x 12" x 42" DP	

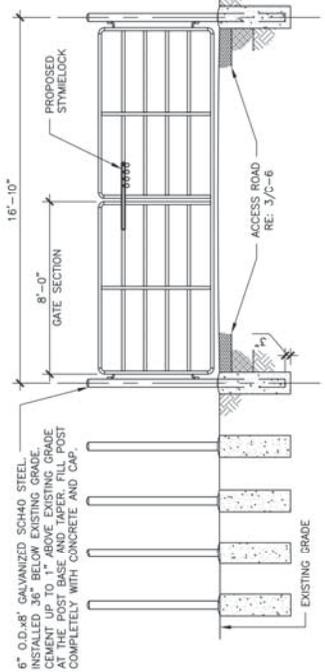
**FENCE DETAIL**  
 SCALE: N.T.S.

**STYME SECURITY LOCK SYSTEM**  
 CONTRACTOR TO INSTALL STYME SECURITY LOCK SYSTEM TO THE NEWLY INSTALLED ACCESS GATE. STYME TO BE INSTALLED USING GALVANIZED METAL SCREWS IN 4 PLACES. NO PLASTIC WIRE TIES WILL BE USED.  
 ACQUIRE FROM: EMER CONSTRUCTION  
 JOHN EAKER: (704) 617-0792  
 (888) 276-9643

**GATE SIZING**  
 CONTRACTOR TO INSTALL STYME SECURITY LOCK SYSTEM TO THE NEWLY INSTALLED ACCESS GATE. STYME TO BE INSTALLED USING GALVANIZED METAL SCREWS IN 4 PLACES. NO PLASTIC WIRE TIES WILL BE USED.

**GATE DETAIL**  
 PANELS TO BE 4"x8"x16 GALVANIZED TUBULAR STEEL 7" O.D. x 1/8 GAUGE HIGH TENSILE WELDED STEEL-HIGH DUTY MOUNTED TO BE INSTALLED TO THE SUPPORT POSTS.

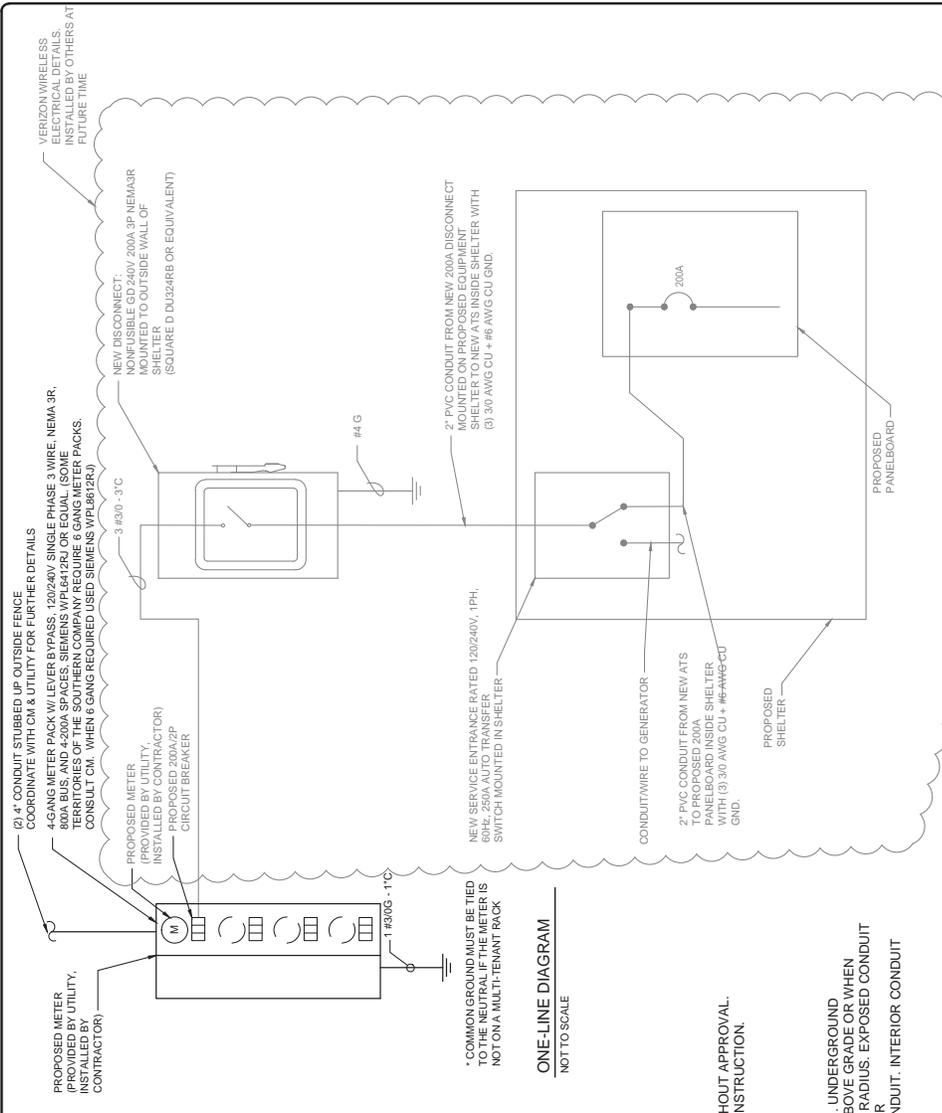
3" O.D. x 8' GALVANIZED SCH40 STEEL INSTALLED 36" BELOW EXISTING GRADE. CEMENT POST BASE TO BE INSTALLED COMPLETELY WITH CONCRETE AND CAP. BOLLARDS TO BE INSTALLED ONLY IF THE CONSTRUCTION MANAGER DEEMS NECESSARY.



**GATE DETAIL**  
 SCALE: N.T.S.

**GENERAL NOTES**

- SCOPE: PROVIDE LABOR, EQUIPMENT, MATERIALS, ETC., REQUIRED TO COMPLETE THE INSTALLATION SHOWN.
- CODES AND STANDARDS: INSTALLATION SHALL COMPLY WITH APPLICABLE LAWS AND ORDINANCES, UTILITY COMPANY REGULATIONS, & APPLICABLE REQUIREMENTS OF LATEST EDITIONS OF:
  - NFC - NATIONAL FIRE CODE
  - UL - UNDERWRITERS LABORATORIES
  - NEC - NATIONAL ELECTRICAL CODE
  - NEMA - NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION
  - OSHA - OCCUPATIONAL SAFETY & HEALTH ACT
  - IBC - STANDARD BUILDING CODE
- PERMITS: OBTAIN & PAY FOR REQUIRED PERMITS, LICENSES, FEES, INSPECTIONS, ETC.
- COORDINATION: COORDINATE WORK WITH OTHER TRADES.
- SUBMITTALS: SUBMIT BROCHURES FOR APPROVAL ON DISCONNECT SWITCH & OTHER MAJOR SYSTEM COMPONENTS.
- EXISTING SERVICES: DO NOT INTERRUPT EXISTING SERVICES WITHOUT WRITTEN PERMISSION OF THE OWNER.
- EQUIPMENT: CONNECT ELECTRICALLY OPERATED EQUIPMENT.
- RECORD DRAWINGS: MAINTAIN A RECORD OF ALL CHANGES, SUBSTITUTIONS BETWEEN WORK AS SPECIFIED AND INSTALLED. RECORD CHANGES ON A CLEAN SET OF CONTRACT DOCUMENTS WHICH SHALL BE TURNED OVER TO THE OWNER UPON COMPLETION OF THE PROJECT.
- IDENTIFICATION: IDENTIFY DISCONNECT SWITCH WITH PERMANENT ENGRAVED NAMEPLATE.
- GUARANTEE/WARRANTY: GUARANTEE INSTALLATION TO BE FREE OF DEFECTS, SHORTS, GROUNDS, ETC., FOR A PERIOD OF ONE YEAR. FURNISH WARRANTY SO THE DEFECTIVE MATERIALS AND/OR WORKMANSHIP WILL BE REPAIRED/REPLACED IMMEDIATELY UPON NOTIFICATION AT NO COST TO THE OWNER FOR PERIOD OF WARRANTY.
- CUTTING & PATCHING: PROVIDE CUTTING REQUIRED TO DO THE WORK. DO NOT CUT STRUCTURAL ELEMENTS WITHOUT APPROVAL. PATCHING SHALL BE OF QUALITY EQUAL TO & OF MATCHING APPEARANCE OF EXISTING CONSTRUCTION.
- TRENCHING & BACKFILL: PROVIDE FOR ALL UNDERGROUND INSTALLED CONDUIT AND/OR CABLES.
- RACEWAYS: UNDERGROUND CONDUIT SHALL BE SCHEDULE 40 PVC CONDUIT (MEETING NEMA TC2-1990). UNDERGROUND PVC CONDUIT SHALL TRANSITION TO RIGID GALVANIZED STEEL CONDUIT BEFORE RISING ABOVE GRADE OR WHEN SUBJECT TO VEHICLE TRAFFIC LOADS. ALL CONDUIT BENDS SHALL BE A MINIMUM OF 24" RADIUS. EXPOSED CONDUIT SHALL BE RIGID GALVANIZED STEEL. RGS CONDUIT, WHEN SPECIFIED, SHALL MEET UL-6 FOR GALVANIZED STEEL. ALL FITTINGS SHALL BE SUITABLE FOR USE WITH THREADED RIGID CONDUIT. INTERIOR CONDUIT SHALL BE ELECTRICAL METALLIC TUBING WITH COMPRESSION TYPE FITTINGS.
- SUPPORTS: AS REQUIRED BY THE NEC.
- CONDUCTORS: USE 96% CONDUCTIVITY COPPER WITH TYPE THHN/THWN INSULATION, 600 VOLT, COLOR CODED. USE SOLID CONDUCTORS FOR WIRE UP TO #8 AWG. USE STRANDED CONDUCTORS FOR WIRE #8 AWG AND ABOVE.
- CONNECTORS FOR POWER CONDUCTORS: USE PRESSURE TYPE INSULATED TWIST CONNECTORS FOR #10 AWG AND SMALLER. USE SOLDERLESS MECHANICAL TERMINAL LUGS FOR #8 AWG AND LARGER.
- GROUNDING:
  - ALL MATERIALS SHALL BE INSTALLED PER MANUFACTURER'S RECOMMENDATIONS & INSTRUCTIONS.
  - ALL CONNECTIONS SHALL BE 2" HOLE LUG UNLESS UNDERGROUND.
  - LUGS SHALL BE ATTACHED TO GROUND BARS USING STAINLESS STEEL OR HOT-DIPPED GALVANIZED STEEL BOLTS, NUTS, & LOCKWASHERS.
  - PROVIDE TESTING OF GROUNDING SYSTEM AS DIRECTED BY CONSTRUCTION MANAGER.



**TOWER OWNER:**

**DEVELOPER:**  
**TELECOM DEVELOPMENT SERVICES LLC**

**A&E FIRM:**  
**A&E SOURCES**  
 1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL 678-990-2338  
 FAX 678-990-2342  
 ENGINEER: ELIZABETH B. USHER

THE INFORMATION CONTAINED IN THIS SET OF DOCUMENTS IS PROPRIETARY TO A&E SOURCES AND IS TO BE USED ONLY FOR THE PROJECT AND OTHER THAN THAT WHICH RELATES TO THE CLIENT IS STRICTLY PROHIBITED.

**A&E PROJECT #:** --  
**DRAWN BY:** WCG  
**CHECKED BY:** EBU

NO.	DATE	DESCRIPTION
A	06/24/15	ISSUED FOR REVIEW
0	07/15/15	ISSUED FOR CONSTRUCTION
1	10/1/15	ISSUED FOR CONSTRUCTION

**SITE NAME:** PCT SE  
**PAPER GA**  
 TOWER OWNER / SITE NUMBER: AMERICAN TOWER  
 DESIGN TYPE: GREENFIELD

**SHEET TITLE:** ELECTRICAL NOTES & ONE-LINE DIAGRAM

**DRAWING NO.:** E1  
**REVISION NO.:** 1

VERIZON WIRELESS ELECTRICAL DETAILS. INSTALLED BY OTHERS AT FUTURE TIME

NEW DISCONNECT: NON-FUSIBLE GD 240V, 200A 3P NEMA 3R MOUNTED TO OUTSIDE WALL OF BUILDING (SQUARE D DUS24RB8 OR EQUIV/ALENT)

2" PVC CONDUIT FROM NEW 200A DISCONNECT MOUNTED ON PROPOSED EQUIPMENT PANELBOARD WITH (3) 3/0 AWG CU + #6 AWG CU GND.

NEW SERVICE ENTRANCE RATED 120/240V, 1PH, 60Hz, 250A AUTO TRANSFER SWITCH MOUNTED IN SHELTER

CONDUIT WIRE TO GENERATOR

2" PVC CONDUIT FROM NEW WATS PANELBOARD INSIDE SHELTER WITH (3) 3/0 AWG CU + #6 AWG CU GND.

PROPOSED METER (PROVIDED BY UTILITY, INSTALLED BY CONTRACTOR)

4-GANG METER PACK W/ LEVER BYPASS, 120/240V SINGLE PHASE 3 WIRE, NEMA 3R, 800A BUS, AND 4-200A SPACES. SIEMENS WP1647R1 OR EQUAL. (SOME SPACES MAY BE USED FOR PACKS. CONSULT C.A. WHEN 6 GANG REQUIRED. USED SIEMENS WP1681R1)

(2) 4" CONDUIT STUBBED UP OUTSIDE FENCE COORDINATE WITH CM & UTILITY FOR FURTHER DETAILS

TOWER OWNER:  


DEVELOPER:  
 TELECOM DEVELOPMENT  
 SERVICES LLC

A&E FIRM:  
 **POWERSOURCE**  
 1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL 678-990-2338  
 FAX 678-990-2342  
 ENGINEER: ELIZABETH B. USHER

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A&E PROJECT #:  
 DRAWN BY: WCG  
 CHECKED BY: EBU

REVISIONS	
NO.	DESCRIPTION
A	06/24/15 ISSUED FOR REVIEW
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1	10/1/15 ISSUED FOR CONSTRUCTION



SITE NAME:  
**PCT SE  
 PAPER GA**  
 TOWER OWNER / SITE NUMBER:  
 AMERICAN TOWER  
 DESIGN TYPE:  
 GREENFIELD

SHEET TITLE:  
**ELECTRICAL PLAN**

DRAWING NO. **E2**  
 REVISION NO. **1**

**CODED DRAWING NOTES:**

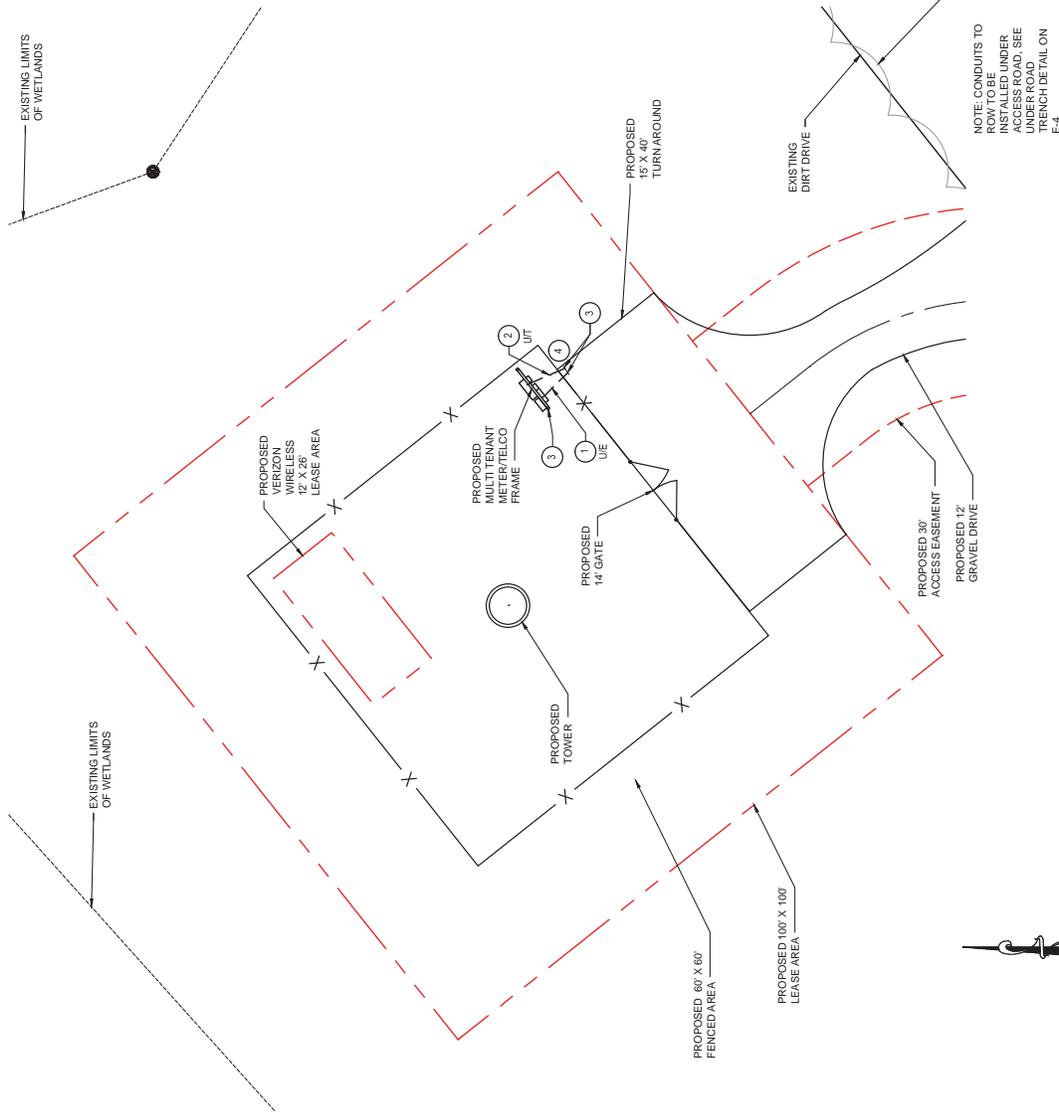
- (1) 4" FOR POWER SERVICE FROM TRANSFORMER TO MULTI-TENANT FRAME; REFER TO E-1. CONTRACTOR TO COORDINATE WITH UTILITY FOR POWER DEMARC LOCATION.
- (1) 3" FOR POWER FROM MULTI-TENANT FRAME TO SHELTER.
- (1) 2" WITH PULL WIRE FOR FIBER SERVICE TO BE RAN FROM INSIDE SHELTER TO MULTI-TENANT FIBER BOX OR STUBBED UP 5' OUTSIDE FENCE. CONSULT CM BEFORE STARTING CONSTRUCTION TO DETERMINE UTILITY EXACT REQUIREMENTS.
- COORDINATE ELECTRICAL SERVICE REQUIREMENTS IN ADVANCE WITH UTILITY COMPANY. STUB UP POWER AND FIBER CONDUIT AS DIRECTED BY UTILITY COMPANY.
- COORDINATE WITH EQUIPMENT MANUFACTURER FOR EXACT LOCATION OF CONDUIT PENETRATIONS.
- MAINTAIN ALL NEC CLEARANCES.
- (1) 4" WITH PULL WIRE RUN FROM FIBER BOX ON FRAME AND STUBBED UP 5' OUTSIDE FENCE. CAP EXPOSED CONDUIT WITH WATER-PROOF CAP.
- 3/4" FOR TOWER LIGHTING, TOWER LIGHT CONTROLLER TO BE MOUNTED INSIDE SHELTER. CABLES TO BE RUN AGAINST WAGESIDE LADDER AND NOT THE LEGS, SUPPORTED WITH HARDWARE, AND NOT ZIP TIES OR STRINGS.

**CODED DRAWING NOTES:**

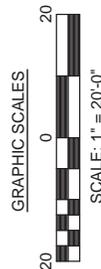
- (2) 4" WITH PULL WIRE FOR POWER SERVICE TO BE STUBBED UP AT UTILITY POLE OR TRANSFORMER OUTSIDE FENCE AND RUN TO MULTI-TENANT FRAME. REFER TO E-1.
- (1) 3" WITH PULL WIRE FOR FIBER SERVICE TO BE STUBBED UP 5' OUTSIDE FENCE OR AS DIRECTED BY UTILITY AND RUN TO FIBER BOX ON FRAME.
- COORDINATE SERVICE REQUIREMENTS IN ADVANCE WITH UTILITY COMPANY.
- MAINTAIN ALL NEC CLEARANCES

**ABBREVIATIONS**

AWG	AMERICAN WIRE GAUGE	PVC	POLYVINYL CHLORIDE
BFG	BELOW FINISH GRADE	RGS	RIGID GALVANIZED STEEL
C	CONDUIT	SS	STAINLESS STEEL
CAB	CABINET	SST	SELF SUPPORTING TOWER
DWG	DRAWING	TYP.	TYPICAL
G	GROUND		



**ELECTRICAL PLAN**  
 SCALE: 1" = 20'-0"



TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC



A&E FIRM:  
**POWERSOURCE**  
 1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL 678-990-2338  
 FAX 678-990-2342  
 ENGINEER: ELIZABETH B. USHER

THE INFORMATION CONTAINED IN THIS SET OF DOCUMENTS IS PROPRIETARY TO THE ENGINEER AND IS TO BE USED ONLY FOR THE PROJECT AND SITE SPECIFIC TO THE CLIENT IS STRICTLY PROHIBITED.

A&E PROJECT #:	--
DRAWN BY:	WCG
CHECKED BY:	EBU

REVISIONS		
NO.	DATE	DESCRIPTION
A	06/24/15	ISSUED FOR REVIEW
0	07/15/15	ISSUED FOR CONSTRUCTION
1	10/1/15	ISSUED FOR CONSTRUCTION



SITE NAME:  
**PCT SE PAPER GA**

TOWER OWNER / SITE NUMBER:  
 AMERICAN TOWER

DESIGN TYPE:  
 GREENFIELD

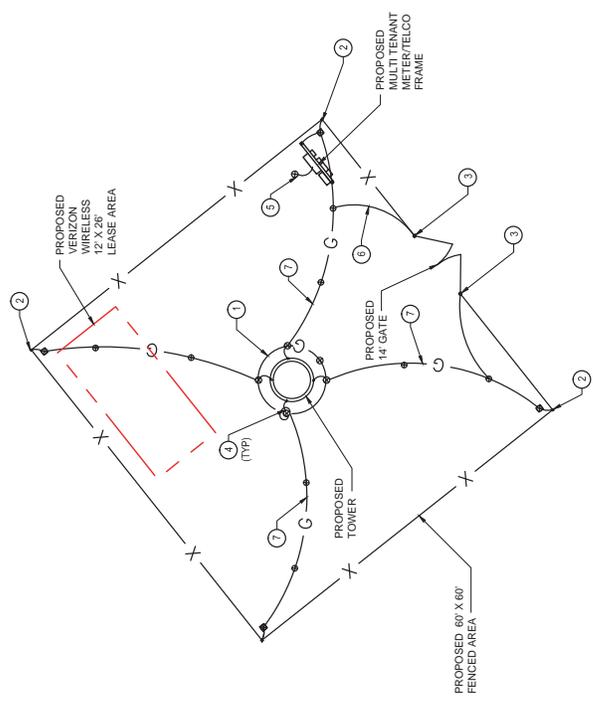
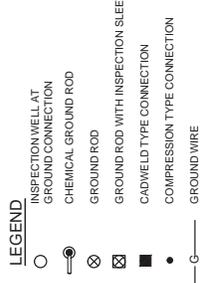
SHEET TITLE:  
 GROUNDING SITE PLAN

DRAWING NO.  
**E3**

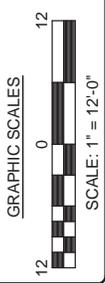
REVISION NO.  
**1**

- GENERAL GROUNDING NOTES:**
- TO ENSURE PROPER BONDING, ALL CONNECTIONS SHALL BE AS FOLLOWS:
    - ALL WELDED CONNECTIONS SHALL BE MADE TO THE BONDING SYSTEM USING GALVANIZED STEEL OR ALUMINUM. GALVANIZED STEEL SHALL BE GALVANIZED WITH OXIDE INHIBITOR AND ALL WELDED BUS BARS UNLESS NOTED OTHERWISE. GALVANIZED STEEL SHALL BE COPPER OR ALUMINUM SHALL BE PERMITTED. PROVIDE LOCK WASHERS FOR ALL MECHANICAL CONNECTIONS FOR GROUND CONDUCTORS. USE STAINLESS STEEL HARDWARE THROUGHOUT.
    - ALL GROUNDING CABLE IN CONCRETE OR THROUGH WALLS SHALL BE IN 3/4" PVC CONDUIT. SEAL AROUND CONDUIT WITH GUN APPLIED GROUT. PROVIDE 1/2" MINIMUM CLEARANCE FROM WALLS AND FLOOR SLABS.
    - DEVELOPER'S REPRESENTATIVE WILL BE PRESENT TO INSPECT CADWELDS AND MEGGER TEST DURING BURIAL. MAXIMUM 5 OHMS RESISTANCE IS REQUIRED.
    - DO NOT INSTALL GROUND RING OUTSIDE OF LEASE AREA.
    - MAKE ALL GROUND CONNECTIONS AS SHORT AND DIRECT AS POSSIBLE. AVOID SHARP BENDS. ALL BENDS SHALL BE MADE AT 90 DEGREE ANGLES AND NOT AT 45 DEGREE ANGLES.
    - ALL CABLES TO BE BURIED GROUND RING SHALL BE THE PARALLEL TYPE, EXCEPT FOR THE GROUND RODS WHICH SHALL BE THE TEE TYPE.
    - BOND DOOR FRAMES, HANDRAILS, UNUSED HATCH PLATES AND MISCELLANEOUS LIFTING EYEPLATES TO GROUND RING. BOND METAL WINING TO DOOR FRAME.
    - BOND SERVICE CONDUITS TO GROUND RING AS THEY CROSS. DO NOT EXOTHERMICALLY WELD TO GROUND RING.
    - ALL BUS BAR SHALL BE GALVANIZED. ALL CONNECTIONS TO BUS BAR ARE TO BE 2" HOLE LUGS.
    - ALL GROUNDING IS TO COMPLY WITH THE DEVELOPER'S STANDARDS. IF YOU DO NOT HAVE A COPY OF THE PRACTICE STANDARD PLEASE REQUEST A COPY FROM THE PROJECT MANAGER.
    - ALL EXPOSED GROUND LEADS TO BE COVERED WITH EMT (ELECTRICAL METALLIC TUBING) AND CRIMPED EVERY 4'.

- CODED DRAWING NOTES**
- PROVIDE #2 TINED SOLID FOR TOWER RING BURIED AT MINIMUM 36" BELOW GRADE.
  - BOND ALL FENCE CORNER POST TO COMPOUND GROUND RING.
  - BOND GATE POST TO TOWER GROUND RING.
  - BOND TOWER TO TOWER GROUND RING (TYPICAL 3 PLACES).
  - GROUND BUS BAR ON NEW METER TO ISOLATED GROUND ROD.
  - BOND UTILITY FRAME POST TO COMPOUND GROUND RING AT EACH LEG.
  - CONNECT TOWER GROUND RING TO COMPOUND GROUND RING.



GROUNDING SITE PLAN  
 SCALE: 1" = 12'-0"



TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM: **AWAYERSOURCE**  
1875 OLD ALABAMA ROAD, SUITE 1008  
ROSWELL, GA 30076  
TEL 678-990-2338  
FAX 678-990-2342  
ENGINEER: ELIZABETH B. USHER

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A&E PROJECT #: --  
DRAWN BY: WCG  
CHECKED BY: EBU

REVISIONS	
NO.	DESCRIPTION
1	ISSUED FOR REVIEW
0	ISSUED FOR CONSTRUCTION
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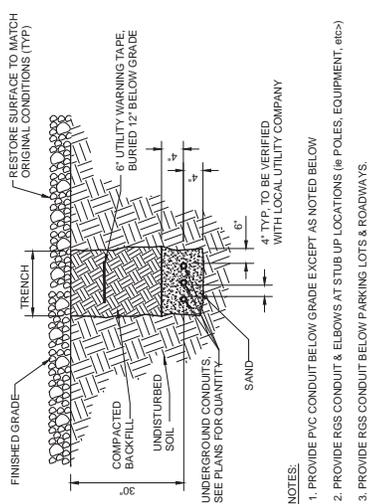
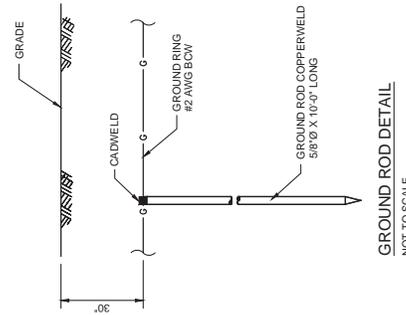
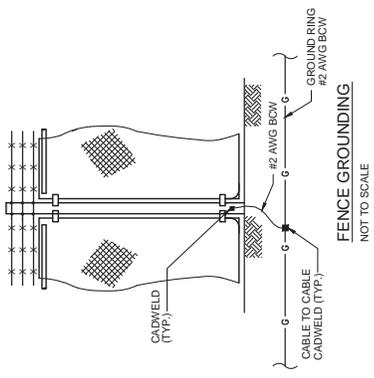


SITE NAME: **PCT SE PAPER GA**  
TOWER OWNER/SITE NUMBER: AMERICAN TOWER

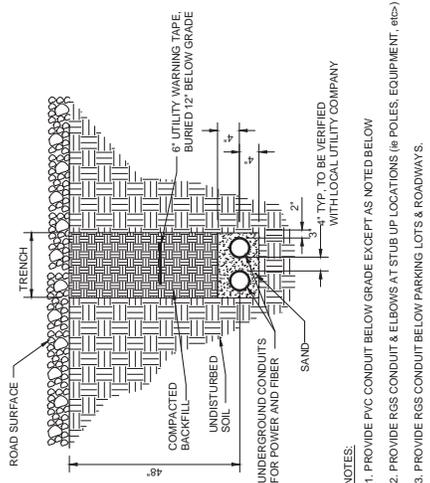
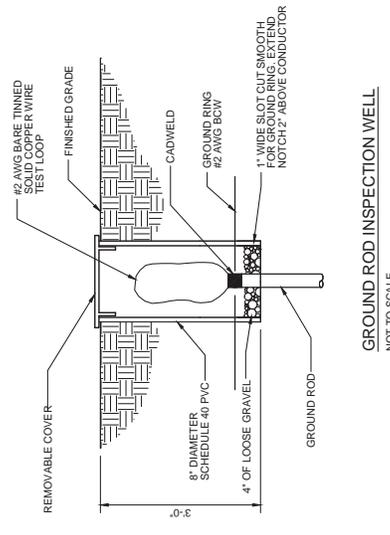
DESIGN TYPE: GREENFIELD

SHEET TITLE: **GROUNDING DETAILS**

DRAWING NO. **E4** REVISION NO. **1**



- NOTES:
1. PROVIDE PVC CONDUIT BELOW GRADE EXCEPT AS NOTED BELOW
  2. PROVIDE RGS CONDUIT & ELBOWS AT STUB UP LOCATIONS (e.g. POLES, EQUIPMENT, etc.)
  3. PROVIDE RGS CONDUIT BELOW PARKING LOTS & ROADWAYS.



- NOTES:
1. PROVIDE PVC CONDUIT BELOW GRADE EXCEPT AS NOTED BELOW
  2. PROVIDE RGS CONDUIT & ELBOWS AT STUB UP LOCATIONS (e.g. POLES, EQUIPMENT, etc.)
  3. PROVIDE RGS CONDUIT BELOW PARKING LOTS & ROADWAYS.

TOWER OWNER:  


DEVELOPER:  
 TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM:  
 **POWERSOURCE**  
 1875 OLD ALABAMA ROAD, SUITE 1008  
 ROSWELL, GA 30076  
 TEL: 678-990-2338  
 FAX: 678-990-2342  
 ENGINEER: ELIZABETH B. USHER

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A&E PROJECT #:  
 DRAWN BY: WCG  
 CHECKED BY: EBU

REVISIONS	
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A	06/24/15 ISSUED FOR REVIEW
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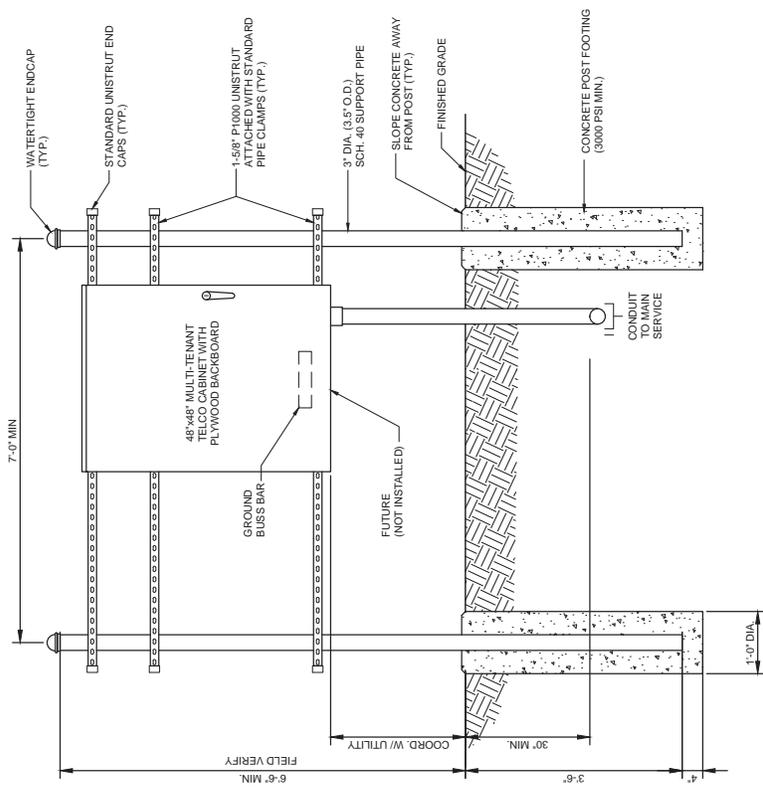
SITE NAME:  
**PCT SE PAPER GA**

TOWER OWNER / SITE NUMBER:  
 AMERICAN TOWER

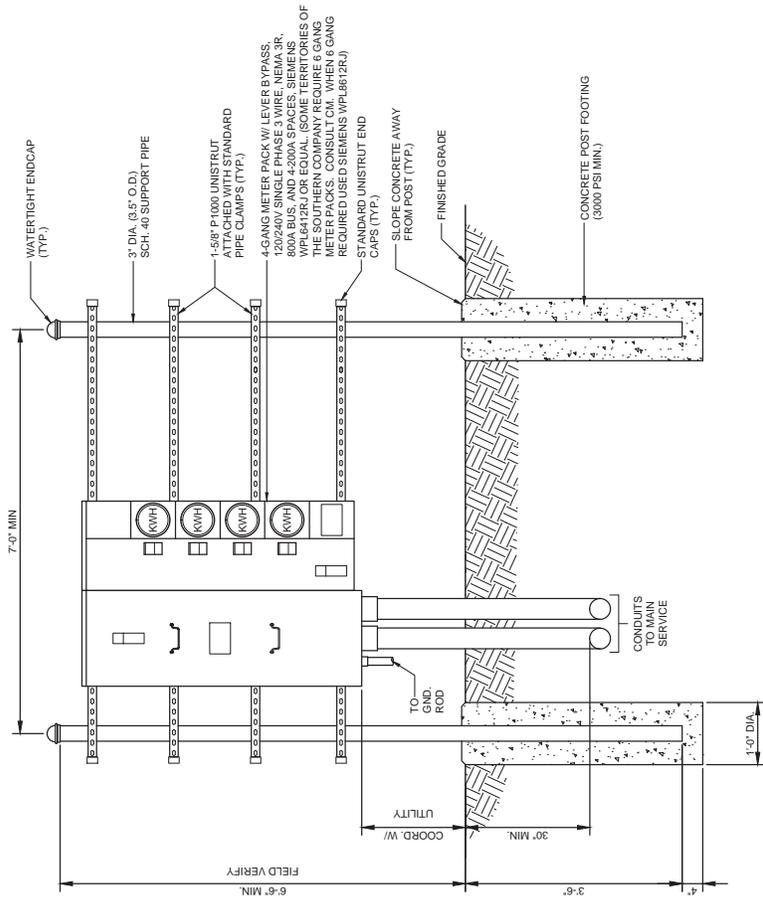
DESIGN TYPE:  
 GREENFIELD

STREET TITLE:  
 METER DETAILS

DRAWING NO. **E5** REVISION NO. **1**



UTILITY FRAME DETAIL (TELCO)  
 NOT TO SCALE



UTILITY FRAME DETAIL (GANG METER)  
 NOT TO SCALE

- NOTES:
- ALL UNDERGROUND CONDUIT SHALL BE PVC, SCHEDULE 40 UNLESS OTHERWISE INDICATED. ALL CONDUITS EXPOSED ABOVE GROUND SHALL BE RIGID GALVANIZED STEEL. ALL UNDERGROUND CONDUIT SHALL TRANSITION FROM PVC TO RIGID AT THE 90° BEND BELOW GRADE.
  - CONTRACTOR SHALL FIELD LOCATE THE METER PEDESTAL AS SHOWN ON SITE PLAN. INSTALL THE METER PEDESTAL NEAR THE PERIMETER OF THE FENCED COMPOUND WITH THE METERS FACING AS SHOWN.
  - THE CONTRACTOR SHALL COORDINATE WITH THE LOCAL UTILITY COMPANY FOR THE CONDUIT RUN TO THE MAIN SERVICE CONNECTION OR TRANSFORMER.
  - THE CONTRACTOR SHALL COORDINATE WITH THE LOCAL UTILITY COMPANY FOR GROUND ROD REQUIREMENTS. IF REQUIRED, THE CONTRACTOR SHALL ORDER AND PAY FOR NECESSARY GROUND TESTS.
  - SUPPORT POST AND UNISTRUT SHALL BE GALVANIZED. PIPE CLAMPS AND HARDWARE SHALL BE GALVANIZED OR STAINLESS STEEL.
  - TELCO CABINET SHALL BE 36"x48"x10" HOFFMAN OR EQUIVALENT. PROVIDE 3/4" PLYWOOD BACKBOARD INSIDE THE MULTI-TENANT TELCO CABINET.
  - ADJUSTMENTS TO THE METER PEDESTAL DESIGN MAY BE REQUIRED DEPENDING ON THE EXACT METER PANEL INSTALLED. CONTRACTOR SHALL FIELD COORDINATE ADJUSTMENTS AND INFORM THE ENGINEER IF ANY UNUSUAL CONDITIONS ARE FOUND TO EXIST.



## Tower Construction Notification

[FCC](#) > [WTB](#) > Tower Construction Notification

[FCC Site Map](#)

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### Tower Construction Notification New Notification

[Notifications Home](#)

Your Notification has been successfully submitted to the FCC. The date for this Notification is 06/26/2015. Your Notification ID number is **128471**. Please make a note of this Notification ID — print out this page for your records. A confirmation of this submitted notification will also be emailed to the email address specified in your notification.

This system is intended to facilitate consultation under Section 106 of the National Historic Preservation Act by providing early notification of proposed construction to Tribes and State Historic Preservation officers. This system is not to be used in place of Section 106 consultation, and use of this notification system in itself does not satisfy parties' obligations with respect to historic preservation review under the Commission's rules.

**Please note: the submission of this notification is NOT to be considered a 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.

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Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
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## Sarah-Beth Miller

---

**From:** towernotifyinfo@fcc.gov  
**Sent:** Friday, June 26, 2015 12:39 PM  
**To:** Sarah-Beth Miller  
**Subject:** Proposed Tower Structure Info - Email ID #4258587

Dear Sarah Beth Miller,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 06/26/2015

Notification ID: 128471  
Tower Owner Individual or Entity Name: American Towers LLC  
Consultant Name: Sarah Beth Miller  
Street Address: 326 Tryon Road  
City: Raleigh  
State: NORTH CAROLINA  
Zip Code: 27603  
Phone: 919-661-6351  
Email: [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)

Structure Type: MTOWER - Monopole  
Latitude: 32 deg 29 min 24.2 sec N  
Longitude: 82 deg 50 min 0.4 sec W  
Location Description: S Hwy 199  
City: Dublin  
State: GEORGIA  
County: LAURENS  
Detailed Description of Project:  
Ground Elevation: 51.2 meters  
Support Structure: 45.7 meters above ground level  
Overall Structure: 48.8 meters above ground level  
Overall Height AMSL: 100 meters above mean sea level

## Sarah-Beth Miller

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**From:** towernotifyinfo@fcc.gov  
**Sent:** Friday, July 03, 2015 3:04 AM  
**To:** Sarah-Beth Miller  
**Cc:** Jonathan.Jonas@fcc.gov; diane.dupert@fcc.gov  
**Subject:** NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #4259726

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

The information you provided was forwarded to the following Tribal Nations and NHOs. If a Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

1. THPO Linda P Langley - Coushatta Indian Tribe - Elton, LA - electronic mail

Details: The Coushatta Tribe of Louisiana has implementing a paperless review process for all new applications. Beginning November 20, 2013, we will no longer mail initial letters of interest, invoices, receipts for payments, or determination letters.

In order to expedite the review process, we are requesting that you upload the following information for each new or modified TCNS application to your Dropbox folder: New or existing tower site, site name & number, legal description or physical address of site, photographs in contour directions, topographic or quadrangle maps, height and type of tower, complete FCC Form 620 or 621, Phase 1 archaeological survey, and specific discussion of mitigation plans for any

traditional cultural properties identified. Please be sure to identify and group information by the project TCNS application number.

Our research and review fee is \$500.00 per TCNS application. Please make checks payable to the Coushatta Tribe of LA, and mail them to the Coushatta Heritage Dept., PO Box 10, Elton, LA 70532.

2. 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 IMMEDIATELY notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction.

3. Cultural Preservation Officer Kara J Gann - Kialegee Tribal Town - Wetumpka, OK - electronic mail

Details: The Kialegee Tribal Town charges a \$1000 review fee for all projects within a TCNS# (in the event there are more than one with in the TCNS#)involving new constructions, and \$600 per collocation site. Please send payment in a timely manner.

Submit your Form 620 or 621 by Email to [kialegeettcpo@gmail.com](mailto:kialegeettcpo@gmail.com). Please ensure your submission includes photographs, maps, archival research, archaeological reports, and relevant project information.

Please send all checks with TCNS# on it to our Headquarters, to the attention of our tribal leader, Mekko Jeremiah Hobia. Please make the checks payable to the KIALEGEE TRIBAL TOWN, CULTURAL PRESERVATION PROGRAM, and send to:

Mekko Jeremiah Hobia  
Kialegee Tribal Town  
P.O. Box 332  
Wetumpka, OK 74883

Thank you!

Sincerely,  
Kara Gann, Cultural Preservation Officer Kialegee Tribal Town  
(405) 452-3262

4. Historic Preservation Officer Seminole Nation - Seminole Nation of Oklahoma - Wewoka, OK - electronic mail

Details: If the Applicant/tower builder receives no response from the Seminole Nation of Oklahoma within 30 days after notification through TCNS, the Seminole Nation of Oklahoma has no interest in participating in pre-construction review

for the site. The Applicant/tower builder, however, must IMMEDIATELY notify the Seminole Nation 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.

5. THPO Emman Spain - Muscogee Creek Nation - Okmulgee, OK - electronic mail and regular mail

Details: **\*\*PLEASE NOTE OUR NEW REQUIREMENT\*\***: Because the TCNS Details do not provide enough information for us to conduct a proper assessment on behalf of the Muscogee Creek Nation (MCN) of Oklahoma, we, instead, require that you submit with your original notification (**\*NEW REQUIREMENT\***), the following as EMAIL attachments: 1) a copy of the 620/621 Form, 2) photos, 3) a map that clearly shows the proposed site location, and 4) a copy of the archaeological assessment or survey.

Please treat this request for additional information material as a routine supplement to the TCNS Details Notification for each of your projects that fall within our Tribe's areas of geographic interest.

EFFECTIVE 01/01/2012

**\*\*PLEASE NOTE OUR NEW REVIEW FEES\*\***: Due to the high volume of 620/621 review requests, it has become necessary for the MCN to initiate an increase for the Cultural Resource Review service fee. Please contact MCN for details. Upon attaching all attachments as outlined above the completed 620/621 form and receipt of the review fee, a letter of decision will be sent if all the requirements are met. However, if you do not receive a response within 25 days from the date the payment and the completed 620/621 forms were sent to us, please contact us by phone or email to confirm review status.

Thank you.

Emman Spain, Deputy THPO  
Muscogee Creek Nation  
918-732-7835  
mcn-tcns@mcn-nsn.gov

6. Acting THPO Lisa C LaRue-Baker - United Keetoowah Band of Cherokee Indians - Tahlequah, OK - electronic mail and regular mail

Details: In order to be in compliance with Section 106 of the NHPA, the United Keetoowah Band of Cherokee Indians in Oklahoma reviews all projects within 30 days. This review is to identify sites in the APE which are known to the tribe and are important, sacred and historic to our tribe.

Invoices are sent when we receive notification from the FCC which initiates the Section 106 process. You will receive your review through the TCNS system. All invoices are due within 30 days, as well.

SHOULD OUR SITE BE ABANDONED, we must be notified immediately. Please let us know by contacting ukbthpo-larue at yahoo.com Unfortunately, the FCC does not notify us when a site is abandoned, and if we receive initiation, the project is reviewed by us within 30 days. If you have not notified us of the cancellation prior to our review, you are responsible for paying for the work performed for your project.

NON PAYMENT: Any payments over 90 days late will be considered non-payment and will result in termination of reviews for consultant/tower company (unless handled directly by the Federal Agency) and will be turned over to tribal court to be recommended for assignment to collection agency and notification to the Better Business Bureau. Future reviews for the consultant/tower company will require PREPAYMENT.

Our review fee of 500.00 is for ALL reviews, including colocations and resites, as well as making determinations if properties are potentially eligible for the NRHP. Cancelled projects are still subject to fee, as the UKB reviews the project in good faith, even if the site is later abandoned. REVIEWS AND INVOICES ARE BASED ON OFFICIAL REPORTS OF TOWERS SUBMITTED DELIVERED TO THE UKB BY THE FCC. If a site is cancelled or abandoned within the first week of listing on the TCNS system, PLEASE CONTACT THE UKB (Lisa Baker) at ukbthpo-larue@yahoo.com to CANCEL to avoid review and invoicing. We respond within expected timeframes, we expect payment in 30 days, as well.

YOUR SECTION 106 obligations with our tribe are not fulfilled until you receive our written response indicating our determination. Please do not hamper your client's ability to receive reviews and responses by becoming late with your payments!!

ALL CORRESPONDENCE COMING FROM TCNS AFTER YOUR RECEIVE YOUR INITIAL FILING NOTIFICATION ARE NOT AUTOMATED, BUT GENERATED INDIVIDUALLY AND AS NEEDED BY THE TRIBE, USING THE TCNS SYSTEM AS THE DELIVERY VEHICLE.

#### 7. THPO Robin Dushane - Eastern Shawnee Tribe of Oklahoma - Wyandotte, OK - regular mail

Details: NOTE: CHANGE IN CONSULTATION PROCEDURES AND FEE

The Cultural Preservation Office of the Eastern Shawnee Tribe of Oklahoma requires the following information and fees regarding all proposed FCC projects.

Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation accompanied with a CD version.

Please submit by US postal mail or other parcel carrier all of the following information for all FCC projects:

1. A 1-page cover letter with the following information:

- a) TCNS number
- b) Company name
- c) Project name, city, county, state
- d) Project type
- e) UTM coordinates using WGS84 (G1150)
- f) Total area surveyed in acres
- g) Contact information.

2. Professional cultural/archaeological resource survey report.

3. Aerial and color USGS topographic maps locating project area within the state, county, and local area.

4. Aerial, color USGS topographic, or planimetric maps locating tower site, APE, access road, utility easement, guy wire locations surveyed, surveyed staging areas, and known archaeological/historic sites.

5. Project site plan map depicting labeled shovel test locations.

6. Shovel test log.

7. Site photographs.

8. A copy of the review letter or TCNS e-response from the State Historic Preservation Office and all other state-mandated review offices.

9. Submit a \$550.00 per/tower fee for administration, data processing, handling, research, and review. Collocations, PTC poles, and projects in previously disturbed locations require a \$100.00 fee. Make the check payable to the Eastern Shawnee Tribe of Oklahoma. On the memo line write all TCNS numbers.

NOTE: Effective November 1, 2014, for TCNS #119606 and forward, regarding collocations, PTC poles, and projects in previously disturbed locations; the administration, data processing, handling, research and review fee will decrease to \$100.00.

10. THE EASTERN SHAWNEE TRIBE'S NEW CONSULTATION PROCEDURES DOCUMENT is available by email and is highly recommended for guidance. Send an email to Dee Gardner at: [celltower@estoo.net](mailto:celltower@estoo.net).

If the applicant/tower builder receives no response from the Eastern Shawnee Tribe of Oklahoma within 30 days after notification through TCNS, the Eastern Shawnee 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 Eastern Shawnee 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. Cultural Advisor Ace Buckner - Alabama Quassarte Tribal Town - Wetumka, OK - electronic mail and regular mail

Details: The Alabama-Quassarte Tribal Town's TCNS matters are being handled by Ace Buckner, Culture Advisor. The Alabama-Quassarte Tribal Town has a \$500 review fee for new builds, and a \$300 review fee for collocations. Please

make checks payable to : "AQEDA Tribal Heritage Center" and send to AQEDA Tribal Heritage Center, P.O. Box 186, Wetumka, Oklahoma, 74883."

Thank you.

Ace J. Buckner, Culture Advisor

Alabama-Quassarte Tribal Town Heritage Center [ajbuckner14@gmail.com](mailto:ajbuckner14@gmail.com)

9. THPO/NAGPRA Representative Charles Coleman - Thlopthlocco Tribal Town - Weleetka, OK - electronic mail and regular mail

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 June 2006, 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 a final 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 notification as 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 January 2008 - 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. THPO Robert Thrower - Poarch Band of Creek Indians - Atmore, AL - electronic mail and regular mail

If the applicant/tower builder receives no response from the Poarch Band of Creek Indians within 30 days after notification through TCNS, the Poarch Band of Creek Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however,

must immediately notify the Poarch Band of Creek Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

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. SHPO Lee Warner - Alabama Historical Commission - Montgomery, AL - electronic mail

13. Deputy SHPO Elizabeth Ann Brown - Alabama Historical Commission - Montgomery, AL - electronic mail

14. Environmental Review Specialist Michelle Volkema - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

15. Division Director W. Ray Luce - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

16. Deputy SHPO Richard Cloues - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

17. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - Raleigh, NC - electronic mail

18. Deputy SHPO David Brook - Historic Preservation Office - Raleigh, NC - electronic mail

19. Environmental Review Specialist Jennifer Dixon - Georgia Historic Preservation Division - Atlanta, GA - electronic mail

"Exclusions" above set forth language provided by the Tribal Nation or SHPO. These exclusions may indicate types of PTC wayside pole notifications that the Tribal Nation or SHPO does not wish to review. TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. Exclusions may also set forth policies or procedures of a particular Tribal Nation or SHPO (for example, types of information that a Tribal Nation routinely requests, or a policy that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above 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: 06/26/2015  
Notification ID: 128471  
Tower Owner Individual or Entity Name: American Towers LLC  
Consultant Name: Sarah Beth Miller  
Street Address: 326 Tryon Road  
City: Raleigh  
State: NORTH CAROLINA  
Zip Code: 27603  
Phone: 919-661-6351  
Email: sbmiller@tepgroup.net

Structure Type: MTOWER - Monopole  
Latitude: 32 deg 29 min 24.2 sec N  
Longitude: 82 deg 50 min 0.4 sec W  
Location Description: S Hwy 199  
City: Dublin

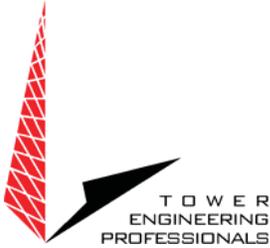
State: GEORGIA  
County: LAURENS  
Detailed Description of Project:  
Ground Elevation: 51.2 meters  
Support Structure: 45.7 meters above ground level  
Overall Structure: 48.8 meters above ground level  
Overall Height AMSL: 100.0 meters above mean sea level

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



October 26, 2015

Coushatta Indian Tribe  
Coushatta Heritage Department  
P.O. Box 10  
Elton, LA 70532

Attn: Linda P Langley – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Langley:

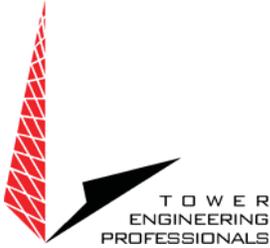
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE. The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

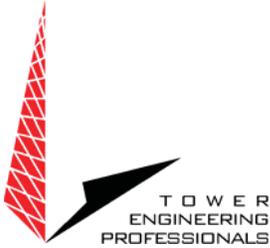
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that has been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Couthatta Indian Tribe has interest in this proposed**

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**telecommunications tower site/project, we request approval and/or comments from the Couthatta Indian Tribe regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

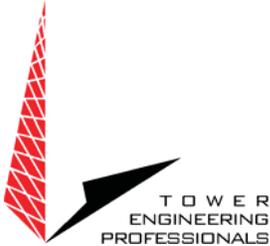
Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Kialegee Tribal Town  
P.O. Box 332  
Wetumpka, OK 74883

Attn: Kara J Gann – Cultural Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

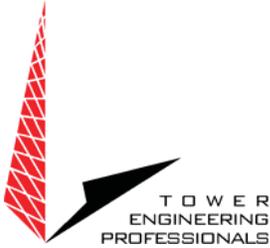
Ms. Gann:

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Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

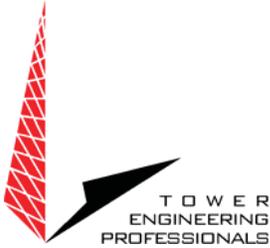
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Kialegee Tribal Town has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Kialegee Tribal Town regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

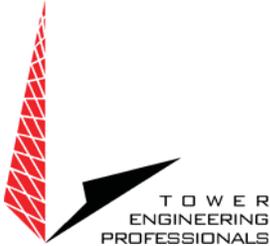
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Seminole Nation of Oklahoma  
P.O. Box 1498  
Wewoka, OK 74884

Attn: Natalie Harjo – Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

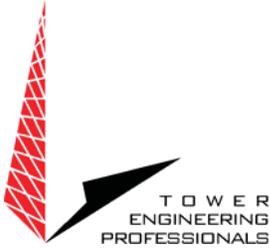
Ms. Harjo:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

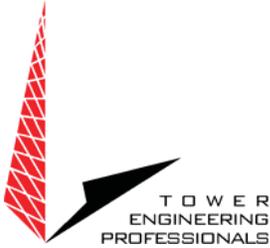
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Seminole Nation of Oklahoma has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Seminole Nation of Oklahoma regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

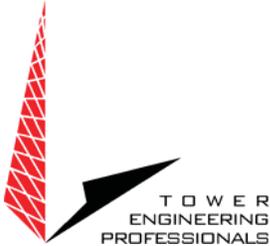
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Muscogee Creek Nation  
P.O. Box 580  
Hwy 75 & Loop 56  
Okmulgee, OK 74447

Attn: Corain Lowe – TCNS Coordinator

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

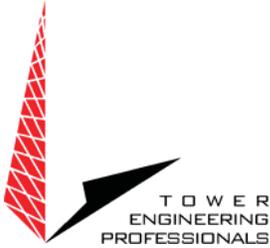
Ms. Lowe:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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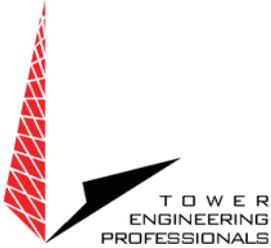
The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Muscogee Creek Nation has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
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**the Muscogee Creek Nation regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

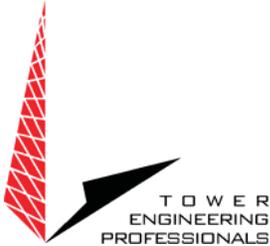
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

United Keetoowah Band of Cherokee Indians  
P.O. Box 746  
Tahlequah, OK 74465

Attn: Lisa LaRue-Baker

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

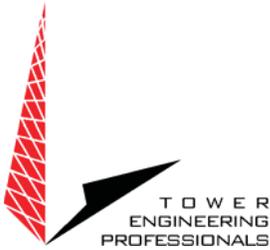
Ms. LaRue-Baker:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

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The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

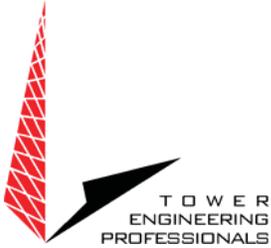
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the United Keetoowah Band of Cherokee Indians has interest in this proposed telecommunications tower site/project, we request approval and/or**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**comments from the United Keetoowah Band of Cherokee Indians regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

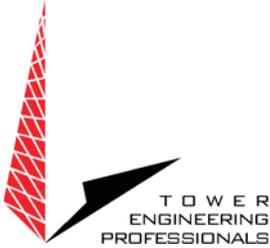
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I thank you in advance for your consideration of this request and your attention to this matter.

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Eastern Shawnee Tribe  
Cultural Preservation Department  
70500 East 128 Road  
Wyandotte, OK 74370

Attn: Robin Dushane – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
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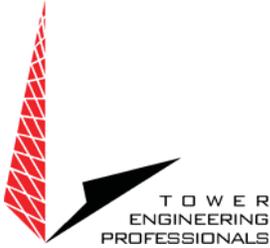
Ms. Dushane:

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



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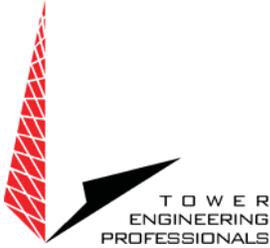
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Eastern Shawnee Tribe of Oklahoma has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Eastern Shawnee Tribe of Oklahoma regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

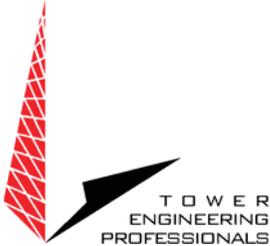
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

The Alabama-Quassarte Tribal Town  
AQEDA Tribal Heritage Center  
P.O. Box 186  
Wetumka, OK 74883

Attn: Tilda Harjo – Tribal Secretary

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Harjo:

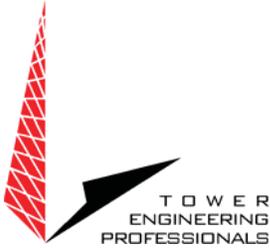
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS

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database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE. The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

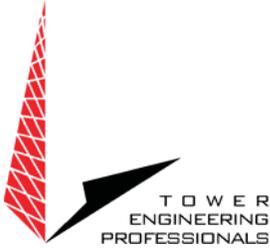
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Alabama-Quassarte Tribal Town has interest in this proposed**

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**telecommunications tower site/project, we request approval and/or comments from the Alabama-Quassarte Tribal Town regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

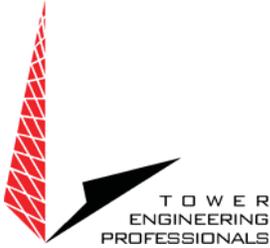
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Thlopthlocco Tribal Town  
P.O. Box 188  
Okemah, OK 74859

Attn: Charles Coleman – Assistant Tribal Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

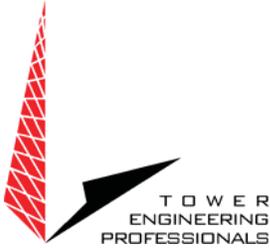
Mr. Coleman:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

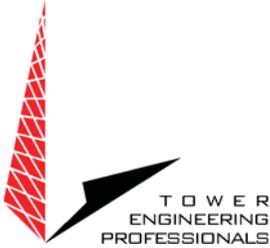
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**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Thlopthlocco Tribal Town has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

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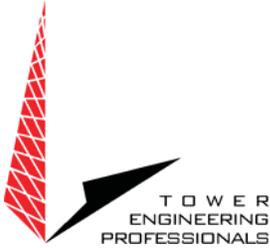
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I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Shawnee Tribe  
Tribal Historic Preservation Office  
29 South Highway 69A  
Miami, OK 74354

Attn: Kim Jumper – Assistant Tribal Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Jumper:

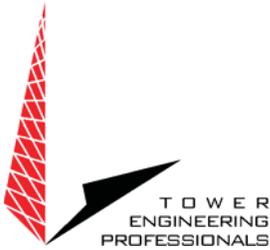
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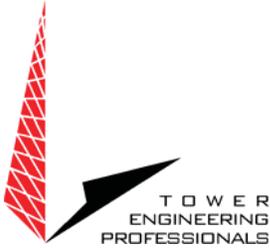
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**tower site/project, we request approval and/or comments from the Shawnee Tribe regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

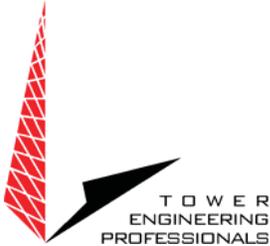
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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



October 26, 2015

Poarch Band of Creek Indians  
5811 Jack Springs Road  
Atmore, AL 36502

Attn: Robert Thrower – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
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**TCNS# 128471, filed 6/26/2015**  
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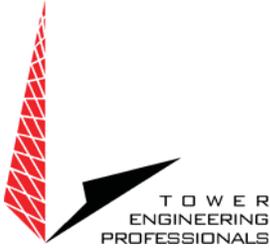
Mr. Thrower:

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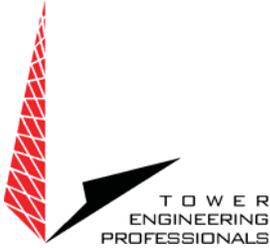
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Poarch Band of Creek Indians has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Poarch Band of Creek Indians regarding the proposed Work Plan for the Phase II Archaeological Assessment by the date above or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

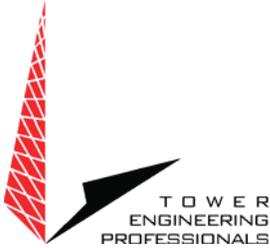
Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



July 1, 2015

City of Dublin Historic Board  
P.O. Box 690  
Dublin, GA 31040

**Attn: Mr. Johnny Parham – Building Inspector**

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Mr. Parham:

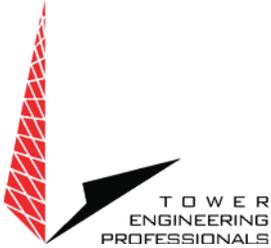
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

The purpose of this letter is to invite the participation and input of the City of Dublin Historic Board in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide any comments that the City of Dublin Historic Board may have regarding any potential adverse impacts that the proposed action may have on historic resources.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



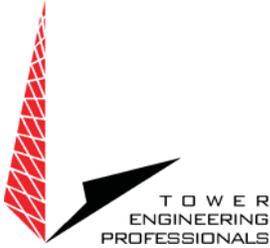
A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth<sup>®</sup> Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



July 1, 2015

Laurens County Board of Commissioners  
P.O. Box 2011  
Dublin, GA 31040

**Attn: Mr. Emory Lake – Laurens County Commissioner – District 5**

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Mr. Lake:

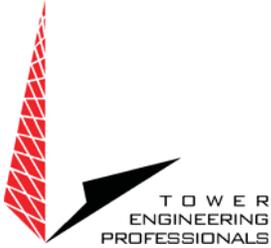
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

The purpose of this letter is to invite the participation and input of the Laurens County Board of Commissioners in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide any comments that the Laurens County Board of Commissioners may have regarding any potential adverse impacts that the proposed action may have on historic resources.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



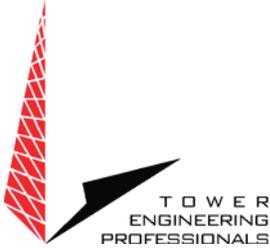
A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth® Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



July 1, 2015

Regional Historic Commissions of Georgia  
Heart of Georgia-Altamaha Regional Commission (Region 9)  
5405 Oak Street  
Eastman, GA 31023

**Attn: Ms. Robin B. Nail – Senior Planner/Historic Preservation Planner**

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Ms. Nail:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

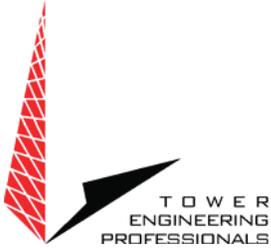
The purpose of this letter is to invite the participation and input of the Heart of Georgia-Altamaha Regional Commission (Region 9) in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



any comments that the Heart of Georgia-Altamaha Regional Commission (Region 9) may have regarding any potential adverse impacts that the proposed action may have on historic resources.

A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth<sup>®</sup> Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

# HEART OF GEORGIA ALTAMAHA REGIONAL COMMISSION

5405 Oak Street • Eastman, Georgia 31023  
Ph. (478) 374-4771 • Fax (478) 374-0703

331 West Parker Street • Baxley, Georgia 31513  
Ph. (912) 367-3648 • Fax (912) 367-3640

July 21, 2015

Ms. Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.  
326 Tryon Road  
Raleigh, NC 27603-3530

RE: Proposed 150 ft. Monopole Telecommunications Tower, American Towers LLC Site Name: PCT  
SE Paper GA, Site Number: 201440, South Highway 199, Dublin, Laurens County, GA

Dear Ms. Miller:

Thank you for the opportunity to comment on the above referenced proposed project. We have reviewed the 1976 Laurens County Historic Resources Survey, and there were no structures identified which appear to be located within the planned area of potential effect (APE). Given the age of the survey, there may be structures located within or near the APE which are now old enough to be considered historic. Please be aware that Laurens County has a cell tower ordinance.

We trust that this information will be of help as you proceed with environmental review compliance efforts. The Heart of Georgia Altamaha Regional Commission requests to be a consulting party on this important project. To expedite project review, please send all project correspondence on this and future projects to me at our Baxley Office rather than to Eastman. The address is 331 W. Parker Street, Baxley, GA 31513. In the meantime, please let us know if we can provide further assistance.

Sincerely,



Robin B. Nail  
Senior Planner/Historic Preservation Planner

f. 300.001.10

cc: Ms. Jennifer Dixon, HPD/DNR  
Mr. Bryan Rogers, Laurens Co.

## Sarah-Beth Miller

---

**From:** Sarah-Beth Miller  
**Sent:** Monday, October 26, 2015 12:30 PM  
**To:** rbmail@hogarc.org  
**Subject:** Proposed telecommunications tower in Laurens County, GA - PCT SE Paper GA  
**Attachments:** Additional information for PCT SE Paper GA site (reduced).pdf

Ms. Nail,

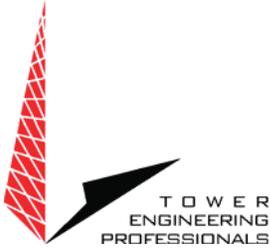
I have attached the FCC Form 620, cultural resources assessment, construction drawings, and site photographs for the proposed American Towers, LLC (ATC) telecommunications tower identified as PCT SE Paper GA (201440) to be located in Laurens County, Georgia. Please let me know if you have any questions or need any additional information.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

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July 1, 2015

Laurens County Historical Society  
Dublin-Laurens Museum  
P.O. Box 1461  
Dublin, GA 31040

**Attn: Mr. Scott Thompson – Senior Director**

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Mr.Thompson:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

The purpose of this letter is to invite the participation and input of the Laurens County Historical Society in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide



any comments that the Laurens County Historical Society may have regarding any potential adverse impacts that the proposed action may have on historic resources.

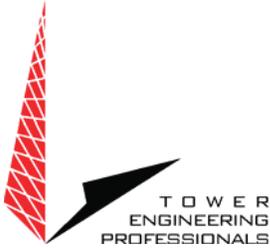
A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth® Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or **sbmiller@tepgroup.net**.

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is positioned above the typed name.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



July 1, 2015

Georgia Historical Society  
501 Whitaker Street  
Savannah, GA 31401

**Attn:** Ms. Lynette Stoudt – Director, Research Center

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Ms. Stoudt:

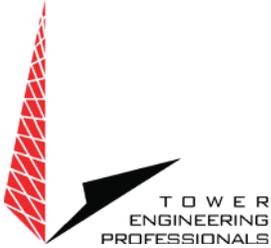
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

The purpose of this letter is to invite the participation and input of the Georgia Historical Society in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide any comments that the Georgia Historical Society may have regarding any potential adverse impacts that the proposed action may have on historic resources.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth<sup>®</sup> Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

## Sarah-Beth Miller

---

**From:** Lynette Stoudt <LStoudt@georgiahistory.com>  
**Sent:** Wednesday, July 01, 2015 10:00 AM  
**To:** Sarah-Beth Miller  
**Subject:** RE: Invitation to Comment - PCT SE Paper GA

Hello Ms. Miller,

Thank you for your email. However, as an archivist/librarian, I do not believe I am qualified to comment.

Best wishes,

Lynette



Lynette J. Stoudt

*Director, Research Center*

**Savannah**

501 Whitaker Street | Savannah, GA 31401

tel: 912.651.2125 ext 134 | fax: 912.651.2831

**Atlanta**

260 14th Street, N.W., Suite A-148 | Atlanta, GA 30318

tel: 404.382.5410 | fax: 404.671.8570

[www.georgiahistory.com](http://www.georgiahistory.com)

*The Research Center will be closed July 3 through August 4 for the Independence Day holiday, special programs, and collections care. We will reopen on Wednesday, August 5 at noon.*

*To schedule a research appointment during our closure, please contact me.*

---

**From:** Sarah-Beth Miller [<mailto:sbmiller@tepgroup.net>]  
**Sent:** Wednesday, July 01, 2015 9:31 AM  
**To:** Lynette Stoudt  
**Subject:** Invitation to Comment - PCT SE Paper GA

Ms. Stoudt,

Attached you will find an Invitation to Comment for a proposed telecommunications tower that will be located west of a portion of S Hwy 199 and north of a portion of Interstate 16, southeast of Dublin, Georgia (Laurens County). Please let me know if you have any questions or need any additional information.

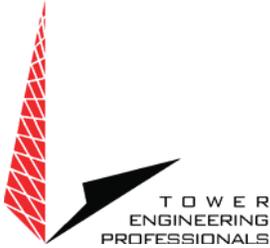
Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

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July 1, 2015

Oconee Regional Library  
P.O. Box 100  
Dublin, GA 31040

**Attn: Mr. Leard Daughety– Director**

**Subject:** Invitation to comment on proposed 150-ft monopole telecommunications tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LCC Site Number: **201440**  
S Hwy 199  
Dublin, GA 31027  
(Laurens County)

Mr. Daughety:

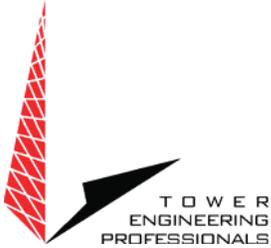
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC"), regarding a proposed 150-ft monopole telecommunications tower (160-ft with appurtenances) to be located **west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia.**

The purpose of this letter is to invite the participation and input of the Oconee Regional Library in the review of this project under federal law, to help determine: (1) whether or not any historic properties may exist in the area of this project; and (2) if so, whether the project may cause an adverse effect to such properties.

This review of potential effects to historic properties is required by federal law, including Section 106 of the National Historic Preservation Act of 1966 ("NHPA") (16 U.S.C. § 470f), and the FCC's rules, including the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (the "NPA") (47 C.F.R. Part 1, Appendix B), and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (the "CNPA") (47 C.F.R. Part 1, Appendix C).

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances) monopole telecommunications tower within a portion of a forested area located west of a portion of S Hwy 199 and north of a portion of Interstate 16, Dublin, Georgia, Tax Parcel: 203 064. The proposed tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30-ft buffer surrounding the lease area. Please provide any comments that the Oconee Regional Library may have regarding any potential adverse impacts that the proposed action may have on historic resources.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



A portion of the pertinent USGS 7.5-Minute Minter, GA topographic map and a Google Earth<sup>®</sup> Satellite Image dated 9/20/2014 have been included for your review. If you wish to comment on this project, please provide any comments to us by August 5, 2015. Written comments may be addressed to me at **Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530** or **[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)**.

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

# THE COURIER HERALD

STATE OF GEORGIA

COUNTY OF LAURENS

Legal No. 15-1575

American Towers, LLC

## AFFIDAVIT OF PUBLISHER

Personally appeared before me, the undersigned officer, duly authorized to administer oaths in said State and County, Cheryl Gay who, having been duly sworn, deposes and says that he/she is authorized to make this affidavit, and that the legal notice was published in The Courier Herald, a local newspaper of general circulation in Dublin, Georgia on July 11, 18, 25, August 1, 8, 2015.

This 8<sup>th</sup> day of October, 2015.

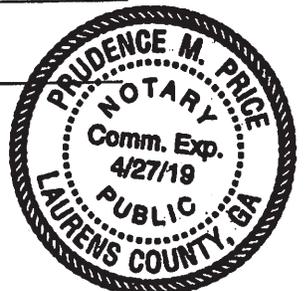
Cheryl Gay  
AGENT THE COURIER HERALD

Sworn to and subscribed before me

this 8<sup>th</sup> day of October, 2015

Notary Public Prudence M. Price

My Commission Expires: 04-27-19



15-1575

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances), monopole telecommunications tower located north of a portion of I-16, south of a portion of Papermill Rd., and west of a portion of S Hwy 199, Dublin, Laurens County, GA; Tax Parcel: 203 064. The tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30ft buffer surrounding the lease area. American Towers LLC seeks comments from all interested persons on any potential significant impact the proposed action could have on the quality of the human environment pursuant to 47 C.F.R. Section 1.1307, including potential impacts to historic or cultural resources that are listed or eligible for listing in the National Register of Historic Places. Interested persons may comment or raise concerns about the proposed action by submitting an e-mail to [enviro.services@americantower.com](mailto:enviro.services@americantower.com). Paper comments can be sent to: American Towers LLC, Attn: Environmental Compliance, 10 Presidential Way, Woburn, MA 01801. Requests or comments should be limited to environmental and historic/cultural resource impact concerns, and must be received on or before August 10, 2015. This invitation to comment is separate from any local planning/zoning process that may apply to this project.

July 11, 18, 25, August 1, 8, 2015



Photo facing south-southwest along existing two-track drive and along proposed ingress-egress & utility easement.



Photo facing north towards deer stand located south-southwest of the proposed tower compound lease area.



Photo facing south-southeast from eastern 30-ft buffer.



Photo facing southeast from eastern 30-ft buffer.



Photo facing west from eastern 30-ft buffer.



Photo facing north-northeast from eastern 30-ft buffer.



Photo facing west-southwest from northern 30-ft buffer.



Photo facing east from western 30-ft buffer.



Photo facing west towards western 30-ft buffer.



Photo facing north-northwest from western 30-ft buffer.



Photo facing south from northern 30-ft buffer.



Photo facing south-southeast within southern 30-ft buffer.



Photo facing north-northwest towards portion of southern 30-ft buffer.



Photo facing northwest towards southern 30-ft buffer.



Photo facing north towards proposed access & utility easement.



Photo facing north-northwest along proposed access & utility easement.



Photo facing east from proposed tower compound centerline.



Photo facing north-northwest from proposed tower compound lease area.



Photo facing north-northeast from proposed tower compound centerline.



Photo facing west-southwest from proposed tower centerline.



Photo facing southwest from proposed tower centerline.



Photo facing south from proposed tower centerline.



Photo facing north towards proposed tower centerline.



Photo facing south-southeast along proposed ingress-egress & utility easement.



Photo facing north-northeast along two-track access drive & proposed ingress-egress & utility easement.



Photo facing south along existing two-track access drive and proposed ingress-egress & utility easement.



Photo facing northeast along existing two-track access drive & proposed ingress-egress & utility easement.



Photo facing southwest along existing earthen access drive and proposed ingress-egress & utility easement.



Photo facing northeast towards existing earthen drive and proposed ingress-egress & utility easement.



Photo facing south along existing two-track drive and proposed ingress-egress & utility easement.



Photo of gravel pile along portion of existing two-track drive and proposed ingress-egress & utility easement.



Photo facing east-southeast along earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing east-southeast along earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing southeast along earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing northwest along earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing east along existing earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo of surface water feature, facing west along existing earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo of surface water feature, facing east along existing earthen/gravel and proposed ingress-egress & utility easement.



Photo facing west along existing earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing west-northwest towards surface water feature located along existing earthen/gravel access drive and proposed ingress-egress & utility easement, abutting northern portion of the jurisdictional waters of the U.S.



Photo facing southwest towards the surface water feature located along existing gravel/earthen access drive and abutting the southern portion of the jurisdictional waters of the U.S.



Photo facing north-northwest towards surface water feature abutting northern jurisdictional waters of the U.S.



Photo facing north towards northern portion of the jurisdictional waters of the U.S.



Photo facing north towards existing jurisdictional waters of the U.S.



Photo facing west along existing earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing northeast along existing earthen/gravel access drive and proposed ingress-egress & utility easement.



Photo facing west-southwest towards proposed earthen/gravel access drive and proposed ingress-egress & utility easement from S Hwy 199.



Photo facing east-northeast along existing earthen/gravel access drive towards S Hwy 199.



Photo facing south-southeast along S Hwy 199



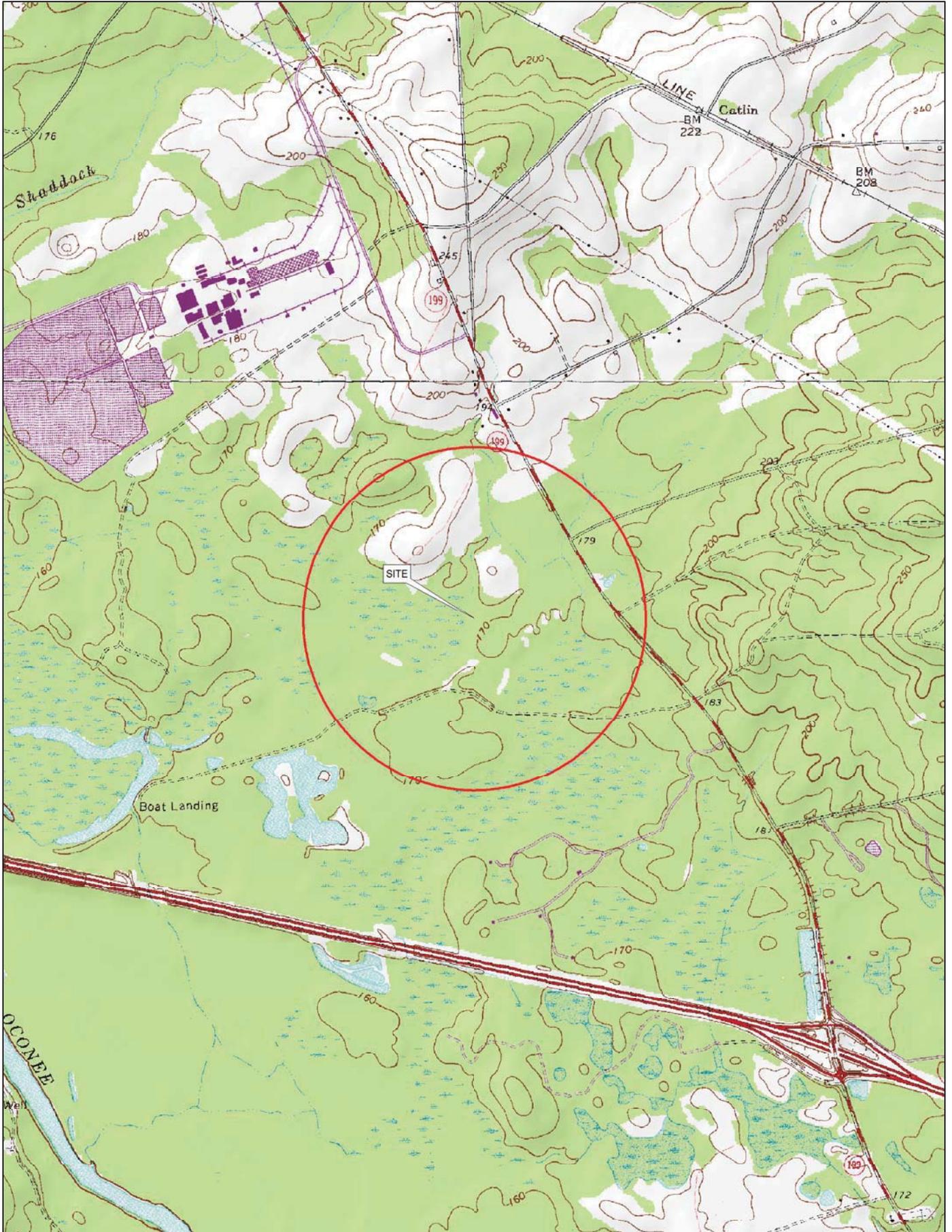
Photo facing northwest along S Hwy 199.



Photo facing northeast from intersection of S Hwy 199 and existing earthen/gravel access drive.



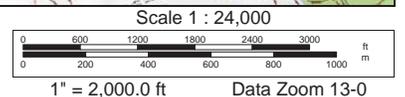
Photo of existing RCP spanning northwest to southeast beneath a portion of the existing earthen/gravel access drive and proposed ingress-egress & utility easement.



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www.delorme.com



# PCT SE Paper GA

ATC # 201440

PCT SE Paper GA



1000 ft

## Sarah-Beth Miller

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**From:** Sarah-Beth Miller  
**Sent:** Tuesday, December 08, 2015 5:35 PM  
**To:** Fisher, Barbara  
**Cc:** Spencer, Leslie  
**Subject:** RE: PCT SE Paper GA Tribe Responses to proposed Phase II SOW (Laurens HP-151029-005)  
**Attachments:** Official Communication Record - United Keetoowah Band of Cherokee Indians 12-8-15.pdf

Hi Barbara and Leslie,

We have received another response from a tribe regarding the proposed Phase II SOW for the PCT SE Paper GA site in Laurens County identified as HPD Project: HP-151029-005.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

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**From:** Fisher, Barbara [<mailto:Barbara.Fisher@dnr.ga.gov>]  
**Sent:** Monday, December 07, 2015 2:12 PM  
**To:** Sarah-Beth Miller  
**Cc:** Spencer, Leslie  
**Subject:** RE: PCT SE Paper GA Tribe Responses to proposed Phase II SOW (Laurens HP-151029-005)

Thanks Sarah-Beth!

### **Barbara L. Fisher, MHP**

#### **Environmental Review Historian - Transportation**

Environmental Review & Preservation Planning

Historic Preservation Division | Georgia Department of Natural Resources

[Barbara.Fisher@dnr.ga.gov](mailto:Barbara.Fisher@dnr.ga.gov) | P 770.389.7854

---

**From:** Sarah-Beth Miller [<mailto:sbmiller@tepgroup.net>]  
**Sent:** Monday, December 07, 2015 2:06 PM  
**To:** Fisher, Barbara <[Barbara.Fisher@dnr.ga.gov](mailto:Barbara.Fisher@dnr.ga.gov)>  
**Cc:** Spencer, Leslie <[Leslie.Spencer@dnr.ga.gov](mailto:Leslie.Spencer@dnr.ga.gov)>  
**Subject:** RE: PCT SE Paper GA Tribe Responses to proposed Phase II SOW (Laurens HP-151029-005)

Hi Barbara and Leslie,

We have received two more responses from tribes regarding the proposed Phase II SOW for the PCT SE Paper GA site in Laurens County identified as HPD Project: HP-151029-005.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

**From:** Fisher, Barbara [<mailto:Barbara.Fisher@dnr.ga.gov>]  
**Sent:** Thursday, December 03, 2015 12:23 PM  
**To:** Sarah-Beth Miller  
**Cc:** Spencer, Leslie  
**Subject:** RE: PCT SE Paper GA Tribe Responses to proposed Phase II SOW (Laurens HP-151029-005)

Thank you Sarah-Beth, we will add these responses to our files.

**Barbara L. Fisher, MHP**  
**Environmental Review Historian - Transportation**  
Environmental Review & Preservation Planning  
Historic Preservation Division | Georgia Department of Natural Resources  
[Barbara.Fisher@dnr.ga.gov](mailto:Barbara.Fisher@dnr.ga.gov) | P 770.389.7854

---

**From:** Sarah-Beth Miller [<mailto:sbmiller@tepgroup.net>]  
**Sent:** Thursday, December 03, 2015 12:22 PM  
**To:** Fisher, Barbara <[Barbara.Fisher@dnr.ga.gov](mailto:Barbara.Fisher@dnr.ga.gov)>  
**Cc:** Spencer, Leslie <[Leslie.Spencer@dnr.ga.gov](mailto:Leslie.Spencer@dnr.ga.gov)>  
**Subject:** RE: PCT SE Paper GA Tribe Responses to proposed Phase II SOW (Laurens HP-151029-005)

Hi Barbara and Leslie,

I have attached three responses from tribes regarding the proposed Phase II SOW for the PCT SE Paper GA site in Laurens County identified as HPD Project: HP-151029-005. We are still waiting to hear back from five tribes; however we have scheduled the Phase II Archaeological field work to commence the week of 12/14/15-12/18/15. I will send you remaining responses from tribes as we get them.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))  
326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

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**From:** Sarah-Beth Miller  
**Sent:** Thursday, November 19, 2015 3:15 PM  
**To:** Fisher, Barbara  
**Cc:** 'leslie.spencer@dnr.ga.gov'  
**Subject:** PCT SE Paper GA Tribe Responses to proposed Phase II SOW

Hi Barbara,

I have attached two responses from tribes regarding the proposed Phase II SOW.

Additionally, when we reached out to the Tuscarora Nation on 10-14-15, they stated that they did not have any affiliation for any counties in Georgia and therefore had no interest in the site.

We are still waiting to hear back from eight (8) more tribes but I will send you their responses as soon as they come in.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

[Civil](#) | [Surveying](#) | [Environmental](#) | [PM&E](#) | [Structural](#) | [Inspections](#) | [Geotechnical and Material Testing](#) | [Construction](#) | [Renewable Energy](#)



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS  
COMMISSIONER

February 12, 2016

DR. DAVID CRASS  
DIVISION DIRECTOR

Sara-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals Inc.  
326 Tryon Road  
Raleigh, NC 27603-3530

**RE: Cell Tower: 155' Monopole, South Highway 199 and CR 106, Dublin  
Laurens County, Georgia  
HP-151029-005**

Dear Ms. Miller:

The Historic Preservation Division (HPD) has reviewed the draft archaeological report entitled, *Site 9LS337 Phase II Investigation PCT SE Paper GA Tower Site, Laurens County, Georgia*, dated January 2016. Our review is in accordance with the 2005 Nationwide Programmatic Agreement (NPA) among the Federal Communications Commission, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation, for review under the National Historic Preservation Act of 1966, as amended (NHPA).

Based on the information contained in the report, HPD finds that archaeological site 9LS337 is of unknown eligibility for listing in the National Register of Historic Places (NRHP) and that the portion of the site located within the area of potential effects (APE) does not retain sufficient integrity to contribute to the overall eligibility of the site. Should project plans change, HPD recommends completing additional archaeological testing. Please mail one electronic copy of the archaeological report to HPD. Please ensure the electronic copy is an optical character enabled .pdf. For your information, the electronic file will be uploaded to the Georgia Archaeological Site File at the University of Georgia, Athens for permanent retention.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any future changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning.

Please refer to project number **HP-151029-005** in any future correspondence regarding this project. If we may be of further assistance, please contact Jennifer Bedell, Archaeological Compliance Unit Manager, by phone at (770) 389-7861 or by email at [Jennifer.bedell@dnr.ga.gov](mailto:Jennifer.bedell@dnr.ga.gov) or Barbara Fisher, Environmental Review Historian, by phone at (770) 389-7854 or by email at [Barbara.Fisher@dnr.ga.gov](mailto:Barbara.Fisher@dnr.ga.gov).

Sincerely,

Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

JAD/blf

cc: Robin Nail, Heart of Georgia-Altamaha Regional Commission

# THE COURIER HERALD

STATE OF GEORGIA

COUNTY OF LAURENS

Legal No. 16-370  
American Towers, LLC - 150 ft telecommunication Tower

## AFFIDAVIT OF PUBLISHER

Personally appeared before me, the undersigned officer, duly authorized to administer oaths in said State and County, Cheryl Gay who, having been duly sworn, deposes and says that he/she is authorized to make this affidavit, and that the legal notice was published in The Courier Herald, a local newspaper of general circulation in Dublin, Georgia on August 13, 20, 2016.

This 8<sup>th</sup> day of November, 2016.

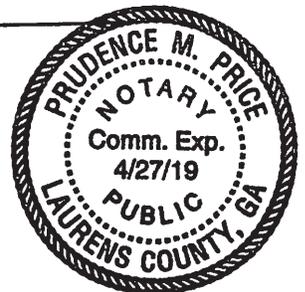
Cheryl Gay  
AGENT THE COURIER HERALD

Sworn to and subscribed before me

this 8<sup>th</sup> day of November, 2016

Notary Public Prudence M. Price

My Commission Expires: 04-27-19



**PUBLIC NOTICE**

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances), monopole telecommunications tower north of a portion of I-16, south of a portion of Papermill Rd., and west of a portion of S Hwy 199, Dublin, Laurens County, GA; Tax Parcel: 203 064. The tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30ft buffer surrounding the lease area. American Towers LLC seeks comments from all interested persons on any potential significant impact the proposed action could have on the quality of the human environment pursuant to 47 C.F.R. Section 1.1307, including potential impacts to historic or cultural resources that are listed or eligible for listing in the National Register of Historic Places.

Interested persons may review the project application pending with the Federal Communications Commission (FCC) at [www.fcc.gov/asr/applications](http://www.fcc.gov/asr/applications) by entering Form 854 File No. A1046433. Interested persons may comment or raise environmental impact concerns about the proposed action by filing a Request for Environmental Review with the FCC. The FCC strongly encourages all interested parties to make such filings online, following the instructions found at [www.fcc.gov/asr/environmentalrequest](http://www.fcc.gov/asr/environmentalrequest). Paper filings can be sent to: FCC Requests for Environmental Review, Attn: Ramon Williams, 445 12th Street SW, Washington, DC 20554. The Request must also be sent to American Towers LLC, by e-mailing a copy to [enviro.services@americantower.com](mailto:enviro.services@americantower.com) or mailing a copy to: American Tower, 10 Presidential Way, Woburn, MA 01801 ATTN: Environmental Compliance. Requests or comments should be limited to environmental and historic/cultural resource impact concerns, and must be received on or before September 12, 2016. This invitation to comment is separate from any local planning/zoning process that may apply to this project.

August 13, 20, 2016

# THE COURIER HERALD

STATE OF GEORGIA

COUNTY OF LAURENS

Legal No. 15-1575

American Towers, LLC

## AFFIDAVIT OF PUBLISHER

Personally appeared before me, the undersigned officer, duly authorized to administer oaths in said State and County, Cheryl Gay who, having been duly sworn, deposes and says that he/she is authorized to make this affidavit, and that the legal notice was published in The Courier Herald, a local newspaper of general circulation in Dublin, Georgia on July 11, 18, 25, August 1, 8, 2015.

This 8<sup>th</sup> day of October, 2015.

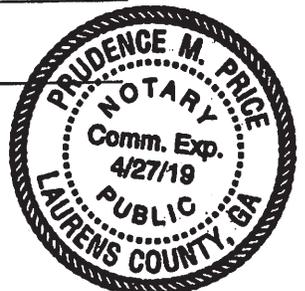
Cheryl Gay  
AGENT THE COURIER HERALD

Sworn to and subscribed before me

this 8<sup>th</sup> day of October, 2015

Notary Public Prudence M. Price

My Commission Expires: 04-27-19



15-1575

American Towers LLC is proposing to construct a 150-ft (160-ft with appurtenances), monopole telecommunications tower located north of a portion of I-16, south of a portion of Papermill Rd., and west of a portion of S Hwy 199, Dublin, Laurens County, GA; Tax Parcel: 203 064. The tower facility will include a 100-ft x 100-ft lease area and associated easements, along with a 30ft buffer surrounding the lease area. American Towers LLC seeks comments from all interested persons on any potential significant impact the proposed action could have on the quality of the human environment pursuant to 47 C.F.R. Section 1.1307, including potential impacts to historic or cultural resources that are listed or eligible for listing in the National Register of Historic Places. Interested persons may comment or raise concerns about the proposed action by submitting an e-mail to [enviro.services@americantower.com](mailto:enviro.services@americantower.com). Paper comments can be sent to: American Towers LLC, Attn: Environmental Compliance, 10 Presidential Way, Woburn, MA 01801. Requests or comments should be limited to environmental and historic/cultural resource impact concerns, and must be received on or before August 10, 2015. This invitation to comment is separate from any local planning/zoning process that may apply to this project.

July 11, 18, 25, August 1, 8, 2015

## **Appendix 4.**

# **Native American Tribe Documentation**



## Tower Construction Notification

[FCC](#) > [WTB](#) > Tower Construction Notification

[FCC Site Map](#)

Logged In: ([Log Out](#)) [Section 106](#)

### Tower Construction Notification New Notification

[Notifications Home](#)

Your Notification has been successfully submitted to the FCC. The date for this Notification is 06/26/2015. Your Notification ID number is **128471**. Please make a note of this Notification ID — print out this page for your records. A confirmation of this submitted notification will also be emailed to the email address specified in your notification.

This system is intended to facilitate consultation under Section 106 of the National Historic Preservation Act by providing early notification of proposed construction to Tribes and State Historic Preservation officers. This system is not to be used in place of Section 106 consultation, and use of this notification system in itself does not satisfy parties' obligations with respect to historic preservation review under the Commission's rules.

**Please note: the submission of this notification is NOT to be considered a 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.

**ASR Help**

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**ASR Online Systems**

[TOWAIR](#)- [CORES/ASR Registration](#) - [ASR Online Filing](#) - [Application Search](#) - [Registration Search](#)

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Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
[More FCC Contact Information...](#)

Phone: 1-877-480-3201  
TTY: 1-717-338-2824  
Fax: 1-866-418-0232  
[Submit Help Request](#)

- [Web Policies & Privacy Statement](#)  
- [Required Browser Plug-ins](#)  
- [Customer Service Standards](#)  
- [Freedom of Information Act](#)

## Sarah-Beth Miller

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**From:** towernotifyinfo@fcc.gov  
**Sent:** Friday, June 26, 2015 12:39 PM  
**To:** Sarah-Beth Miller  
**Subject:** Proposed Tower Structure Info - Email ID #4258587

Dear Sarah Beth Miller,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 06/26/2015

Notification ID: 128471  
Tower Owner Individual or Entity Name: American Towers LLC  
Consultant Name: Sarah Beth Miller  
Street Address: 326 Tryon Road  
City: Raleigh  
State: NORTH CAROLINA  
Zip Code: 27603  
Phone: 919-661-6351  
Email: [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)

Structure Type: MTOWER - Monopole  
Latitude: 32 deg 29 min 24.2 sec N  
Longitude: 82 deg 50 min 0.4 sec W  
Location Description: S Hwy 199  
City: Dublin  
State: GEORGIA  
County: LAURENS  
Detailed Description of Project:  
Ground Elevation: 51.2 meters  
Support Structure: 45.7 meters above ground level  
Overall Structure: 48.8 meters above ground level  
Overall Height AMSL: 100 meters above mean sea level

## Sarah-Beth Miller

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**From:** towernotifyinfo@fcc.gov  
**Sent:** Friday, July 03, 2015 3:04 AM  
**To:** Sarah-Beth Miller  
**Cc:** Jonathan.Jonas@fcc.gov; diane.dupert@fcc.gov  
**Subject:** NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #4259726

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

The information you provided was forwarded to the following Tribal Nations and NHOs. If a Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

1. THPO Linda P Langley - Coushatta Indian Tribe - Elton, LA - electronic mail

Details: The Coushatta Tribe of Louisiana has implementing a paperless review process for all new applications. Beginning November 20, 2013, we will no longer mail initial letters of interest, invoices, receipts for payments, or determination letters.

In order to expedite the review process, we are requesting that you upload the following information for each new or modified TCNS application to your Dropbox folder: New or existing tower site, site name & number, legal description or physical address of site, photographs in contour directions, topographic or quadrangle maps, height and type of tower, complete FCC Form 620 or 621, Phase 1 archaeological survey, and specific discussion of mitigation plans for any

traditional cultural properties identified. Please be sure to identify and group information by the project TCNS application number.

Our research and review fee is \$500.00 per TCNS application. Please make checks payable to the Coushatta Tribe of LA, and mail them to the Coushatta Heritage Dept., PO Box 10, Elton, LA 70532.

2. 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 IMMEDIATELY notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction.

3. Cultural Preservation Officer Kara J Gann - Kialegee Tribal Town - Wetumpka, OK - electronic mail

Details: The Kialegee Tribal Town charges a \$1000 review fee for all projects within a TCNS# (in the event there are more than one with in the TCNS#)involving new constructions, and \$600 per collocation site. Please send payment in a timely manner.

Submit your Form 620 or 621 by Email to [kialegeettcpo@gmail.com](mailto:kialegeettcpo@gmail.com). Please ensure your submission includes photographs, maps, archival research, archaeological reports, and relevant project information.

Please send all checks with TCNS# on it to our Headquarters, to the attention of our tribal leader, Mekko Jeremiah Hobia. Please make the checks payable to the KIALEGEE TRIBAL TOWN, CULTURAL PRESERVATION PROGRAM, and send to:

Mekko Jeremiah Hobia  
Kialegee Tribal Town  
P.O. Box 332  
Wetumpka, OK 74883

Thank you!

Sincerely,  
Kara Gann, Cultural Preservation Officer Kialegee Tribal Town  
(405) 452-3262

4. Historic Preservation Officer Seminole Nation - Seminole Nation of Oklahoma - Wewoka, OK - electronic mail

Details: If the Applicant/tower builder receives no response from the Seminole Nation of Oklahoma within 30 days after notification through TCNS, the Seminole Nation of Oklahoma has no interest in participating in pre-construction review

for the site. The Applicant/tower builder, however, must IMMEDIATELY notify the Seminole Nation 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.

5. THPO Emman Spain - Muscogee Creek Nation - Okmulgee, OK - electronic mail and regular mail

Details: **\*\*PLEASE NOTE OUR NEW REQUIREMENT\*\***: Because the TCNS Details do not provide enough information for us to conduct a proper assessment on behalf of the Muscogee Creek Nation (MCN) of Oklahoma, we, instead, require that you submit with your original notification (**\*NEW REQUIREMENT\***), the following as EMAIL attachments: 1) a copy of the 620/621 Form, 2) photos, 3) a map that clearly shows the proposed site location, and 4) a copy of the archaeological assessment or survey.

Please treat this request for additional information material as a routine supplement to the TCNS Details Notification for each of your projects that fall within our Tribe's areas of geographic interest.

EFFECTIVE 01/01/2012

**\*\*PLEASE NOTE OUR NEW REVIEW FEES\*\***: Due to the high volume of 620/621 review requests, it has become necessary for the MCN to initiate an increase for the Cultural Resource Review service fee. Please contact MCN for details. Upon attaching all attachments as outlined above the completed 620/621 form and receipt of the review fee, a letter of decision will be sent if all the requirements are met. However, if you do not receive a response within 25 days from the date the payment and the completed 620/621 forms were sent to us, please contact us by phone or email to confirm review status.

Thank you.

Emman Spain, Deputy THPO  
Muscogee Creek Nation  
918-732-7835  
mcn-tcns@mcn-nsn.gov

6. Acting THPO Lisa C LaRue-Baker - United Keetoowah Band of Cherokee Indians - Tahlequah, OK - electronic mail and regular mail

Details: In order to be in compliance with Section 106 of the NHPA, the United Keetoowah Band of Cherokee Indians in Oklahoma reviews all projects within 30 days. This review is to identify sites in the APE which are known to the tribe and are important, sacred and historic to our tribe.

Invoices are sent when we receive notification from the FCC which initiates the Section 106 process. You will receive your review through the TCNS system. All invoices are due within 30 days, as well.

SHOULD OUR SITE BE ABANDONED, we must be notified immediately. Please let us know by contacting ukbthpo-larue at yahoo.com Unfortunately, the FCC does not notify us when a site is abandoned, and if we receive initiation, the project is reviewed by us within 30 days. If you have not notified us of the cancellation prior to our review, you are responsible for paying for the work performed for your project.

NON PAYMENT: Any payments over 90 days late will be considered non-payment and will result in termination of reviews for consultant/tower company (unless handled directly by the Federal Agency) and will be turned over to tribal court to be recommended for assignment to collection agency and notification to the Better Business Bureau. Future reviews for the consultant/tower company will require PREPAYMENT.

Our review fee of 500.00 is for ALL reviews, including colocations and resites, as well as making determinations if properties are potentially eligible for the NRHP. Cancelled projects are still subject to fee, as the UKB reviews the project in good faith, even if the site is later abandoned. REVIEWS AND INVOICES ARE BASED ON OFFICIAL REPORTS OF TOWERS SUBMITTED DELIVERED TO THE UKB BY THE FCC. If a site is cancelled or abandoned within the first week of listing on the TCNS system, PLEASE CONTACT THE UKB (Lisa Baker) at ukbthpo-larue@yahoo.com to CANCEL to avoid review and invoicing. We respond within expected timeframes, we expect payment in 30 days, as well.

YOUR SECTION 106 obligations with our tribe are not fulfilled until you receive our written response indicating our determination. Please do not hamper your client's ability to receive reviews and responses by becoming late with your payments!!

ALL CORRESPONDENCE COMING FROM TCNS AFTER YOUR RECEIVE YOUR INITIAL FILING NOTIFICATION ARE NOT AUTOMATED, BUT GENERATED INDIVIDUALLY AND AS NEEDED BY THE TRIBE, USING THE TCNS SYSTEM AS THE DELIVERY VEHICLE.

#### 7. THPO Robin Dushane - Eastern Shawnee Tribe of Oklahoma - Wyandotte, OK - regular mail

Details: NOTE: CHANGE IN CONSULTATION PROCEDURES AND FEE

The Cultural Preservation Office of the Eastern Shawnee Tribe of Oklahoma requires the following information and fees regarding all proposed FCC projects.

Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation accompanied with a CD version.

Please submit by US postal mail or other parcel carrier all of the following information for all FCC projects:

1. A 1-page cover letter with the following information:

- a) TCNS number
- b) Company name
- c) Project name, city, county, state
- d) Project type
- e) UTM coordinates using WGS84 (G1150)
- f) Total area surveyed in acres
- g) Contact information.

2. Professional cultural/archaeological resource survey report.

3. Aerial and color USGS topographic maps locating project area within the state, county, and local area.

4. Aerial, color USGS topographic, or planimetric maps locating tower site, APE, access road, utility easement, guy wire locations surveyed, surveyed staging areas, and known archaeological/historic sites.

5. Project site plan map depicting labeled shovel test locations.

6. Shovel test log.

7. Site photographs.

8. A copy of the review letter or TCNS e-response from the State Historic Preservation Office and all other state-mandated review offices.

9. Submit a \$550.00 per/tower fee for administration, data processing, handling, research, and review. Collocations, PTC poles, and projects in previously disturbed locations require a \$100.00 fee. Make the check payable to the Eastern Shawnee Tribe of Oklahoma. On the memo line write all TCNS numbers.

NOTE: Effective November 1, 2014, for TCNS #119606 and forward, regarding collocations, PTC poles, and projects in previously disturbed locations; the administration, data processing, handling, research and review fee will decrease to \$100.00.

10. THE EASTERN SHAWNEE TRIBE'S NEW CONSULTATION PROCEDURES DOCUMENT is available by email and is highly recommended for guidance. Send an email to Dee Gardner at: [celltower@estoo.net](mailto:celltower@estoo.net).

If the applicant/tower builder receives no response from the Eastern Shawnee Tribe of Oklahoma within 30 days after notification through TCNS, the Eastern Shawnee 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 Eastern Shawnee 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. Cultural Advisor Ace Buckner - Alabama Quassarte Tribal Town - Wetumka, OK - electronic mail and regular mail

Details: The Alabama-Quassarte Tribal Town's TCNS matters are being handled by Ace Buckner, Culture Advisor. The Alabama-Quassarte Tribal Town has a \$500 review fee for new builds, and a \$300 review fee for collocations. Please

make checks payable to : "AQEDA Tribal Heritage Center" and send to AQEDA Tribal Heritage Center, P.O. Box 186, Wetumka, Oklahoma, 74883."

Thank you.

Ace J. Buckner, Culture Advisor

Alabama-Quassarte Tribal Town Heritage Center ajbuckner14@gmail.com

9. THPO/NAGPRA Representative Charles Coleman - Thlopthlocco Tribal Town - Weleetka, OK - electronic mail and regular mail

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 June 2006, 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 a final 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 notification as 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 January 2008 - 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. THPO Robert Thrower - Poarch Band of Creek Indians - Atmore, AL - electronic mail and regular mail

If the applicant/tower builder receives no response from the Poarch Band of Creek Indians within 30 days after notification through TCNS, the Poarch Band of Creek Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however,

must immediately notify the Poarch Band of Creek Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

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. SHPO Lee Warner - Alabama Historical Commission - Montgomery, AL - electronic mail

13. Deputy SHPO Elizabeth Ann Brown - Alabama Historical Commission - Montgomery, AL - electronic mail

14. Environmental Review Specialist Michelle Volkema - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

15. Division Director W. Ray Luce - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

16. Deputy SHPO Richard Cloues - Historic Preservation Division - Atlanta, GA - electronic mail and regular mail

17. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - Raleigh, NC - electronic mail

18. Deputy SHPO David Brook - Historic Preservation Office - Raleigh, NC - electronic mail

19. Environmental Review Specialist Jennifer Dixon - Georgia Historic Preservation Division - Atlanta, GA - electronic mail

"Exclusions" above set forth language provided by the Tribal Nation or SHPO. These exclusions may indicate types of PTC wayside pole notifications that the Tribal Nation or SHPO does not wish to review. TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. Exclusions may also set forth policies or procedures of a particular Tribal Nation or SHPO (for example, types of information that a Tribal Nation routinely requests, or a policy that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above 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: 06/26/2015  
Notification ID: 128471  
Tower Owner Individual or Entity Name: American Towers LLC  
Consultant Name: Sarah Beth Miller  
Street Address: 326 Tryon Road  
City: Raleigh  
State: NORTH CAROLINA  
Zip Code: 27603  
Phone: 919-661-6351  
Email: sbmiller@tepgroup.net

Structure Type: MTOWER - Monopole  
Latitude: 32 deg 29 min 24.2 sec N  
Longitude: 82 deg 50 min 0.4 sec W  
Location Description: S Hwy 199  
City: Dublin

State: GEORGIA

County: LAURENS

Detailed Description of Project:

Ground Elevation: 51.2 meters

Support Structure: 45.7 meters above ground level

Overall Structure: 48.8 meters above ground level

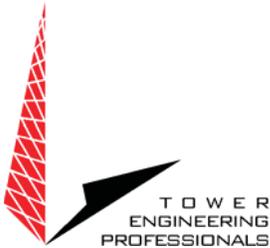
Overall Height AMSL: 100.0 meters above mean sea level

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



October 26, 2015

Coushatta Indian Tribe  
Coushatta Heritage Department  
P.O. Box 10  
Elton, LA 70532

Attn: Linda P Langley – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Langley:

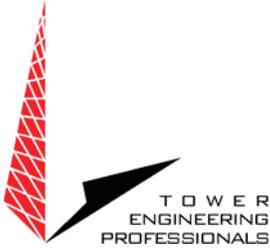
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE. The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

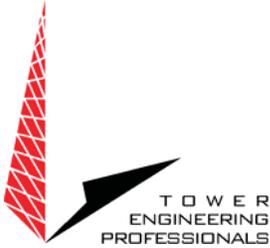
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Couthatta Indian Tribe has interest in this proposed**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**telecommunications tower site/project, we request approval and/or comments from the Couthatta Indian Tribe regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



# COUSHATTA TRIBE OF LOUISIANA

HERITAGE DEPARTMENT

12/3/2015

Sarah-Beth Miller  
Tower Engineering  
326 Tyron Road  
Raleigh, NC 27603

Dear Ms. Miller:

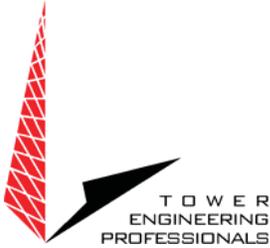
By this correspondence I am concurring with your findings that archaeological sites 9LS335 and 9LS336 do not retain sufficient integrity to contribute to the eligibility for listing in the National Register of Historic Places. The Coushatta Tribe also concurs that archaeological site 9LS337 is of unknown eligibility for listing in the National Register of Historic Places without further archaeological testing. The Coushatta Tribe concurs that the recommended Phase II work planned for site 9LS337 is adequate to determine the site's National Register eligibility.

Sincerely,

A handwritten signature in blue ink that reads "Linda Langley".

Linda Langley, Ph.D.  
Tribal Historic Preservation Officer

**KOWASSAATON NATHIHILKAS—LET US SPEAK KOASATI**



January 14, 2016

Coushatta Indian Tribe  
Coushatta Heritage Department  
P.O. Box 10  
Elton, LA 70532

Attn: Linda P Langley – THPO

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

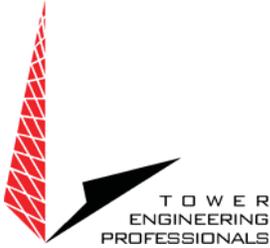
Ms. Langley:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Coushatta Indian Tribe on October 26, 2015 and we received your approval of the Phase II SOW on 12/3/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB" followed by a flourish.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Coushatta Tribe of Louisiana

26080  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	500.00	500.00		500.00

10630 53rd TEP AP Accoun... TCNS# 128471

500.00

7015 1520 0000 1776 0697

**U.S. Postal Service**  
**CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**OFFICIAL USE**

Certified Mail Fee \$ \_\_\_\_\_

Extra Services & Fees (check box, add fee as appropriate)

Return Receipt (hardcopy) \$ \_\_\_\_\_

Return Receipt (electronic) \$ \_\_\_\_\_

Certified Mail Restricted Delivery \$ \_\_\_\_\_

Adult Signature Required \$ \_\_\_\_\_

Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage \$ \_\_\_\_\_

Total Postage and Fees \$ \_\_\_\_\_

Sent To Coushatta Tribe

Street and Apt. No. or PO Box No. P.O. Box 10

City, State, ZIP+4® Elton LA 70532

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

*Phase II results*

Postmark Here

*PCT JE Paper GA*



# Coushatta Tribe Of Louisiana

Heritage Department

01/26/2016

Tower Engineering Professionals, Inc.  
326 Tryon Road  
Raleigh, North Carolina 27603

Dear To Whom It May Concern:

By this correspondence I am acknowledging receipt of your payment of \$500.00, in check number 26080, for TCNS # 128471 at S Hwy 199, Dublin, Laurens County, Georgia.

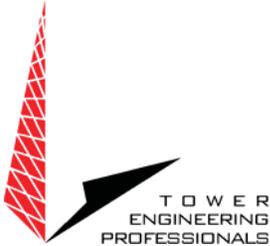
At this time, I know of no known sacred or ceremonial sites in the immediate area, and do not require further Section 106 consultation on this project. However, if any cultural resources, such as, bone, pottery, stone tools, etc, are found during the construction phase we may elect to discuss additional mitigation steps, including on-site monitoring. In the event that archaeological properties or human remains are discovered during construction, please stop work and contact us immediately consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

Sincerely,

A handwritten signature in blue ink that reads "Linda Langlely".

Linda Langlely, Ph.D.  
Tribal Historic Preservation Officer

Kowassaaton Natihilikas—Let us speak Koasati



October 26, 2015

Kialegee Tribal Town  
P.O. Box 332  
Wetumpka, OK 74883

Attn: Kara J Gann – Cultural Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

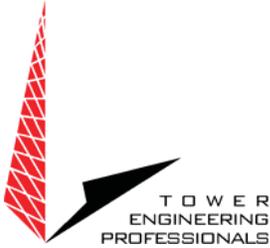
Ms. Gann:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

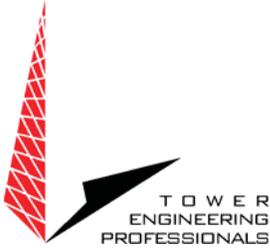
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Kialegee Tribal Town has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Kialegee Tribal Town regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



**10/8/2015**

This opinion is being provided by Kialegee Tribal Town's Cultural Advisor, pursuant to authority vested by the Kialegee Tribal Town Business Committee. The Kialegee Tribal Town is an independently Federally-Recognized Indian Nation headquartered in Wetumka, OK. The Tribal Town originated in southeastern United States, originated in Tennessee, North Carolina, South Carolina, and Georgia, Alabama and parts of Florida. Upon their removal in the mid-1800's, Kialegee people came to Oklahoma via land and river routes through the states of Alabama, Mississippi, Louisiana, Tennessee, Arkansas and into Oklahoma. I have researched historical, cultural, and sacred sites and have determined that your construction project should not have an adverse impact on our known historical or cultural sites. The Kialegee Tribal Town has no objection to the proposed construction of:

## **Communication Tower (FCC-TCNS #128471) M-Tower, S Hwy 199, Dublin, County of Laurens, Georgia**

The conditional release is being provided with the understanding that not all of the Kialegee Tribal Town's ancestral homeland and culturally-significant sites are presently known. If an inadvertent discovery of American Indian archaeological materials should occur during construction, you are hereby requested to please notify the Kialegee Tribal Town immediately so that a more thorough site evaluation may be conducted. Also, if, at any time, our data, files, and/or maps of any site, require that an in-person site review be conducted, and Tribal Representatives are required to travel to the site, airfare, area mileage, per diem, and lodging expenses must be paid by the Communication Tower Contractor.

### **Invoice**

By performing this preliminary cultural site assessment, Kialegee Tribal Town is providing a professional service, and therefore, must be compensated. As the contractor, you are cognizant of various expenses that are typically incurred in order to provide this type of professional service and opinion. Our review fee of **\$1000.00 per project per site** will be sufficient to cover our time and expenses. Thank you for your cooperation. Should you have any questions about this opinion, release or invoice, please contact Kara Gann at Kialegee Tribal Town (405)452-3262, or by e-mail [kialegeettcpo@gmail.com](mailto:kialegeettcpo@gmail.com). Payments should be made by check and be addressed to:

Kialegee Tribal Town  
Cultural Preservation Program  
P.O. Box 332  
Wetumka, OK 74883

## Sarah-Beth Miller

---

**From:** David Cook <dc13.dc4@gmail.com>  
**Sent:** Tuesday, December 01, 2015 10:25 AM  
**To:** Sarah-Beth Miller  
**Subject:** Re: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

After reviewing the documents sent, it does look like further study may be needed for the site. The Oconee area is a well documented area of interest for many tribes, many settlements were in that area prior to removal. While most of the settlements have been disturbed over the years, I do believe that most objects would be scattered around this proposed area. Keeping that in mind, I do believe that any major findings would initiate the NAGPRA process and all persons with interest would be notified. It would be hard to absolutely determine what tribe potentially would be affected. In our opinion, we do believe that further site evaluation would be warranted if more objects are found and determined to be Tribal in nature, we do believe that in the proposed project, all proper protocol would be followed and it is our opinion that the proposal can continue.

Thank you,

David Cook  
Tribal Administrator  
Kialegee Tribal Town  
405-452-3262 ext. 15

On Mon, Nov 30, 2015 at 3:57 PM, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

Mr. Cook,

Above are the additional attachments for the PCT SE Paper GA site. If the Kialegee Tribal Town has any interest in the site we request approval and/or comments regarding the proposed Work Plan for the Phase II Archaeological Assessment by 12/4/15.

Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road|Raleigh, NC 27603-3530|Office: [\(919\) 661-6351 ext. 5304](tel:9196616351)|Fax: [\(919\) 661-6350](tel:9196616350)|Mobile: [\(919\) 413-0918](tel:9194130918)

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**From:** Sarah-Beth Miller  
**Sent:** Monday, October 26, 2015 2:37 PM

To: [kialegettcpo@gmail.com](mailto:kialegettcpo@gmail.com)

Subject: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

Ms. Gann & Mr. Cook,

Please see additional attachments for the PCT SE Paper GA site TCNS # 128471 including the proposed Work Plan for the Phase II Archaeological Assessment.

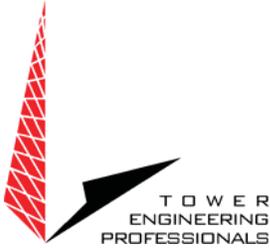
Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road|Raleigh, NC 27603-3530|Office:  [\(919\) 661-6351 ext. 5304](tel:(919)661-6351)|Fax:  [\(919\) 661-6350](tel:(919)661-6350)|Mobile:  [\(919\) 413-0918](tel:(919)413-0918)

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January 14, 2016

Kialegee Tribal Town  
P.O. Box 332  
Wetumpka, OK 74883

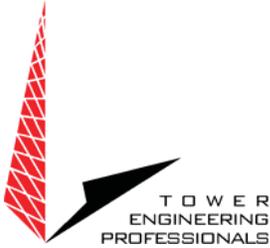
Attn: Mr. David Cook – Tribal Administrator

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Mr. Cook:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Kialegee Tribal Town on October 26, 2015 and we received your approval of the Phase II SOW on 12/1/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Kialegee Tribal Town

1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	1,000.00	1,000.00		1,000.00

10630 53rd TEP AP Accoun... TCNS# 128471

1,000.00

7015 1520 0000 1776 0635

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Certified Mail Fee \$	Phase II Results  Postmark Here  POT SE Paper GA
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To <u>Kialegee Tribal Town</u>	
Street and Apt. No., or PO Box No. <u>P.O. Box 332</u>	
City, State, ZIP+4® <u>Wetumpka, OK</u>	

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

## Sarah-Beth Miller

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**From:** David Cook <dc13.dc4@gmail.com>  
**Sent:** Thursday, February 18, 2016 2:44 PM  
**To:** Sarah-Beth Miller  
**Subject:** Re: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

My apologies, I thought you had received our conditional release and opinion regarding this site. I had sent that back in either late November or early December. We see no issue with this project continuing at this point.

On Wed, Feb 17, 2016 at 1:01 PM, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

Hi Mr. Cook,

Our records show that we have not received a response from the Kialegee Tribal Town for the Phase II Archaeological Assessment for TCNS # 128471. Would you mind checking on the status of this site?

Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office:  [\(919\) 661-6351 ext. 5304](tel:(919)661-6351) | Fax:  [\(919\) 661-6350](tel:(919)661-6350) | Mobile:  [\(919\) 413-0918](tel:(919)413-0918)

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**From:** Sarah-Beth Miller  
**Sent:** Thursday, January 14, 2016 2:17 PM  
**To:** 'David Cook' <[dc13.dc4@gmail.com](mailto:dc13.dc4@gmail.com)>  
**Cc:** '[kialegeettcpo@gmail.com](mailto:kialegeettcpo@gmail.com)' <[kialegeettcpo@gmail.com](mailto:kialegeettcpo@gmail.com)>  
**Subject:** RE: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

Mr. Cook,

I have attached a letter packet and the Phase II Archaeological Assessment for the proposed telecommunications tower site identified as PCT SE Paper GA (ATC # 201440) TCNS# 128471 to be located in Laurens County, GA. The results of the Phase II Archaeological Assessment indicate that no historic properties eligible for listing in the NRHP will be affected by the proposed communications tower site. Additionally, this information and the review fee check was mailed to your office via USPS on 1/14/16.

Please don't hesitate to contact me if you have any questions or need any additional information about the project.

Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

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---

**From:** Sarah-Beth Miller

**Sent:** Tuesday, December 01, 2015 11:34 AM

**To:** David Cook <[dc13.dc4@gmail.com](mailto:dc13.dc4@gmail.com)>

**Subject:** RE: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

Thank you and hope you do as well!

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office:  [\(919\) 661-6351 ext. 5304](tel:(919)661-6351) | Fax:  [\(919\) 661-6350](tel:(919)661-6350) | Mobile:  [\(919\) 413-0918](tel:(919)413-0918)

**From:** David Cook [<mailto:dc13.dc4@gmail.com>]

**Sent:** Tuesday, December 01, 2015 11:33 AM

**To:** Sarah-Beth Miller

**Subject:** Re: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

You are welcome. Thank you for the information, I look forward to hearing from you again. If I don't visit with you before, have a great holiday.

On Tue, Dec 1, 2015 at 10:17 AM, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

Hi Mr. Cook,

Thank you so much for your response. I appreciate you getting back to me so quickly. We hope to complete the Phase II Archaeological Evaluation field work before Christmas and have the results of the Phase II to you in January.

Thanks again,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: [\(919\) 661-6351 ext. 5304](tel:9196616351) | Fax: [\(919\) 661-6350](tel:9196616350) | Mobile: [\(919\) 413-0918](tel:9194130918)

**From:** David Cook [mailto:[dc13.dc4@gmail.com](mailto:dc13.dc4@gmail.com)]

**Sent:** Tuesday, December 01, 2015 10:25 AM

**To:** Sarah-Beth Miller

**Subject:** Re: FW: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

After reviewing the documents sent, it does look like further study may be needed for the site. The Oconee area is a well documented area of interest for many tribes, many settlements were in that area prior to removal. While most of the settlements have been disturbed over the years, I do believe that most objects would be scattered around this proposed area. Keeping that in mind, I do believe that any major findings would initiate the NAGPRA process and all persons with interest would be notified. It would be hard to absolutely determine what tribe potentially would be affected. In our opinion, we do believe that further site evaluation would be warranted if more objects are found and determined to be Tribal in nature, we do believe that in the proposed project, all proper protocol would be followed and it is our opinion that the proposal can continue.

Thank you,

David Cook

Tribal Administrator

Kialegee Tribal Town

[405-452-3262 ext. 15](tel:4054523262)

On Mon, Nov 30, 2015 at 3:57 PM, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

Mr. Cook,

Above are the additional attachments for the PCT SE Paper GA site. If the Kialegee Tribal Town has any interest in the site we request approval and/or comments regarding the proposed Work Plan for the Phase II Archaeological Assessment by 12/4/15.

Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road|Raleigh, NC 27603-3530|Office:  [\(919\) 661-6351 ext. 5304](tel:(919)661-6351)|Fax:  [\(919\) 661-6350](tel:(919)661-6350)|Mobile:  [\(919\) 413-0918](tel:(919)413-0918)

---

**From:** Sarah-Beth Miller  
**Sent:** Monday, October 26, 2015 2:37 PM  
**To:** [kialegeetcpo@gmail.com](mailto:kialegeetcpo@gmail.com)  
**Subject:** TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 2)

Ms. Gann & Mr. Cook,

Please see additional attachments for the PCT SE Paper GA site TCNS # 128471 including the proposed Work Plan for the Phase II Archaeological Assessment.

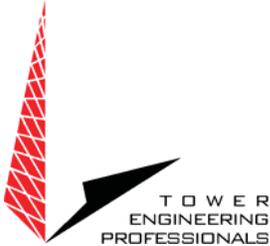
Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road|Raleigh, NC 27603-3530|Office:  [\(919\) 661-6351 ext. 5304](tel:(919)661-6351)|Fax:  [\(919\) 661-6350](tel:(919)661-6350)|Mobile:  [\(919\) 413-0918](tel:(919)413-0918)

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October 26, 2015

Seminole Nation of Oklahoma  
P.O. Box 1498  
Wewoka, OK 74884

Attn: Natalie Harjo – Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

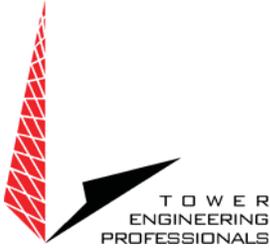
Ms. Harjo:

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TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



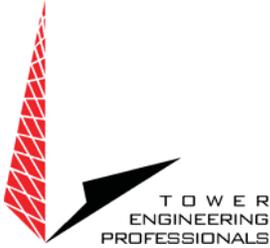
The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Seminole Nation of Oklahoma has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Seminole Nation of Oklahoma regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

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Phase II SOW  
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Postmark GA  
Seminole  
Nation of OK

Sent To **Natalie Harjo**  
 Street & Apt. No.,  
 or PO Box No. **P.O. BOX 1498**  
 City, State, ZIP+4 **WENOKA, OK 74884**



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## Sarah-Beth Miller

---

**From:** Sarah-Beth Miller  
**Sent:** Thursday, December 03, 2015 3:07 PM  
**To:** harjo.n@sno-nsn.gov  
**Subject:** PCT SE Paper GA (TCNS# 128471)

Ms. Harjo,

My name is Sarah-Beth Miller and I work with Tower Engineering Professionals in Raleigh, NC. I mailed a letter packet and attachments for a proposed telecommunications tower identified as PCT SE Paper GA (TCNS# 128471) to your office on October 26, 2015 and just wanted to follow up with you to see if you had any questions or concerns regarding the proposed project. Please let me know if you need any additional information or if you have interest in the proposed tower site by 12/4/15; otherwise we will assume the Seminole Nation of Oklahoma has no interest in the site.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

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## Sarah-Beth Miller

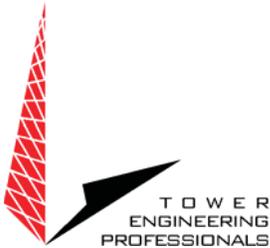
---

**From:** MAILER-DAEMON@server70.appriver.com  
**To:** harjo.n@sno-nsn.gov  
**Sent:** Thursday, December 03, 2015 3:07 PM  
**Subject:** Relayed: PCT SE Paper GA (TCNS# 128471)

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[harjo.n@sno-nsn.gov](mailto:harjo.n@sno-nsn.gov)

Subject: PCT SE Paper GA (TCNS# 128471)



January 14, 2016

Seminole Nation of Oklahoma  
P.O. Box 1498  
Wewoka, OK 74884

Attn: Natalie Harjo – Historic Preservation Officer

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

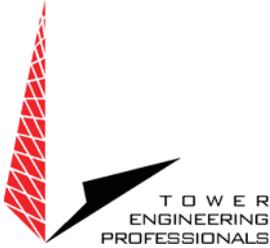
Ms. Harjo:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Seminole Nation of Oklahoma on October 26, 2015 and follow-up attempts were made on 11/30/15 & 12/3/15; however no response regarding the Phase II SOW from the Seminole Nation of Oklahoma has been received to date. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

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a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, and photographs have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

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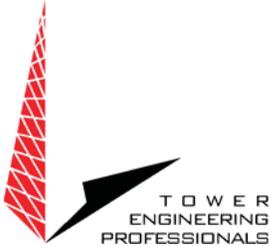
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October 26, 2015

Muscogee Creek Nation  
P.O. Box 580  
Hwy 75 & Loop 56  
Okmulgee, OK 74447

Attn: Corain Lowe – TCNS Coordinator

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

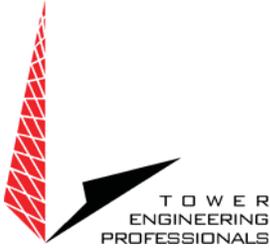
Ms. Lowe:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

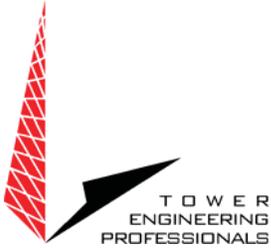
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Muscogee Creek Nation has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Muscogee Creek Nation regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



*Muscogee (Creek) Nation of Oklahoma  
Historical and Cultural Preservation*

**December 3, 2015**

Sarah-Beth Miller  
Tower Engineering Professionals  
326 Tryon Rd.  
Raleigh, NC 27603-5263

**RE: TCNS #128471  
PCT SE Paper GA  
S Hwy 199  
Dublin, Laurens County, GA 31027**

Dear Ms Miller,

In keeping with the Federal Communications Commission (FCC), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Muscogee (Creek) Nation has received notice of the proposed construction of a 160-foot tall monopole telecommunications tower, a proposed 30-foot wide access and utility easement, and a 100-foot by 100-foot lease area at the above referenced location.

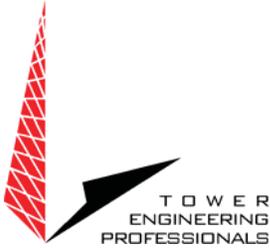
After reviewing all pertinent information and considering the amount of artifacts being discovered at this site, at this time Muscogee (Creek) Nation cannot concur with your findings until the Phase II scope of work is complete. Once Phase II scope of work is complete, please submit report and we will review again.

Should further information or comment be required please do not hesitate to contact me at (918) 732-7835, fax: (918) 758-0649, or by e-mail: [clowe@mcn-nsn.gov](mailto:clowe@mcn-nsn.gov)

Sincerely,

Corain Lowe-Zepeda, TCNS Coordinator  
Muscogee (Creek) Nation

*Muscogee (Creek) Nation Tribal Complex  
Highway 75 & Loop 56 • P.O. Box 580 • Okmulgee, OK 74447  
Phone: 918-732-7733 • Fax: 918-758-0649 • Web: [www.muscogeenation-nsn.gov](http://www.muscogeenation-nsn.gov)*



January 14, 2016

Muscogee Creek Nation  
P.O. Box 580  
Hwy 75 & Loop 56  
Okmulgee, OK 74447

Attn: Corain Lowe-Zepeda– TCNS Coordinator

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

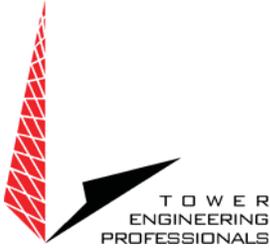
Ms. Lowe-Zepeda:

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Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

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a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB" followed by a stylized flourish.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Muscogee Creek Nation

26086  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	500.00	500.00		500.00

10630 53rd TEP AP Account... TCNS# 128471

500.00

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*Muscogee Creek Nation*  
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*Okmulgee, OK 74447*

7015 1520 0000 1776 0604



*Muscogee (Creek) Nation of Oklahoma  
Historical and Cultural Preservation*

**February 5, 2016**

Sarah-Beth Miller  
Tower Engineering Professionals  
326 Tryon Rd.  
Raleigh, NC 27603-5263

**RE: TCNS #128471  
PCT SE Paper GA  
S Hwy 199  
Dublin, Laurens County, GA 31027**

Dear Ms Miller,

In keeping with the Federal Communications Commission (FCC), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Muscogee (Creek) Nation has received notice of the proposed construction of a 155-foot tall monopole telecommunications tower within a proposed 100-foot by 100-foot American Towers LLC compound lease area, and a proposed access & utility easement as specified in report at the above referenced location.

After reviewing all pertinent information and our records, at this time we are currently unaware of any historic, cultural, religious or sacred sites at this exact location. Therefore, we recommend a finding of “**No Historic Properties Effectuated**” for the proposed undertaking.

Should further information or comment be required please do not hesitate to contact me at (918) 732-7835, fax: (918) 758-0649, or by e-mail: [clowe@mcn-nsn.gov](mailto:clowe@mcn-nsn.gov)

Sincerely,

Corain Lowe-Zepeda, TCNS Coordinator  
Muscogee (Creek) Nation

*Muscogee (Creek) Nation Tribal Complex  
Highway 75 & Loop 56 • P.O. Box 580 • Okmulgee, OK 74447  
Phone: 918-732-7733 • Fax: 918-758-0649 • Web: [www.muscogeenation-nsn.gov](http://www.muscogeenation-nsn.gov)*



*Muscogee (Creek) Nation of Oklahoma  
Historical and Cultural Preservation*

**February 5, 2016**

Sarah-Beth Miller  
Tower Engineering Professionals  
326 Tryon Rd.  
Raleigh, NC 27603-5263

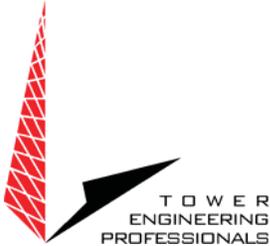
**RE: TCNS #128471  
PCT SE Paper GA  
S Hwy 199  
Dublin, Laurens County, GA 31027**

620 Cultural Resource Review

PAID 1/8/2016	Check #26086	\$500.00
Balance		\$ 0.00

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*Muscogee (Creek) Nation Tribal Complex  
Highway 75 & Loop 56 • P.O. Box 580 • Okmulgee, OK 74447  
Phone: 918-732-7733 • Fax: 918-758-0649 • Web: [www.muscogeenation-nsn.gov](http://www.muscogeenation-nsn.gov)*



October 26, 2015

United Keetoowah Band of Cherokee Indians  
P.O. Box 746  
Tahlequah, OK 74465

Attn: Lisa LaRue-Baker

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

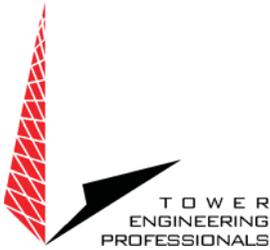
Ms. LaRue-Baker:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

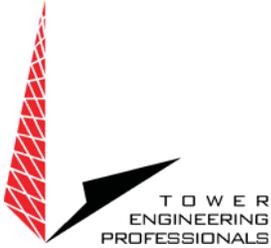
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the United Keetoowah Band of Cherokee Indians has interest in this proposed telecommunications tower site/project, we request approval and/or**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**comments from the United Keetoowah Band of Cherokee Indians regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Official Communication Record

Name: Ms. Lisa LaRue-Baker

Affiliation: THPO for United Keetoowah Band of Cherokee Indians

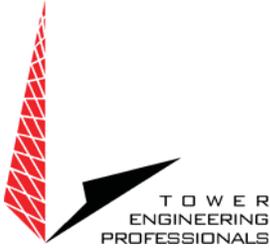
Telephone #: 918-822-1952

Conversation Date: 12/8/15 @ 5:00 P.M.

Completed by: Sarah-Beth Miller of Tower Engineering Professionals, Inc.

Comments:

Ms. LaRue-Baker stated that she did not have any issues with the proposed Phase II SOW associated with the proposed PCT SE Paper GA site (TCNS # 128471). However the United Keetoowah Band of Cherokee Indians is interested in the site and requests to see the findings of the Phase II Archaeological Evaluation.



January 14, 2016

United Keetoowah Band of Cherokee Indians  
P.O. Box 746  
Tahlequah, OK 74465

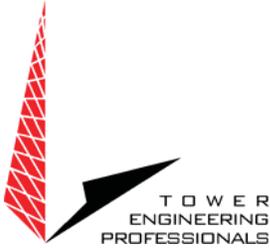
Attn: Lisa LaRue-Baker

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. LaRue-Baker:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the United Keetoowah Band of Cherokee Indians on October 26, 2015 and we received your approval of the Phase II SOW on 12/8/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB" followed by a stylized flourish.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

United Keetoowah Band

26091  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
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Sent To **United Keetoowah Band of Cherokee Indians**

Attn: Ms. Lisa C LaRue-Baker

Street and Ap **PO Box 746**

City, State, Zi **Tahlequah, OK 74465**

PS Form 3800, April 2015 PSN 7530-02-000-9000-7 See Reverse for Instructions

*Phare II*  
*Results*  
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 Here  
*PCT SE Paper*  
*GA*

7015 1520 0000 1776 0642

## Sarah-Beth Miller

---

**From:** karen pritchett <kpritchett@unitedkeetoowahband.org>  
**Sent:** Friday, February 19, 2016 2:32 PM  
**To:** Sarah-Beth Miller; Joe Bunch  
**Subject:** RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

The United Keetoowah Band of Cherokee Indians in Oklahoma has reviewed your project under Section 106 of the NHPA, and has no objections or comments at this time. If any human remains are inadvertently discovered, please cease all work and contact us immediately.

In addition, the UKB retains the right to re-enter consultation at any time on this project.

Thank you,

Karen Pritchett  
Acting THPO  
United Keetoowah Band of Cherokee Indians in Oklahoma P.O. Box 1245 Tahlequah, OK 74465  
918-458-6715  
kpritchett@unitedkeetoowahband.org

-----Original Message-----

From: Sarah-Beth Miller [mailto:sbmiller@tepgroup.net]  
Sent: Friday, February 19, 2016 10:16 AM  
To: Joe Bunch; karen pritchett  
Subject: RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

Chief Bunch & Ms. Pritchett,

Thank you so much for taking the time to call me and speak with me about this site. I have attached the information I sent to Ms. Baker above which includes the a letter of our findings, the Phase II Archaeological Assessment, and concurrence of our findings from the Georgia State Historic Preservation Office. If you have any questions, please do not hesitate to contact me.

Thank you so much for your attention to this matter, Sarah-Beth Miller Environmental Project Manager | Tower Engineering Professionals, Inc. (www.tepgroup.net)  
326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

-----Original Message-----

From: Joe Bunch [mailto:jbunch@unitedkeetoowahband.org]  
Sent: Friday, February 19, 2016 11:10 AM  
To: karen pritchett <kpritchett@unitedkeetoowahband.org>  
Cc: Sarah-Beth Miller <sbmiller@tepgroup.net>  
Subject: FW: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

Karen I have visited with Ms. Miller this am she is resending the information electronicall to expedite the matter all they are looking for is an agreement or disagreement with their findings, below is Ms. Miller phone and email

Thank you

AC Bunch

-----Original Message-----

From: Sarah-Beth Miller [mailto:sbmiller@tepgroup.net]  
Sent: Thursday, February 18, 2016 3:22 PM  
To: Joe Bunch  
Subject: RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

Mr. Bunch,

We are still waiting on a response from the UKB regarding a Phase II Archaeological Assessment completed for TCNS # 128471. We sent the Phase II report and review fee check to your office on 1/14/16 and requested all comments regarding the project by 2/18/16 and we have not received a response from the UKB regarding the Phase II. If you wouldn't mind checking on the status of the site and provide a response for the Phase II findings I would appreciate it. Please don't hesitate to reach out to me if you have any questions or need any additional information.

Thank you,

Sarah-Beth Miller

Environmental Project Manager | Tower Engineering Professionals, Inc. (www.tepgroup.net)  
326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

-----Original Message-----

From: Lisa LaRue-Baker - UKB THPO [mailto:ukbthpo-larue@yahoo.com]  
Sent: Wednesday, February 17, 2016 10:43 AM  
To: Sarah-Beth Miller <sbmiller@tepgroup.net>  
Cc: joe bunch <jbunch@unitedkeetoowahband.org>  
Subject: RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

Lisa C. Baker is no longer representing the UKB. For all historic preservation contacts, please contact Joe Bunch at [jbunch@unitedkeetoowahband.org](mailto:jbunch@unitedkeetoowahband.org) (918-431-1818).

Thank you.

(You will have to ask him to check on the TCNS response, as I am not able to access the info anymore, nor give you an official response, although I am quite sure it was responded to through TCNS. -Lisa)

-----  
On Wed, 2/17/16, Sarah-Beth Miller <sbmiller@tepgroup.net> wrote:

Subject: RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

To: "Lisa LaRue-Baker - UKB THPO" <ukbthpo-larue@yahoo.com>

Date: Wednesday, February 17, 2016, 7:55 AM

Ms. LaRue-Baker,

I just wanted to check in with you about TCNS # 128471. We mailed the Phase II Archaeological Assessment along with the review fee to your office; however our records do not show that we have received your response regarding the Phase II for the site. Can you please check on the status for this project?

Thank you,  
Sarah-Beth Miller  
Environmental  
Project Manager | Tower Engineering Professionals, Inc.  
(www.tepgroup.net)  
326 Tryon Road | Raleigh,  
NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax:  
(919) 661-6350 | Mobile: (919) 413-0918

-----Original Message-----

From: Lisa LaRue-Baker - UKB THPO [mailto:ukbthpo-larue@yahoo.com]

Sent: Wednesday, December 09, 2015 11:18 AM  
To: Sarah-Beth Miller <sbmiller@tepgroup.net>  
Cc: ebird@unitedkeetoowahband.org  
Subject: RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

It was nice speaking with you yesterday on the phone. We look forward to receiving the survey reports.  
Lisa

Lisa C. Baker

Acting THPO  
United  
Keetoowah Band of Cherokee Indians in Oklahoma PO Box 746 Tahlequah, OK 74465

c 918.822.1952  
ukbthpo-larue@yahoo.com

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Please FOLLOW our historic preservation page and LIKE us on FACEBOOK

-----  
On Thu, 12/3/15, Sarah-Beth Miller <sbmiller@tepgroup.net> wrote:

Subject: RE: TCNS #  
128471 PCT SE Paper GA - Laurens County, GA

To: "ukbthpo-larue@yahoo.com" <ukbthpo-larue@yahoo.com>  
Date: Thursday, December 3, 2015, 11:14 AM

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Ms. LaRue-Baker,

I wanted to follow up with you regarding the PCT SE Paper GA site (TCNS# 128471). Our records do not show that we have received a response from the United Keetoowah Tribe regarding the proposed Work Plan for the Phase II Archaeological Assessment. If the United Keetoowah Tribe has an interest in the proposed telecommunications tower site we request your approval and/or comments regarding the proposed Phase II Work Plan by 12/4/15. Please let me know if you have any questions or need any additional information about the site.

Thank you,

Sarah-Beth Miller  
Environmental Project Manager | Tower  
Engineering Professionals, Inc.  
(www.tepgroup.net)  
326 Tryon  
Road | Raleigh, NC  
27603-3530 | Office: (919)  
661-6351 ext. 5304 | Fax: (919)

661-6350 | Mobile: (919) 413-0918

From: Sarah-Beth Miller

Sent: Monday, October 26,  
2015 1:50 PM

To: ukbthpo-larue@yahoo.com

Subject: TCNS # 128471 PCT  
SE Paper GA - Laurens County, GA

Ms.  
LaRue-Baker,

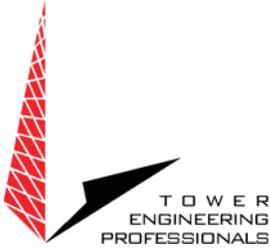
Thank you for taking the time to speak with me this morning about the proposed telecommunications tower site identified as PCT SE Paper GA site (TCNS # 128471) in Laurens County, GA. If you have any questions regarding the archaeological assessments or the proposed Phase II Archaeological Evaluation Work Plan feel free to reach out to me.

Thank you,  
Sarah-Beth Miller

Environmental Project  
Manager | Tower  
Engineering Professionals, Inc.

([www.tepgroup.net](http://www.tepgroup.net))  
326 Tryon Road | Raleigh,  
NC  
27603-3530 | Office: (919) 661-6351 ext.  
5304 | Fax: (919)  
661-6350 | Mobile: (919)  
413-0918

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October 26, 2015

Eastern Shawnee Tribe  
Cultural Preservation Department  
70500 East 128 Road  
Wyandotte, OK 74370

Attn: Robin Dushane – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

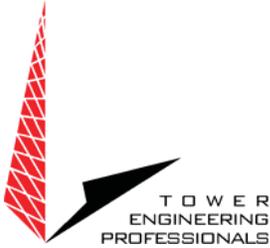
Ms. Dushane:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

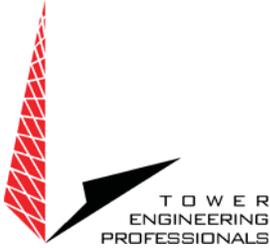
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Eastern Shawnee Tribe of Oklahoma has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Eastern Shawnee Tribe of Oklahoma regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", with a long horizontal flourish extending to the right.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

## Sarah-Beth Miller

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**From:** Jennifer Sigler <JSigler@estoo.net>  
**Sent:** Monday, November 09, 2015 12:55 PM  
**To:** Sarah-Beth Miller  
**Subject:** RE: TCNS # 128471 PCT SE Paper GA - Laurens County, GA

Good afternoon, Ms. Miller. I looked over the original survey report, the letter report describing Tower's revisit, and the Phase II plan of work. In general, it looks like everything has proceeded in a reasonable manner thus far. The main comment I have regarding the plan of work is that it seems to be a little over-reaching. The stated goal of a Phase II is to determine eligibility. Thus, once the site's eligibility has been established, the Phase II activities should stop and a mitigation plan prepared. The Phase II for this project, in my opinion, seems to muddy the waters a little bit between Phase II and Phase III. For instance, this SOW discusses plans for excavating two features, but once one intact subsurface feature is found, I would be comfortable calling the site eligible and moving to the next phase.

That's just my two cents' worth - I am not going to oppose this Phase II proceeding in the manner you have already planned. I appreciate the opportunity to look this over.

Thanks,  
Jennifer

*Jennifer Sigler, M.A., RPA  
Tribal Archaeologist  
Eastern Shawnee Tribe of Oklahoma  
70500 East 128 Road  
Wyandotte, OK 74370  
918-666-5151 ext. 1833*

---

**From:** Sarah-Beth Miller [<mailto:sbmiller@tepgroup.net>]  
**Sent:** Monday, October 26, 2015 12:51 PM  
**To:** Jennifer Sigler <[JSigler@estoo.net](mailto:JSigler@estoo.net)>  
**Subject:** TCNS # 128471 PCT SE Paper GA - Laurens County, GA

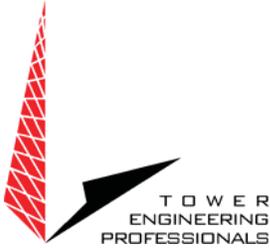
Ms. Sigler,

Thank you for taking the time to speak with me this morning about the proposed telecommunications tower site identified as PCT SE Paper GA site (TCNS # 128471) in Laurens County, GA. If you have any questions regarding the archaeological assessments or the proposed Phase II Archaeological Evaluation Work Plan feel free to reach out to me.

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))  
326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918  
[Civil](#) | [Surveying](#) | [Environmental](#) | [PM&E](#) | [Structural](#) | [Inspections](#) | [Geotechnical and Material Testing](#) | [Construction](#) | [Renewable Energy](#)

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January 14, 2016

Eastern Shawnee Tribe  
Cultural Preservation Department  
70500 East 128 Road  
Wyandotte, OK 74370

Attn: Robin Dushane – THPO

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

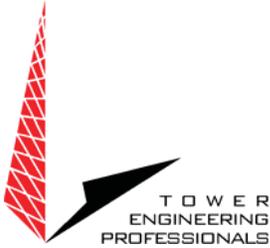
Ms. Dushane:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Eastern Shawnee Tribe of Oklahoma on October 26, 2015 and we received your approval of the Phase II SOW on 11/9/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

UTM Coordinates: 327736.3 E, 3596237.6 N, Zone 17 N

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SBM", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Eastern Shawnee Tribe of Oklaho...

26082  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	550.00	550.00		550.00

10630 53rd TEP AP Accoun... TCNS# 128471

550.00

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*PCT SE Paper*  
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Ms. Robin Dushane (THPO)  
Eastern Shawnee Tribe of Oklahoma  
70500 East 128 Road  
Wyandotte, OK 74370

7015 1520 0000 1776 0659



# **EASTERN SHAWNEE TRIBE OF OKLAHOMA**

12755 S. 705 Road, Wyandotte, OK 74370  
Bluejacket Building (918) 666-2435, Fax: 888-971-3905

Tower Engineering Professionals  
ATTN: Sarah-Beth Miller  
326 Tryon Rd.  
Raleigh, NC 27603

RE: Cell Tower Project PCT SE Paper GA, Dublin, Laurens County, GA  
**TCNS 128471**

February 16, 2016

Dear Ms. Miller,

The Cultural Preservation Department of the Eastern Shawnee Tribe of Oklahoma (ESTO) has received the Phase II report for Tower Engineering Professionals' proposed telecommunications project, PCT SE Paper GA, located at UTM Zone 17, 327736.3 m E, 3596237.6 m N (WGS84) in/near Dublin in Laurens County, GA. ESTO has reviewed the project, TCNS 128471 in accordance with Section 106 of the National Historic Preservation Act (NHPA) and the 2005 Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA).

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). The NPA further defines and clarifies responsibilities regarding cultural resources during specific types of undertakings, particularly telecommunications projects.

The Phase II testing project was undertaken to evaluate the significance of a pre-contact archaeological site, 9Ls337, identified during the original survey for this project. Based on the results of the Phase I and Phase II, this site consists of an artifact scatter (predominantly lithics, with a few ceramics) with few diagnostic artifacts and no features. The consultant did not identify the full extent of the site, as it continues beyond the APE; however, the identification effort is considered adequate based on the stipulations of the NPA. Although the site has not been fully delineated or recorded, ESTP concurs that the recorded portion does not embody any of the NRHP significance criteria and would not contribute to the site's eligibility. It should be noted that the site as a whole remains unevaluated for the NRHP.

Based on the information provided and a review of our records, we find that the proposed undertaking will have **No Adverse Effect** on the aforementioned unevaluated cultural resource, and no other historic properties of sacred and/or cultural significance to the Tribe are known to be in the project area. Therefore, ESTO has no objection to the project proceeding as described; however, please note that any future changes to this project may require additional consultation. If cultural objects or human remains are inadvertently discovered during construction, please stop work immediately and contact the Cultural Preservation Department of the Eastern Shawnee Tribe of Oklahoma, as well as any agencies required by law.

Thank you for submitting this project to the Eastern Shawnee Tribe of Oklahoma.



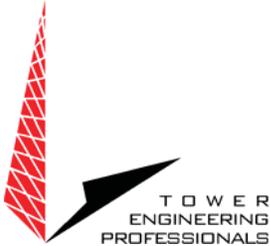
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Robin Dushane  
Tribal Historic Preservation Officer



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Jennifer Sigler  
Tribal Archaeologist



October 26, 2015

The Alabama-Quassarte Tribal Town  
AQEDA Tribal Heritage Center  
P.O. Box 186  
Wetumka, OK 74883

Attn: Tilda Harjo – Tribal Secretary

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Harjo:

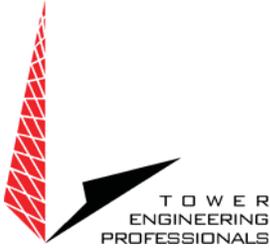
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TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE. The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

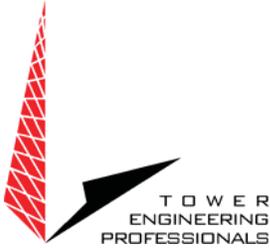
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According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Alabama-Quassarte Tribal Town has interest in this proposed**

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**telecommunications tower site/project, we request approval and/or comments from the Alabama-Quassarte Tribal Town regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

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Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Alabama-Quassarte Tribal Town

Historic Preservation Office

Po Box 187

Wetumka, Ok 74883

[AQhpo@mail.com](mailto:AQhpo@mail.com)

Phone:405-452-3881 Cell:405-712-1959

12/1/2015

TCNS # 128471

Laurens County, GA

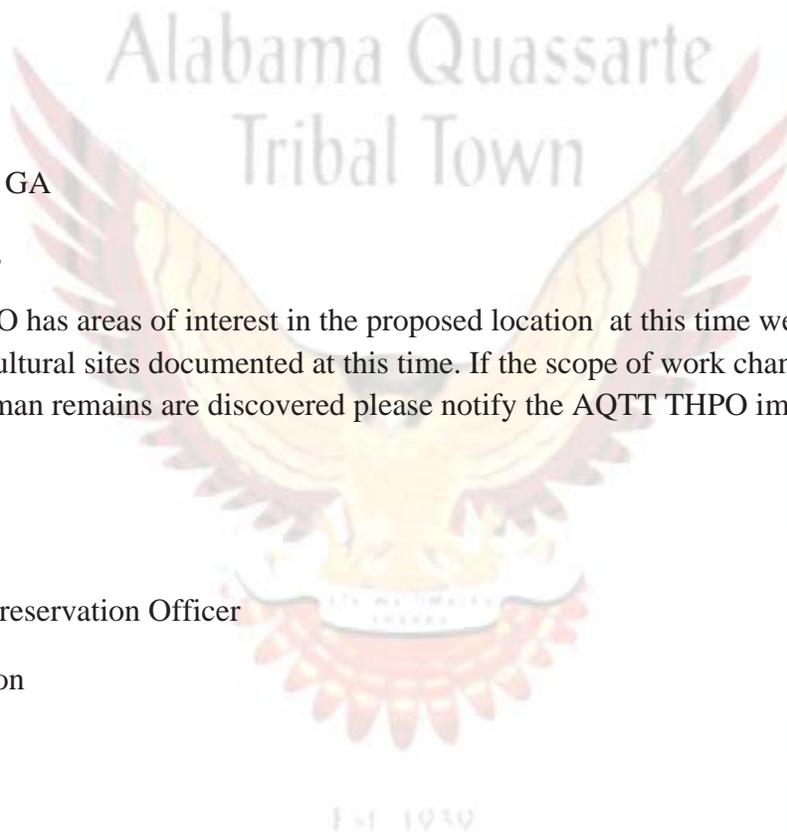
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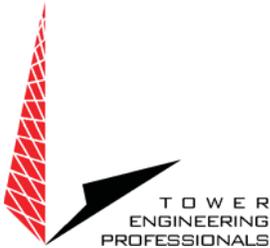
The AQTT THPO has areas of interest in the proposed location at this time we have identified no religious or cultural sites documented at this time. If the scope of work changes in any way or if artifacts or human remains are discovered please notify the AQTT THPO immediately.

Thank You,

Tribal Historic Preservation Officer

Samantha Robison





January 14, 2016

The Alabama-Quassarte Tribal Town  
AQEDA Tribal Heritage Center  
P.O. Box 186  
Wetumka, OK 74883

Attn: Ms. Tilda Harjo & Ms. Samantha Robinson

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

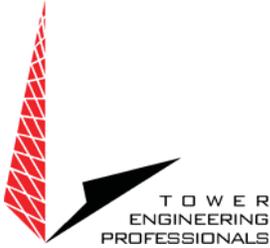
Ms. Harjo & Ms. Robinson:

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a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

AQEDA Tribal Heritage Center

26077  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	500.00	500.00		500.00

10630 53rd TEP AP Accoun... TCNS# 128471

500.00

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*P.O. Box 180*  
*Netumka, OK 74883*

7015 1520 0000 1776 0680

Alabama-Quassarte Tribal Town

Historic Preservation Office

Po Box 187

Wetumka, Ok 74883

[AQhpo@mail.com](mailto:AQhpo@mail.com)

Phone:405-452-3881 Cell:405-712-1959

2/19/2016

TCNS #128471

Laurens County, GA

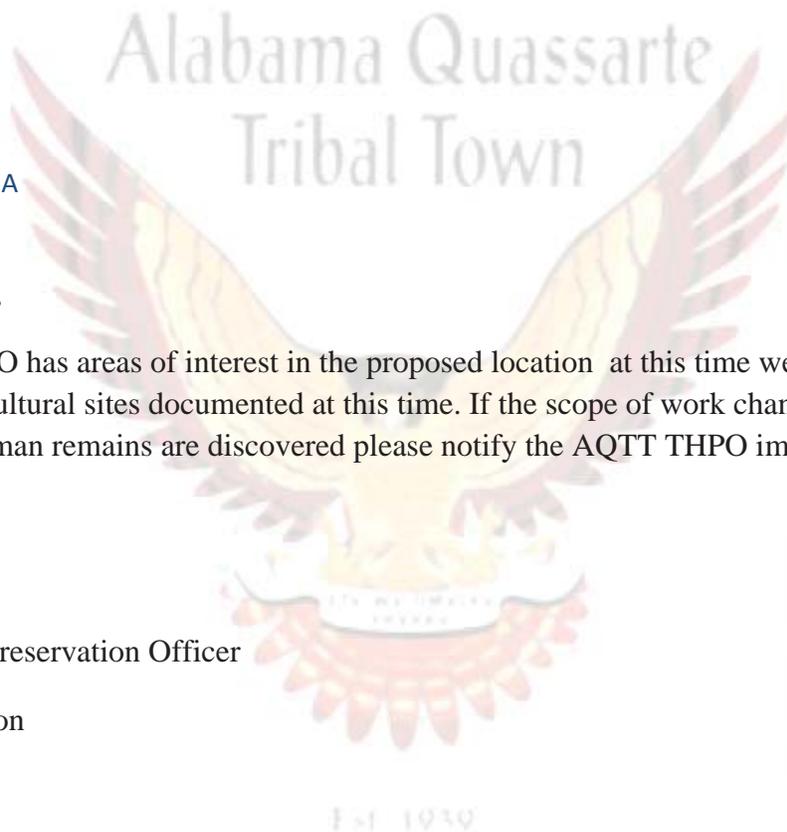
Good Afternoon,

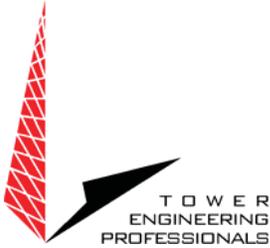
The AQTT THPO has areas of interest in the proposed location at this time we have identified no religious or cultural sites documented at this time. If the scope of work changes in any way or if artifacts or human remains are discovered please notify the AQTT THPO immediately.

Thank You,

Tribal Historic Preservation Officer

Samantha Robison





October 26, 2015

Thlopthlocco Tribal Town  
P.O. Box 188  
Okemah, OK 74859

Attn: Charles Coleman – Assistant Tribal Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

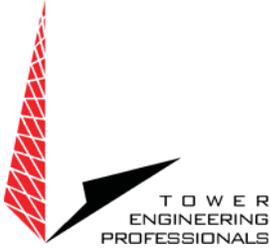
Mr. Coleman:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350  
[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

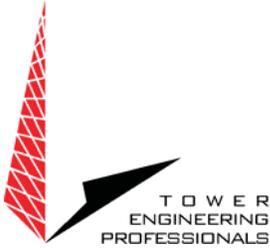
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Thlopthlocco Tribal Town has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**the Thlopthlocco Tribal Town regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

## Sarah-Beth Miller

---

**From:** Sarah A. Stephens  
**Sent:** Tuesday, November 03, 2015 3:49 PM  
**To:** Sarah-Beth Miller  
**Subject:** FW: Fw: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

[Here you go.](#)

---

**From:** thpo@tttown.org [mailto:thpo@tttown.org]  
**Sent:** Tuesday, November 03, 2015 3:48 PM  
**To:** Sarah A. Stephens  
**Subject:** RE: Fw: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

Ms. Stephens,

Thank you for the information and photographs of the proposed Phase II Evaluation of site 9Ls337 in Laurens County, GA. After further communication concerning additional shovel testing north of the road near surface find 8, we have reconsidered our request. We believe additional shovel testing would not be necessary at this time. Thank you and we look forward to reviewing the Phase II report.

Emman Spain  
Interim THPO  
Thlopthlocco Tribal Town  
P. O. Box 188  
Okemah, OK 74859  
Phone: 918-560-6198 Ext. 113  
[THPO@tttown.org](mailto:THPO@tttown.org)

----- Original Message -----

**Subject:** RE: Fw: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)  
**From:** "Sarah A. Stephens" <[sastephens@tepgroup.net](mailto:sastephens@tepgroup.net)>  
**Date:** Thu, October 29, 2015 8:33 am  
**To:** "[thpo@tttown.org](mailto:thpo@tttown.org)" <[thpo@tttown.org](mailto:thpo@tttown.org)>  
**Cc:** Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)>

Mr. Spain,

Thank you for reviewing our proposed Phase II work plan for the PCT SE Paper GA Tower Site. We appreciate your comments. The reason we did not propose shovel testing near the surface scatter (Surface Find 8 on the site map) in the southern portion of the site is because this area is in a heavily disturbed road. Shovel tests performed in the southern portion of the site were also negative for subsurface deposits. The road that runs east-west (Photo 095) is heavily traveled and improved compared to the grassy north-south road that runs through the majority of the site, were additional shovel tests are proposed (Photo 093). I've attached two photos of the roads at site 9Ls337 to better illustrate the difference in disturbance. The third picture attached, 092, shows the intersection of the roads at the site (view south).

The reason we did not propose additional shovel tests is because we are trying to limit our shovel testing to within the proposed areas of disturbance, which is a narrow corridor, and out of concern of disturbing the site

too much. We believe the proposed amount of shovel tests and units will allow us to determine if the site is eligible.

I hope this helps clarify our proposed plan of work. If you still recommend additional shovel tests, please let us know where and how many more you have in mind. Please feel free to contact me to discuss.

Thank you,

Sarah Stephens

**Cultural Resources Division Manager | Tower Engineering Professionals, Inc. ([www.tepgroup.net](http://www.tepgroup.net))**

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 Ext. 5309 | Fax: (919) 661-6350 |

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---

**From:** [thpo@ttown.org](mailto:thpo@ttown.org) [<mailto:thpo@ttown.org>] ,

**Sent:** Wednesday, October 28, 2015 2:53 PM

**To:** Sarah-Beth Miller

**Subject:** RE: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

Ms. Miller,

Thlopthlocco Tribal Town has received notification of the Phase I Archaeological Survey of the PCT SE Paper GA Tower Site and the Phase II Archaeological Evaluation Work Plan for the site 9Ls337 to be conducted by Tower Engineering Professionals, Inc. (TEP) in Laurens County, Georgia. After review of the Phase I survey, we concur that further evaluation of site 9Ls337 for National Register of Historic Places listing is warranted. In addition, after review of the National Register Evaluation Work Plan, we would like to see more shovel tests conducted along the access road or adjacent to it where the surface scatter was noted. Finally, under the Human Remains heading, we wish to be contacted only if human remains are suspected, known, or determine most likely to be Native American. We look forward to receiving the final Phase II report. Thank you.

Emman Spain

Interim THPO

Thlopthlocco Tribal Town

P. O. Box 188

Okemah, OK 74859

Phone: 918-560-6198 Ext. 113

[THPO@ttown.org](mailto:THPO@ttown.org)

----- Original Message -----

Subject: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

From: Charles Coleman <[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)>

Date: Tue, October 27, 2015 6:17 am

To: [thpo@ttown.org](mailto:thpo@ttown.org)

--- On Mon, 10/26/15, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

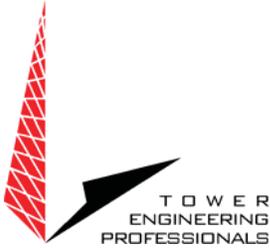
> From: Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)>

> Subject: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

> To: "[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)" <[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)>  
> Date: Monday, October 26, 2015, 1:45 PM  
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> {}  
> #yiv9680592570  
>  
> Mr. Coleman,  
>  
> Sorry I incorrectly had the wrong tribe in  
> the previous email. I apologize. It should have read:  
>  
>  
> Thus, if the Thlopthlocco Tribal Town  
> has interest in this proposed telecommunications tower  
> site/project, we request approval and/or comments regarding  
> the proposed Work Plan for the Phase II Archaeological  
> Assessment by 12/1/15 (please see proposed work plan  
> attached above). This information was also mailed to your  
> office via USPS on 10/26/2015. Due to the size of the  
> project information (over 10 MB) there will be a subsequent  
> email with the remaining attachments  
> for your review. Please note, the tribal review fee will be  
> sent with the results of the Phase II Archaeological  
> Evaluation at a later date.  
>  
>  
> Again I am sorry for the mistake.  
>  
>  
>  
> Sarah-Beth Miller  
> Environmental Project Manager | Tower  
> Engineering Professionals, Inc.

> ([www.tepgroup.net](http://www.tepgroup.net))  
> 326 Tryon Road|Raleigh, NC  
> 27603-3530|Office: (919) 661-6351 ext. 5304|Fax: (919)  
> 661-6350|Mobile: (919) 413-0918  
>  
>  
>  
>  
> From: Sarah-Beth Miller  
>  
>  
> Sent: Monday, October 26, 2015 2:40 PM  
>  
> To: [chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)  
>  
> Subject: TCNS # 128471 PCT SE Paper GA Tower Site -  
> Laurens County, GA (Part 1)  
>  
>  
>  
> Mr. Coleman,  
>  
> I have attached a letter  
> packet for a proposed telecommunications tower site  
> identified as PCT SE Paper GA (ATC # 201440) TCNS #128471 to  
> be located in Laurens County, GA. In the attached  
> information you will find that three (3) previously  
> unrecorded prehistoric sites were identified with the  
> proposed access & utility easement. Two (2) of the  
> aforementioned sites were determined not eligible for  
> listing in the National Register of Historic Places (NRHP)  
> and the remaining site will require further  
> evaluation to determine its eligibility. Thus, if the  
> Alabama-Quassarte Tribal Town has interest in this proposed  
> telecommunications tower site/project, we request approval  
> and/or comments regarding the proposed Work Plan for the  
> Phase II Archaeological Assessment  
> by 12/1/15 (please see proposed work plan attached  
> above). This information was also mailed to your office  
> via USPS on 10/26/2015. Due to the size of the project  
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> with the remaining attachments for  
> your review. Please note, the tribal review fee will be  
> sent with the results of the Phase II Archaeological  
> Evaluation at a later date.  
>  
>  
>  
> Please don't hesitate to  
> contact me if you have any questions or need any additional  
> information about the project.  
>  
>  
> Thank you,  
> Sarah-Beth Miller  
> Environmental Project  
> Manager | Tower Engineering Professionals, Inc.  
> ([www.tepgroup.net](http://www.tepgroup.net))  
> 326 Tryon Road|Raleigh, NC

- > 27603-3530|Office: (919) 661-6351 ext. 5304|Fax: (919)
- > 661-6350|Mobile: (919) 413-0918
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January 14, 2016

Thlopthlocco Tribal Town  
P.O. Box 188  
Okemah, OK 74859

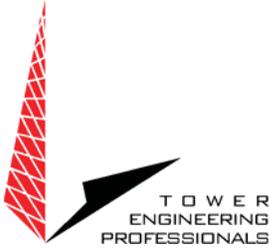
Attn: Emman Spain – Interim Tribal Historic Preservation Officer

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Mr. Spain:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Thlopthlocco Tribal Town on October 26, 2015 and we received your approval of the Phase II SOW on 11/3/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB" followed by a flourish.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Thlopthlocco Tribal Town

1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
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Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage \$ \_\_\_\_\_

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City, State, ZIP+4® Okemah, OK 74859

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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GA

## Sarah-Beth Miller

---

**From:** thpo@tttown.org  
**Sent:** Wednesday, February 17, 2016 11:47 AM  
**To:** Sarah-Beth Miller  
**Subject:** RE: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

Dear Ms. Miller,  
Thlopthlocco Tribal Town has received the Phase II Archaeological Assessment for TCNS #128471. Upon review of the Phase II Assessment report, we concur with the determination that the portion of site 9LS337 within the project APE lacks cultural context and is not eligible for listing in the NRHP. Furthermore, we agree that site 9LS337 may extend outside of the project APE, and with an unknown NRHP eligibility, this portion should be avoided. In conclusion, as long as this recommendation is adhered to, we have no concerns with the communications tower project proceeding. Thank you.

Emman Spain, THPO  
Thlopthlocco Tribal Town  
P. O. Box 188  
Okemah, OK 74859  
Phone: 918-560-6198 Ext. 113  
THPO@tttown.org

----- Original Message -----

**Subject:** RE: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)  
**From:** Sarah-Beth Miller <sbmiller@tepgroup.net>  
**Date:** Wed, February 17, 2016 7:20 am  
**To:** "thpo@tttown.org" <thpo@tttown.org>

Mr. Spain,

Our records show that we still do not have a response from the Thlopthlocco Tribal Town regarding Phase II Archaeological Assessment for TCNS # 128471. Can you check on the status for this site?

Thank you,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))  
326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

---

**From:** Sarah-Beth Miller  
**Sent:** Thursday, January 14, 2016 2:13 PM  
**To:** 'thpo@tttown.org' <thpo@tttown.org>  
**Subject:** RE: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

Mr. Spain,

I have attached a letter packet and the Phase II Archaeological Assessment for the proposed telecommunications tower site identified as PCT SE Paper GA (ATC # 201440) TCNS# 128471 to be located in

Laurens County, GA. The results of the Phase II Archaeological Assessment indicate that no historic properties eligible for listing in the NRHP will be affected by the proposed communications tower site. Additionally, this information and the review fee check was mailed to your office via USPS on 1/14/16.

Please don't hesitate to contact me if you have any questions or need any additional information about the project.

Thank you,

Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

326 Tryon Road | Raleigh, NC 27603-3530 | Office: (919) 661-6351 ext. 5304 | Fax: (919) 661-6350 | Mobile: (919) 413-0918

---

**From:** [thpo@tttown.org](mailto:thpo@tttown.org) [<mailto:thpo@tttown.org>]

**Sent:** Wednesday, October 28, 2015 2:53 PM

**To:** Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)>

**Subject:** RE: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

Ms. Miller,

Thlopthlocco Tribal Town has received notification of the Phase I Archaeological Survey of the PCT SE Paper GA Tower Site and the Phase II Archaeological Evaluation Work Plan for the site 9Ls337 to be conducted by Tower Engineering Professionals, Inc. (TEP) in Laurens County, Georgia. After review of the Phase I survey, we concur that further evaluation of site 9Ls337 for National Register of Historic Places listing is warranted. In addition, after review of the National Register Evaluation Work Plan, we would like to see more shovel tests conducted along the access road or adjacent to it where the surface scatter was noted. Finally, under the Human Remains heading, we wish to be contacted only if human remains are suspected, known, or determine most likely to be Native American. We look forward to receiving the final Phase II report. Thank you.

Emman Spain

Interim THPO

Thlopthlocco Tribal Town

P. O. Box 188

Okemah, OK 74859

Phone: 918-560-6198 Ext. 113

[THPO@tttown.org](mailto:THPO@tttown.org)

----- Original Message -----

Subject: Fw: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

From: Charles Coleman <[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)>

Date: Tue, October 27, 2015 6:17 am

To: [thpo@tttown.org](mailto:thpo@tttown.org)

--- On Mon, 10/26/15, Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)> wrote:

> From: Sarah-Beth Miller <[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)>

> Subject: RE: TCNS # 128471 PCT SE Paper GA Tower Site - Laurens County, GA (Part 1)

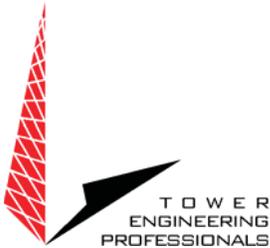
> To: "[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)" <[chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)>

> Date: Monday, October 26, 2015, 1:45 PM

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> {}  
> #yiv9680592570  
>  
> Mr. Coleman,  
>  
> Sorry I incorrectly had the wrong tribe in  
> the previous email. I apologize. It should have read:  
>  
>  
> Thus, if the Thlopthlocco Tribal Town  
> has interest in this proposed telecommunications tower  
> site/project, we request approval and/or comments regarding  
> the proposed Work Plan for the Phase II Archaeological  
> Assessment by 12/1/15 (please see proposed work plan  
> attached above). This information was also mailed to your  
> office via USPS on 10/26/2015. Due to the size of the  
> project information (over 10 MB) there will be a subsequent  
> email with the remaining attachments  
> for your review. Please note, the tribal review fee will be  
> sent with the results of the Phase II Archaeological  
> Evaluation at a later date.  
>  
>  
> Again I am sorry for the mistake.  
>  
>  
>  
> Sarah-Beth Miller  
> Environmental Project Manager | Tower  
> Engineering Professionals, Inc.  
> ([www.tepgroup.net](http://www.tepgroup.net))  
> 326 Tryon Road|Raleigh, NC

> 27603-3530|Office: (919) 661-6351 ext. 5304|Fax: (919)  
> 661-6350|Mobile: (919) 413-0918  
>  
>  
>  
>  
> From: Sarah-Beth Miller  
>  
>  
> Sent: Monday, October 26, 2015 2:40 PM  
>  
> To: [chascoleman75@yahoo.com](mailto:chascoleman75@yahoo.com)  
>  
> Subject: TCNS # 128471 PCT SE Paper GA Tower Site -  
> Laurens County, GA (Part 1)  
>  
>  
>  
> Mr. Coleman,  
>  
> I have attached a letter  
> packet for a proposed telecommunications tower site  
> identified as PCT SE Paper GA (ATC # 201440) TCNS #128471 to  
> be located in Laurens County, GA. In the attached  
> information you will find that three (3) previously  
> unrecorded prehistoric sites were identified with the  
> proposed access & utility easement. Two (2) of the  
> aforementioned sites were determined not eligible for  
> listing in the National Register of Historic Places (NRHP)  
> and the remaining site will require further  
> evaluation to determine its eligibility. Thus, if the  
> Alabama-Quassarte Tribal Town has interest in this proposed  
> telecommunications tower site/project, we request approval  
> and/or comments regarding the proposed Work Plan for the  
> Phase II Archaeological Assessment  
> by 12/1/15 (please see proposed work plan attached  
> above). This information was also mailed to your office  
> via USPS on 10/26/2015. Due to the size of the project  
> information (over 10 MB) there will be a subsequent email  
> with the remaining attachments for  
> your review. Please note, the tribal review fee will be  
> sent with the results of the Phase II Archaeological  
> Evaluation at a later date.  
>  
>  
> Please don't hesitate to  
> contact me if you have any questions or need any additional  
> information about the project.  
>  
>  
> Thank you,  
> Sarah-Beth Miller  
> Environmental Project  
> Manager | Tower Engineering Professionals, Inc.  
> ([www.tepgroup.net](http://www.tepgroup.net))  
> 326 Tryon Road|Raleigh, NC  
> 27603-3530|Office: (919) 661-6351 ext. 5304|Fax: (919)  
> 661-6350|Mobile: (919) 413-0918

- > Civil|Surveying|Environmental|PM&E|Structural|Inspections|Geotechnical
- > and Material Testing|Construction|Renewable
- > Energy
- >
- >
- >



October 26, 2015

Shawnee Tribe  
Tribal Historic Preservation Office  
29 South Highway 69A  
Miami, OK 74354

Attn: Kim Jumper – Assistant Tribal Historic Preservation Officer

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

Ms. Jumper:

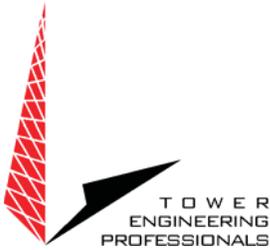
I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE. The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

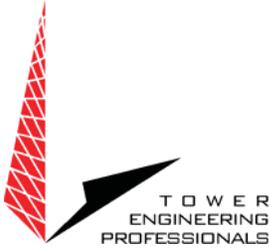
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Shawnee Tribe has interest in this proposed telecommunications**

326 Tryon Road, Raleigh, NC 27603-3530 O) (919) 661-6351 F)(919) 661-6350

[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



**tower site/project, we request approval and/or comments from the Shawnee Tribe regarding the proposed Work Plan for the Phase II Archaeological Assessment by the above date or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.



SHAWNEE TRIBE  
HISTORIC PRESERVATION DEPARTMENT  
29 SOUTH HIGHWAY 69A  
MIAMI, OKLAHOMA 74354  
918 ^ 542 ^ 2441 PHONE 918 ^ 542 ^ 9915 FAX

FACSIMILE COVER PAGE

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TO: Sarah-Beth FROM: KIM JUMPER

FIRM/AGENCY: TEP DATE/TIME: 12/01/15

FAX NUMBER: 919-666-6350 NO. OF PAGES, INCLUDING COVER: 1

PHONE NUMBER: \_\_\_\_\_ MEMO: 128313, 128471

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**Message:** The Shawnee Tribe's Tribal Historic Preservation Officer concurs that no known historic properties will be negatively impacted by construction of this tower site (see memo line above for TCNS number/s). The Shawnee Tribe's archives do not reveal any issues of concern at this tower location. In the event that archaeological materials are encountered later during construction, use, or maintenance of this tower location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

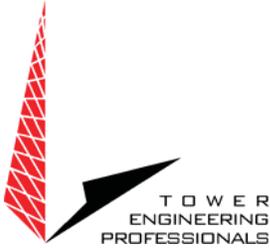
The Shawnee Tribe's Environmental and Natural Resources Department takes this opportunity to express its concerns that telecommunication towers can have a potentially destructive impact on bats and migratory birds, particularly those that migrate at night, including species listed as threatened and endangered by both states and the federal government, as well as other species. The Shawnee Tribe suggests that this tower be constructed in accordance with the guidelines available from the US Fish and Wildlife Service to reduce the adverse effects of telecommunications towers on migratory birds; these guidelines may be found at: [www.fws.gov/migratorybirds/issues/towers/comtow.html](http://www.fws.gov/migratorybirds/issues/towers/comtow.html).

The Shawnee Tribe's Environmental and Natural Resources Department is further concerned that the proliferation of cell towers may play a role in honey bee Colony Collapse Disorder. We acknowledge that cell phone technology may not be to blame, especially by itself, as other potential causative factors for the decline have been noted, such as insecticides, tracheal and varroa mites [an immunosuppressant], other parasites, pesticides used on hives to eliminate parasites, genetically modified plants, *Nosema* fungus, Israeli Acute Paralysis Virus (IAPV) perhaps introduced from Australia in 2004, Kashmir Bee Virus [KBV], climate change, and drought.

Finally, the Shawnee Tribe's Environmental and Natural Resources Department requests that cell tower sites, whenever remotely feasible, be restored to native vegetation. In all cases, habitat restoration can protect a variety of species, even in small project areas. The large number of cell tower sites provides an as yet unrealized opportunity for region-wide habitat restoration. The Tribe urges the cell phone industry to provide a model for native habitat restoration for other industries.

Please do not hesitate to call us for additional comment.





January 14, 2016

Shawnee Tribe  
Tribal Historic Preservation Office  
29 South Highway 69A  
Miami, OK 74354

Attn: Kim Jumper – Assistant Tribal Historic Preservation Officer

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

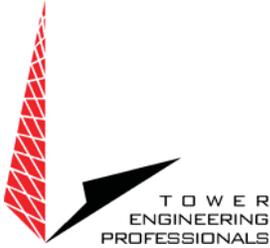
Ms. Jumper:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Shawnee Tribe on October 26, 2015 and we received your approval of the Phase II SOW on 12/1/15. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, & 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, photographs, and tribal review fee have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB" followed by a flourish.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

Shawnee Tribe

26089  
1/8/2016

Date	Description	Orig. Amt.	Amt. Due	Discount	Amount
1/8/2016	Bill #TCNS# 128471	400.00	400.00		400.00

10630 53rd TEP AP Accoun... TCNS# 128471

400.00

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PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

*Phase II  
 Results  
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 Here  
 PCT SE Paper  
 GA*

*Shawnee Tribe  
 29 South Hwy 129A  
 Miami, OK 74355*

7015 1520 0000 1776 0611



SHAWNEE TRIBE  
HISTORIC PRESERVATION DEPARTMENT  
29 SOUTH HIGHWAY 69A  
MIAMI, OKLAHOMA 74354  
918 ^ 542 ^ 2441 PHONE 918 ^ 542 ^ 9915 FAX

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To: Sarah Beth FROM: KIM JUMPER  
 FIRM/AGENCY: TEP DATE/TIME: 2/08/16  
 FAX NUMBER: 919-6661-6350 NO. OF PAGES, INCLUDING COVER: 1  
 PHONE NUMBER: \_\_\_\_\_ MEMO: 128471,

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**Message:** The Shawnee Tribe's Tribal Historic Preservation Officer concurs that no known historic properties will be negatively impacted by construction of this tower site (see memo line above for TCNS number/s). The Shawnee Tribe's archives do not reveal any issues of concern at this tower location. In the event that archaeological materials are encountered later during construction, use, or maintenance of this tower location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

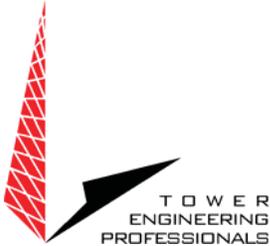
The Shawnee Tribe's Environmental and Natural Resources Department takes this opportunity to express its concerns that telecommunication towers can have a potentially destructive impact on bats and migratory birds, particularly those that migrate at night, including species listed as threatened and endangered by both states and the federal government, as well as other species. The Shawnee Tribe suggests that this tower be constructed in accordance with the guidelines available from the US Fish and Wildlife Service to reduce the adverse effects of telecommunications towers on migratory birds; these guidelines may be found at: [www.fws.gov/migratorybirds/issues/towers/comtow.html](http://www.fws.gov/migratorybirds/issues/towers/comtow.html).

The Shawnee Tribe's Environmental and Natural Resources Department is further concerned that the proliferation of cell towers may play a role in honey bee Colony Collapse Disorder. We acknowledge that cell phone technology may not be to blame, especially by itself, as other potential causative factors for the decline have been noted, such as insecticides, tracheal and varroa mites (an immunosuppressant), other parasites, pesticides used on hives to eliminate parasites, genetically modified plants, *Nosema* fungus, Israeli Acute Paralysis Virus (IAPV) perhaps introduced from Australia in 2004, Kashmir Bee Virus [KBV], climate change, and drought.

Finally, the Shawnee Tribe's Environmental and Natural Resources Department requests that cell tower sites, whenever remotely feasible, be restored to native vegetation. In all cases, habitat restoration can protect a variety of species, even in small project areas. The large number of cell tower sites provides an as yet unrealized opportunity for region-wide habitat restoration. The Tribe urges the cell phone industry to provide a model for native habitat restoration for other industries.

Please do not hesitate to call us for additional comment.





October 26, 2015

Poarch Band of Creek Indians  
5811 Jack Springs Road  
Atmore, AL 36502

Attn: Robert Thrower – THPO

Subject: Review and Approval of Work Plan for Phase II Archaeological  
Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole  
Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

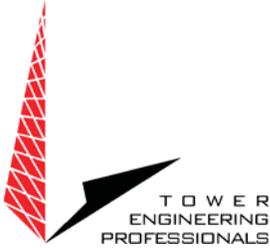
Mr. Thrower:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

TEP contracted Southern Research Historic Preservation Consultants (HPC), Inc., a cultural resources consulting firm, to conduct a Cultural Resources Survey for the proposed direct and visual effects APEs. Southern Research HPC performed the file search at the Georgia Historic Preservation Division (HPD) and the GNAHRGIS database on July 7, 2015 for the direct effects APE and the 0.5-mile visual effects APE.

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[sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net)



The file search indicated that there are no (0) previously recorded historic resources and/or archaeological sites within the direct and visual effects APEs.

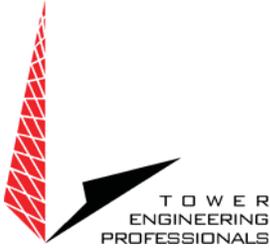
Southern Research HPC completed the archaeological survey in July, 2015 and identified three (3) previously unrecorded prehistoric sites, 9Ls335, 9Ls336, and 9Ls337. According to their report, site 9Ls335, “is represented by a thin lithic scatter of artifacts” and was identified within a portion of the existing access road that have been previously cut and graded. HPC concluded that although the site most likely extends beyond the existing road bed, the portion of the site within the proposed access & utility easement does not have integrity, is not recommended as significant and does not meet the criteria for listing in the National Register of Historic Places (NRHP). Site 9Ls336, consisted of undiagnostic lithic scatter located within a portion of the existing overgrown two-track access drive and site 9Ls337, consisted of a ceramic and lithic scatter located within a portion of the existing earthen road. HPC recommended further archaeological work be completed for sites 9Ls336 and 9Ls337, to determine their eligibility for listing in the National Register of Historic Places (NRHP). However, the archaeologists were unable to provide soil information for the sites or identify which soil strata contained artifacts. Therefore Sarah Stephens, archaeologist and architectural historian for TEP, completed an additional archaeological assessment on September 1, 2015 to determine the soil stratigraphy and integrity of the sites 9Ls336 and 9Ls337.

According to the aforementioned additional assessment, site 9Ls336 “appears to maintain integrity” however, “the site lacks artifact diversity, is small in size, and is a common site type” and therefore not recommended as eligible for listing in the NRHP. Site 9Ls337 is identified as a Late Archaic and Woodland site that includes “a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd.” According to the additional shovel testing and surface investigations within site 9Ls337 completed by TEP, the soils within Stratum I revealed that the existing two-track and earthen access drive has been previously disturbed by road grading. However, “shovel tests also revealed that Stratum II, which contained artifacts, appears to be intact.” Therefore based on the archaeological assessment completed by Southern Research HPC and the additional archaeological assessment completed by TEP, it is the opinion of TEP that “site 9Ls337 may be able to address research questions regarding Late Archaic and Woodland period lifeways and land use in this region” and recommends that “further work is necessary to determine if 9Ls337 is eligible for listing in the NRHP.” Please find the attached Phase I Archaeological Assessment completed by Southern Research HPC, Additional Archaeological Assessment and the proposed Work Plan for the Phase II Archaeological Evaluation of site 9Ls337, in Laurens County, Georgia.

**For the purposes of advancing Section 106 consultation, American Towers, LLC intends on moving forward to schedule the Phase II Archaeological Assessment on 12/1/2015. If the Poarch Band of Creek Indians has interest in this proposed telecommunications tower site/project, we request approval and/or comments from**

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**the Poarch Band of Creek Indians regarding the proposed Work Plan for the Phase II Archaeological Assessment by the date above or we will assume you have no interest.** Once approval has been received from the Georgia Historic Preservation Division and all interested tribes with aboriginal rights to Laurens County, GA, the proposed Phase II Archaeological Assessment will commence. After the Phase II Archaeological Evaluation is completed, consultation letters will be sent along with the results of the Evaluation.

Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net). In addition, please feel free to call me at (919) 661-6351, ext. 5304 if you have any questions or would like further information for this particular project.

I thank you in advance for your consideration of this request and your attention to this matter.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", is written over a horizontal line.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

7014 2120 0004 0121 9598

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## Sarah-Beth Miller

---

**From:** Sarah-Beth Miller  
**Sent:** Tuesday, November 17, 2015 1:18 PM  
**To:** rthrower@pci-nsn.gov  
**Subject:** PCT SE Paper GA - TCNS # 128471

Mr. Thrower,

My named is Sarah-Beth Miller and I work for Tower Engineering Professionals, Inc. in Raleigh, NC. I mailed a letter packet and attachments for a proposed telecommunications tower site identified as PCT SE Paper GA (ATC #201440) TCNS# 128471 to your office on October 26, 2015 and just wanted to follow up with you to see if you had any questions or concerns regarding the proposed project. Please let me know if you need any additional information or if you have interest in the proposed tower site by 12/1/2015; otherwise we will assume the Poarch Band of Creek Indians have no interest in the site.

Thank you for your time,  
Sarah-Beth Miller

**Environmental Project Manager | Tower Engineering Professionals, Inc.** ([www.tepgroup.net](http://www.tepgroup.net))

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**Sarah-Beth Miller**

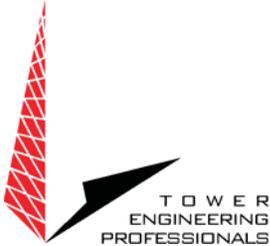
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**From:** postmaster@pci-nsn.gov  
**To:** rthrower@pci-nsn.gov  
**Sent:** Tuesday, November 17, 2015 1:18 PM  
**Subject:** Delivered: PCT SE Paper GA - TCNS # 128471

**Your message has been delivered to the following recipients:**

[rthrower@pci-nsn.gov](mailto:rthrower@pci-nsn.gov)

Subject: PCT SE Paper GA - TCNS # 128471



January 14, 2016

Poarch Band of Creek Indians  
5811 Jack Springs Road  
Atmore, AL 36502

Attn: Robert Thrower – THPO

Subject: Phase II Archaeological Evaluation for a Proposed 150-ft (155-ft with appurtenances) Monopole Communications Tower  
American Towers LLC Site Name: **PCT SE Paper GA**  
American Towers LLC Site Number: **201440**  
**TCNS# 128471, filed 6/26/2015**  
S Hwy 199  
Dublin, GA  
(Laurens County)

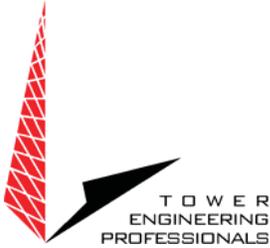
Mr. Thrower:

I am writing on behalf of American Towers LLC and the Federal Communications Commission ("FCC") regarding a proposed 150-ft monopole telecommunications tower (155-ft with appurtenances) to be located west of a portion of S Hwy 199, Dublin, Laurens County, Georgia. Two Cultural Resources Assessments were completed for the proposed telecommunications tower site and identified one previously unrecorded archaeological site, 9Ls337, and further investigation was needed to determine the eligibility of the 9Ls337. TEP sent the proposed Scope of Work (SOW) for the Phase II Archaeological Evaluation to the Poarch Band of Creek Indians on October 26, 2015 and follow-up attempts were made on 11/30/15 & 12/3/15; however no response regarding the Phase II SOW from the Poarch Band of Creek Indians has been received to date. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian of TEP, completed the Phase II Archaeological Evaluation on December 15, 16, 17, 2015 and the results of the investigation are summarized below.

Access to the site will be provided by a proposed 30-ft wide access & utility easement, which will proceed west from a portion of S Hwy 199, along an existing earthen/gravel access drive for approximately 3,960-ft before turning northeast and continuing approximately 1,072-ft along a portion of an existing two-track and earthen access drive, and continuing approximately 35-ft through a portion of an undeveloped forested area until reaching the proposed 100-ft x 100-ft American Towers LLC compound lease area. The proposed tower facility will include the aforementioned 100-ft x 100-ft American Towers LLC lease area and the associated access & utility easement, along with a 30-ft buffer surrounding the proposed tower lease area and are herein referred to as the direct effects area of potential effect (APE). The visual effects APE has been determined to be

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a 0.5-mile radius from the proposed tower's centerline. The proposed tower is anticipated to be an unlit structure.

Site 9Ls337 was identified as a Late Archaic and Woodland site that included "a Savannah River type projectile point, Stallings Island Plain sherd, and a Deptford Simple Stamped sherd" and was located within a portion of the proposed overgrown two-track access drive. The Phase II Archaeological Evaluation was completed on December 15, 16, & 17, 2015 to determine if site 9Ls337 addresses additional research questions regarding Late Archaic and Woodland period lifeways and land use in this region. Ms. Sarah Stephens, Secretary of Interior qualified archaeologist and architectural historian supervised and completed the Phase II field work with field technicians, Ms. Sarah Kidder and Mr. William Brant. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. The Phase II investigation consisted of excavating thirteen (13) 50-cm x 50-cm shovel tests and two (2) 1-m x 1-m units. Thirteen (13) 50-cm x 50-cm shovel tests and two 1-m x 1-m units were excavated. A large amount of lithic material was recovered; however no cultural features were identified.

The combined data from the Review of Archaeological Potential and National Register of Historic Places Assessment completed by TEP indicated that "based on the lack of cultural context and low artifact variation at the site" and "although further excavations would result in recovery of additional artifacts, the data would most likely have a low probability of providing information not already available about the site and region." Therefore, it is the opinion of TEP that "site 9Ls337 in the current project area is not eligible for listing in the NRHP and no further work is recommended."

A portion of the pertinent USGS 7.5-minute topographic map, Phase II Archaeological Evaluation, site plans, and photographs have been included for your review. If you wish to comment on this project, please provide any comments to us by 35 Calendar days from the date of this ITC letter. Written comments may be addressed to me at Tower Engineering Professionals, Inc. 326 Tryon Road, Raleigh, NC 27603-3530 or [sbmiller@tepgroup.net](mailto:sbmiller@tepgroup.net).

If there are any questions, or if any additional information is needed, please do not hesitate to call. Thank you for your assistance and cooperation.

Sincerely and respectfully,

A handwritten signature in black ink, appearing to read "SB Miller", with a wavy line underneath.

Sarah-Beth Miller  
Environmental Project Manager  
Tower Engineering Professionals, Inc.

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Tribe Name	Date of Initial Contact	Initial Response	Date Phase I Findings and Proposed Phase II SOW sent	Phase II Scope of Work Response	Date Phase II Findings Letter Sent	Response to Findings Letter	Date of FCC Referral	Response to FCC Referral	Final Consultation Status
Coushatta Indian Tribe	6/26/2015	Upload review packet including 620 into Dropbox folder and mail review fee.	10/26/2015	"I am concurring with your findings that archaeological sites 9L5335 and 9L5336 do not retain sufficient integrity to contribute to the eligibility for listing in the National Register of Historic Places. The Coushatta Tribe also concurs that archaeological site 9L5337 is of unknown eligibility for listing in the NRHP without further archaeological testing. The Coushatta Tribe concurs that the recommended Phase II work planned for site 9L5337 is adequate to determine the site's NR eligibility." Via telephone on 10/17/15 @ 11:45 AM: "Mr. Bryan Pritchard stated that his tribe had no affiliation for any counties in GA."	1/14/2016	"At this time, I know of no known sacred or ceremonial sites in the immediate area and do not require further Section 106 consultation on this project."	N/A	N/A	Tribe Responded with No Interest
Tuscarora Nation	6/26/2015	If no response within 30 days of NOO, no interest in pre-construction review	N/A	"After reviewing the documents sent, it does look like further study may be needed for the site. In our opinion, we do believe that further site evaluation would be warranted if more objects are found and determined to be Tribal in nature, we do believe that in the proposed project, all proper protocol would be followed and it is our opinion that the proposal can continue."	N/A	"We see no issue with this project continuing at this point."	N/A	N/A	Exclusion Applies
Seminole Nation of Oklahoma	6/26/2015	If no response within 30 days of NOO, no interest in pre-	10/26/2015	No response - left voicemail 11/30/15 & 12/3/15 and emailed 12/3/15	1/14/2016	N/A	N/A	N/A	Exclusion Applies
Muscogee Creek Nation	6/26/2015	Mail review packet including 620 and review fee (include hard copy and CD).	10/26/2015	"After reviewing all pertinent information and considering the amount of artifacts being discovered at this site, at this time Muscogee (Creek) Nation cannot concur with your findings until the Phase II scope of work is complete. Once Phase II scope of work is complete, please submit report and we will review again."	1/14/2016	"After reviewing all pertinent information and our records, at this time we are currently unaware of any historic, cultural, religious or sacred sites at this exact location. Therefore, we recommend a finding of "No Historic Properties Effectuated" for the proposed undertaking."	N/A	N/A	Tribe Responded with No Interest
United Keetoowah Band of Cherokee Indians	6/26/2015	Pay review fee.	10/26/2015	Via telephone on 12/18/15 @ 5:00 PM: "Ms. LaRue-Baker stated that she did not have any issues with the proposed Phase II SOW; however the United Keetoowah Band of Cherokee Indians are interested in the site and requests to see the findings of the Phase II Archaeological Evaluation."	1/14/2016	"The USBCI in Oklahoma has reviewed your project under Section 106 of the NHPA, and has no objections or comments at this time."	N/A	N/A	Tribe Responded with No Interest
Eastern Shawnee Tribe of Oklahoma	6/26/2015	Mail review packet, SHPO response, and review fee.	10/26/2015	"The main comment I have regarding the plan of work is that it seems to be a little over-reaching. The stated goal of a Phase II is to determine eligibility. Thus, once the site's eligibility has been established, the Phase II activities should stop and a mitigation plan prepared."	1/14/2016	"Based on the information provided and a review of our records, we find that the proposed undertaking will have No Adverse Effect on the aforementioned unevaluated cultural resource, and no other historic properties of sacred and/or cultural significance to the Tribe are known to be in the project area. Therefore, ESTO has no objection to the project proceeding as described."	N/A	N/A	Tribe Responded with No Interest
Alabama-Quassarte Tribal Town	6/26/2015	Email and mail review packet and fee.	10/26/2015	"The AQTT THPO has areas of interest in the proposed location and at this time we have identified no religious or cultural sites documented at this time. If the scope of work changes in any way or if artifacts or human remains are discovered please notify the AQTT THPO immediately."	1/14/2016	"The AQTT THPO has areas of interest in the proposed location at this time we have identified no religious or cultural sites documented at this time."	N/A	N/A	Tribe Responded with No Interest
Thipshilocco Tribal Town	6/26/2015	Email and mail review packet and fee.	10/26/2015	"We concur that further evaluation of site 9L5337 for NRHP listing is warranted"	1/14/2016	"Upon review of the Phase II Assessment report, we concur with the determination that the portion of site 9L5337 within the project APE lacks cultural context and is not eligible for listing in the NRHP. Furthermore, we agree that site 9L5337 may extend outside of the project APE, and with an unknown NRHP eligibility, this portion should be avoided."	N/A	N/A	Tribe Responded with No Interest
Shawnee Tribe	6/26/2015	Mail review packet and fee.	10/26/2015	"The Shawnee Tribe's Tribal Historic Preservation Officer concurs that no known historic properties will be negatively impacted by construction of this tower site. The Shawnee Tribe's archives do not reveal any issues of concern at this tower location."	1/14/2016	"The Shawnee Tribe's tribal historic preservation officer concurs that no known historic properties will be negatively impacted by construction of this tower site. The Shawnee Tribe's archives do not reveal any issues of concern at this tower location."	N/A	N/A	Tribe Responded with No Interest
Poncha Band of Creek Indians	6/26/2015	If no response within 30 days, no interest in pre-construction review.	10/26/2015	No response -left voicemail 11/30/15 & 12/3/15 and emailed 11/17/15	1/14/2016	N/A	N/A	N/A	Exclusion Applies

**Appendix 5.**  
**Applicable Permits**



DEPARTMENT OF THE ARMY  
SAVANNAH DISTRICT, CORPS OF ENGINEERS  
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November 4, 2016

Regulatory Division  
SAS-2016-00044

Ms. Margaret Robinson  
American Towers, LLC  
10 Presidential Way  
Woburn, Massachusetts 01801

Dear Ms. Robinson:

I refer to the Pre-Construction Notification submitted on September 21, 2016, requesting verification for use of Nationwide Permit (NWP) No. 14 for impacts to 0.0106 acres of wetland with improvements to an existing utility easement access road. The project is located on the western portion of an approximately 3.303-acre parcel (Tax Parcel: 203 064), South Highway 199, north of a portion of Interstate 16, and south of a portion of Papermill Road, in Laurens County, Georgia (Latitude: 32.486124, Longitude: -82.830257). The request was submitted on your behalf by George T. Swearingen. This project has been assigned number SAS-2016-00044 and it is important that you refer to this number in all communication concerning this matter.

We have completed coordination with other federal and state agencies as described in Part C (31)(d) of our NWP Program, published in the February 12, 2012, Federal Register, Vol. 77, No. 34, Pages 10184-10290 (77 FR). The NWPs and Savannah District's Regional Conditions for NWPs can be found on our website at <http://www.sas.usace.army.mil/Missions/Regulatory/Permitting/GeneralPermits/NationwidePermits.aspx>. During our coordination procedure, no adverse comments regarding the proposed work were received.

Waters of the United States were verified by letter dated June 2, 2016. As a result of our evaluation of your project, we have determined that the proposed activity is authorized under NWP 14, as described in Part B of the NWP Program. Your use of this NWP is valid only if the activity is conducted in accordance with the information submitted and meets the conditions applicable to the NWP, as described at Part C of the NWP Program, the Savannah District's Regional Conditions for NWPs, and the following special conditions:

1. You shall notify the Corps, in writing; at least 10 days in advance of commencement of work authorized by this permit

2. You shall install and maintain erosion and sediment control measures for all fill material that is authorized to be discharged in streams, wetlands and other waters of the United States, in accordance with the Georgia Erosion and Sedimentation Control Act of 1975, as amended, and permanently stabilize fill areas at the earliest practicable date.

3. You shall install and maintain erosion and sediment control measures in upland areas of the project site, in accordance with the Georgia Erosion and Sedimentation Control Act of 1975, as amended, to minimize the introduction of sediment into and the erosion of streams, wetlands and other waters of the United States. This permit does not authorize installation of check-dams, weirs, rip-rap, bulkheads or other erosion control measures in streams, wetlands or other waters of the United States. Authorization would be required from the U.S. Army Corps of Engineers prior to installing any erosion control measures in waters of the United States.

4. All work conducted under this permit shall be located, outlined, designed, constructed and operated in accordance with the minimal requirements of the Georgia Erosion and Sedimentation Control Act of 1975, as amended. Utilization of plans and specifications contained in the "Manual for Erosion and Sediment Control," (Latest Edition), published by the Georgia Soil and Water Conservation Commission, will aid in achieving compliance with the aforementioned minimal requirements.

5. You must fill out and sign the enclosed certification and return it to our office within 30 days of completion of the activity authorized by this permit.

This proposal was reviewed in accordance with Section 7 of the Endangered Species Act. Based on the information we have available, we have determined that the project would have no effect on any threatened or endangered species nor any critical habitat for such species. Authorization of an activity by a NWP does not authorize the "take" of threatened or endangered species. In the absence of separate authorization, both lethal and non-lethal "takes" of protected species are in violation of the Endangered Species Act. See Part (C) of 77 FR for more information.

This verification is valid until the NWP is modified, reissued or revoked. All of the existing NWPs are scheduled to expire on March 18, 2017. It is incumbent upon you to remain informed of changes to the NWPs. Furthermore, if you commence or are under contract to commence this activity before the date that the relevant NWP is modified or revoked, you will have 12 months from the date of the modification or revocation of the NWP to complete the activity under the present terms and conditions of this NWP.

This authorization should not be construed to mean that any future projects requiring Department of the Army authorization would necessarily be authorized. Any new proposal, whether associated with this project or not, would be evaluated on a case-by-case basis. Any prior approvals would not be a determining factor in making a decision on any future request.

Revisions to your proposal may invalidate this authorization. In the event changes to this project are contemplated, I recommend that you coordinate with us prior to proceeding with the work.

This communication does not relieve you of any obligation or responsibility for complying with the provisions of any other laws or regulations of other federal, state or local authorities. It does not affect your liability for any damages or claims that may arise as a result of the work. It does not convey any property rights, either in real estate or material, or any exclusive privileges. It also does not affect your liability for any interference with existing or proposed federal projects. If the information you have submitted and on which the Corps bases its determination/decision of authorization under the NWP is later found to be in error, this determination may be subject to modification, suspension, or revocation.

A copy of this letter is being provided to the following party: Mr. George T. Swearingen, III, 326 Tryon Road, Raleigh, North Carolina 27603.

Thank you in advance for completing our on-line Customer Survey Form located at [http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey). We value your comments and appreciate your taking the time to complete a survey each time you have interaction with our office.

If you have any questions, please call Meredith Allen, Project Manager, Coastal Branch, at 912-652-5503.

Sincerely,

A handwritten signature in black ink, appearing to read "Will. Rutlin". The signature is written in a cursive style with a large initial "W" and a distinct "R".

William M. Rutlin  
Chief, Coastal Branch

Enclosures

Regulatory Division

CERTIFICATION OF COMPLIANCE  
WITH  
DEPARTMENT OF THE ARMY  
NWP 14

PERMIT FILE NUMBER: SAS-2016-00044

PERMITTEE ADDRESS: Ms. Margaret Robinson, American Towers, LLC, 10  
Presidential Way, Woburn, Massachusetts 01801.

LOCATION OF WORK: The project site is located on the western portion of an  
approximately 3.303-acre parcel (Tax Parcel: 203 064), South Highway 199, north of a  
portion of Interstate 16, and south of a portion of Papermill Road, in Laurens County,  
Georgia (Latitude: 32.486124, Longitude: -82.830257).

PROJECT DESCRIPTION: To discharge fill in 0.0106 acre of waters of the United  
States in association with improvements to an existing utility easement access road.

ACRES AND/OR LINEAR FEET OF WATERS OF THE UNITED STATES IMPACTED:  
0.0106 acre

DATE WORK IN WATERS OF UNITED STATES COMPLETED:

COMPENSATORY MITIGATION REQUIRED: No

DATE MITIGATION COMPLETED OR PURCHASED (include name of bank): N/A

I understand that the permitted activity is subject to a U.S. Army Corps of Engineers'  
Compliance Inspection. If I fail to comply with the permit conditions at Part C of the  
Nationwide Permit Program, published in the February 12, 2012, Federal Register, Vol.  
77, No.34, Pages 10184-10290, it may be subject to suspension, modification or  
revocation.

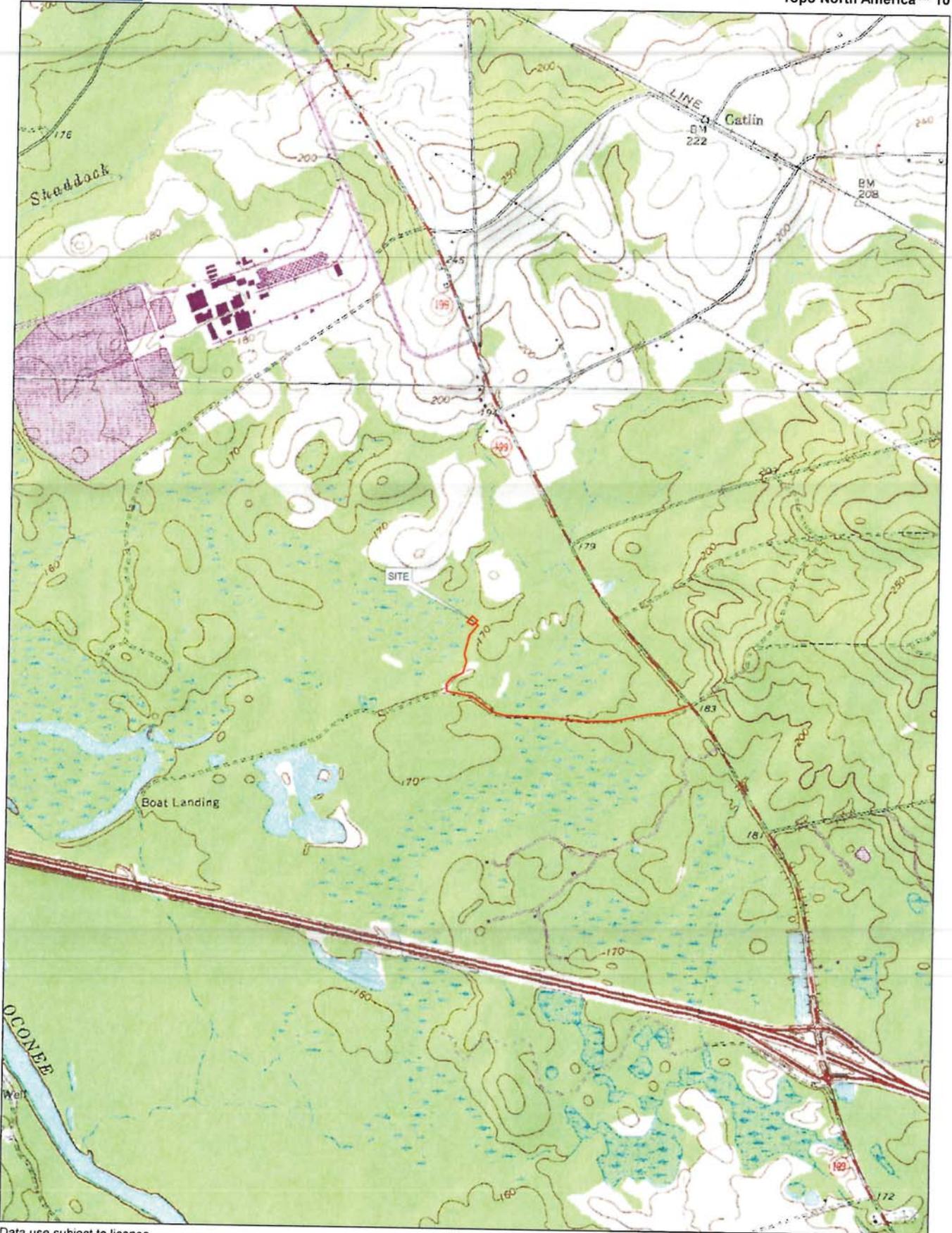
I hereby certify that the work authorized by the above referenced permit as well as any  
required mitigation (if applicable) has been completed in accordance with the terms and  
conditions of the said permit.

---

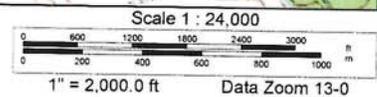
Signature of Permittee

---

Date



Data use subject to license.  
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www.delorme.com



TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC

SITE NAME:

PCT SE PAPER GA

SITE NUMBER: 201440

PROJECT DESCRIPTION

RAWLAND  
150' MONOPOLE

TOTAL TOWER HEIGHT INCLUDING THE APURTENANCE - 155' AGL

VICINITY MAP



LOCATION MAP



DRIVING DIRECTIONS FROM ATLANTA:

- Take I-75 S/485 S
- Continue to follow I-75 S
- Keep left at the fork to stay on I-75 S
- Use the left lane to take exit 165 for I-16 E toward Jim L. Gills Hwy/Savannah
- Continue onto I-16 E
- Use the right lane to take exit 109 toward Dublin E
- Turn left onto GA-509
- Turn left and site will be on the right

- 67.9 mi
- 12.7 mi
- 0.6 mi
- 57.1 mi
- 0.3 mi
- 1.2 mi
- 0.7 mi

PROJECT SUMMARY

SITE ADDRESS: S HWY 169, DUBLIN, GA 31027  
 LATITUDE: 32° 29' 24.2"  
 LONGITUDE: 82° 50' 00.4"  
 PARCEL ID: PORTION OF 203 064  
 ZONING CLASSIFICATION: A  
 ZONING JURISDICTION: LAURENS COUNTY  
 PROPERTY OWNER: PLUM CREEK TIMBERLANDS LP  
 GLENN JOHNSON  
 788-883-6728  
 TOWER OWNER: AMERICAN TOWER CORPORATION  
 10 PRESIDENTIAL WAY  
 DUBLIN, GA 31001  
 TEL: 1-770-528-4500  
 ENGINEER: TOWERSOURCE INC.  
 1875 OLD ALABAMA ROAD  
 DUBLIN, GA 31006  
 678-460-2336  
 ELIZABETH B USHER P.E.  
 655VCC LEVEL II 0000088880  
 CONTACT: MICHAEL 'KEITH' SKINNER  
 CONSTRUCTION MANAGER  
 NETWORK DEVELOPMENT-SE  
 AMERICAN TOWER CORPORATION  
 CELL: 609-529-9276  
 TELEPHONE COMPANY: AT&T  
 888-757-4500  
 POWER COMPANY: GA POWER  
 888-690-5860

SHEET INDEX

NO.	DESCRIPTION
T1	TITLE SHEET
-	SURVEY
A1	AERIAL MAP
C1	GENERAL NOTES
C2	OVERALL SITE PLAN
C3	DETAILED SITE PLAN
C4	TOWER ELEVATION
C5	GRADING & EROSION CONTROL PLAN
C5B	GRADING & EROSION CONTROL PLAN
C5C	GRADING & EROSION CONTROL PLAN
C5D	GRADING & EROSION CONTROL PLAN
C5E	GRADING & EROSION CONTROL PLAN
C6	ROAD PROFILE DETAILS
C7	MAINTENANCE NOTES
C8	GRADING & SEDIMENT CONTROL NOTES
C9	FENCE DETAILS
E1	ELECTRICAL NOTES & ONE-LINE DIAGRAM
E2	ELECTRICAL PLAN
E3	GROUNDING SITE PLAN
E4	GROUNDING DETAILS
E5	METER DETAILS

TOWER OWNER:



DEVELOPER:

TELECOM DEVELOPMENT SERVICES LLC



AAE FIRM  
 TOWERSOURCE  
 10000 W. ALABAMA AVE. SUITE 1000  
 DUBLIN, GA 31006  
 404.688.9998 FAX  
 404.688.9998  
 ENGINEER: ELIZABETH B. USHER

THE INFORMATION CONTAINED HEREIN IS A SET OF DOCUMENTS IS PROPRIETARY AND CONFIDENTIAL. IT IS TO BE USED ONLY FOR THE PROJECT AND TO THE CLIENT'S STRICTLY PRIVILEGED.

NO.	DATE	DESCRIPTION
1	01/11/17	ISSUED FOR PERMITS
2	01/11/17	ISSUED FOR PERMITS
3	01/11/17	ISSUED FOR PERMITS
4	01/11/17	ISSUED FOR PERMITS
5	01/11/17	ISSUED FOR PERMITS
6	01/11/17	ISSUED FOR PERMITS
7	01/11/17	ISSUED FOR PERMITS
8	01/11/17	ISSUED FOR PERMITS
9	01/11/17	ISSUED FOR PERMITS
10	01/11/17	ISSUED FOR PERMITS
11	01/11/17	ISSUED FOR PERMITS
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13	01/11/17	ISSUED FOR PERMITS
14	01/11/17	ISSUED FOR PERMITS
15	01/11/17	ISSUED FOR PERMITS
16	01/11/17	ISSUED FOR PERMITS
17	01/11/17	ISSUED FOR PERMITS
18	01/11/17	ISSUED FOR PERMITS
19	01/11/17	ISSUED FOR PERMITS
20	01/11/17	ISSUED FOR PERMITS



SITE NAME	PCT SE
TOWER OWNER: SITE NUMBER	PAPER GA
REGION TYPE	AMERICAN TOWER
SHEET TITLE	GREENFIELD
TITLE SHEET	
DRAWING NO.	T1
REVISION NO.	1







**TOWER OWNER**



**DEVELOPER**

**TELECOM DEVELOPMENT SERVICES LLC**

**A&E FIRM**

**AA POWERSOURCE**

REGISTERED PROFESSIONAL ENGINEER  
 STATE OF GEORGIA  
 LICENSE NO. 10000  
 ELIZABETH B. USHER

THE INFORMATION CONTAINED IN THIS DRAWING IS THE PROPERTY OF AA POWERSOURCE. IT IS TO BE USED ONLY FOR THE PROJECT AND SITE SPECIFICALLY IDENTIFIED HEREIN. ANY OTHER USE OR DISCLOSURE TO THE CLIENT IS STRICTLY PROHIBITED.

DATE PROJECT #	---
DRAWN BY	WCG
CHECKED BY	EBU

REVISIONS		
NO.	DATE	DESCRIPTION
1	01/11/16	ISSUED FOR PERMITS
2	01/11/16	ISSUED FOR CONSTRUCTION
3	01/11/16	ISSUED FOR CONSTRUCTION



**SITE NAME**

**PCT SE**

**PAPER GA**

**TOWER OWNER: SITE NUMBER**

**AMERICAN TOWER**

**REGION TYPE**

**GREENFIELD**

**SHEET TITLE**

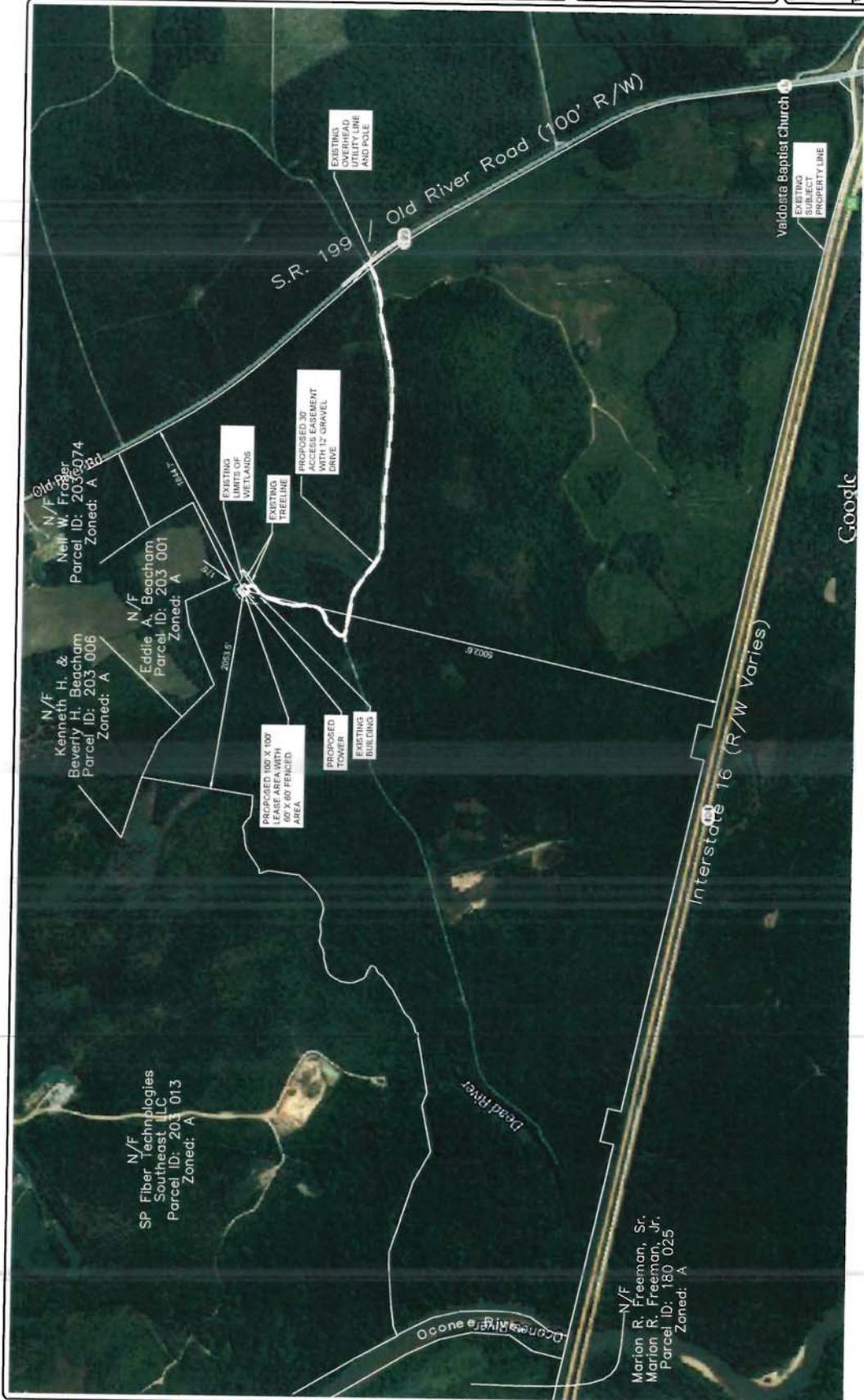
**AERIAL MAP**

**DRAWING NO.**

**A1**

**REGION NO.**

**1**



Google

**AERIAL SITE PLAN**  
 SCALE: 1" = 1000'-0"



**TOWER OWNER:**



**DEVELOPER:**

**TELECOM DEVELOPMENT SERVICES LLC**

**A&E FIRM**

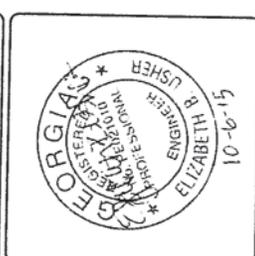
**AWORKSOURCES**

1110 S. W. 10TH AVE.  
SUITE 100  
MIAMI, FL 33135  
TEL: 305.441.1111  
WWW.AWORKSOURCES.COM

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AGE PROJECT #	—
DRAWN BY	WCG
CHECKED BY	EBU

REVISIONS	
NO.	DATE
1	08/14/15
2	08/14/15
3	08/14/15
4	08/14/15
5	08/14/15
6	08/14/15
7	08/14/15
8	08/14/15
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12	08/14/15
13	08/14/15
14	08/14/15
15	08/14/15
16	08/14/15
17	08/14/15



**SITE NAME**

**PCT SE PAPER GA**

**TOWER OWNER - SITE NUMBER**

**AMERICAN TOWER**

**DESIGN TYPE**

**GREENFIELD**

**SHEET TITLE**

**GENERAL NOTES**

**DRAWING NO**

**C1**

**REVISION NO**

**1**

**CONCRETE NOTES:**

- DESIGN & CONSTRUCTION OF ALL CONCRETE ELEMENTS SHALL CONFORM TO THE LATEST EDITION OF THE FOLLOWING APPLICABLE CODES: ACI 301, SPECIFICATIONS FOR STRUCTURAL CONCRETE FOR BUILDINGS; ACI 318, BUILDING CODE REQUIREMENTS FOR REINFORCED CONCRETE.
- MAX DESIGN SHALL BE APPROVED BY OWNER'S REPRESENTATIVE PRIOR TO PLACING CONCRETE. CONCRETE SHALL BE NORMAL WEIGHT (11.5) WITH A MAXIMUM 4" SLUMP AND A MINIMUM 28-DAY COMPRESSIVE STRENGTH OF 3000 PSI UNLESS NOTED OTHERWISE.
- CONCRETE MATERIALS PORTLAND CEMENT REINFORCEMENT WIRE MESH WEIGHT AGGREGATE ADMIXTURES
- ASTM C 150, TYPE I  
ASTM A 185  
ASTM C 33  
NON-CHLORIDE
- REINFORCING DETAILS SHALL BE IN ACCORDANCE WITH THE LATEST EDITION OF ACI 315. OTHER REINFORCING SHALL CONFORM TO ASTM A 615, GRADE 60, DEFORMED UNLESS NOTED OTHERWISE. WAF SHALL CONFORM TO ASTM A 615. ALL REINFORCING SHALL BE CLASS "B" AND HOOKS SHALL BE ASTM STANDARD UNLESS NOTED OTHERWISE.
- MINIMUM COVER FOR REINFORCING STEEL EXPOSED CONCRETE 3 IN NON-EXPOSED SLAB & WALL 1.5 IN NON-EXPOSED BEAMS & COLUMNS 3 IN 1.5 IN LARGER - 2 IN #3 & SMALLER - 1.12 IN HIGH-CHLORIDE
- A 3"x4" CHAMFER SHALL BE PROVIDED AT ALL EXPOSED EDGES OF CONCRETE IN ACCORDANCE WITH ACI 301, SECTION 4.2.4
- INSTALLATION OF CONCRETE EXPANSION/WEDGE ANCHOR SHALL BE PER MANUFACTURER'S RECOMMENDATIONS. NO REINFORCING SHALL BE CUT WITHOUT ENGINEER'S APPROVAL.
- CURING COMPOUNDS SHALL CONFORM TO ASTM C 309.
- ADMIXTURES SHALL CONFORM TO THE APPROPRIATE ASTM STANDARD AS REFERENCED IN ACI 301.
- DO NOT WELD OR TACK WELD REINFORCING STEEL.
- ALL PENETRATIONS SHALL BE IN PLACE PRIOR TO CONCRETE PLACEMENT.
- REINFORCEMENT SHALL BE COLD BENT WHENEVER BENDING IS REQUIRED.
- CONCRETE SHALL NOT BE PLACED IN WATER, ICE, OR ON FROZEN GROUND.
- DO NOT ALLOW CONCRETE SUBBASE TO FREEZE DURING CONCRETE CURING AND SETTING PERIOD
- FOR COLD WEATHER & HOT WEATHER PLACEMENT CONFORM TO APPLICABLE ACI CODES AND RECOMMENDATIONS.

**STRUCTURAL STEEL NOTES:**

- STRUCTURAL STEEL SHALL CONFORM TO THE LATEST EDITION OF THE AISC "SPECIFICATION FOR THE DESIGN, FABRICATION & ERECTION OF STRUCTURAL STEEL FOR BUILDINGS"
- ALL INTERIOR STRUCTURAL STEEL SHALL BE FINISHED WITH ONE COAT FABRICATOR'S NON-LEAD, RED OIL RESISTANT PRIMER. PRIMER SHALL BE PERFORMED AFTER SHOP FABRICATION TO THE GREATEST EXTENT POSSIBLE. ALL WELDS & WELDS IN THE PRIMED AREAS SHALL BE REPAIRED BY FIELD TOUCHUP PRIOR TO COMPLETION OF THE WORK.
- ALL EXTERIOR STRUCTURAL STEEL SHALL BE GALVANIZED IN ACCORDANCE WITH THE SPECIFICATION FOR GALVANIZING STEEL. GALVANIZING SHALL BE PERFORMED AFTER SHOP FABRICATION TO THE GREATEST EXTENT POSSIBLE. GALVANIZING SHALL BE REPAIRED BY FIELD TOUCHUP PRIOR TO COMPLETION OF THE WORK.
- HOLES SHALL NOT BE PLACED THROUGH STRUCTURAL STEEL MEMBERS EXCEPT AS SHOWN AND DETAILED ON THE DRAWINGS.
- CONNECTIONS
  - ALL WELDING SHALL BE DONE USING E70XX ELECTRODES AND SHALL CONFORM TO AISC AND AWS. THE AISC WELDED FILLET WELD SIZES ARE NOT SHOWN. PROVIDE THE MINIMUM SIZE PER TABLE J2.4 IN THE AISC WELDED CONNECTIONS. CONSTRUCTION: 100% EDITION. AT THE COMPLETION OF WELDING, ALL BOLTED CONNECTIONS SHALL USE BEARING TYPE GALVANIZED ASTM A325 BOLTS (3/4") AND SHALL HAVE A MINIMUM OF TWO BOLTS UNLESS NOTED OTHERWISE.
  - BOLTS UNLESS NOTED OTHERWISE SHALL BE GALVANIZED IN ACCORDANCE WITH THE SPECIFICATION FOR GALVANIZING STEEL. GALVANIZING SHALL BE PERFORMED AFTER SHOP FABRICATION TO THE GREATEST EXTENT POSSIBLE. GALVANIZING SHALL BE REPAIRED BY FIELD TOUCHUP PRIOR TO COMPLETION OF THE WORK.
  - CONNECTION DESIGN BY FABRICATOR WILL BE SUBJECT TO REVIEW AND APPROVAL BY ENGINEER.

**GENERAL NOTES:**

- ALL CONSTRUCTION TO COMPLY WITH HRR17 BUILDING CODES
- CONTRACTOR IS TO COMPLY WITH THE REQUIREMENTS FOR QUOTATION (RFQ) AND CONSTRUCTION SPECIFICATIONS (LATEST REVISION) & BUILDING MANUFACTURER'S DRAWINGS, ALL PREVIOUSLY PROVIDED BY DEVELOPER.
- DIMENSIONS TO ALL EXISTING SITE FEATURES SHALL BE FIELD VERIFIED BY THE CONTRACTOR & ANY DISCREPANCIES SHALL BE REPORTED TO THE OWNER'S REPRESENTATIVE.
- THE CONTRACTOR SHALL DETERMINE THE EXACT LOCATION OF EXISTING UTILITIES, PIPES, OR ANY SUBSURFACE STRUCTURES PRIOR TO COMMENCING WORK. THE CONTRACTOR SHALL CONTACT THE LOCAL UTILITY LOCATING SERVICE 48 HRS PRIOR TO DIGGING, DRILLING, OR BLASTING. DEVELOPER'S REPRESENTATIVE SHALL BE NOTIFIED IN WRITING OF ANY CONDITIONS THAT VARY FROM THE PLANS. THE CONTRACTOR'S WORK SHALL NOT VARY FROM THE PLANS WITHOUT THE DEVELOPER'S REPRESENTATIVE.
- IT SHALL BE THE CONTRACTOR'S RESPONSIBILITY TO EXAMINE ALL DRAWINGS & SPECIFICATIONS AND TO COORDINATE HIS WORK WITH THE WORK OF ALL OTHERS TO ENSURE THAT WORK PROGRESSION IS NOT INTERRUPTED.
- CONTRACTOR SHALL COORDINATE THE CONSTRUCTION SCHEDULE WITH THE PROPERTY OWNER AS TO AVOID ANY INTERRUPTIONS WITH THE PROPERTY OWNER'S OPERATIONS
- CONTRACTOR SHALL KEEP THE PROJECT SITE FREE FROM ACCUMULATION OF WASTE MATERIALS & RUBBISH AT ALL TIMES DURING THE CONSTRUCTION. THE CONTRACTOR SHALL MAINTAIN THE PROJECT SITE AT THE COMPLETION OF WORK, EXCEPT FOR MATERIALS REQUIRED BY THE CONTRACT DOCUMENTS TO BE LEFT FOR THE OWNER'S MAINTENANCE.
- THE CONTRACTOR SHALL RESTORE ALL PROPERTY TO ITS PRE-CONSTRUCTION CONDITION TO THE OWNER'S SATISFACTION.
- THE CONTRACTOR SHALL PROTECT EXISTING PROPERTY LINE MONUMENTATION. ANY DISTURBED OR DAMAGED MONUMENTATION SHALL BE REPLACED AT THE CONTRACTOR'S EXPENSE UNDER THE SUPERVISION OF A REGISTERED LAND SURVEYOR.
- DAMAGE TO EXISTING STRUCTURES & UTILITIES SHALL BE REPAIRED OR REPLACED TO OWNER'S SATISFACTION AT THE CONTRACTOR'S EXPENSE. MAINTAIN FLOW FOR ALL UTILITIES.
- UNLESS OTHERWISE INDICATED, DEVELOPER SHALL OBTAIN & PROVIDE CONSTRUCTION PERMITS. THE CONTRACTOR SHALL OBTAIN ALL REQUIRED LOCAL, CITY, STATE, AND OR COUNTY CONSTRUCTION LICENSES, UPON COMPLETION OF THE WORK. THE CONTRACTOR SHALL APPLY FOR & PROVIDE A CERTIFICATE OF OCCUPANCY.
- THE CONTRACTOR SHALL BE RESPONSIBLE FOR DEWATERING AND THE MAINTENANCE OF SURFACE FOR CONSTRUCTION.
- CONTRACTOR SHALL COMPLY WITH ALL LOCAL, STATE, & FEDERAL REGULATIONS.
- CONSTRUCTION WASTE MAY NEITHER BE BURNED NOR BURIED AND MUST BE TAKEN TO AN APPROVED LANDFILL.
- SECURITY TO THE SITE SHALL BE MAINTAINED AT ALL TIMES.
- CONTRACTOR IS RESPONSIBLE FOR THE CONDITION OF THE SHELTER DURING AND AFTER CONSTRUCTION. THE EQUIPMENT SHELTER SHALL NOT BE USED FOR STORAGE OF MATERIALS OR EQUIPMENT. CONTRACTOR SHALL ENSURE THE SHELTER IS CLEANED AT CONCLUSION OF CONSTRUCTION AND THE FLOOR CLEANED, WAXED, AND BUFFED TO SHINE.
- FOR GREENFIELD/TOWER SITES, CONTRACTOR IS RESPONSIBLE FOR ENSURING THE TOWER LIGHTS ARE MONITORED MORNING AND NIGHT EACH 24 HRS FROM PROJECT START TO PROJECT END. THE TOWER LIGHTS SHALL BE MONITORED BY THE CONTRACTOR TO THE PROJECT MANAGER AT THE TIME THE TOWER IS TOPPED OUT TO FORWARD NOTIFICATION TO DEVELOPER.

**LEGEND**

- X — FENCE
- 550 — COUNTRY LINE
- LEASE AREA
- EASEMENT
- — DISCONNECT SWITCH
- ⊕ — METER
- — CIRCUIT BREAKER
- ⊗ — CODED NOTE NUMBER
- CHEMICAL GROUND ROD
- GROUND ROD
- ⊗ — GROUND ROD WITH INSPECTION SLEEVE
- CABLED TYPE CONNECTION
- COMPRESSION TYPE CONNECTION
- GROUND WIRE





TOWER OWNER  


DEVELOPER  
 TELECOM DEVELOPMENT SERVICES LLC

A&E FIRM  
  
 POWERSOURCE  
 18 SULLY AVENUE, SUITE 1000  
 ROSWELL, GA 30076  
 TEL: 678-990-2244  
 FAX: 678-990-2245  
 ENGINEER: RICHARD L. DICKER

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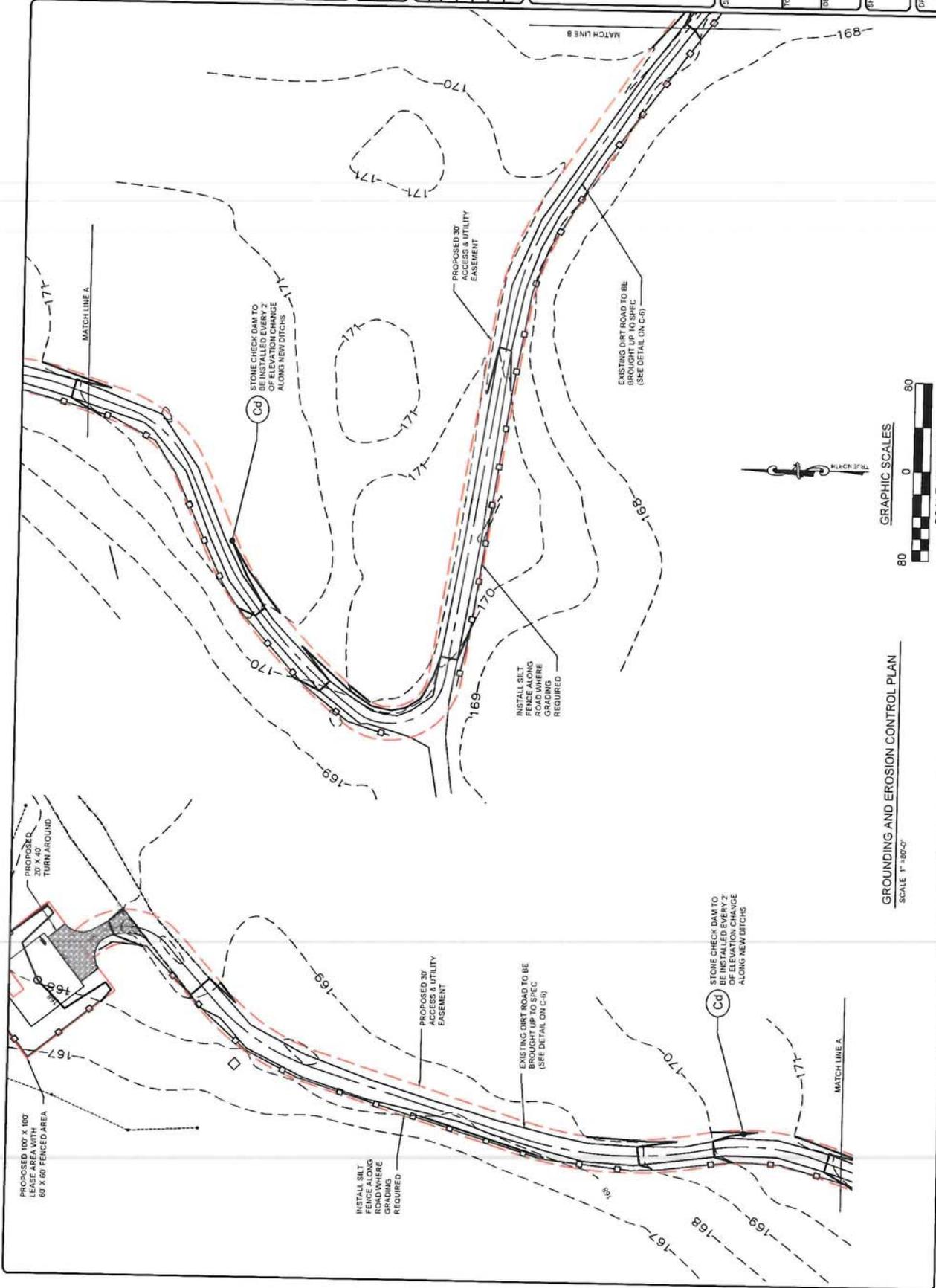
A&E PROJECT #	---
DRAWN BY	WCG
CHECKED BY	EBU

REVISIONS	
NO.	DESCRIPTION
1	ISSUED FOR PERMITS
2	ISSUED FOR CONSTRUCTION
3	ISSUED FOR CONSTRUCTION

PROFESSIONAL ENGINEER  
 RICHARD L. DICKER  
 LICENSE NO. 10000  
 STATE OF GEORGIA  
 10-6-15

SITE NAME  
**PCT SE**  
**PAPER GA**  
 TOWER OWNER: SITE NUMBER  
 AMERICAN TOWER  
 DESIGN TYPE  
 GREENFIELD

SHEET TITLE  
**GRADING & EROSION CONTROL PLAN**  
 DRAWING NO.  
**C5C**  
 REVISION NO.  
**1**



GRADING AND EROSION CONTROL PLAN  
 SCALE: 1"=80'-0"