

NEPA Report

April 23, 2020



Moncure

2389 Old U.S. Highway 1

Moncure, NC 27559

Trileaf # 657434

Prepared For:

Pyramid Network Services

6615 Towpath Road
East Syracuse, NY 13057

Prepared By:

Trileaf Corporation

2550 S IH 35, Suite 200
Austin, TX 78704

NEPA Report Summary

Site Name/Location:

Moncure / Trileaf # 657434
2389 Old U.S. Highway 1, Moncure, NC 27559
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

Project Description:

Pyramid Network Services proposes to construct a 350-foot self-support communications tower, with an overall height of 360 feet, and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area. The project includes an access/utility easement, measuring 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1.

1. Is the facility located in an officially designated wilderness area? [47 CFR 1.1307 (a)(1)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) National Wilderness Preservation System Website (www.wilderness.net)

2. Is the facility located in an officially designated wildlife preserve? [47 CFR 1.1307 (a)(2)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) US Fish & Wildlife Service National Wildlife Refuge System Map (Appendix B)

3. Will the facility: (i) affect listed threatened or endangered species or designated critical habitats; or (ii) jeopardize the continued existence of any proposed endangered or threatened species; or is it likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973? [47 CFR 1.1307 (a)(3)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Site Reconnaissance Review of US Fish & Wildlife Service Critical Habitat and Federally Listed Endangered Species (Appendix D) Informal Biological Assessment (Appendix D)

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing on the State or National Registers of Historic Places? [47 CFR 1.1307 (a)(4)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Site Reconnaissance Cultural Resource Investigation (Appendix E) State Historic Preservation Office Section 106 Review (Appendix E)

5. Will the facility affect an Indian religious site? [47 CFR 1.1307 (a)(5)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Conditional Clearance	Site Reconnaissance Correspondence with Native American Tribes via FCC TCNS (Appendix F) Review of Bureau of Indian Affairs Indian Reservation Map (Appendix B)

6. Will the facility be located in a "floodplain", and not be placed at least one (1) foot above the base flood elevation of the floodplain? [47 CFR 1.1307 (a)(6)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Review of FEMA Flood Map (Appendix B)

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)? [47 CFR 1.1307 (a)(7)]

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) Review of US Fish & Wildlife Service National Wetlands Inventory Map (Appendix B) Review of USDA NRCS Web Soil Survey Map (Appendix B)

8. Will the antenna tower or supporting structure be equipped with high intensity white lights and located in a residential neighborhood, as defined by the applicable zoning law?

Yes	No	Data Sources:	
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Construction Drawings (Appendix A) It is assumed that clients will not utilize high intensity white lights in residential areas

Morgan Rasmussen

Signature

Morgan Rasmussen
Name

April 23, 2020

Date

Trileaf Corporation
Company

NEPA Report

Introduction

Trileaf Corporation (Trileaf) completed a NEPA Review for the above-referenced Pyramid Network Services (Pyramid) site. The purpose of a NEPA Review is to comply with the National Environmental Policy Act (NEPA) of 1969. Trileaf performed extensive research by consulting with appropriate state and federal agencies and reviewing readily available published lists, files, data, and maps to provide our clients with a complete NEPA document. The following summarizes the scope of work Trileaf performed in accordance with the Federal Communications Commission's (FCC's) rules implementing NEPA (47 CFR Section 1.1307 (a) (1) through (8) to determine whether any of the below listed FCC special interest items would be affected by the proposed action. Referenced materials are included as attachments, where applicable and available.

Pyramid is proposing to construct a 350-foot self-support communications tower with an overall height of 360 feet, place associated equipment within an approximately 3,600 square foot lease area, and install an approximately 30-foot wide access/utility easement. The proposed easement will extend approximately 185 feet east to an existing asphalt lot, then approximately 268 feet south, connecting with Old U.S. Highway 1. The proposed project site is located at approximately 2389 Old U.S. Highway 1, Moncure, NC 27559 at 35° 37' 0.13" North latitude and 79° 3' 9.96" West longitude.

During Trileaf's site reconnaissance, it was observed that the site is currently a forested area being used for silviculture, and the areas surrounding the site are predominately wooded land.

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

Trileaf reviewed the USGS 7.5-minute topographic map titled "Moncure" Quadrangle, North Carolina, and information from the National Wilderness Preservation System (NWPS) (<http://www.wilderness.net>) to determine if the site is located within an officially designated wilderness area.

There are currently twelve (12) officially designated wilderness areas in the State of North Carolina. The closest wilderness area to the project site is the Birkhead Mountains Wilderness Area, which is located approximately 57 miles west of the project site.

Based on this review, the project site is not located within an officially designated wilderness area.

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

Trileaf reviewed the USGS 7.5-minute topographic map titled "Moncure" Quadrangle, North Carolina, and information from the National Wildlife Refuge (NWR) System (<http://www.fws.gov/refuges>) to determine if the site is located within an officially designated wildlife preserve or refuge.

Based on this review, the project site is not located within an officially designated wildlife preserve or refuge. A copy of the NWR System map is located in Appendix B.

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

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

On November 21, 2019, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). In addition, Trileaf reviewed the United States Fish and Wildlife Service (USFWS) critical habitat information and determined that the site is not located within designated critical habitat. Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or critical habitats resulting from the proposed action may be affected, but are not likely to be adversely affected. Trileaf determined the finding of “may affect, but is not likely to adversely affect” for the species, their habitats, and designated critical habitats for the site. Copies of the IBA and critical habitat review are located in Appendix D.

FEDERAL

On December 17, 2019, Trileaf requested the Section 7 Consultation guidance from the USFWS – Raleigh, North Carolina Ecological Services Field Office. According to guidance obtained on January 16, 2020, the USFWS concurs with the finding of “may affect, but not likely to adversely affect” federally listed species, their critical habitat, or other special resources.” A copy of the USFWS’ Section 7 clearance is located in Appendix D.

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or are eligible for listing, in the National Register of Historic Places?

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

A search of the *National Historic Landmarks* (NHL), *National Register of Historic Places* (NRHP), *State Historic Preservation Office* (SHPO) files, and a field survey was conducted by Ms. Abigail Heller, Secretary of Interior-qualified Archaeologist, Ms. Lindsey Allen, Secretary of Interior-qualified Senior Architectural Historian, and Mr. Garrett Silliman, Senior Archeologist, contracted by Trileaf through Johnson, Mirmiran, and Thompson, Inc., to identify any cultural resources within the area of direct effects and within a 0.75-mile radius for visual effects.

It was determined that there were no historic properties identified within the Area of Potential Effects (APE) for direct effects, and no historic properties identified within the APE for visual effects. Additionally, the

identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to the SHPO via Form 620 on December 5, 2019. The SHPO concurred that the proposed undertaking would have no direct or visual effects on historic properties in a response letter dated December 17, 2019. A copy of the SHPO concurrence letter, Form 620, and associated documents are located in Appendix E.

On November 20, 2019, Ms. Angela Birchett, Administrator of Chatham County Zoning Board of Adjustment, and Chatham County Historical Museum were notified of the proposed project and invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. On December 3, 2019, Ms. Angela Birchett responded with comments concerning zoning. On November 28, 2019, Ms. Beverly Wiggins, a volunteer at the Chatham County Historical Association, responded with no interest in consulting further on the proposed project. Additionally, a legal notice regarding the proposed telecommunications tower construction was posted in the *Chatham News and Record* on November 21, 2019. No comments from the legal notice have been received by Trileaf. Copies of the correspondence and legal notice are located in Appendix E.

NATIONAL SCENIC TRAILS

On October 5, 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System created by the National Trails System Act of 1968.

Based on this review, the project site is not located within 1 mile of a National Scenic Trail. A copy of the trails map is located in Appendix B.

5. Will the facility affect any Indian religious sites?

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

On November 15, 2019, Trileaf submitted project information through the Tower Construction Notification System (TCNS) to the FCC who initiated contact with the tribes on November 22, 2019. As of January 31, 2020, all tribes have confirmed clearance either directly or by default via the FCC referral process. Trileaf determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that the client stop construction and notify our office immediately. Tribal consultation documentation and associated correspondence is located in Appendix F.

The Crow Creek Sioux Tribal Council requests that a Tribal Monitor be present during all ground disturbing activities. The Tribal Monitor must be notified 7 days prior to any ground disturbing activity.

6. Will the facility be located in a floodplain and not be placed at least one (1) foot above the base flood elevation of the floodplain?

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel #3710968700L, dated November 17, 2017, to determine if the project was located within the 100-year floodplain.

Trileaf determined that the property is located in Zone X, areas determined to be outside the 500-year floodplain. Therefore, the project site is not located within a 100-year floodplain. A copy of the FEMA FIRM showing the project site location is located in Appendix B.

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

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5-minute topographic map titled “Moncure” Quadrangle, North Carolina, and review of the relevant USFWS National Wetlands Inventory Map (<http://www.fws.gov/wetlands/Data/Mapper.html>) that there are no federally designated wetlands on or in the immediate vicinity of the proposed project site.

Trileaf’s site assessment revealed the potential for jurisdictional features located on the project site. Trileaf identified a ditch extending from a pond located on the site that the proposed access/utility easement crosses over. Due to the presence of surface water features mapped within close proximity to the site, and the potential for the ditch to have connectivity to these features, a wetland delineation was recommended to be completed to identify any potentially jurisdictional features located on the site. The wetland delineation was completed by Carolina Wetland Services, Inc., on April 16, 2020. The delineation revealed that the site is an upland area and lacks any jurisdictional features, streams, or wetlands.

Based on this review, no designated wetland areas or potentially jurisdictional features were located within the vicinity of this project and no significant changes in surface features resulting from the proposed undertaking are anticipated. Copies of the soil map, wetlands map, and wetland delineation report are located in Appendix B.

8. Zoning/High Intensity White Lights/Radio Frequency

As a standard practice, Pyramid does not construct facilities requiring high intensity white lights that are to be located in residentially zoned neighborhoods. According to Pyramid, high intensity white lights will not be used for towers less than 500 feet in height.

Conclusion

A NEPA Review of the proposed undertaking was performed by Trileaf Corporation in conformance with the FCC rules and regulations for implementing NEPA; 47 CFR 1.1301 to 1.1319.

Based on data obtained during the Site visit, consultation with government agencies, and a review of readily available information from other sources, the preparation and filing of an Environmental Assessment will not be required and no further NEPA-related action is required for the proposed undertaking.

Qualifications



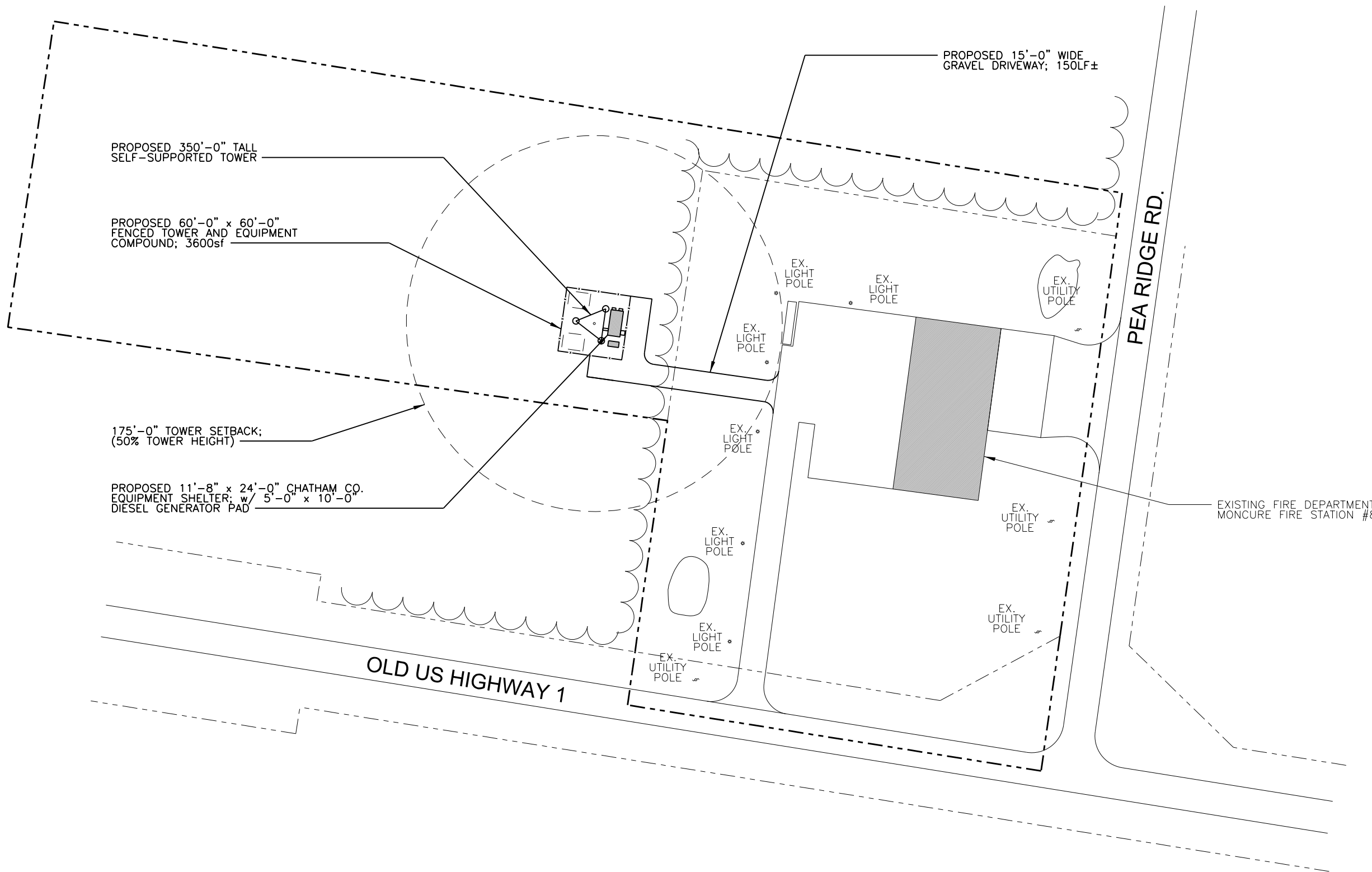
John Huter
Project Manager



Morgan Rasmussen
Project Scientist

Appendix A

Site Plans



1
SS-1

SITE SKETCH

SCALE: 1" = 100'-0"

NO.	DATE	REVISION
90%	08/30/2019	90% SITE SKETCH
95%	10/04/2019	95% SITE SKETCH

KCI TECHNOLOGIES

4505 FALLS OF NEUSE RD., SUITE 400
RALEIGH, NORTH CAROLINA 27609
(919) 783-9214
ENGINEERS • PLANNERS • ECOLOGISTS

MOTOROLA SOLUTIONS

MOTOROLA SOLUTIONS, INC.
8720 RED OAK BLVD., SUITE 123
CHARLOTTE, NC 28217

CONTACT: CARL CARDINALE
PHONE: (704) 609-6182

MONCURE FIRE STATION

2389 OLD US HIGHWAY 1
MONCURE, NC 27559
CHATHAM COUNTY, NC

DATE OF ORIGATION : 07/01/2019

DRAWN BY : TNW APPROVED BY :

CHECKED BY : KCI# : 0119xxxxx_x

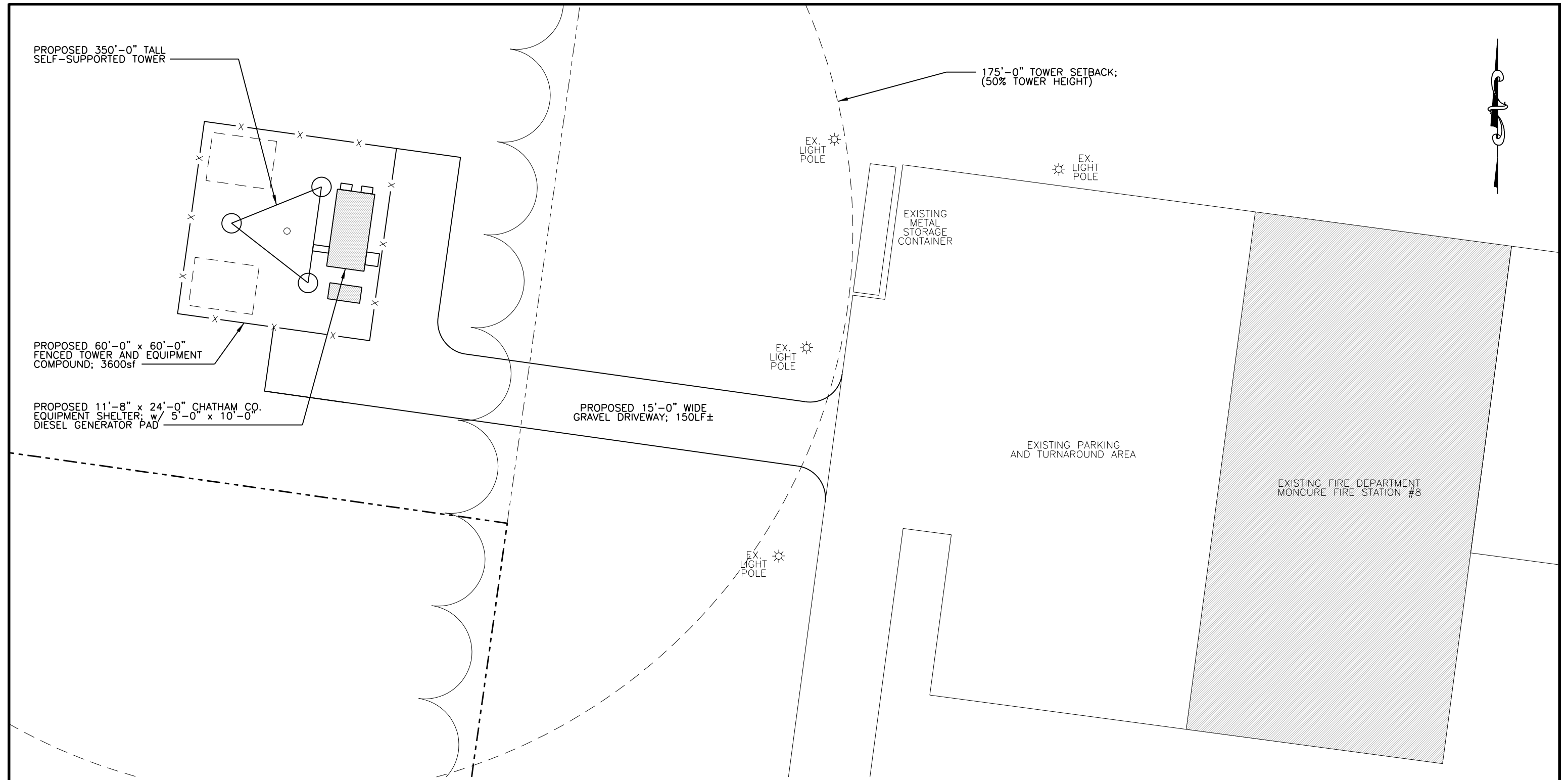


CHATHAM COUNTY, NC
PLANNING DEPARTMENT
80-A EAST STREET.
PITTSBORO, NC 27312
(919) 542-8204

SITE SKETCH

SS-1

SEAL:



1
SS-2

SITE SKETCH

SCALE: 1" = 30'-0"

NO.	DATE	REVISION
90%	08/30/2019	90% SITE SKETCH
95%	10/04/2019	95% SITE SKETCH

KCI
TECHNOLOGIES

4505 FALLS OF NEUSE RD.,
SUITE 400
RALEIGH, NORTH CAROLINA 27609
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MONCURE FIRE STATION

2389 OLD US HIGHWAY 1
MONCURE, NC 27559
CHATHAM COUNTY, NC

DATE OF ORIGATION : 07/01/2019

DRAWN BY : TNW APPROVED BY :

CHECKED BY : KCI# : 0119xxxxx_x



CHATHAM COUNTY, NC
PLANNING DEPARTMENT
80-A EAST STREET.
PITTSBORO, NC 27312
(919) 542-8204

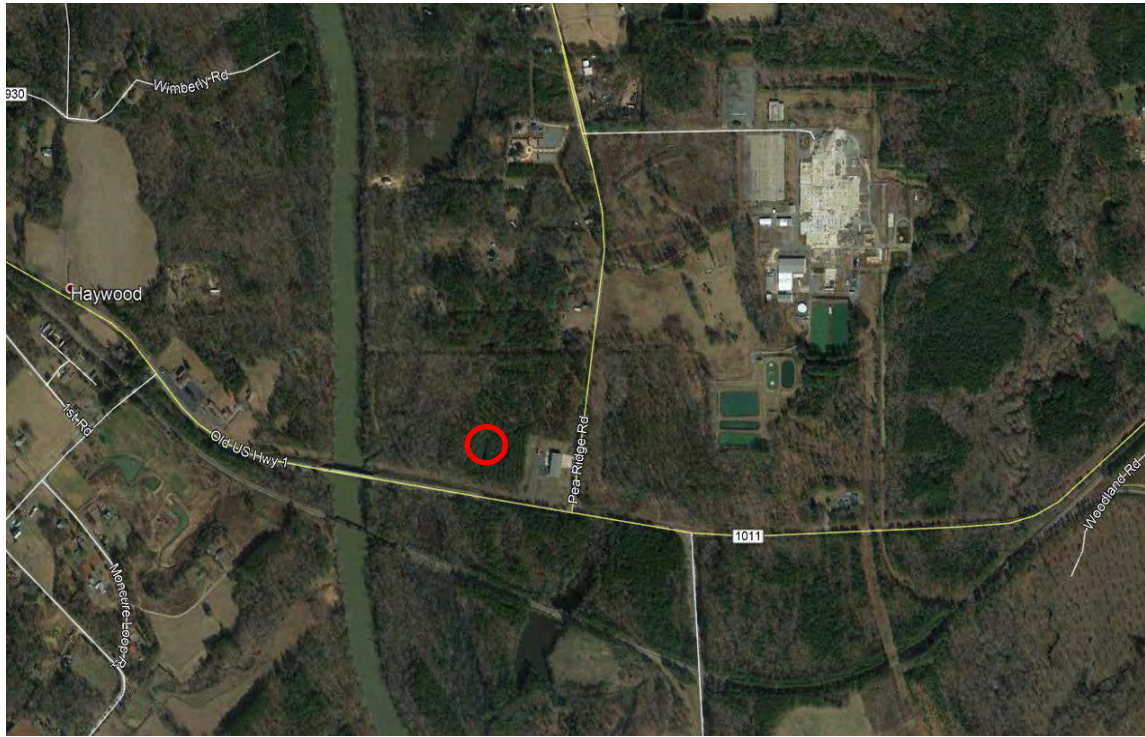
SEAL:

SITE SKETCH

SS-2

Appendix B

Site Maps



Site Location & Surrounding Properties



Site Location



Easement

Aerial Photographs (2018)
Pyramid Network Services – Moncure
 2389 Old U.S. Highway 1
 Moncure, NC 27559



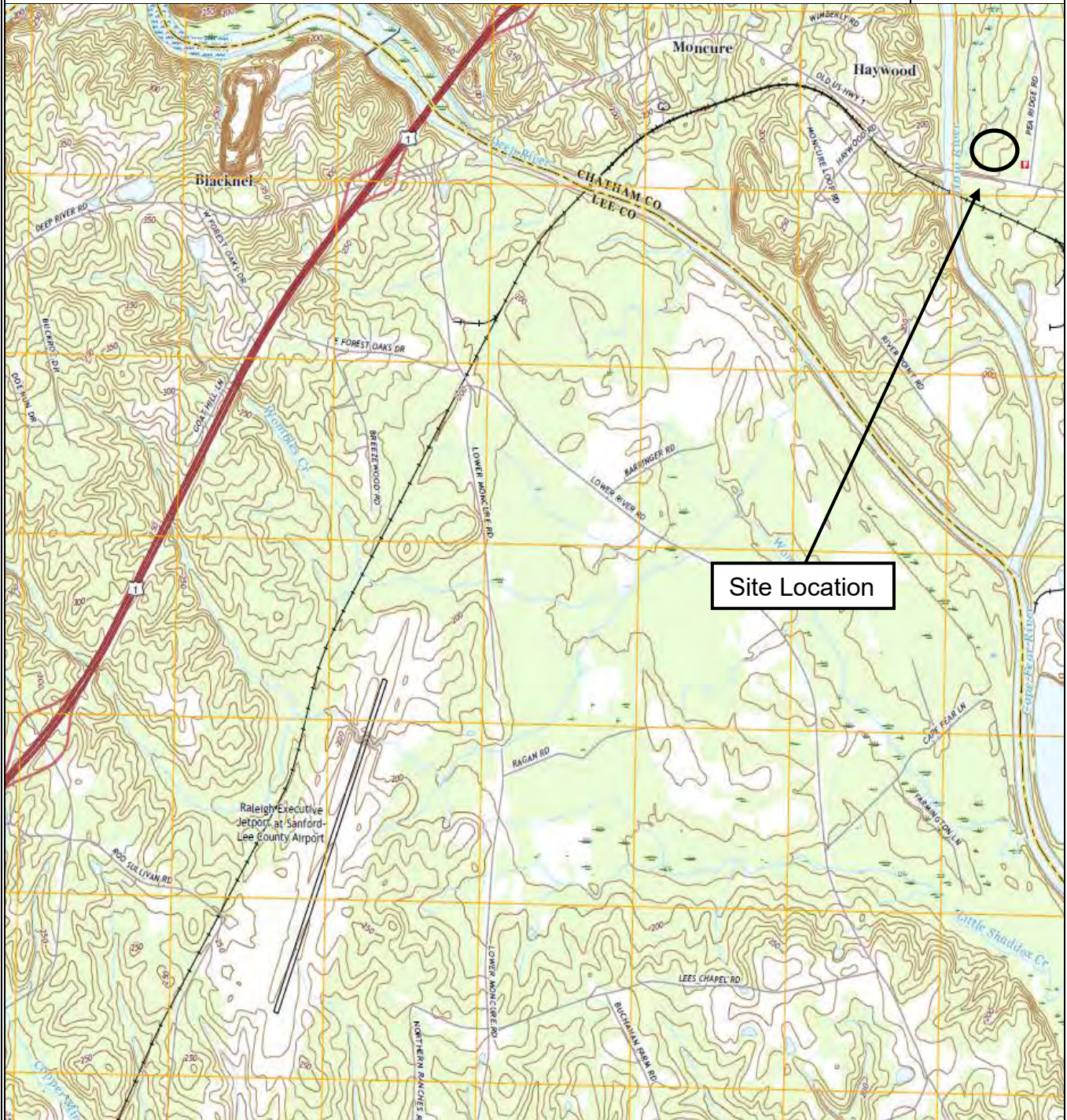
Moncure Quadrangle, North Carolina (2019)

Contour Interval = 10 Feet

Latitude: 35° 37' 0.13" N Longitude: 79° 3' 9.96" W



North



Site Location

Site Vicinity Map

Pyramid Network Services – Moncure

2389 Old U.S. Highway 1

Moncure, NC 27559



National Flood Hazard Layer FIRMette



Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



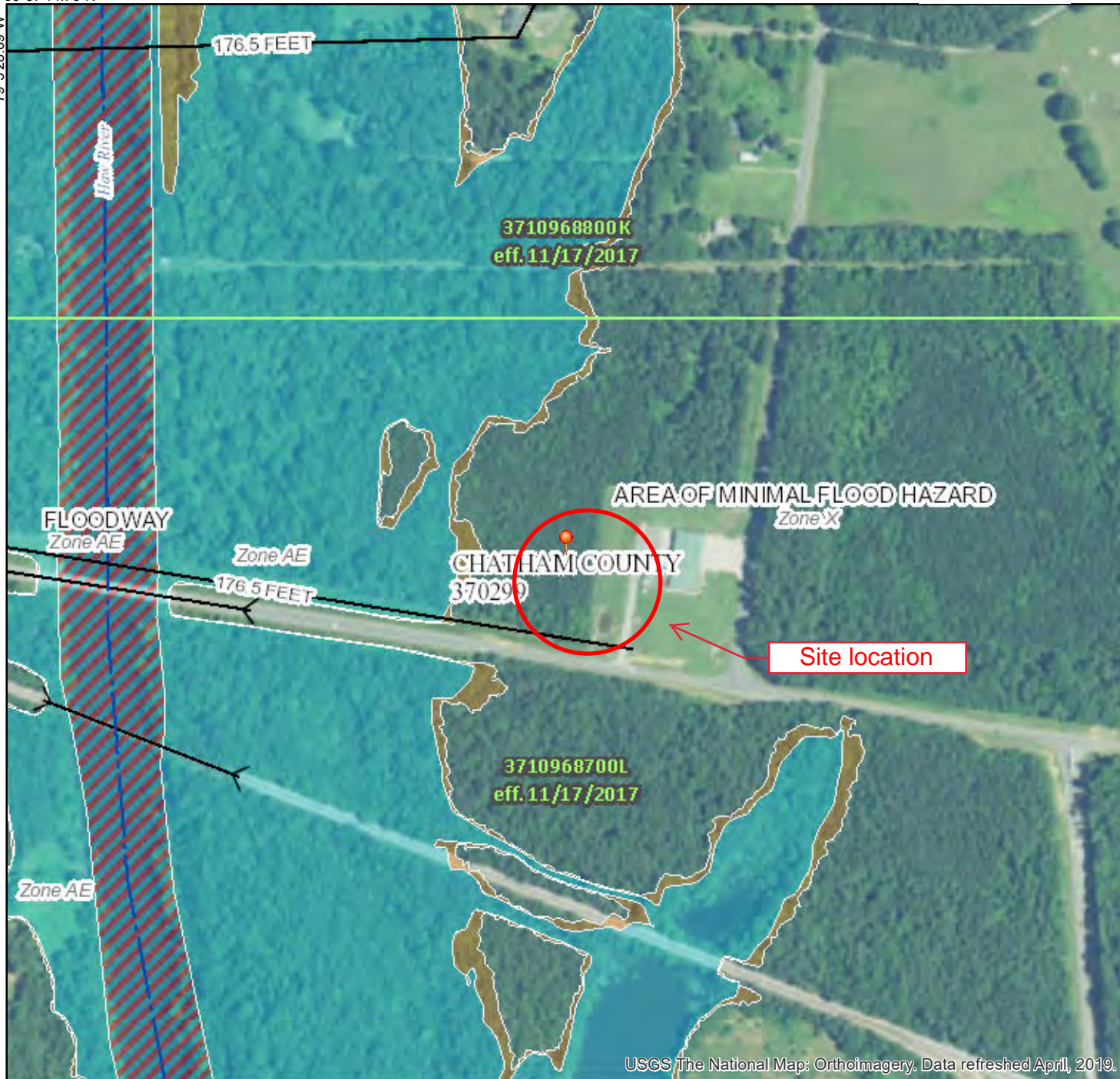
The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/20/2019 at 3:38:56 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

35°37'14.75"N
79°3'28.69"W

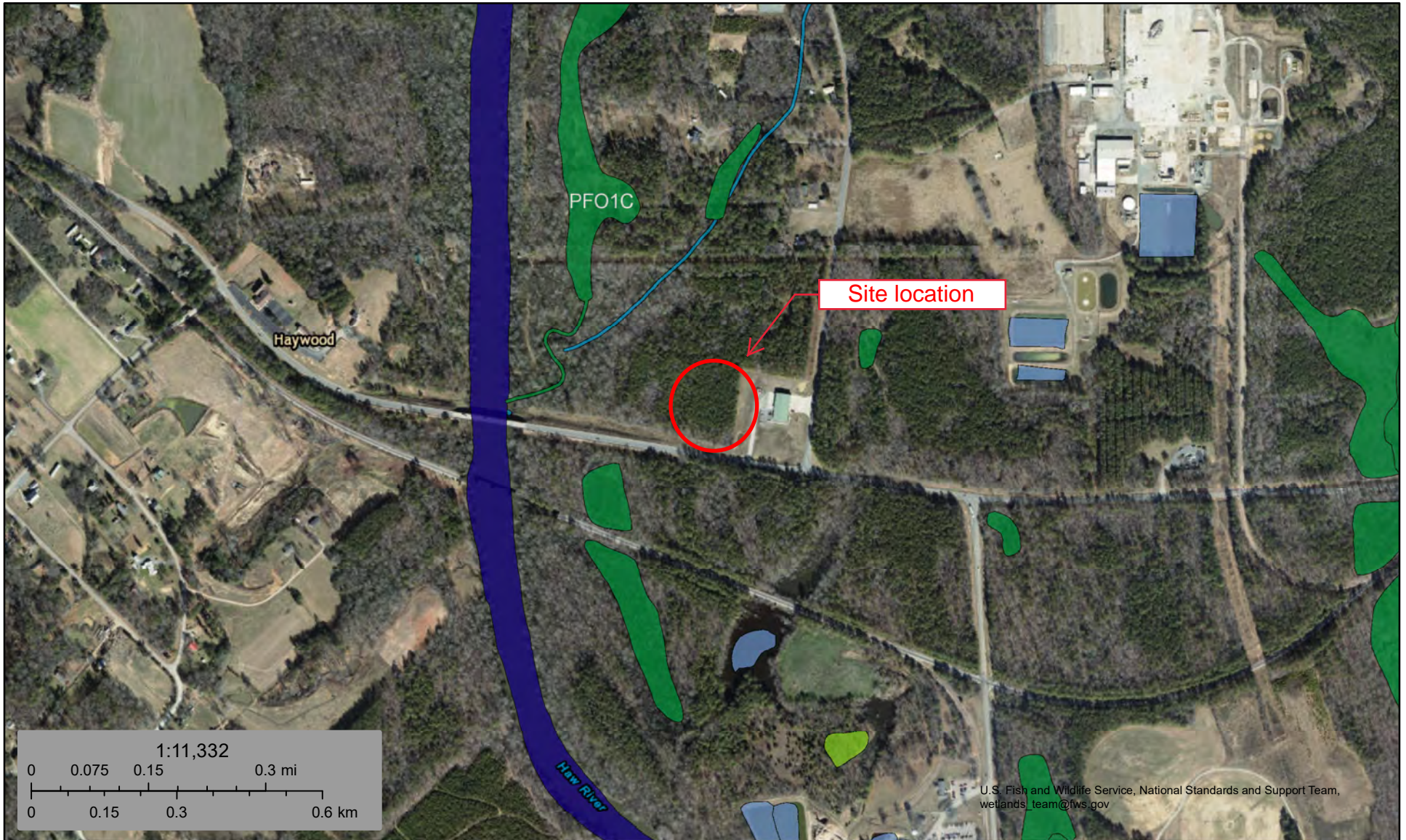


USGS The National Map: Orthoimagery. Data refreshed April, 2019.

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








35°36'45.51"N

79°2'51.23"W



November 20, 2019

Wetlands

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

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

Soil Map—Chatham County, North Carolina



Map Scale: 1:3,000 if printed on A portrait (8.5" x 11") sheet.


Meters 240

Feet 600

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 17N WGS84

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

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

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

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

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

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

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

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

Soil Survey Area: Chatham County, North Carolina
Survey Area Data: Version 22, Sep 16, 2019

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

Date(s) aerial images were photographed: Jun 15, 2015—Dec 9, 2017

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
ChA	Chewacla and Wehadkee soils, 0 to 2 percent slopes, frequently flooded	0.0	5.9%
PeA	Peawick fine sandy loam, 0 to 2 percent slopes	0.3	94.1%
Totals for Area of Interest		0.4	100.0%

U.S. Fish and Wildlife Service
National Wildlife Refuge System Map



North



Ref
20,
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tha
We
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20,000
Abb

USFWS – Wildlife Refuge Map

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, NC 27559



North American Migration Flyways



North



Migratory Bird Flyways – Location Map

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, NC 27559



National Park Service
National Historic Trails and Scenic Routes



North



National Park Service – Trails and Routes Map

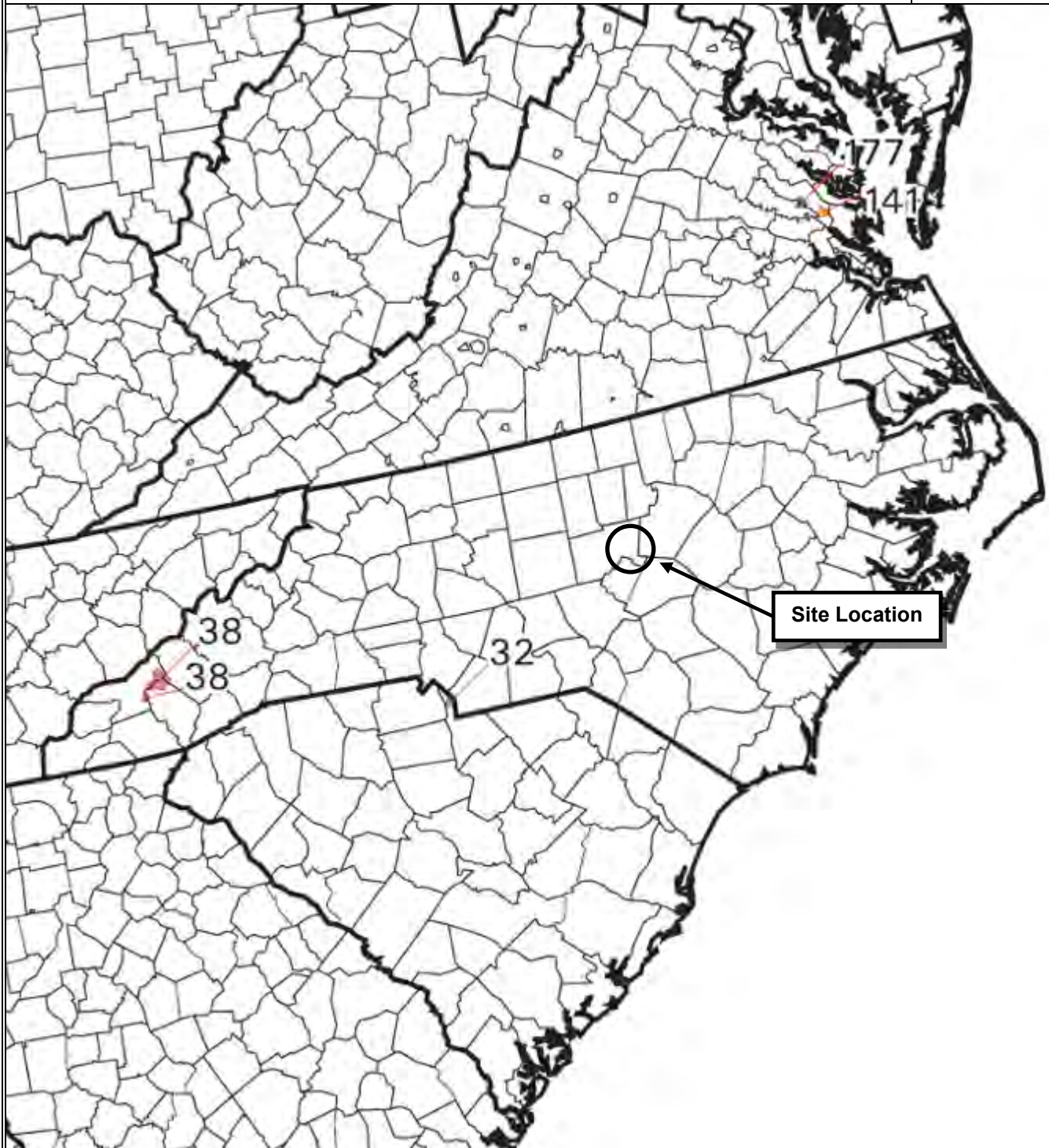
Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, NC 27559



Bureau of Indian Affairs
Indian Reservation Map



North



Bureau of Indian Affairs – Reservation Map

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, NC 27559



Appendix C
Site Photographs



Site Photograph 1 – Looking north at the Site



Site Photograph 2 – Looking south at the Site

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019



Site Photograph 3 – Looking east at the Site



Site Photograph 4 – Looking west at the Site

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019



Site Photograph 5 – Looking north away from the Site



Site Photograph 6 – Looking south away from the Site

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019



Site Photograph 7 – Looking east away from the Site



Site Photograph 8 – Looking west away from the Site

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019



Site Photograph 9 – Looking west along the access/utility easement



Site Photograph 10 – Looking east along the access/utility easement

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019

Appendix D

Documentation of Officially Designated
Wilderness Areas, Wildlife Preserves and
Endangered Species



ENVIRONMENTAL • ARCHITECTURE • ENGINEERING

1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

December 17, 2019

**U.S. Fish and Wildlife Service
Raleigh Ecological Services Field Office**

Attn: Dale Suiter

P.O. Box 33726

Raleigh, NC 27636-3726

Email: dale_suiter@fws.gov

RE: Pyramid Network Services – Moncure – Trileaf Project #657434

2389 Old U.S. Highway 1, Moncure, NC 27559

Chatham County, Moncure Quadrangle (USGS)

Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

Dear Mr. Suiter:

Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our client proposes to construct a 360-foot self-support communications tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area. The project includes an access/utility easement, measuring 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1. The proposed access/utility easement and proposed tower compound lease area are located within wooded land, with a portion of the easement utilizing a grass-covered area and existing asphalt covered driveway. A site location map, photos and biological assessment are enclosed to assist you in your review.

Our investigation includes determining if any of the following special resource areas are located at the site.

1. Is the site located in or on a wilderness area or wildlife preserve?
2. Is the site located within a principal migratory bird flyway?
3. Is the site located in or on a designated critical habitat?
4. Does the site sustain any species of plant or animal life that is designated or proposed as threatened or endangered?

As noted in the enclosed Informal Biological Assessment, potential habitat may be present within the action area for the Red-cockaded Woodpecker (*Picoides borealis*). However, it is worth noting that only a portion of the Site is located within a wooded area where living pine trees are present. The Site consists of a proposed easement extending through land associated with the Moncure Fire Department, which is situated on grazed land where pine trees are not present, into a proposed lease area located near the edge of a wooded area. Furthermore, the pine trees observed within the wooded area were not identified as mature pine trees, which are often the preferred habitat of Red-cockaded Woodpeckers. Due to the Site's close proximity to development and the lack of dominating mature pine trees, it is Trileaf's opinion that the proposed project will have an insignificant impact on the Red-cockaded Woodpecker. Therefore, based on the documents reviewed, Trileaf concluded that the project may affect, but is not likely to adversely affect, the Red-cockaded Woodpecker.

Trileaf is requesting concurrence from the USFWS with the finding of "may affect, but not likely to adversely affect" to threatened and endangered species, critical habitat, or other special resources. If you need additional information or have any questions you may reach me at (404) 993-1760 or m.rasmussen@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Morgan Rasmussen

Morgan Rasmussen
Project Scientist

Informal Biological Assessment
Pyramid Network Services
Project Name: Moncure / Trileaf #657434
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

Trileaf performed an Informal Biological Assessment for the subject site. The purpose is to document whether the proposed undertaking will affect listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds. A project description, site photographs and topographical site location maps are included in this report.

Proposed Project Description:

The Site is located at 2390 Old U.S. Highway 1, Moncure, Chatham County, North Carolina, 27559, and consists of the construction of a 350-foot self-support communications tower, with a total height of 360 feet including attachments. The proposed tower will be within a 60-foot by 60-foot (3,600-square-foot) lease area. In addition, the project includes an access/utility easement, measuring approximately 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1. The proposed tower site is approximately 183.2 feet above mean sea level.

Site and Surrounding Habitat:

The Site is currently located within a forested area being used for silviculture. During the area reconnaissance, a tree survey was not conducted, however using the provided photographs it is assumed the trees to be removed include a variety of pine trees (*Pinus spp.*), with average diameters at breast height (DBH) ranging from approximately 5 to 9 inches. Dogfennel (*Eupatorium capillifolium*) was also observed throughout the Site.

The surrounding habitat within a 0.5 mile radius of the proposed site consists predominantly of wooded land. To the north is silvicultural land, followed by a residence, followed by a pond and additional residences. To the east is Moncure Fire Department, followed by Pea Ridge Road, followed by wooded land, followed by industrial retention ponds, followed by residences. To the south is U.S. Highway 1, followed by silvicultural land, followed by railroad tracks, followed by two ponds and an industrial complex. To the west is silvicultural land, followed by wooded land, followed by the Haw River, followed by Liberty Chapel United Church. The current habitat is not mapped as critical habitat.

Wetlands:

Trileaf has reviewed the topographic map, soil composition, as well as the National Wetlands Inventory Map to determine if the proposed lease area and easements would have an impact on any wetlands or require significant amounts of fill or grading. Trileaf determined that the site is not located in a recognized national wetland area.

Trileaf performed a field visit and identified surface water bodies. Using local maps in combination with an area reconnaissance the following water bodies have been identified in the table below:

Water Body Type	Water Body Name	Direction from Tower	Distance from Tower
Retention Pond	Unnamed	SE	224 feet
Retention Pond	Unnamed	NE	410 feet
Creek associated with Freshwater Forested/Shrub Wetland	Unnamed tributary of Shaddox Creek	NW	0.11 miles
Freshwater Forested/Shrub Wetland	Unnamed	SW	0.12 miles
Freshwater Forested/Shrub Wetland	Unnamed	NE	0.17 miles
Creek associated with Freshwater Forested/Shrub Wetland	Shaddox Creek	W	0.16 miles
Freshwater Forested/Shrub Wetland	Unnamed	SW	0.20 miles
River	Haw River	W	0.22 miles
Freshwater Pond	Unnamed	S	0.26 miles
Freshwater Ponds associated with industrial complex	Unnamed	NE	0.32 miles
Freshwater Emergent Wetland	Unnamed	SE	0.33 miles
Freshwater Pond associated with industrial complex	Unnamed	S	0.45 miles

Migratory Birds:

The proposed Site and design process for this project could not conform to all the USFWS recommendations to decrease potential effects on migratory birds. Therefore, it has included mitigating factors such as tower placement within minimally sensitive areas and eliminating the need for guy wires. While the proposed Site is located near the Atlantic flyway, our site investigation has determined that the project area is not located in an NWI mapped wetland, waterway, wildlife refuge, national wilderness area, native grassland, ridge-line, mountain top, coastline or area commonly known to have high incidences of fog or low clouds, where migratory birds may be found. Based upon the efforts undertaken during this IBA as well as the current data made available, we have concluded that this project will not have a significant effect on migratory birds; however, the presence of migratory birds cannot be ruled out.

Soils:

According to the U.S. Soil Conservation Service Soil Survey of Chatham County, North Carolina, the Site is underlain by Peawick, Chewacla, and Wehadkee soils.

The proposed lease area and the majority of the proposed access/utility easement is composed Peawick fine sandy loam, with 0 to 2 percent slopes. Peawick soils consist of moderately well drained soils that are formed from old clayey alluvium and are found in stream terraces. The depth to the most restrictive feature is more than 80 inches. The depth to the water table is about 18 to 36 inches. A typical profile of Peawick soils consists of a surface layer of fine sandy loam extending from 0 to 6 inches, subsurface layers of loam extending from 6 to 10 inches, clay extending from 10 to 64 inches, and

Moncure
Trileaf# 657434

clay loam extending from 64 to 80 inches. Peawick soils have no frequency of flooding or ponding. Peawick fine sandy loam, with 0 to 2 percent slopes, is not considered a hydric soil, and no hydrophytic vegetation or surface water was observed.

A small portion of the Site, located at the terminus of the proposed access/utility easement, consists Chewacla and Wehadkee soil, with 0 to 2 percent slopes. The composition of this soil is 55 percent of Chewacla soils, 30 percent of undrained Wehadkee soils, and 10 percent of drained Wehadkee soils. Chewacla soils, with 0 to 2 percent slopes, consist of somewhat poorly drained soils that are formed from loamy alluvium derived from igneous and metamorphic rock, and are found in flood plains. The depth to the most restrictive feature is more than 80 inches. The depth to the water table is about 6 to 24 inches. A typical profile of Chewacla soils consists of a surface layer of loam extending from 0 to 4 inches, subsurface layers of silty clay loam extending from 4 to 26 inches, loam extending from 26 to 38 inches, clay loam extending from 38 to 60 inches, and loam extending from 60 to 80 inches. Chewacla soils have a frequency for flooding and no frequency of ponding. Undrained and drained Wehadkee soils, with 0 to 2 percent slopes, consist of poorly drained soils that are formed from loamy alluvium derived from igneous and metamorphic rock, and are found in depressions on flood plains. The depth to the most restrictive feature is more than 80 inches. The depth to the water table is about 0 to 12 inches. A typical profile of undrained and drained Wehadkee soils consists of a surface layer of loam extending from 0 to 8 inches, subsurface layers of sandy clay loam extending from 8 to 43 inches, and sandy loam extending from 43 to 80 inches. Undrained and drained Wehadkee soils have a frequency for flooding and no frequency of ponding. Chewacla and Wehadkee soil, with 0 to 2 percent slopes, is not considered a hydric soil, and no hydrophytic vegetation or surface water was observed.

Threatened or Endangered Species:

Trileaf has researched the listed or proposed threatened or endangered species and designated critical habitat for the project area. This includes any such species that have been reported to exist within the action area where the project is located. The list of federally threatened or endangered species was acquired through the U.S. Fish and Wildlife Service's Information, Planning, and Consultation system (IPaC). The lease area is not located within an aquatic environment; therefore, any obligate aquatic species should not be directly impacted by this project and are not included in the table below. A list of remaining species and site observations are summarized in the following table:

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Red-cockaded Woodpecker (<i>Picoides borealis</i>)	Federal-Endangered	Mature pine forests; longleaf pines are preferred	May affect, but not likely to adversely affect	Habitat assessment indicated potential habitat present; however, no individuals, nests, or nesting cavities were observed in the vicinity of the project footprint
Harperella (<i>Ptilimnium nodosum</i>)	Federal-Endangered	Found in flooded margins of rocky streams	No effect	Habitat assessment indicated no potential habitat present

Red-cockaded Woodpecker:

Due to the presence of living pine trees on a portion of the Site, potential habitat was observed within the project area for the Red-cockaded Woodpecker (*Picoides borealis*). However, it is worth noting that only a portion of the Site is located within a wooded area where pine trees are present, and that this area is used for silviculture. The Site consists of a proposed easement extending through land associated with the Moncure Fire Department, which is situated on grazed land where pine trees are not present, into a proposed lease area located near the edge of a wooded area. Furthermore, the pine trees observed within the wooded area were not identified as mature pine trees, which are often the preferred habitat of Red-cockaded Woodpeckers. Due to the Site's close proximity to development and the lack of dominating mature pine trees, it is Trileaf's opinion that the proposed project will have an insignificant impact on the Red-cockaded Woodpecker. Therefore, based on the documents reviewed, Trileaf concluded that the project may affect, but is not likely to adversely affect, the Red-cockaded Woodpecker.

Conclusions:

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

It should be noted that this informal biological assessment was conducted in accordance with the Scope of Work and does not constitute a Section 7 Biological Assessment under the Endangered Species Act (50 CFR Part 402.01).

Moncure
Trileaf# 657434

Morgan Rasmussen

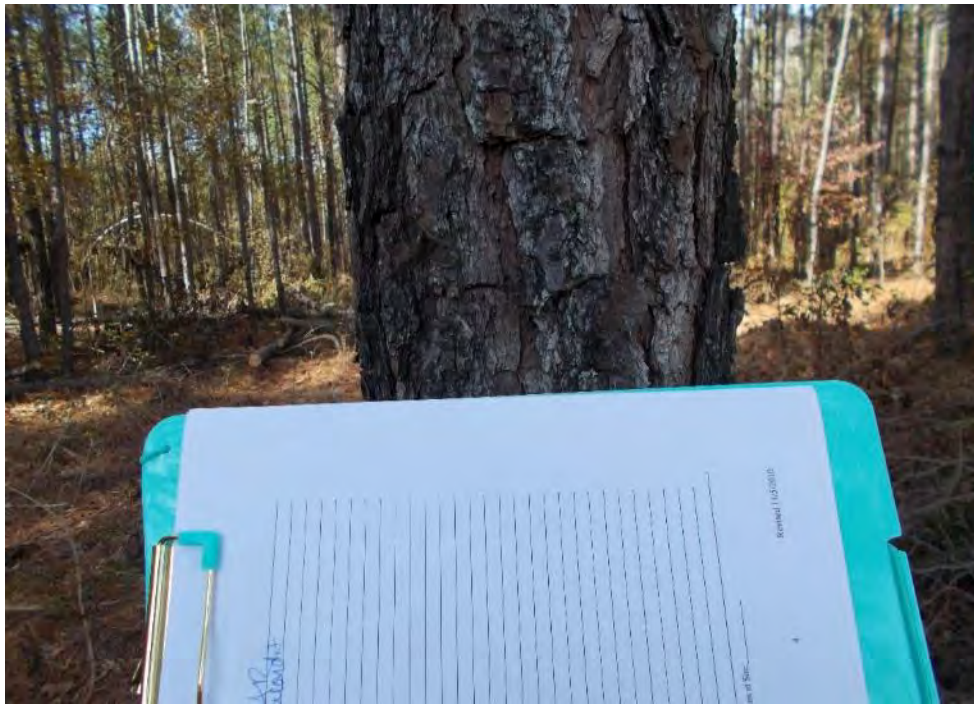
Morgan Rasmussen
Project Scientist

Please refer to Appendix B for Site Maps

Please refer to Appendix C for Site Photographs



Site Photograph 11 – Freshwater pond located approximately 210 feet southeast of the proposed lease area



Site Photograph 12 – Pine tree (*Pinus spp.*) located on the Property

Site Photographs

Pyramid Network Services – Moncure
2389 Old U.S. Highway 1
Moncure, North Carolina 27559

Photographed:
November 21, 2019

Please refer to Appendix B for Site Maps



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Raleigh Ecological Services Field Office
Post Office Box 33726
Raleigh, NC 27636-3726
Phone: (919) 856-4520 Fax: (919) 856-4556

In Reply Refer To:
Consultation Code: 04EN2000-2020-SLI-0262
Event Code: 04EN2000-2020-E-00598
Project Name: Moncure

November 22, 2019

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

To Whom It May Concern:

The species list generated pursuant to the information you provided identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

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

Section 7 of the Act requires that all federal agencies (or their designated non-federal representative), in consultation with the Service, insure that any action federally authorized, funded, or carried out by such agencies is not likely to jeopardize the continued existence of any federally-listed endangered or threatened species. A biological assessment or evaluation may be prepared to fulfill that requirement and in determining whether additional consultation with the Service is necessary. In addition to the federally-protected species list, information on the species' life histories and habitats and information on completing a biological assessment or

evaluation and can be found on our web page at <http://www.fws.gov/raleigh>. Please check the web site often for updated information or changes

If your project contains suitable habitat for any of the federally-listed species known to be present within the county where your project occurs, the proposed action has the potential to adversely affect those species. As such, we recommend that surveys be conducted to determine the species' presence or absence within the project area. The use of North Carolina Natural Heritage program data should not be substituted for actual field surveys.

If you determine that the proposed action may affect (i.e., likely to adversely affect or not likely to adversely affect) a federally-protected species, you should notify this office with your determination, the results of your surveys, survey methodologies, and an analysis of the effects of the action on listed species, including consideration of direct, indirect, and cumulative effects, before conducting any activities that might affect the species. If you determine that the proposed action will have no effect (i.e., no beneficial or adverse, direct or indirect effect) on federally listed species, then you are not required to contact our office for concurrence (unless an Environmental Impact Statement is prepared). However, you should maintain a complete record of the assessment, including steps leading to your determination of effect, the qualified personnel conducting the assessment, habitat conditions, site photographs, and any other related articles.

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

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

Not all Threatened and Endangered Species that occur in North Carolina are subject to section 7 consultation with the U.S Fish and Wildlife Service. Atlantic and shortnose sturgeon, sea turtles, when in the water, and certain marine mammals are under purview of the National Marine Fisheries Service. If your project occurs in marine, estuarine, or coastal river systems you should also contact the National Marine Fisheries Service, <http://www.nmfs.noaa.gov/>

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If you have any questions or comments, please contact John Ellis of this office at john_ellis@fws.gov.

Attachment(s):

- Official Species List

Official Species List

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

This species list is provided by:

Raleigh Ecological Services Field Office

Post Office Box 33726

Raleigh, NC 27636-3726

(919) 856-4520

Project Summary

Consultation Code: 04EN2000-2020-SLI-0262

Event Code: 04EN2000-2020-E-00598

Project Name: Moncure

Project Type: COMMUNICATIONS TOWER

Project Description: Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area. The project includes an access/utility easement, measuring 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/35.61631771439147N79.0521726034114W>



Counties: Chatham, NC

Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

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

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

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

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

Birds

NAME	STATUS
Red-cockaded Woodpecker <i>Picoides borealis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7614	Endangered

Fishes

NAME	STATUS
Cape Fear Shiner <i>Notropis mekistocholas</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6063	Endangered

Flowering Plants

NAME	STATUS
Harperella <i>Ptilimnium nodosum</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3739	Endangered

Critical habitats

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

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

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

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

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

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

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

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

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

Soil Survey Area: Chatham County, North Carolina
 Survey Area Data: Version 22, Sep 16, 2019

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

Date(s) aerial images were photographed: Jun 15, 2015—Dec 9, 2017

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
ChA	Chewacla and Wehadkee soils, 0 to 2 percent slopes, frequently flooded	0.0	5.9%
PeA	Peawick fine sandy loam, 0 to 2 percent slopes	0.3	94.1%
Totals for Area of Interest		0.4	100.0%

Morgan Rasmussen

From: Suiter, Dale <dale_suiter@fws.gov>
Sent: Thursday, January 16, 2020 3:52 PM
To: Morgan Rasmussen
Subject: Re: [EXTERNAL] RE: Request to consult - NEPA review in Moncure, North Carolina

Hi Morgan,

I'm so sorry. It looks like this one came in while I was on vacation and slipped through the cracks. I've reviewed your original email and attachments and concur with your finding of Not Likely to Adversely Affect Red cockaded woodpecker and No Effect for Harperella. Please let me know if you have any questions.

Dale Suiter
Endangered Species Biologist
U.S. Fish and Wildlife Service
Raleigh Ecological Services Field Office
PO Box 33726
Raleigh, NC 27636-3726
office: 919-856-4520 x 18
fax: 919-856-4556
email: dale_suiter@fws.gov

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

On Thu, Jan 16, 2020 at 3:22 PM Morgan Rasmussen <m.rasmussen@trileaf.com> wrote:

Good Afternoon Mr. Suiter,

It has been roughly 30 days since I submitted my request for consultation on this project. I just wanted to follow up on the status of your review. Please let me know if you need any additional information or have any questions.

Kindest Regards,

Morgan Rasmussen

Project Scientist



CAROLINA WETLAND SERVICES, INC.
550 E. Westinghouse Blvd.
Charlotte, NC 28273
704-527-1177 (office)
704-527-1133 (fax)

April 22, 2020

Morgan Rasmussen
Trileaf Corporation
1395 South Marietta Parkway
Marietta, GA 30067

**Subject: Jurisdictional Delineation Report
U.S. Hwy 1 Moncure Cell Tower
Moncure, North Carolina
CWS Project No. 2020-0075**

Dear Ms. Rasmussen,

The U.S. Hwy 1 Moncure Cell Tower study area is approximately 1.40 acres in extent and is located northwest of the Pea Ridge Road and Old U.S. 1 intersection in Chatham County, North Carolina (Figure 1, attached). Trileaf Corporation has contracted Carolina Wetland Services, Inc. (CWS) to delineate the extent of jurisdictional features within the potential lease area and easement area (project limits; 0.19 acre).

Street Address of Project: Northwest of the Pea Ridge Road and Old U.S. 1 intersection in Chatham County, North Carolina

Waterway: UT to Haw River

Basin: Cape Fear (HUC¹ 0303002)

City: Moncure

County: Chatham

Tax Parcel No(s): 81087 (partial)

Decimal Degree Coordinate Location of Project Site: 35.616698°, -79.052592°

USGS Quadrangle Name: Moncure, NC (2018)

Current Land Use

The project area consists of forested areas and a maintained lawn. On-site elevations range from 175-180 feet above mean sea level (Figure 2). Land cover within the project area consists of mixed forest and developed open space (Figure 3)².

According to the United States Department of Agriculture - Natural Resources Conservation Service (USDA-NRCS) Web Soil Survey of Chatham County³ (Figure 4) and the NRCS Published Soil Survey for Chatham County⁴ (Figure 5), on-site soils consist of three soil types

¹ "HUC" is the Hydrologic Unit Code. U.S. Geological Survey, 1974. Hydrologic Unit Map, State of North Carolina.

² MLRC. National Land Cover Database, 2011. https://www.mrlc.gov/nlcd11_leg.php

³ United States Department of Agriculture, 2019. Web Soil Survey of Chatham County, North Carolina. Accessed at <https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>

⁴ United States Department of Agriculture – Natural Resources Conservation Service, 2006. Soil Survey of Chatham County, North Carolina.

(Table 1). Chewacla and Wehadkee soils are listed on the web soil survey as containing hydric inclusions.

Table 1. Summary of On-Site Soils

Soil Unit Name and Description		Hydric	Coverage (%)
ChA	Chewacla and Wehadkee soils, 0 to 2 percent slopes, frequently flooded	Yes	3.3
PeA	Peawick fine sandy loam, 0 to 2 percent slopes	No	85.7
PeB	Peawick fine sandy loam, 2 to 8 percent slopes	No	11.1
Total Coverage:			100%

National Wetlands Inventory

Wetlands are an important source of biodiversity and provide a multitude of ecological services. The National Wetlands Inventory (NWI), created by the U.S. Fish and Wildlife Service, is a program that provides wetland data and analysis to the public. A review of the NWI GIS layer does not depict any wetlands within the study area (Figure 6).

FEMA National Flood Hazard

FEMA National Flood Hazard Layer was reviewed for the project area (FEMA Panel 3710968700L). The potential lease area and easement are within an area of minimal flood hazard (Figure 7).

Jurisdictional Delineation

The U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency (EPA) define wetlands as: "Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."⁵ The USACE uses three parameters to identify jurisdictional wetlands. These parameters are as follows: 1) hydrophytic vegetation, 2) wetland hydrology, and 3) hydric soils. Except in certain atypical situations, all three parameters must be present in order for an area to be determined to be a jurisdictional wetland.

Potentially jurisdictional areas were investigated using the (USACE) Routine On-Site Determination Method. This method is defined in the 1987 Corps of Engineers Delineation Manual,⁶ the 2007 USACE Jurisdictional Form Instructional Guidebook,⁷ with further technical guidance from the 2012 Eastern Mountains & Piedmont Regional Supplement.⁸ Data representative of on-site non-jurisdictional upland areas was collected and reported using Wetland Determination Data Forms (DP; Attachment A).

⁵ Environmental Laboratory. 1987. "Corps of Engineers Wetlands Delineation Manual," Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.

⁶ Environmental Laboratory. 1987. "Corps of Engineers Wetlands Delineation Manual", Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.

⁷ USACE Jurisdictional Determination Form Instructional Guidebook. 2007. USACE Regulatory National Standard Operating Procedures for conducting an approved jurisdictional determination (JD) and documenting practices to support an approved JD. USACE Headquarters, Washington, DC.

⁸ US Army Corps of Engineers, April 2012. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region. US Army Engineer Research and Development Center, Vicksburg, Mississippi.

Jurisdictional stream channels were classified (perennial, intermittent, or ephemeral) according to the North Carolina Department of Environmental Quality (NCDEQ) guidance based on biological, hydrological, and physical characteristics. These classifications include sampling with a D-shaped dip net, collecting photographic documentation, and defining approximate breakpoints (location at which stream channel changes classification) within each on-site stream channel. NCDEQ Stream Classification Forms representative of on-site stream channels were used to document stream conditions (SCP).

Representative photographs were taken of on-site existing conditions (Attachment B). Locations of mapped wetlands and other waters, Wetland Determination Data Forms, Stream Classification Forms, and representative photographs are depicted on figure 8.

Results

On April 16, 2020, Carolina Wetland Services, Inc. (CWS) scientists Aliisa Harjuniemi, PWS⁹, and Megan Bollero¹⁰, WPIT, delineated on-site jurisdictional waters of the U.S., including wetlands. Based on the results of this field investigation, there are no jurisdictional waters of the U.S. located within the project boundary.

Non-Jurisdictional Upland Areas

No jurisdictional features were found within the study area (Figure 8). Due to the study area lacking the jurisdictional parameters of stream or wetland, CWS has concluded this area to be considered non-jurisdictional. A Wetland Determination Data Form representative of non-jurisdictional upland areas is attached as DP1 (Photographs 1 and 2). An additional photograph of the site is included as Photograph 3.

Recommendations

CWS found no potentially jurisdictional features within the property. All jurisdictional determinations presented in this report represent CWS's best professional opinion and are not official determinations of the USACE. A jurisdictional determination form the USACE is recommended to confirm the findings of CWS if needed for accounting or legal purposes.

⁹ Professional Wetland Scientists, The Society of Wetland Scientists Professional Certification Program

¹⁰ Wetland Professional in Training, The Society of Wetland Scientists Professional Certification Program

Thank you for the opportunity to provide these services on this important project. Please do not hesitate to contact Aliisa Harjuniemi at 980-259-1222 or aliisa@cws-inc.net should you have any questions or comments regarding this report.

Sincerely,

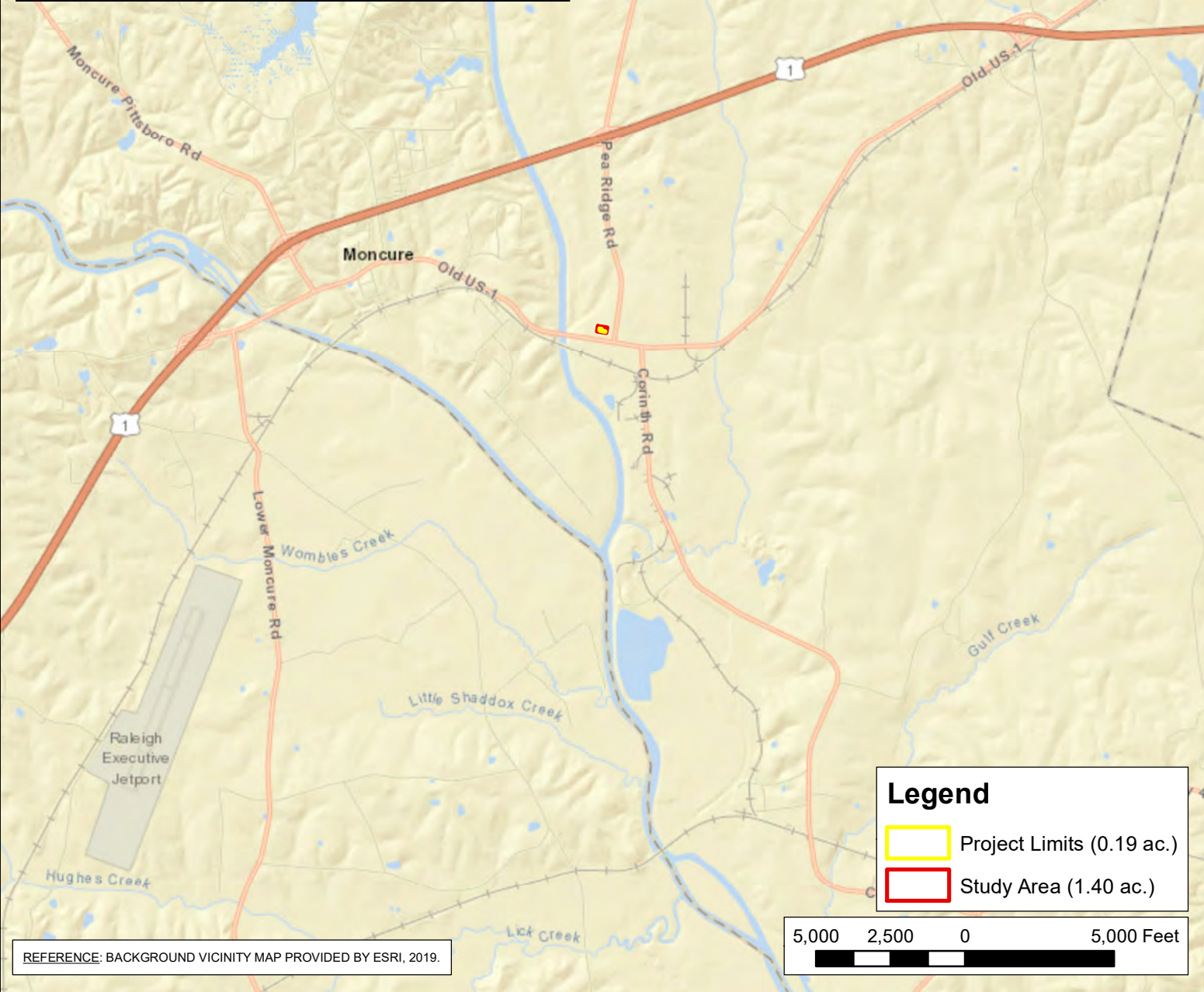


Megan Bollero, WPIT
Project Scientist



Aliisa Harjuniemi, PWS
Senior Project Manager

Attachments: Figure 1: Vicinity Map
Figure 2: USGS Topographic Map
Figure 3: Aerial Map
Figure 4: USDA-NRCS Web Soil Survey of Chatham County
Figure 5: USDA-NRCS Published Soil Survey of Chatham County
Figure 6: National Wetlands Inventory
Figure 7: FEMA National Flood Hazard Map
Figure 8: Jurisdictional Boundaries
Attachment A: USACE Wetland Determination Data Form (DP1)
Attachment B: Photopage (Photographs 1-3)



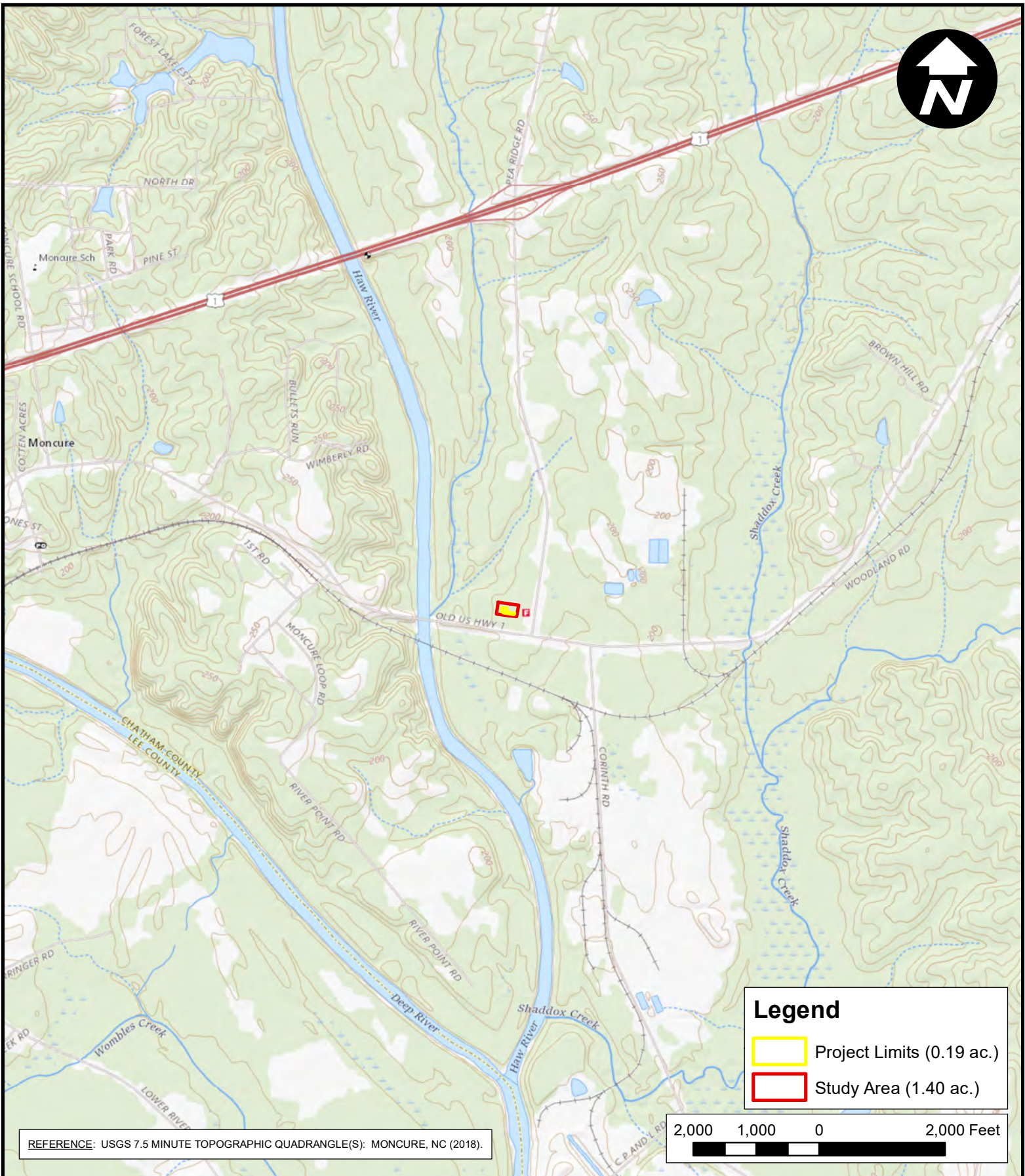
REFERENCE: BACKGROUND VICINITY MAP PROVIDED BY ESRI, 2019.

Legend

- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)



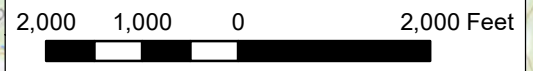
SCALE: 1 inch = 5,000 feet	DATE: 4/20/2020		Vicinity Map	FIGURE NO.
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB		U.S. Hwy 1 Moncure Cell Tower Chatham County Moncure, North Carolina	1
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH			



REFERENCE: USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE(S): MONCURE, NC (2018).

Legend

- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)



SCALE: 1 inch = 2,000 feet	DATE: 4/20/2020		USGS Topographic Map U.S. Hwy 1 Moncure Cell Tower Chatham County Moncure, North Carolina	FIGURE NO.
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB			2
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH			



REFERENCE: BACKGROUND AERIAL IMAGERY PROVIDED BY ESRI, ACCESSED 2020.
BACKGROUND GIS LAYER(S) PROVIDED BY CHATHAM COUNTY GIS DEPARTMENT, DATED 2020.

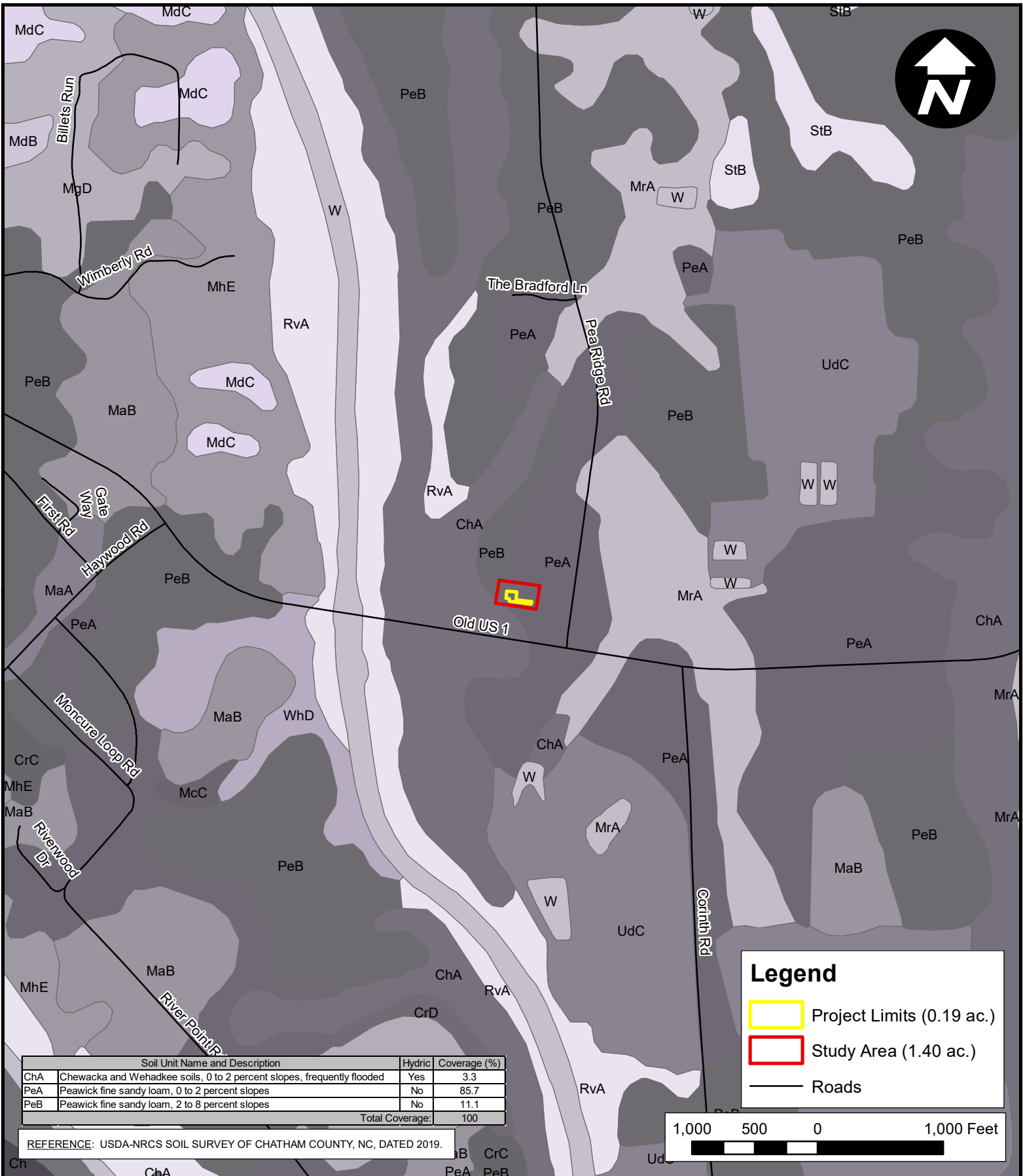
SCALE: 1 inch = 300 feet	DATE: 4/20/2020
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH



Aerial Map

**U.S. Hwy 1 Moncure Cell Tower
Chatham County
Moncure, North Carolina**

FIGURE NO.
3



Legend

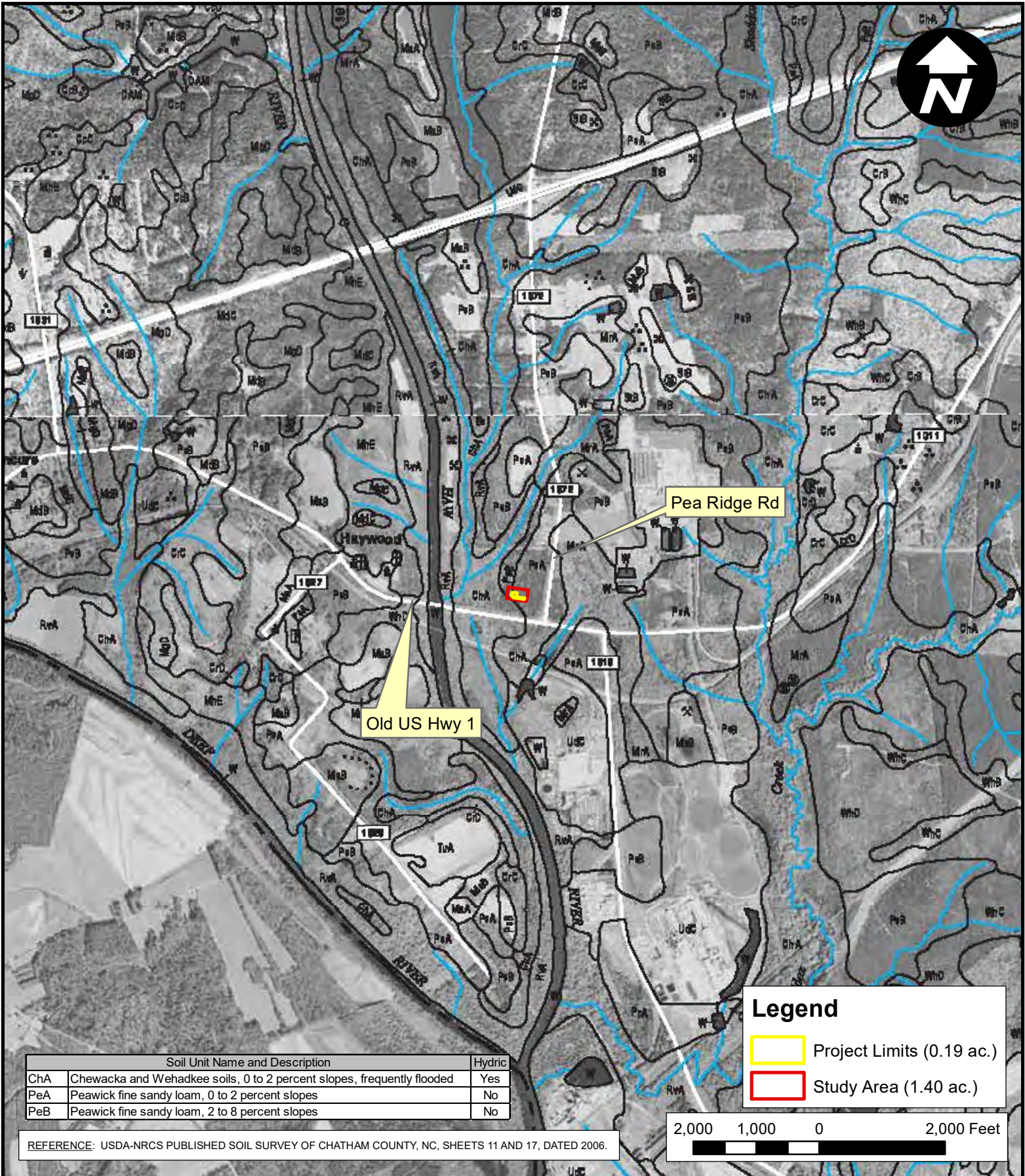
- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)
- Roads



Soil Unit Name and Description	Hydic	Coverage (%)
ChA Chewacka and Wehadkee soils, 0 to 2 percent slopes, frequently flooded	Yes	3.3
PeA Peawick fine sandy loam, 0 to 2 percent slopes	No	85.7
PeB Peawick fine sandy loam, 2 to 8 percent slopes	No	11.1
Total Coverage:		100

REFERENCE: USDA-NRCS SOIL SURVEY OF CHATHAM COUNTY, NC, DATED 2019.

SCALE: 1 inch = 1,000 feet	DATE: 4/20/2020		USDA-NRCS Web Soil Survey of Chatham County	FIGURE NO.
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB		U.S. Hwy 1 Moncre Cell Tower Chatham County Moncre, North Carolina	4
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH			

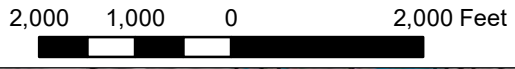


Soil Unit Name and Description		Hydric
ChA	Chewacka and Wehadkee soils, 0 to 2 percent slopes, frequently flooded	Yes
PeA	Peawick fine sandy loam, 0 to 2 percent slopes	No
PeB	Peawick fine sandy loam, 2 to 8 percent slopes	No

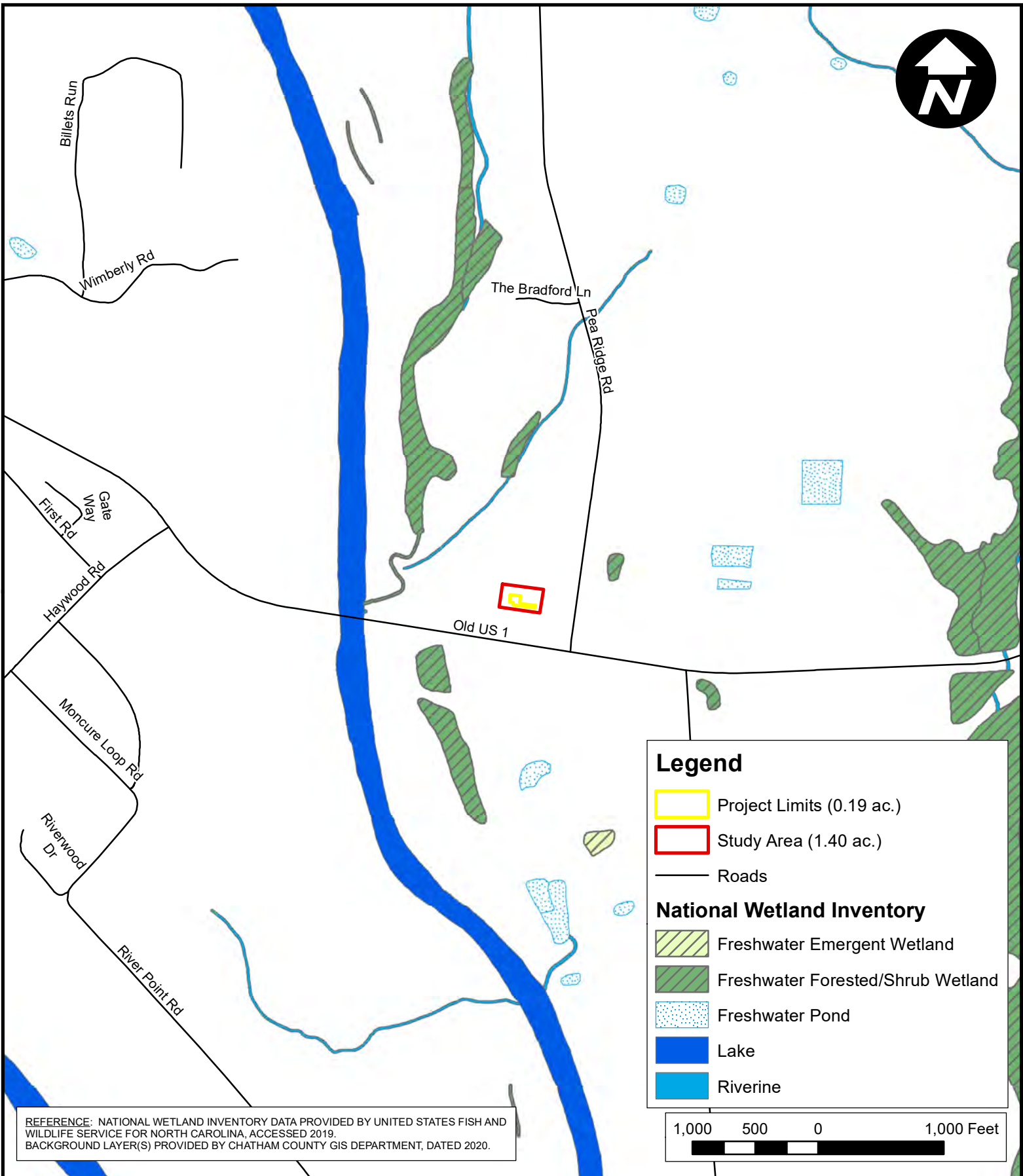
REFERENCE: USDA-NRCS PUBLISHED SOIL SURVEY OF CHATHAM COUNTY, NC, SHEETS 11 AND 17, DATED 2006.

Legend

- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)



SCALE: 1 inch = 2,000 feet	DATE: 4/20/2020		USDA-NRCS Published Soil Survey of Chatham County	FIGURE NO.
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB			U.S. Hwy 1 Moncure Cell Tower Chatham County Moncure, North Carolina
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH			



REFERENCE: NATIONAL WETLAND INVENTORY DATA PROVIDED BY UNITED STATES FISH AND WILDLIFE SERVICE FOR NORTH CAROLINA, ACCESSED 2019.
BACKGROUND LAYER(S) PROVIDED BY CHATHAM COUNTY GIS DEPARTMENT, DATED 2020.

Legend

- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)
- Roads

National Wetland Inventory

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Riverine



SCALE: 1 inch = 1,000 feet	DATE: 4/20/2020
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH



National Wetland Inventory

U.S. Hwy 1 Moncure Cell Tower
Chatham County
Moncure, North Carolina

FIGURE NO.

6



176.5 FEET

PANEL
3710968800K
eff. 11/17/2017

Zone AE

Pea Ridge Rd

AREA OF MINIMAL FLOOD HAZARD Zone X

176.5 FEET

3710968700L
eff. 11/17/2017

Legend

Project Limits (0.19 ac.)

Study Area (1.40 ac.)

Roads

Tax Parcels

Flood Hazard Zones

Zone Type

1% Annual Chance Flood Hazard

Regulatory Floodway

Special Floodway

Area of Undetermined Flood Hazard

0.2% Annual Chance Flood Hazard

Future Conditions 1% Annual Chance Flood Hazard

Area with Reduced Risk Due to Levee

REFERENCE: BACKGROUND AERIAL IMAGERY PROVIDED BY ESRI, ACCESSED 2020.
BACKGROUND GIS LAYER(S) PROVIDED BY CHATHAM COUNTY GIS DEPARTMENT,
DATED 2020. FEMA NATIONAL FLOOD HAZARD LAYER PROVIDED BY FEMA, DATED 2017.

300 150 0 300 Feet

SCALE: 1 inch = 300 feet	DATE: 4/20/2020
CWS PROJECT NO: 2020-0075	DRAWN BY: MLB
COORDINATES: 35.616698, -79.052592	CHECKED BY: AVH

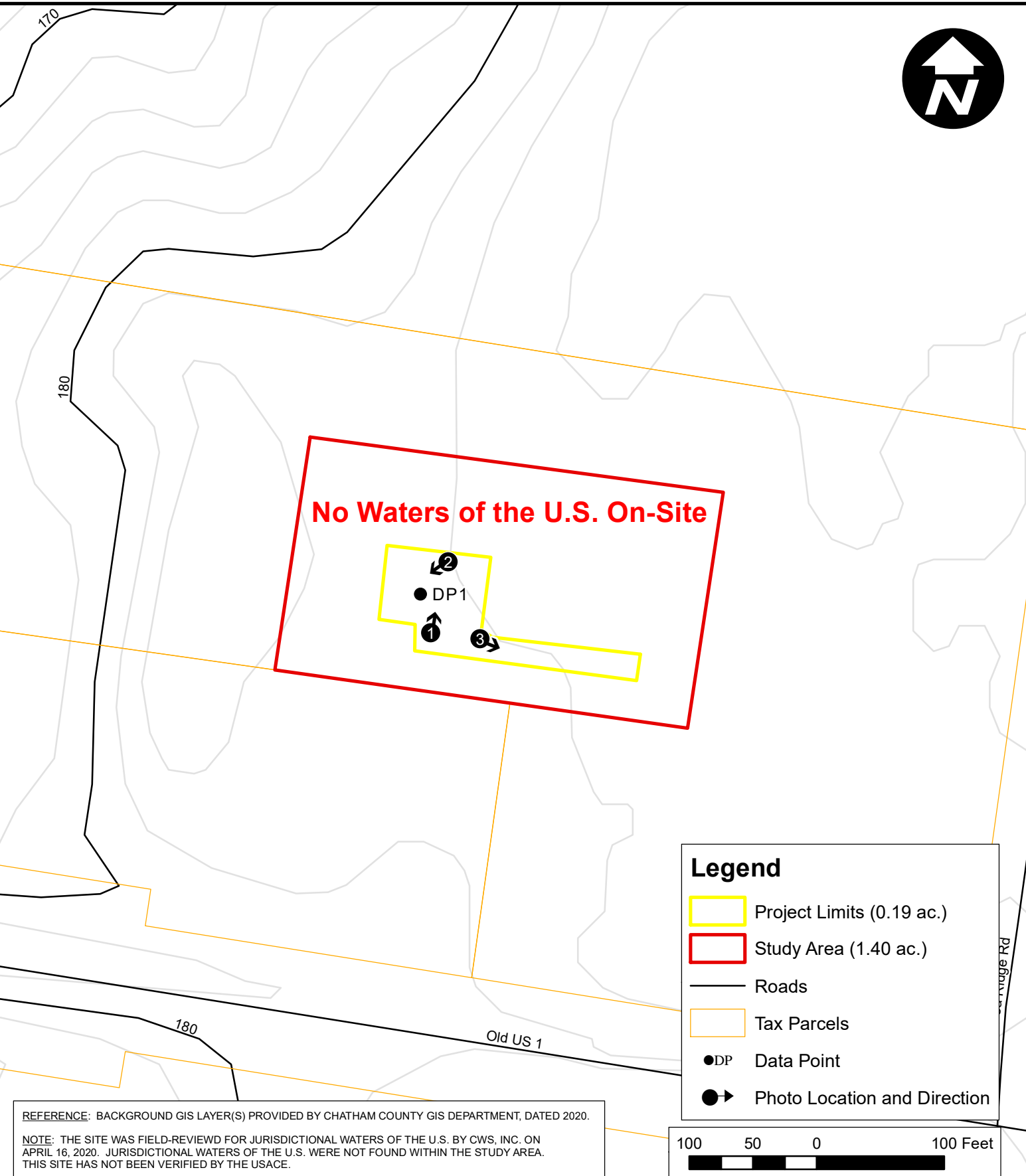


FEMA National Flood Hazard Map

U.S. Hwy 1 Moncure Cell Tower
Chatham County
Moncure, North Carolina

FIGURE NO.

7



No Waters of the U.S. On-Site

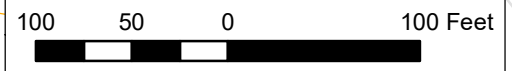
● DP1

Legend

- Project Limits (0.19 ac.)
- Study Area (1.40 ac.)
- Roads
- Tax Parcels
- DP Data Point
- ➔ Photo Location and Direction

REFERENCE: BACKGROUND GIS LAYER(S) PROVIDED BY CHATHAM COUNTY GIS DEPARTMENT, DATED 2020.

NOTE: THE SITE WAS FIELD-REVIEWD FOR JURISDICTIONAL WATERS OF THE U.S. BY CWS, INC. ON APRIL 16, 2020. JURISDICTIONAL WATERS OF THE U.S. WERE NOT FOUND WITHIN THE STUDY AREA. THIS SITE HAS NOT BEEN VERIFIED BY THE USACE.



SCALE:
1 inch = 100 feet

CWS PROJECT NO:
2020-0075

COORDINATES:
35.616698, -79.052592

DATE:
4/20/2020

DRAWN BY:
MLB

CHECKED BY:
AVH



Jurisdictional Boundaries

U.S. Hwy 1 Moncure Cell Tower
Chatham County
Moncure, North Carolina

FIGURE NO.
8

Attachment A:

USACE Wetland Determination Data Form (DP1)

Project/Site: U.S Hwy 1 Moncure Cell Tower City/County: Chatham County Sampling Date: 4-16-20
 Applicant/Owner: Trileaf Corporation State: NC Sampling Point: DP1
 Investigator(s): AVH/MLB Section, Township, Range: Moncure
 Landform (hillside, terrace, etc.): Flatland Local relief (concave, convex, none): None Slope (%): 0
 Subregion (LRR or MLRA): LRR P, MLRA 136 Lat: 35.616697 Long: -79.052665 Datum: NAD 83
 Soil Map Unit Name: Peawick fine sandy loam, 0 to 2 percent slopes (PeA) NWI classification: N/A
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes X No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u>X</u> No <u> </u> Hydric Soil Present? Yes <u> </u> No <u>X</u> Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u>
Remarks: Data point is representative of non-jurisdictional upland area.	

HYDROLOGY

Wetland Hydrology Indicators: <u>Primary Indicators (minimum of one is required; check all that apply)</u> ___ Surface Water (A1) ___ True Aquatic Plants (B14) ___ High Water Table (A2) ___ Hydrogen Sulfide Odor (C1) ___ Saturation (A3) ___ Oxidized Rhizospheres on Living Roots (C3) ___ Water Marks (B1) ___ Presence of Reduced Iron (C4) ___ Sediment Deposits (B2) ___ Recent Iron Reduction in Tilled Soils (C6) ___ Drift Deposits (B3) ___ Thin Muck Surface (C7) ___ Algal Mat or Crust (B4) ___ Other (Explain in Remarks) ___ Iron Deposits (B5) ___ Inundation Visible on Aerial Imagery (B7) ___ Water-Stained Leaves (B9) ___ Aquatic Fauna (B13)	<u>Secondary Indicators (minimum of two required)</u> ___ Surface Soil Cracks (B6) ___ Sparsely Vegetated Concave Surface (B8) ___ Drainage Patterns (B10) ___ Moss Trim Lines (B16) ___ Dry-Season Water Table (C2) ___ Crayfish Burrows (C8) ___ Saturation Visible on Aerial Imagery (C9) ___ Stunted or Stressed Plants (D1) ___ Geomorphic Position (D2) ___ Shallow Aquitard (D3) ___ Microtopographic Relief (D4) ___ FAC-Neutral Test (D5)
---	--

Field Observations: Surface Water Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> Water Table Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> Saturation Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> (includes capillary fringe)	Wetland Hydrology Present? Yes <u> </u> No <u>X</u>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
 Indicators of wetland hydrology are not present.

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DP1

<u>Tree Stratum</u> (Plot size: <u>30</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u><i>Pinus taeda</i></u>	<u>75</u>	Yes	FAC	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>7</u> (A) Total Number of Dominant Species Across All Strata: <u>10</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>70.0%</u> (A/B)
2. <u><i>Liquidambar styraciflua</i></u>	<u>10</u>	No	FAC	
3. <u><i>Acer rubrum</i></u>	<u>5</u>	No	FAC	
4. _____				
5. _____				
6. _____				
7. _____				
	<u>90</u> =Total Cover			Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species _____ x 5 = _____ Column Totals: _____ (A) _____ (B) Prevalence Index = B/A = _____
50% of total cover: <u>45</u>		20% of total cover: <u>18</u>		
<u>Sapling/Shrub Stratum</u> (Plot size: <u>15</u>)				
1. <u><i>Fraxinus pennsylvanica</i></u>	<u>5</u>	Yes	FACW	Hydrophytic Vegetation Indicators: ___ 1 - Rapid Test for Hydrophytic Vegetation <input checked="" type="checkbox"/> 2 - Dominance Test is >50% ___ 3 - Prevalence Index is ≤3.0 ¹ ___ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ___ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. <u><i>Liquidambar styraciflua</i></u>	<u>10</u>	Yes	FAC	
3. <u><i>Ulmus alata</i></u>	<u>5</u>	Yes	FACU	
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
9. _____				
	<u>20</u> =Total Cover			
50% of total cover: <u>10</u>		20% of total cover: <u>4</u>		
<u>Herb Stratum</u> (Plot size: <u>5</u>)				
1. <u><i>Lonicera japonica</i></u>	<u>20</u>	Yes	FACU	Definitions of Four Vegetation Strata: Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height. Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall. Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall. Woody Vine – All woody vines greater than 3.28 ft in height.
2. <u><i>Bignonia capreolata</i></u>	<u>5</u>	Yes	FAC	
3. <u><i>Smilax rotundifolia</i></u>	<u>2</u>	No	FAC	
4. <u><i>Ulmus alata</i></u>	<u>2</u>	No	FACU	
5. <u><i>Digitaria ciliaris</i></u>	<u>5</u>	Yes	FAC	
6. <u><i>Rubus argutus</i></u>	<u>2</u>	No	FACU	
7. <u><i>Vitis rotundifolia</i></u>	<u>5</u>	Yes	FAC	
8. _____				
9. _____				
10. _____				
11. _____				
	<u>41</u> =Total Cover			
50% of total cover: <u>21</u>		20% of total cover: <u>9</u>		
<u>Woody Vine Stratum</u> (Plot size: <u>30</u>)				
1. <u><i>Vitis rotundifolia</i></u>	<u>10</u>	Yes	FAC	Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No _____
2. <u><i>Lonicera japonica</i></u>	<u>10</u>	Yes	FACU	
3. _____				
4. _____				
5. _____				
	<u>20</u> =Total Cover			
50% of total cover: <u>10</u>		20% of total cover: <u>4</u>		

Remarks: (Include photo numbers here or on a separate sheet.)
70% of dominant vegetation is FAC or wetter.

SOIL

Sampling Point: DP1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-3	5Y 5/3	90	2.5Y 5/6	10	C	M	Loamy/Clayey	Prominent redox concentrations
3-13	5Y 5/4	90	10YR 5/6	10	C	M	Loamy/Clayey	Prominent redox concentrations
13-20	2.5Y 6/6	50					Loamy/Clayey	Co-Matrix: 2.5Y 6/8 50%

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (**LRR N**)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7)

- Polyvalue Below Surface (S8) (**MLRA 147, 148**)
- Thin Dark Surface (S9) (**MLRA 147, 148**)
- Loamy Mucky Mineral (F1) (**MLRA 136**)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (**LRR N, MLRA 136**)
- Umbric Surface (F13) (**MLRA 122, 136**)
- Piedmont Floodplain Soils (F19) (**MLRA 148**)
- Red Parent Material (F21) (**MLRA 127, 147, 148**)

Indicators for Problematic Hydric Soils³:

- 2 cm Muck (A10) (**MLRA 147**)
- Coast Prairie Redox (A16) (**MLRA 147, 148**)
- Piedmont Floodplain Soils (F19) (**MLRA 136, 147**)
- Red Parent Material (F21) (**outside MLRA 127, 147, 148**)
- Very Shallow Dark Surface (F22)
- Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____
 Depth (inches): _____

Hydric Soil Present? Yes _____ No X

Remarks:

Indicators of hydric soil are not present.

Attachment B:

Photopage (Photographs 1-3)



Photograph 1. View of non-jurisdictional upland area, facing north (DP1).



Photograph 2. View of non-jurisdictional upland area, facing southwest.



Photograph 3. View of non-jurisdictional upland area, facing southeast.

Appendix E
Section 106 Review

December 5, 2019

North Carolina State Historic Preservation Office

109 E. Jones Street
Raleigh, NC 27601
Phone: (919) 807-6599

RE: Pyramid Network Services – Moncure – Trileaf Project #657434

2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

To Whom It May Concern:

Trileaf Corporation is in the process of completing a NEPA review at the referenced property. Our client proposes to construct a Self-Support Communications Tower, with an overall height of 360 feet, and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a proposed 30-foot wide easement, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot and extending approximately 268 feet south towards Old U.S. Highway 1. The site is located within wooded land. The antenna will be licensed by the Federal Communications Commission (FCC).

In accordance with the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission*, dated September 2004, a cultural resource investigation has been conducted. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Summary reports of this investigation, maps, photographs and other information are provided in the attached Form 620. As noted in Attachment 5, there are **No Historic Properties in the APE for Direct Effects or for Visual Effects**. Therefore, it is recommended that the proposed undertaking proceed without further archaeological review.

We appreciate your cooperation in this regard and anticipate your concurrence with these findings. Please call me at (404) 993-1760 or email m.rasmussen@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,



Morgan Rasmussen
Project Scientist

Notification Date: 7AM EST 12/06/2019

New Tower ("NT") Submission Packet

See instructions for
public burden estimates

File Number: 0008903733

General Information

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

Applicant Information

3) FCC Registration Number (FRN): 0005428818
4) Name: Pyramid Network Services

Contact Name

5) First Name: Don	6) MI:	7) Last Name: Cottrell	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 6615 Towpath Road	
12) City: East Syracuse		13) State: NY	14) Zip Code: 13057
15) Telephone Number: (330)531-5327		16) Fax Number:	
17) E-mail Address: dcottrell@pyramidnetworkservices.com			

Consultant Information

18) FCC Registration Number (FRN): 0011724176
19) Name: Johnson, Mirmiran & Thompson, Inc. on behalf of Trileaf Corporation

Principal Investigator

20) First Name: Abigail	21) MI: G	22) Last Name: Heller	23) Suffix:
24) Title: Archaeologist			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 1600 Market Street, Suite 520	
27) City: Philadelphia		28) State: PA	29) Zip Code: 19103
30) Telephone Number: (404)993-1760		31) Fax Number:	
32) E-mail Address: m.rasmussen@trileaf.com			

Professional Qualification

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

Additional Staff

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

If "YES," complete the following:

36) First Name: Lindsey	37) MI:	38) Last Name: Allen	39) Suffix:
40) Title: Senior Architectural Historian			
41) Areas of Professional Qualification: <input type="checkbox"/>) Archaeologist <input checked="" type="checkbox"/>) Architectural Historian <input type="checkbox"/>) Historian <input type="checkbox"/>) Architect <input type="checkbox"/>) Other (Specify) _____			
36) First Name: Garrett	37) MI: W	38) Last Name: Silliman	39) Suffix:
40) Title: Senior Archaeologist			
41) Areas of Professional Qualification: <input checked="" type="checkbox"/>) Archaeologist <input type="checkbox"/>) Architectural Historian <input type="checkbox"/>) Historian <input type="checkbox"/>) Architect <input type="checkbox"/>) Other (Specify) _____			

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **192744**

Site Information

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

3) Site Name: **Moncure**

4) Site Address: **2389 Old U.S. Highway 1**

5) Detailed Description of Project:

No township found.

6) City: **Moncure**

7) State: **NC**

8) Zip Code: **27559**

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

10) Nearest Crossroads: **Old U.S. Highway 1 and Pea Ridge Road**

11) NAD 83 Latitude (DD-MM-SS.S): **35-37-00.1**

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

12) NAD 83 Longitude (DD-MM-SS.S): **079-03-10.0**

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

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): 109.7 () Feet (**X**) Meters

14) Tower Type (Select One):

() Guyed lattice tower

(**X**) Self-supporting lattice

() Monopole

() Other (Describe):

Project Status

15) Current Project Status (Select One):

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

() Construction has commenced, but is not completed

Construction commenced on: _____

() Construction has been completed

Construction commenced on: _____

Construction completed on: _____

Determination of Effect

14) Direct Effects (Select One):

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

15) Visual Effects (Select One):

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

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>192744</u> Number of Tribes/NHOs: <u>7</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Catawba Indian Nation

Contact Name

5) First Name: Dr. Wenonah	6) MI: G	7) Last Name: Haire	8) Suffix:
9) Title: THPO and Executive Director			

Dates & Response

10) Date Contacted <u>11/21/2019</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Gwen	6) MI:	7) Last Name: Terrapin	8) Suffix:
9) Title:			

Dates & Response

10) Date Contacted <u>11/20/2019</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>192744</u>	Number of Tribes/NHOs: <u>7</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Crow Creek Sioux Tribe

Contact Name

5) First Name: Montana & Associates	6) MI:	7) Last Name: LLC	8) Suffix:
9) Title: Attorney			

Dates & Response

10) Date Contacted <u>11/20/2019</u>	11) Date Replied <u>12/02/2019</u>
() No Reply	
() Replied/No Interest	
(<input checked="" type="checkbox"/>) Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Kelly	6) MI:	7) Last Name: Nelson	8) Suffix:
9) Title: Cell Tower Coordinator			

Dates & Response

10) Date Contacted <u>11/21/2019</u>	11) Date Replied <u>11/21/2019</u>
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
(<input checked="" type="checkbox"/>) Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>192744</u> Number of Tribes/NHOs: <u>7</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Flandreau Santee Sioux Tribe

Contact Name

5) First Name: Garrie	6) MI:	7) Last Name: Kills a Hundred	8) Suffix:
9) Title: THPO Officer			

Dates & Response

10) Date Contacted <u>11/21/2019</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Prairie Island Indian Community

Contact Name

5) First Name: Noah	6) MI: C	7) Last Name: White	8) Suffix: III
9) Title: THPO			

Dates & Response

10) Date Contacted <u>11/20/2019</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>192744</u>	Number of Tribes/NHOs: <u>7</u>
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>

Tribes/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Shawnee Tribe

Contact Name

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

Dates & Response

10) Date Contacted <u>11/21/2019</u>	11) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Other Tribes/NHOs Contacted

Tribe/NHO Information

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

Contact Name

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

Contact Information

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

Dates & Response

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

Historic Properties

Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	(<input type="checkbox"/>) <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o

Historic Property

4) Property Name:
5) SHPO Site Number:

Property Address

6) Street Address:		
7) City:	8) State:	9) Zip Code:
10) County/Borough/Parish:		

Status & Eligibility

11) Is this property listed on the National Register? Source: _____	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: _____	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o
13) Is this property a National Historic Landmark?	(<input type="checkbox"/>) <u>Y</u> es (<input type="checkbox"/>) <u>N</u> o

14) Direct Effects (Select One): <input type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One): <input type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):
2) Name: Chatham County Zoning Board of Adjustment

Contact Name

3) First Name: Angela	4) MI:	5) Last Name: Birchett	6) Suffix:
7) Title: Planner II and Zoning Administrator			

Contact Information

8) P.O. Box:	And /Or	9) Street Address: 12 East Street	
10) City: Pittsboro		11) State: NC	12) Zip Code: 27312
13) Telephone Number: (919)542-8285		14) Fax Number:	
15) E-mail Address: angela.birchett@chathamnc.org			
16) Preferred means of communication:			
<input type="checkbox"/> E-mail <input type="checkbox"/> Letter <input checked="" type="checkbox"/> Both			

Dates & Response

17) Date Contacted 11/20/2019	18) Date Replied 12/03/2019
<input type="checkbox"/> No Reply <input type="checkbox"/> Replied/No Interest <input type="checkbox"/> Replied/Have Interest <input checked="" type="checkbox"/> Replied/Other	
Ms. Birchett replied with a referral to complete zoning actions.	

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	(<input checked="" type="checkbox"/>) <u>Yes</u> (<input type="checkbox"/>) <u>No</u>
--	---

Consulting Party

2) FCC Registration Number (FRN):
3) Name: Chatham County Historical Museum

Contact Name

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

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 9 Hillsboro St
11) City: Pittsboro	12) State: NC	13) Zip Code: 27312
14) Telephone Number: (919)542-6222	15) Fax Number:	
16) E-mail Address: preservation@chathamhistory.org		
17) Preferred means of communication: (<input type="checkbox"/>) E-mail (<input type="checkbox"/>) Letter (<input checked="" type="checkbox"/>) Both		

Dates & Response

18) Date Contacted <u>11/20/2019</u>	19) Date Replied <u>11/28/2019</u>
(<input type="checkbox"/>) No Reply	
(<input checked="" type="checkbox"/>) Replied/No Interest	
(<input type="checkbox"/>) Replied/Have Interest	
(<input type="checkbox"/>) Replied/Other	

Additional Information

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

Designation of SHPO/THPO

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

SHPO/THPO

Name: **NC Historic Preservation Office (Deputy SHPO)**

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

SHPO/THPO Name: _____

SHPO/THPO Name: _____

SHPO/THPO Name: _____

Certification

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

Party Authorized to Sign

First Name: **Morgan**

MI:

Last Name: **Rasmussen**

Suffix:

Signature: **Morgan Rasmussen**

Date: **12/05/2019**

FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Attachments :

Type	Description	Date Entered
Resumes/Vitae	Resumes	12/05/2019
Photographs	Photos	12/05/2019
Map Documents	Maps	12/05/2019
Additional Site Information	Site Info	12/05/2019
Area of Potential Effects	APE	12/05/2019
Tribal/NHO Involvement	Tribes	12/05/2019
Historic Properties for Direct Effects	Direct APE	12/05/2019
Historic Properties for Visual Effects	Visual APE	12/05/2019
Local Government Involvement	Local Gov and ITC	12/05/2019
Public Involvement	Public Notice	12/05/2019
State-Specific Forms	SHPO Specific Forms	12/05/2019

ATTACHMENT 1. CONSULTANT INFORMATION

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

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

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

ABIGAIL G. HELLER, RPA

Archaeologist

Ms. Heller meets the qualifications for Archaeologist under the standards set forth by the Secretary of the Interior. Ms. Heller is familiar with GPS, total station and other technologies utilized in field survey, and is experienced in the principles, concepts, theories and methods of ethnography, history, archaeology and cultural resource management. She has experience with implementing archeological surveys, conducting inventories, excavating sites, and recording site information and artifact data. She also has extensive knowledge of GIS software and analysis. She is familiar with and trained in the Antiquities Act, the Archaeological Resources Protection Act (ARPA), the National Environmental Protection Act (NEPA), the National Historic Preservation Act (NHPA), Curation of Federally Owned and Administered Archaeological Collections (36 CFR 79), and Native American Graves Protection and Repatriation Act (NAGPRA).

Professional Experience

Cultural Resource Services for Telecommunication Towers. *Principal Investigator.*

Ms. Heller has conducted and helped manage telecommunications projects throughout the United States for cultural resource compliance pursuant to Section 106 of the NHPA. This work has included both historic structure surveys and Phase I archaeological surveys and reports. These reports have been completed via the approved FCC 620 and 621 forms. Project locations include Alabama, Colorado, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Maryland, Michigan, Minnesota, Missouri, Montana, New Jersey, New York, North Carolina, Ohio, South Carolina, Tennessee, Texas, Washington, Wisconsin, and Wyoming, producing dozens of technical reports outlining background research, assessment, fieldwork, and results.

Eisenhower Drive Extension, Conewago and Penn Townships, Adams and York Counties, PA. *Principal Investigator/Field Director.* Conducted Phase I/II archaeological surveys of +/- 50 acres for cultural resource due diligence in association with proposed Eisenhower Drive Extension project, undertaken by PennDOT Engineering District 8-0. The survey identified a new portion of a previously recorded Pre-Contact site, 36AD0031. A Phase II evaluation study determined the portion of the site within the project APE is not eligible for listing in the NRHP.

Archaeological Investigation SR 0001 Section RC2, US 1 Improvement Project, Bucks County, PA. *Principal Investigator/Field Director.* Conducted Phase I archaeological survey for 4.1 acres to define complete boundaries around two previously identified archaeological sites, the Schultz Site (36BU365) and the Vansant Mill Complex (36BU366). These sites were previously determined to be potentially significant archaeological resources. Revised site boundaries were provided to the consulting engineers in order to adjust engineering plans and avoid any impacts to either site.

Little Baltimore Road Drainage Improvements, New Castle County, DE. *Field and Lab Director.* Conducted Phase I archaeological survey of 3.75 acres for cultural resource due diligence in association with the proposed Little Baltimore Road Drainage Improvements, which is being undertaken by DelDOT. Work included overseeing field technicians while conducting survey to identify if sites are located within the proposed construction footprint and if identified sites are eligible for listing in the NRHP.

C.R. 518 Bridge over Delaware & Raritan (D&R) Canal, Somerset County, NJ. *Archaeologist.* Performed cultural resource monitoring during ground disturbing activities for the construction of a new bridge over the D&R Canal. Work included monitoring of excavation and documentation of historic resources along the east and west banks of the canal.

Garden State Parkway Interchange 58 Park-N-Ride Project, Little Egg Harbor Township, Ocean County, NJ. *Field Director.* Ms. Heller conducted a Phase I archaeological survey as part of a cultural resource study performed to comply with Subchapter 6, Part XV of the Pinelands Comprehensive Management Plan (N.J.A.C. 7:50-6.151 et seq.) and the Pinelands Cultural Resource Management Plan. Roughly 92,000 ft² were surveyed..

Education

M.A. Anthropology

B.A. Anthropology

Registration

Registered

Professional

Archaeologist, No.
46636123

Years of Experience

7

LINDSEY ALLEN

Project Manager / Senior Architectural Historian

Ms. Allen has over eight years of professional experience, including over five years at JMT. She has a successful track record as an architectural historian and as a project and task manager completing a variety of Cultural Resource Management projects and exceeds the qualifications for Architectural Historian under the standards set forth by the Secretary of the Interior. Her experience includes a wide range of professional and academic experiences relating to architectural history, transportation planning, public consultation, and neighborhood planning. She has prepared National Register Nominations, Historic Resource Surveys, Determination of Eligibility Reports, Determination of Effect Reports, Programmatic and Individual Section 4(f) Evaluations, Memoranda of Agreement, and Mitigation projects.

Education

M.S. Historic Preservation

B.A. Architecture & Urbanism

Years of Experience

8

Professional Experience

PennDOT, Environmental & Cultural Resources Open-End Contract, Central Office, PA. *Cultural Resources Professional.* Ms. Allen serves as an on-call Cultural Resources Professional for the Pennsylvania Department of Transportation (PennDOT) and is currently working in PennDOT Districts 3-0, 4-0 and 5-0. Specific tasks include completing the cultural resource portion of scoping forms; determining the level of cultural resource effort necessary to comply with Section 106, Section 4(f), and the State History Code; reviewing consultant scopes and products; and submitting findings to the Federal Highway Administration (FHWA) and the Pennsylvania State Historic Preservation Office. She is also responsible for preparing determinations of eligibility and determinations of effect, as well as coordinating consulting parties and public involvement. A key aspect of the work Ms. Allen is doing is coordinating and educating engineers regarding historic bridge rehabilitation and replacement projects, especially those projects involving historic truss bridges.

PennDOT, SR 0222-28M Roadway Widening Project, Berks County, PA. *Task Manager & Senior Architectural Historian.* JMT is responsible for completing the cultural resource compliance for a 5-mile stretch of SR 222 related to a roadway widening project, including both above-ground and archaeological surveys. Ms. Allen served as task manager for the above-ground components of the project, including above-ground surveys, recommendations for eligibility (including a 31,000-acre rural historic district), consulting party coordination, and agency coordination. In this role, she managed staff assignments, provided technical expertise, reviewed written work, assisted in fieldwork and report writing, and assisted in coordination with the PennDOT reviewers for the above-ground related tasks. She will coordinate the upcoming determination of effects report and the Section 4(f) Individual Evaluation.

DeIDOT, Little Baltimore Road Improvements Project, New Castle County, DE. *Task Manager & Senior Architectural Historian.* Under a Cultural Resources Services open end contract, JMT was tasked to complete a combined Phase I/II Historic Resource Survey and Evaluation report for the proposed roadway improvements project. The survey included a reconnaissance and intensive-level survey of five properties and resulted in a report containing eligibility recommendations and a determination of effect analysis. Ms. Allen was responsible for staff assignments, fieldwork coordination, quality control, review of written work, and agency coordination.

Cultural Resources Services for Cell Towers throughout the US. *Senior Architectural Historian.* This project involves conducting Section 106 compliance for telecommunications projects throughout the United States including recent work in Pennsylvania, Maryland, Virginia, Wisconsin, and Massachusetts. This fast-paced work involves coordination with multiple SHPOs and completion of 621 Forms in compliance with the FCC's Programmatic Agreement for collocations and raw land sites.

GARRETT W. SILLIMAN, RPA

Senior Archaeologist

Mr. Silliman has over 20 years of experience in cultural resource management, with a research focus on the archaeology of American battlefields, sites associated with the African-American experience, and historic landscapes throughout the eastern United States. His published and presented work has largely dealt with the use and integration of GIS, historic research, and archaeologically-derived battlefield patterns. He has extensive experience in all phases of archaeological investigations (Phase I, II, and III), teaching and public archaeology, remote sensing, artifact analysis and curation, archaeological site and historic structure assessment and mitigation, and site management. Through his extensive background in cultural resource management archaeology, he has experience with and has received formal training in Native American consultation, Section 106 and 110 of the National Historic Preservation Act (1966), and the Archaeological Resources Protection Act (1979). He is thoroughly familiar with the history and prehistory of the eastern United States, and has taught courses in Public Archaeology and Cultural Resource Management for Georgia State University. He is the cultural resources lead for JMT's Raleigh, North Carolina office.

Professional Experience

Cultural Resource Investigation of the Sibley Mill/Confederate Powder Works, Augusta Canal Authority, Augusta, GA. *Project Manager / Field Lead.* Conducted extensive background research and the ground penetrating radar survey (GPR), at the c.1861 Sibley Mill/Confederate Powder Works, a site listed on the National Register of Historic Places (NRHP). Work resulted in the monitoring, identification, and recording of archaeological features associated with the historic mill complex.

1864 Atlanta Campaign Context Study, GA. *Project Manager and Field Lead.* This study is specifically tailored for use as a management tool for cities, towns and counties for planning purposes and encompasses six metro Atlanta counties and specifically examines eight sites of conflict. Consulting parties included regional historical societies, municipal governments, the GA SHPO, and the NPS.

Archaeological Investigations of Site 9Ch1205 (James Wilson/William Miller Plantation), Chatham County, GA. *Principal Investigator and Field Lead.* Phase II archaeological testing and NRHP evaluation of an eighteenth- through early nineteenth-century plantation containing the remains of slave quarters and the landscape's re-use during the Sherman's 1864 Savannah Campaign during the Civil War.

Historical and Archaeological Assessment of the Leigh Farm, City of Durham, Durham, NC. *Archaeology Field Lead.* Directed investigations for the archaeological and landscape study of the c. 1850 Leigh Farm in Durham, North Carolina to document the property's condition and analyze the future use of the site as a historic park. Worked with the City of Durham and the Department of Cultural Resources to assess the remaining portions of the historic landscape.

Archaeological Investigations of the Solomon/Hardy Pace House Property, Vining's Heritage Preservation Society, Cobb County, GA. *Project Manager and Field Lead.* Performed the archaeological investigation, including metal detection, magnetometer survey, and test unit excavation at the location of the antebellum plantation house and purported Civil War hospital on the c. 1845 Solomon Pace property.

Education

M.H.P (Master of Heritage Preservation)
Public History /
Archaeology
Georgia State
University

B.A. Archaeology
The College of
Wooster

Registration

Registered
Professional
Archaeologist, No.
28577953

Years of Experience

20+



MORGAN RASMUSSEN

PROJECT SCIENTIST

Education

B.S. in Environmental Science
Georgia College / Milledgeville, GA

Areas of Expertise

Ms. Morgan Rasmussen has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects.

Environmental service expertise includes the preparations and/or review of:

Phase I Environmental Site Assessments
Historical City Directories
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

Georgia Adopt-A-Stream Macroinvertebrate and Chemical QA/QC Certification

ATTACHMENT 2. SITE INFORMATION - PHOTOGRAPHS

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

Photograph Requirements:

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

- a. Photographs taken from the collocation site should show views from the proposed location in all directions. The direction (e.g., north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the communications tower or non-tower structure.
- b. Photographs of all listed and eligible properties within the Areas of Potential Effects.
- c. If any listed or eligible properties are visible from the proposed collocation site, photographs looking at the site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included. If any listed or eligible properties are within the APE, photos looking at each historic property should be included.

Please see attached photographs, which were taken by JMT staff on November 27, 2019, unless otherwise noted. A photograph location map is included in this attachment.

Aerial photographs of the site were obtained using Google Earth imagery, dated 2018.

Applicant's Name: Pyramid Network Services
 Project Name: Moncure
 Project Number: 657434

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



Project Location Map

Trileaf Project # 657434 (Moncure)



Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



1. View of proposed project location, looking northeast.



2. View of proposed project location, looking southeast.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



3. View of proposed project location, looking southwest.



4. View of proposed project location, looking northwest.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



5. View from proposed project location, looking north at surrounding area.



6. View from proposed project location, looking east at surrounding area.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



7. View from proposed project location, looking south at surrounding area.



8. View from proposed project location, looking west at surrounding area.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



9. View of access road, looking northeast from lease area.



10. View of access road, looking south and showing existing land disturbance.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

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



11. View of access road from existing asphalt parking area, looking west.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

Please refer to Appendix B for Site Maps

ATTACHMENT 3. SITE INFORMATION – MAP REQUIREMENTS

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

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

The following maps have been attached to this report:

1. Project Location Map – USGS Topographic Map
2. Project Location Map – Aerial Map with 0.75-mile Area of Potential Effect
3. Project Location Map – USGS Topographic with 0.75-mile Area of Potential Effect
4. Project Location Map – Street Map with 0.75-mile Area of Potential Effect
5. Historic resource map with 0.75-mile Area of Potential Effect

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

Please refer to Appendix B for Site Maps





Project Location Map


Trileaf Project # 657434 (Moncure)



Legend

-  Project Location
-  0.75-Mile APE

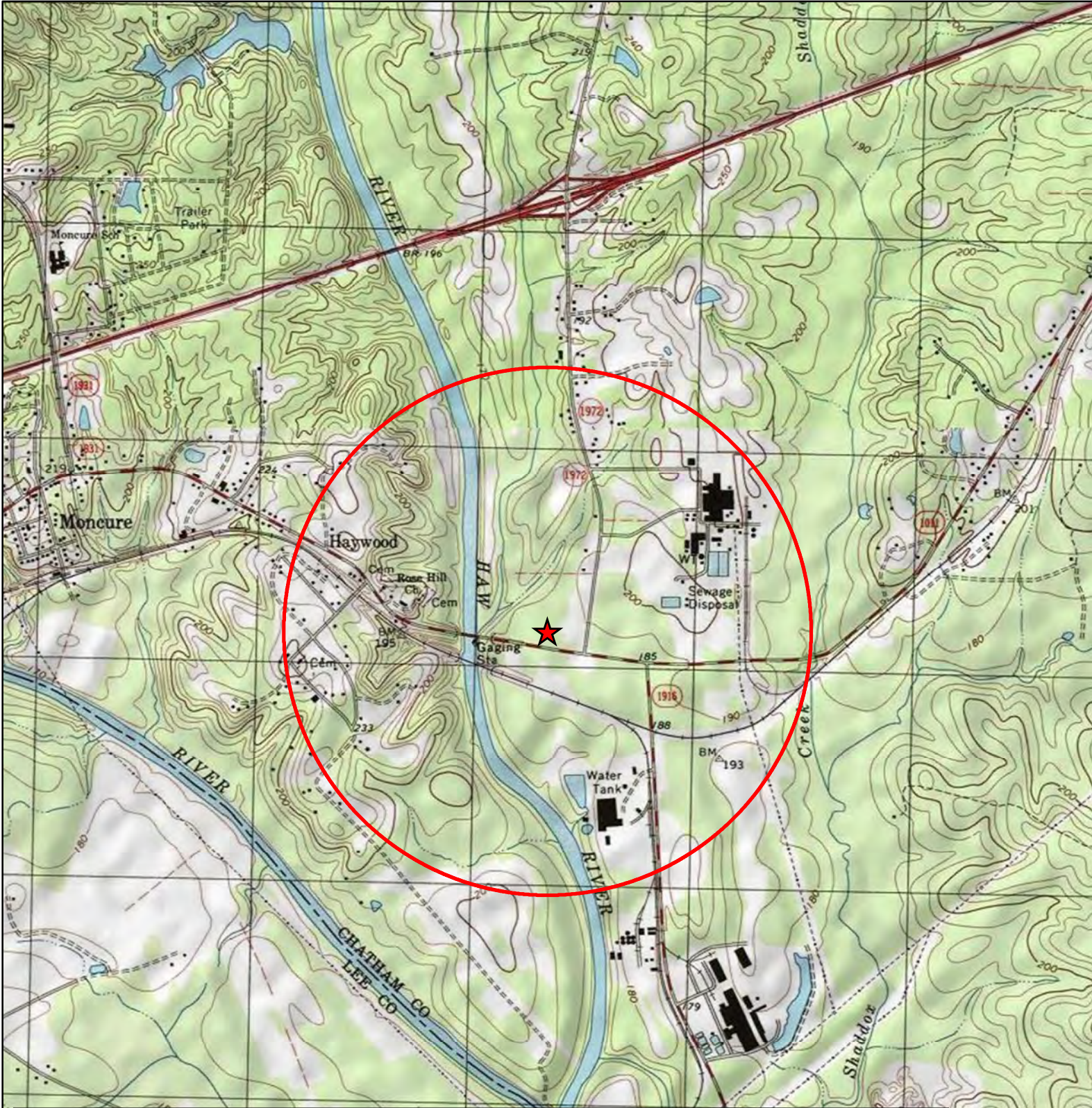
0 650 1,300 2,600 3,900 5,200 Feet

A horizontal scale bar with alternating black and white segments, corresponding to the numerical values above it.





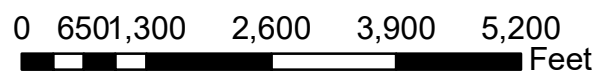
Project Location Map

Trileaf Project # 657434 (Moncure)



Legend

-  Project Location
-  0.75-Mile APE

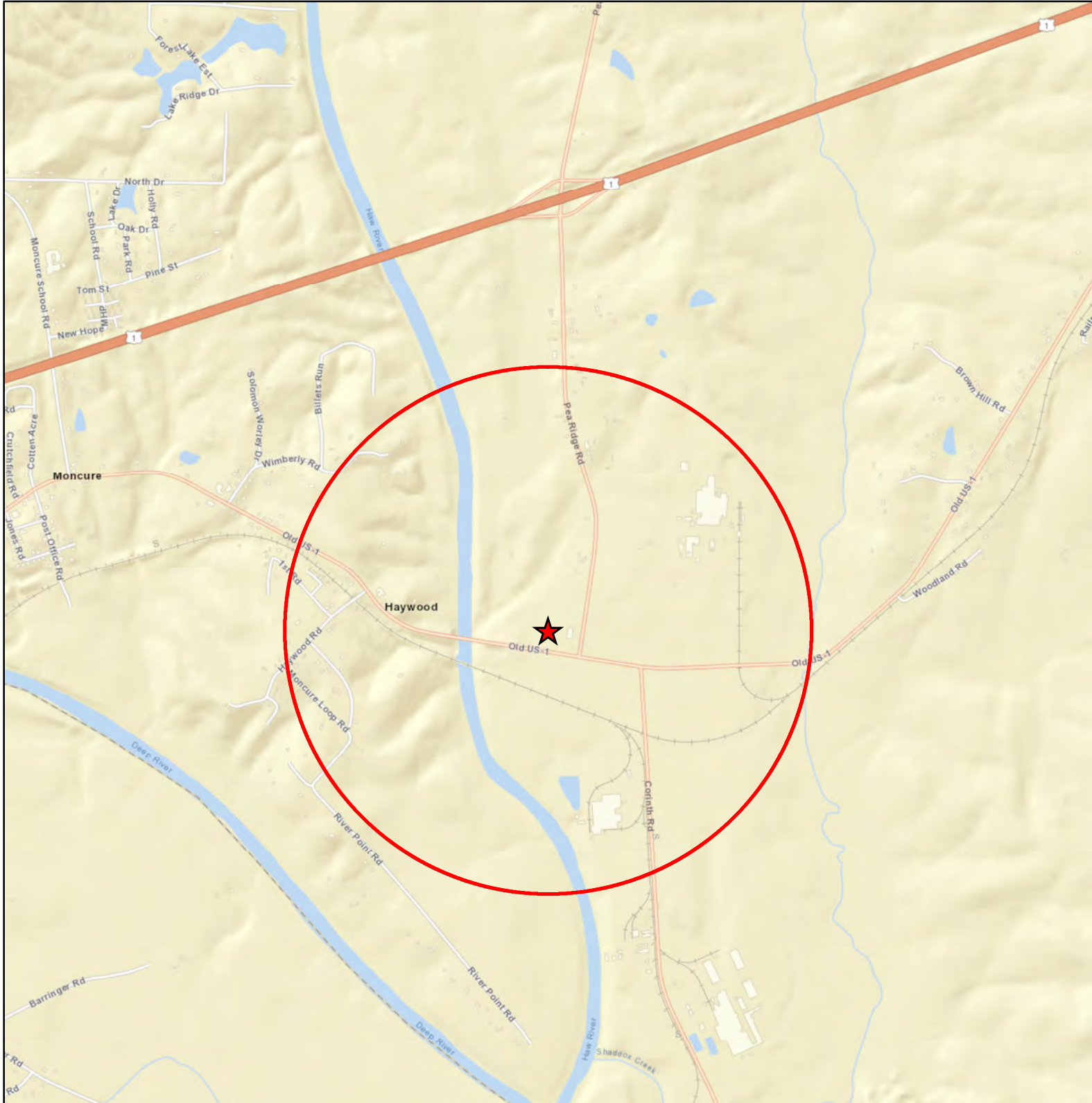


Source: Moncure, NC Quad. USGS 1982.




Project Location Map

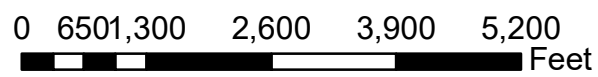
Trileaf Project # 657434 (Moncure)



Legend

 Project Location

 0.75-Mile APE



Dickens Farm Rd

ATTACHMENT 4. SITE INFORMATION – ADDITIONAL SITE INFORMATION

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

See below for a short summary of the project, including a description of the proposed project location, general area and surroundings, and project description.

The proposed project is located at 2389 Old U.S. Highway 1, Moncure, Chatham County, NC, 27559, at coordinates 35° 37' 0.13" N, 79° 3' 9.96" W. The project area is in a wooded lot in a sparsely developed area. The proposed project consists of installing telecommunications antenna and associated equipment on a new self-support tower within a 60' by 60' lease area. The overall height of the installation, including all appurtenances is 360'.

The proposed 30'-wide access/utility easement will extend approximately 185' east to an existing driveway on the adjacent property, where it will utilize approximately 268 feet of existing driveway to meet Old S Highway 1. The proposed project requires ground disturbance, consisting the lease area and the new portion of the access/utility easement.

The construction drawings provided by *Pyramid Network Services* are included in this attachment.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

Please refer to Appendix A for Site Plans

ATTACHMENT 5. AREA OF POTENTIAL EFFECTS

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

Areas of Potential Effect Guidelines:

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

The APE for direct effects is limited to the area of potential ground disturbance and any property, or any portion thereof, that will be physically altered or destroyed by the Undertaking. On November 24, 2008, the FCC further clarified that the APE-for Direct Effects is limited to the tower or non-tower structure on which the collocation will be mounted as well as the lease area including the access route and utility corridor.

The proposed project consists of the construction of a new self-support tower within a 60' by 60' lease area and the 256-foot long access/utility route. The APE for direct effects consists of the project footprint and a 50-foot buffer.

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

The APE for visual effects is the geographic area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register. The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible. Due to the height of the proposed undertaking (360 feet), the presumed APE for visual effects for this project is a 0.75-mile radius from the tower site.

Mitigation of Effect Guidelines:

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

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

No correspondence with the SHPO or THPO has taken place as of the date of this report.

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

No adverse effects are anticipated as a result of the proposed project.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

ATTACHMENT 5. AREA OF POTENTIAL EFFECTS (CONT.)

FOR EACH PROPERTY IDENTIFIED AS A HISTORIC PROPERTY IN THE ONLINE E-106 FORM:

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

A cultural resources records search was conducted on November 16, 2019 by Abigail Heller, RPA of JMT, using North Carolina Historic Preservation Office's HPOWEB mapping service

The results of the cultural resources records search disclosed zero previously identified historic above-ground resources within the 0.75-mile APE for Visual Effects which have been listed in, or determined eligible for listing in, the National Register of Historic Places.

As a result, a finding of No Historic Properties Present within the APE for Visual Effects is recommended. Based on the results of the background research and field investigation, a finding of No Historic Properties Present within the APE for Direct Effects is recommended. Please see the attached Archaeological Survey Report for additional information.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434



Engineering A Brighter Future®



Cultural Resources Overview Report for Trileaf Corporation

**Project 657434 (Moncure)
Moncure, Chatham County, North Carolina**

Lead Agency: FCC

Prepared by

Abigail Heller, RPA
and Lindsey Allen

Johnson, Mirmiran & Thompson
1600 Market Street, Suite 520
Philadelphia, Pennsylvania 19103

Prepared for

Trileaf Corporation
1051 Winderly Place, Suite 201
Maitland, Florida 32751

December 2019

Introduction

This report documents the results of the cultural resources survey for Trileaf Corporation Project 657434 (Moncure) in Moncure, Chatham County, North Carolina. The survey was conducted to ensure that resources eligible for or listed in the National Register of Historic Places (NRHP) located within the Area of Potential Effect (APE) are not adversely affected by the proposed project. This work is being done as required by Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulations, 36 CFR Part 800. In addition, this document is being submitted in compliance with the Federal Communications Commission (FCC) "Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission" (FCC 2004).

Figures and photographs referenced throughout the text that are not within the body of the text can be found at the end of this report.

Project Description and Scope of Work

The subject property is located at 2389 Old U.S. Highway 1, Moncure, Chatham County, North Carolina, 27559, at coordinates 35°37'0.13" N, 79°3'9.96" W. The project area is in a wooded lot in a sparsely developed area. The proposed project consists of installing telecommunications antenna and associated equipment on a new self-support tower within a 60' by 60' lease area. The overall height of the installation, including all appurtenances is 360'. The proposed project area will be accessible via a proposed 30'-wide access/utility easement that extends approximately 185' east to an existing driveway on the adjacent property, where it will utilize approximately 268 feet of existing driveway to meet Old U.S. Highway 1. The proposed project requires ground disturbance, consisting the lease area and the new portion of the access/utility easement.

The cultural resource survey for the project consists of an archaeological survey as well as a viewshed analysis in which all known standing historic resources within the APE were analyzed. The archaeology survey for the project consisted of background research, a cultural resources records search, and fieldwork. Abigail Heller, RPA, of JMT, performed the State Historic Preservation Office (SHPO) file search and background research. Ms. Lindsey Allen, Senior Architectural Historian of JMT, conducted the evaluation for standing historic resources. Garrett Silliman, RPA and Senior Archaeologist of JMT, performed the fieldwork. Abigail Heller, RPA, serves as Principal Investigator and prepared the report.

The APE for Direct Effects is defined as the area of potential ground disturbance and any property, or any portion thereof, which will be physically altered or destroyed by the undertaking. The entire project footprint was included in the survey (Photographs 1-11). The APE for this undertaking includes all areas discussed above. JMT investigated all areas within the proposed APE.

The APE for Visual Effects is the geographic area in which the project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the NRHP. The presumed APE for Visual Effects for construction of new facilities is the area from which the tower will be visible. Due to

the overall height of the proposed undertaking (360'), the presumed APE for Visual Effects for this project is a 0.75-mile radius from the tower site.

Subject Property and Field Conditions

The project area is in a wooded lot in a sparsely developed area. The lease area is surrounded by cleared or planted logging tracts, undeveloped woodland, pastureland, and agricultural fields interspersed with scattered residential, recreational, and commercial development. The project location was easily identified from maps and construction drawings.

Literature and Document Search

A cultural resources records search was completed on November 16, 2019 by Ms. Heller, using HPOWEB GIS Service—an online database of cultural resources, managed by the North Carolina SHPO. The results of the records search concluded that there are zero previously identified historic above-ground resources within the APE for Direct Effects and two within the APE for Visual Effects, which have been listed in, or determined eligible for listing in, the NRHP.

Mr. Silliman visited the NC SHPO on November 26, 2019 and confirmed that there are no previously conducted archaeological surveys or previously recorded archeological sites within the APE for Direct Effects. Two previously recorded archaeological resources are located within approximately 0.75 miles of the APE for Direct Effects and neither have been assessed for NRHP eligibility ().

Table 1. Previously recorded sites within approximately 0.75 miles of the project area.

Site Number	Site Name	Site Type	Description	NRHP Eligibility
31CH23		Prehistoric	Site file describes site as 'mound' and no other information is provided	N/A
31CH33	Haywood Site	Prehistoric; Middle Woodland	Lithic scatter	N/A

No previously recorded cultural resource surveys/projects were conducted within one mile of the APE for Direct Effects.

Standing Historic Structures

The records search disclosed no previously identified standing historic structures listed in or determined eligible for listing in the NRHP located within the 0.75-mile APE for Visual Effects of the proposed project. Ms. Allen reviewed the results of the file search as well as photographs and field notes collected during the archaeological survey on November 27, 2019 and recommends a finding of *No Historic Properties Present within the APE for Direct Effects* and *No Historic Properties within the APE for Visual Effects* for this project.

Historic Archaeological Potential

A review of the NC SHPO files showed that no previously recorded historic archaeological resources are located within approximately 0.75 miles of the APE for Direct Effects. According to historic aerial photos

and historic topographic maps, the proposed project area was partially located within an agricultural field by at least 1965. This area appears to have been repurposed for a logging tract by 1993 and the area was planted around that time. The area was logged or otherwise cleared between 1998 and 2002. The adjacent fire house was constructed between 2002 and 2006. The area appears to have remained relatively unchanged since that time (Google Earth 2019; NETR 2019). Due to the lack of historic development in the proposed project area and prior disturbance from logging or other land clearing events, historic archaeological potential was assessed as low.

Prehistoric Archaeological Potential

Prehistoric archaeological potential was also assessed. A review of SHPO files showed no previously recorded prehistoric archaeological sites are located within the proposed project area, though two are located within approximately 0.75 miles of the APE for Direct Effects. Soils within the proposed lease area are mapped as ChA— Chewacla and Wehadkee soils, 0 to 2 percent slopes, frequently flooded and PeB— Peawick fine sandy loam, 2 to 8 percent slopes (United States Department of Agriculture, Natural Resources Conservation Service [USDA NRCS] 2019). Chewacla soils are somewhat poorly drained soils occurring on floor plains and have a typical profile of *A - 0 to 4 inches: loam over Bw1 - 4 to 26 inches: silty clay loam over Bw2 - 26 to 38 inches: loam over Bw3 - 38 to 60 inches: clay loam over C - 60 to 80 inches: loam*; Wehadkee soils are poorly drained soils occurring on depressions on flood plains and have a typical profile of *A - 0 to 8 inches: loam over Bg - 8 to 43 inches: sandy clay loam over Cg - 43 to 80 inches: sandy loam*. Peakwick fine sandy loam is a moderately well-drained soil occurring on stream terraces and has a typical profile of *Ap - 0 to 6 inches: fine sandy loam over BE - 6 to 10 inches: loam over Bt1 - 10 to 64 inches: clay over Bt2 - 64 to 80 inches: clay loam* (USDA 2019).

The subject property is located in the Piedmont physiographic province (NC.gov 2019). The nearest perennial source of fresh water is the Haw River, located approximately 1175' (358m) due west of the proposed project location. Taking into consideration the distance from fresh water, known sites in the surrounding area, and prior logging or other land clearing activity, the prehistoric archaeological potential was assessed as low to moderate.

Field Methodology

Archaeological testing of the proposed project area was performed to determine the presence of any historic or prehistoric archaeological sites or features. The testing strategy for the Phase I archaeological survey of the APE was determined by the archival research, field observations, and a consideration of the engineering design plans for the project. NC SHPO files disclosed two previously recorded archaeological sites and no archaeological investigations within approximately 0.75 miles of the project area.

Based on project plans and field observations, shovel testing and visual/pedestrian survey was planned within the lease area and the access easement, where appropriate. The project area is in a wooded lot in a sparsely developed area. The proposed project area will be accessible via a proposed 30'-wide access/utility easement that extends approximately 96' east to an existing driveway on the adjacent property, where it will utilize approximately 260 feet of existing driveway to meet Old U.S. Highway 1. The testing strategy for the Phase I archaeological survey of the APE was determined by archival

research, field observations, and a consideration of the engineering design plans for the project. The archaeological testing was accomplished through the systematic use of STPs placed in a grid pattern around portions of the lease area and buffer, approximately every 15-30m. All STPs measured approximately 30 cm (approximately 1ft) in diameter and were excavated by hand. Each STP was excavated following observable changes in soil color, texture, and rock content. Excavated soil was sifted through 0.25-inch hardware cloth. Excavation continued to a depth of at least 10cm into culturally sterile soil or the water table. Fieldwork was performed on November 27, 2019 and one day was spent in the field. No artifacts were uncovered, no archaeological sites were identified, and no additional archaeological testing is recommended at this location.

Results

Five STPs were placed in the proposed area as described above (Photographs 12-16). STPs were placed at the center and at the corners of the lease area. No STPs were placed within the proposed access road due to clear prior disturbance and land modifications (see Photograph 10). The excavated STPs are described below (Figure 1; Table 2).

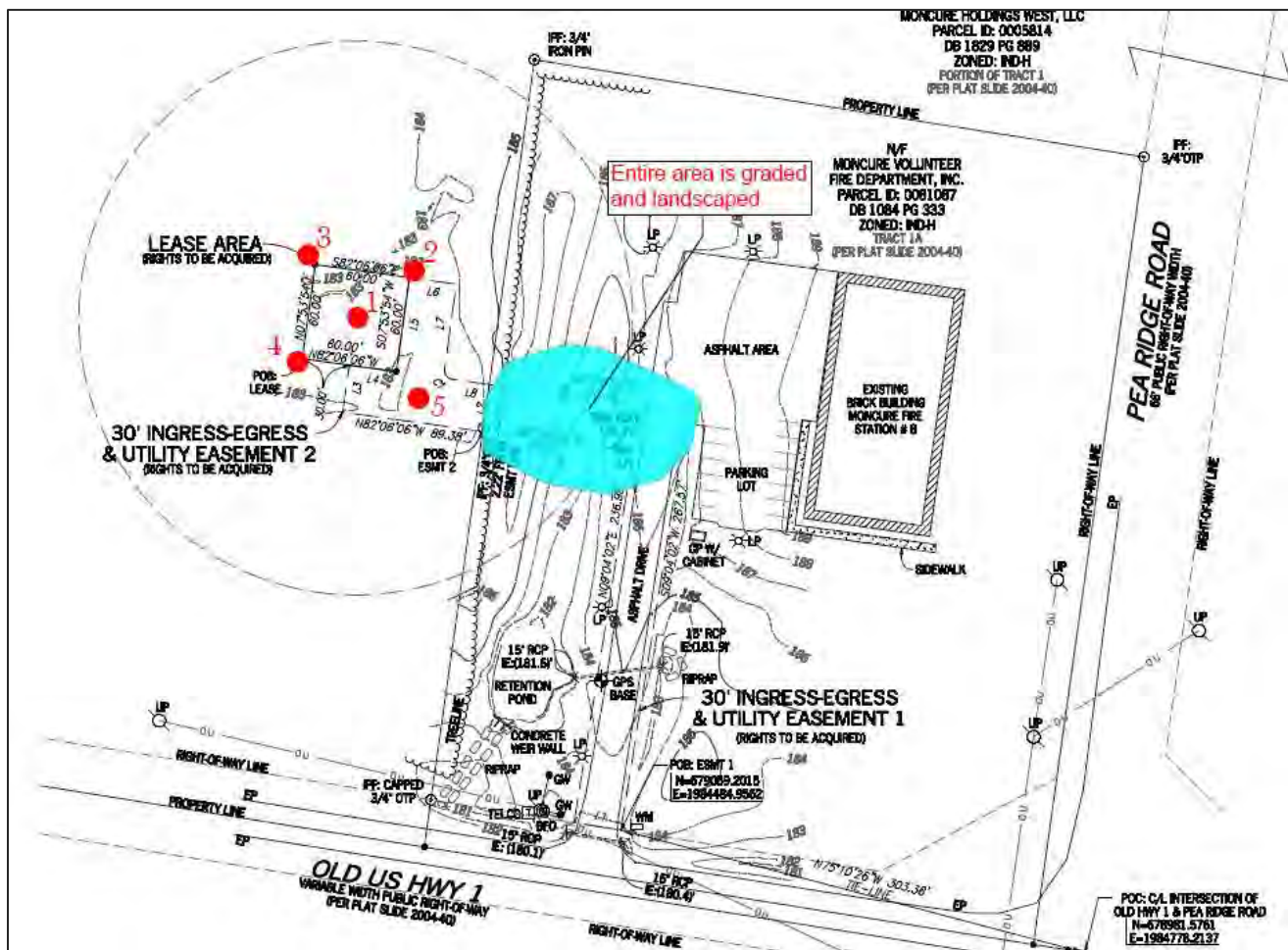


Figure 1. STP location map.

Table 2. STP profile descriptions

STP	Strata	Depth (cm)	Soil Color	Description	Artifacts
1	I	0-5	10YR 6/1	Sandy loam	--
	II	5-40	10YR 5/3	Sandy clay; extensive surface and near surface disturbance from heavy equipment	--
	III	40-50	10YR 6/8	Clay loam	--
2	I	0-5	10YR 6/1	Sandy loam	--
	II	5-40	10YR 5/3	Silty sand	--
	III	40-50	10YR 6/8	Silty clay	--
3	I	0-5	10YR 6/1	Sandy loam	--
	II	5-15	10YR 5/3	Silty sand; evidence of deep ruts and disturbance in north sidewall	--
	III	15-25	10YR 6/8	Silty clay	--
4	I	0-5	10YR 6/1	Sandy loam	--
	II	5-20	10YR 5/3	Silty sand; evidence of deep ruts and disturbance in north sidewall	--
	III	20-30	10YR 6/8	Silty clay	--
5	I	0-5	10YR 6/1	Sandy loam	--
	II	5-25	10YR 5/3	Sandy clay; extensive surface and near surface disturbance from heavy equipment	--
	III	25-35	10YR 6/8	Clay loam	--

Laboratory Methods and Collection Curation

No artifacts were uncovered, no archaeological sites were identified, and no additional archaeological testing is recommended at this location.

Survey Interpretation and Evaluation

The soils encountered in the STPs were somewhat in keeping with the soils identified in the soil survey, though soils in STPs 1 and 3 exhibited extensive surface and near surface disturbance from heavy equipment. Soils in the project location were well drained. The lease area is in a forested area and there is no indication from the field survey or archival research of other land use. No artifacts were collected, and no archaeological sites were identified. No additional archaeological testing is recommended.

The results of the cultural resource records search concluded that there are zero previously recorded above-ground historic resources located within a 0.75-mile radius of the proposed project. Ms. Allen confirmed the absence of standing historic resources within the APE for Direct Effects by reviewing photographs and field notes collected during the archaeological survey. The subject property is wooded lot directly adjacent to the Moncure Firehouse. The firehouse appears to have been constructed between 2006 and 2007 and does meet the age requirement for NRHP listing. No portion of the remainder of the subject property appears to possess any of the characteristics necessary for consideration for listing in the NRHP.

Recommendations

In accordance with 36 CFR Part 800, JMT has assessed the effects of the proposed project on listed and eligible National Register resources in the proposed project APE. There are no resources listed or eligible

for listing in the NRHP located within the APE for Direct Effects. No archaeological sites were identified during archaeological testing. It is our opinion that no additional archaeological investigation is warranted and that the project can proceed as currently designed. There are zero previously recorded above ground resources within the APE for Visual Effects. As a result, findings of *No Historic Properties in APE of Direct Effects* for archaeological resources and *No Historic Properties in APE for Visual Effects* for historic resources are recommended for the proposed telecommunications project, Trileaf Project 657434 (Moncure).

Principal Investigator



Abigail Heller, Registered Professional Archaeologist

December 2, 2019

Date

References Cited

Federal Communications Commission (FCC)

2004 "Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission."

State of North Carolina (NC.gov)

2018 Physiographic Provinces of North Carolina Map and Descriptions.

https://files.nc.gov/ncdeq/Energy%20Mineral%20and%20Land%20Resources/Geological%20Survey/NC_Generalized_Geologic_Map_Description.pdf, accessed November 27, 2019.

Google Earth

2018 Current and historic imagery observed using Google Earth application, <http://earth.google.com>, accessed November 27, 2019.

NETROnline

2018 Historic USGS Topographic Maps and Historic Aerial Photographs. National Environmental Title Research. Historic Aerials, <http://www.historicaerials.com>, accessed November 27, 2019.

United States Department of Agriculture, Natural Resources Conservation Service

2018 *Web Soil Survey*. United States Department of Agriculture, Natural Resources Conservation Service. Electronic document, <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>, accessed November 27, 2019.



Project Location Map

Trileaf Project # 657434 (Moncure)

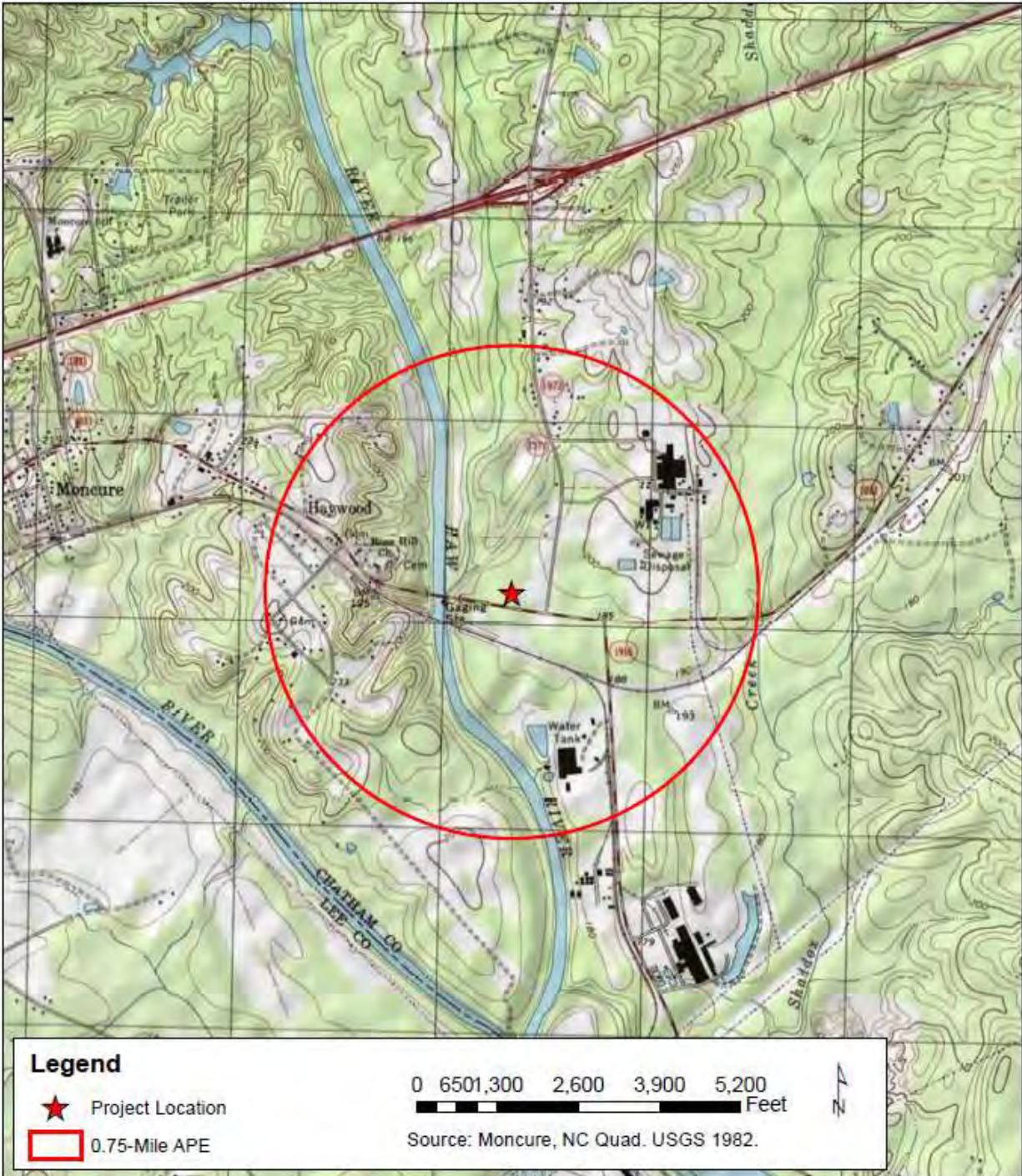


Figure 2. USGS project location map (1:24,000).



Project Location Map

Trileaf Project # 657434 (Moncure)

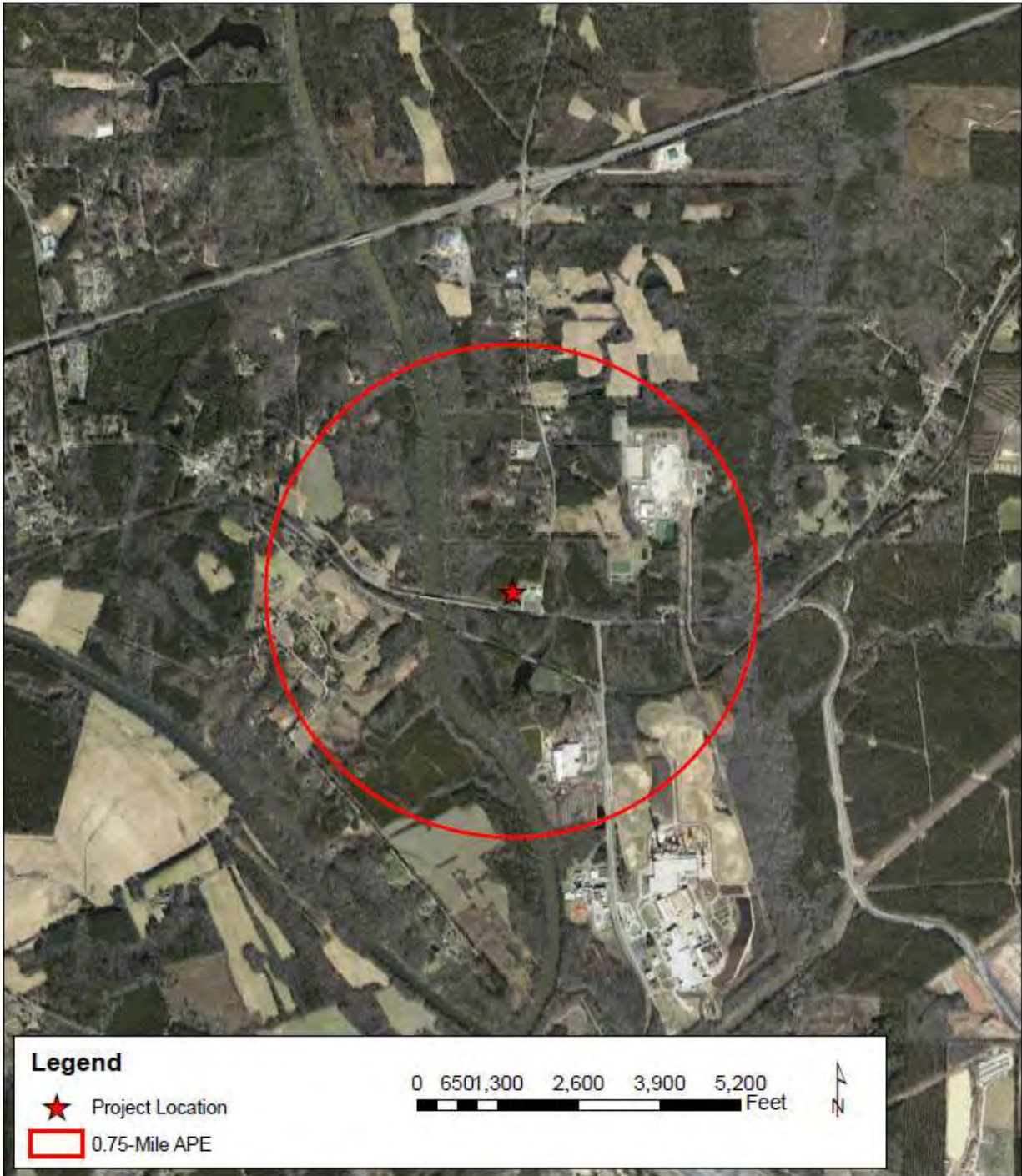


Figure 3. Aerial project location map (1:24,000).



Project Location Map

Trileaf Project # 657434 (Moncure)

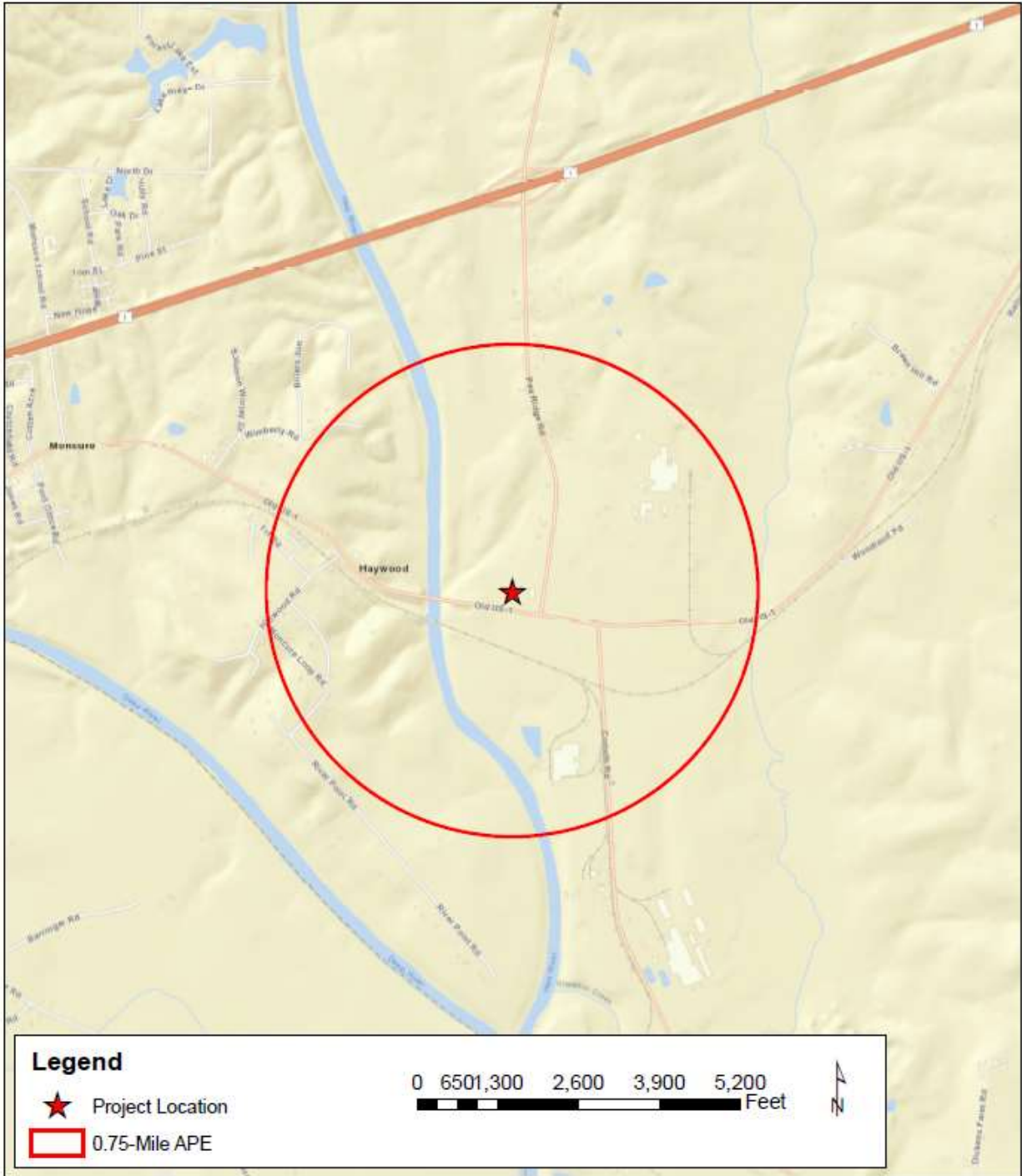


Figure 4. Streets project location map (1:24,000).



Project Location Map

Trileaf Project # 657434 (Moncure)



Figure 5. Photograph location map.



1. View of proposed project location, looking northeast.



2. View of proposed project location, looking southeast.
-



3. View of proposed project location, looking southwest.



4. View of proposed project location, looking northwest.



5. View from proposed project location, looking north at surrounding area.



6. View from proposed project location, looking east at surrounding area.



7. View from proposed project location, looking south at surrounding area.



8. View from proposed project location, looking west at surrounding area.



9. View of access road, looking northeast from lease area.



10. View of access road, looking south and showing existing land disturbance.



11. View of access road from existing asphalt parking area, looking west.



12. View STP 1.



13. View of STP 2.



14. View of STP 3.



15. View of STP 4.



16. View of STP 5.

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

ATTACHMENT 6. TRIBAL AND NHO INVOLVEMENT

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

Trileaf Corporation completed the Tower Construction Notification System (TCNS) on November 15, 2019 and received the notification of interested tribes on November 22, 2019. The attached FCC Notification email lists the Tribes identified through the TCNS process. A second notice will be sent to all interested tribes/organizations, after a period of 30 days and the consultation process will continue per the FCC’s guidelines. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

Applicant’s Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

From: towernotifyinfo@fcc.gov
To: [tribal](#)
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #6509097
Date: Friday, November 22, 2019 2:03:30 AM

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

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

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. Attorney Montana & Associates LLC - Crow Creek Sioux Tribe - N12923 N Prairie Rd Osseo, WI - ccstfctcns@outlook.com; garymontana@montanaandassociates.com - 715-597-6464 (ext: 1) - electronic mail
Exclusions: As of AUGUST 16th 2019 - The Crow Creek Sioux Tribe has updated procedures. Please email us at ccstfctcns@outlook.com about these procedures.

2. THPO Officer Garrie Kills a Hundred - Flandreau Santee Sioux Tribe - 603 W. Broad Avenue (PO Box: 283) Flandreau, SD - garrie.killsahundred@FSST.org - 605-997-3891 (ext: 1240) - electronic mail and regular mail

3. THPO Noah C White III - Prairie Island Indian Community - 5636 Sturgeon Lake Road Welch, MN -

celltower@piic.org - 651-385-4175 - electronic mail

If the applicant/tower builder receives no response from the Prairie Island Indian Community within 30 days after notification through TCNS, the Prairie Island Indian Community has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Prairie Island Indian Community in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

4. Gwen Terrapin - Cherokee Nation - (PO Box: 948) Tahlequah, OK - historicpreservation@cherokee.org; gwen-terrapin@cherokee.org - 918-772-4165 - electronic mail

Exclusions: Please email all review documents for FCC Form 620/621 (i.e. archeologist report, photos, SHPO response, etc.) to historicpreservation@cherokee.org or gwen-terrapin@cherokee.org. You may also mail a cover letter and a CD or flash drive containing the review documents and FCC forms to: Cherokee Nation: Attn: Gwen Terrapin, PO Box 948, Tahlequah, OK 74465. Should you have any questions, please do not hesitate to email or call 918.772.4165.

Wado,
Cherokee Nation

5. Cell Tower Coordinator Kelly Nelson - Eastern Shawnee Tribe of Oklahoma - 70500 East 128 Road Wyandotte, OK - celltower@estoo.net - 918-666-2435 (ext: 1861) - regular mail

Exclusions: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened. Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe
Attn: Cell Tower Program
70500 E. 128 Rd.
Wyandotte, OK 74370

Provide 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. Project coordinates
- f. Contact information

The Eastern Shawnee Procedures document is available and highly recommended for guidance; send an email to celltower@estoo.net requesting our most current copy.

6. THPO Kim Jumper - Shawnee Tribe - 29 South 69A Highway Miami, OK - kim.jumper@shawnee-tribe.com - 918-542-2441 - regular mail

7. THPO and Executive Director Dr. Wenonah G Haire - Catawba Indian Nation - 1536 Tom Steven Road
CIN-THPO Rock Hill, SC - wenonahh@ccppcrafts.com - 803-328-2427 (ext: 224) - regular mail

Exclusions: Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation to address:

Dr. Wenonah G. Haire
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, SC 29730

Please submit by US Postal mail or other parcel carrier complete information for all telecommunication projects:

1. Please provide 1 page cover letter with following information
 - a. TCNS Number
 - b. Company Name
 - c. Project Name, City, County, State
 - d. Project Type
 - e. Project coordinates
 - f. Contact information
2. We also request photographs of project area, previous land use history and copy of SHPO Letter.

If you have any questions about our process or timeline of project notifications you can email Caitlin Rogers at Caitlinh@ccppcrafts.com

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

8. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - 4617
Mail Service Center Raleigh, NC - renee.gledhill-earley@ncmail.net - 919-733-4763 - electronic mail

9. Deputy SHPO David Brook - Historic Preservation Office - 4610 Mail Service Center Raleigh, NC -
david.brook@ncmail.net - 919-807-7283 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-

construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tenshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/15/2019

Notification ID: 192744

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Pyramid Network Services

Consultant Name: Mindi L Okai

Street Address: 10845 Olive Blvd.

Suite 260

City: St. Louis

State: MISSOURI

Zip Code: 63141

Phone: 314-997-6111

Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower

Latitude: 35 deg 37 min 0.1 sec N

Longitude: 79 deg 3 min 10.0 sec W

Location Description: 2389 Old U.S. Highway 1

City: Moncure

State: NORTH CAROLINA

County: CHATHAM

Detailed Description of Project: No township found.

Ground Elevation: 55.8 meters

Support Structure: 106.7 meters above ground level

Overall Structure: 109.7 meters above ground level

Overall Height AMSL: 165.5 meters above mean sea level

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

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.fcc.gov%2fwireless%2favailable-support-services&c=E.1.APwkV7CPaxg4yoMUeevnAyzatmf4Edfpx6pL096NJGE-Tf7esCil-afH-IXU4MqTxZj2T6JQd3QOFdYC4Li1sHz8LeGWrYPEYYZBWYjk16hM1Ot6Q..&typo=1>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

ATTACHMENT 7. HISTORIC PROPERTIES DIRECT EFFECTS

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

On November 16, 2019 JMT completed a review of the available records as required per Section VI.D.2 of the Federal Communications Commission’s 2004 Nationwide Programmatic Agreement to identify historic properties in the APE for Direct Effects. Based on this review, no Historic Properties were identified within the APE for direct effects.

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

The subject property is wooded lot directly adjacent to the Moncure Firehouse. The firehouse appears to have been constructed between 2006 and 2007 and does meet the age requirement for NRHP listing. No portion of the remainder of the subject property appears to possess any of the characteristics necessary for consideration for listing in the NRHP.

c. Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.¹ If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.²

JMT completed the process outlined in Section VI.D.2 of the FCC’s 2004 NPA to identify above ground historic properties. Please see parts **a.** and **b.** above.

Johnson, Mirmiran & Thompson completed an evaluation of the proposed project location for the likelihood of containing archeological Historic Properties. Please refer to the report in **Attachment 5** documenting the findings of this project review by a qualified archaeologist including a description of the techniques and the methodology used to identify Historic Properties within the APE for direct effects.

Archaeological testing of the proposed project area was performed to determine the presence of any historic or prehistoric archaeological sites or features. The testing strategy for the Phase I archaeological survey of the APE was determined by the archival research, field observations, and a consideration of the engineering design plans for the project. NC SHPO files disclosed two previously recorded archaeological sites and no archaeological investigations within approximately 0.75 miles of the project area.

Based on project plans and field observations, shovel testing and visual/pedestrian survey was planned within the lease area and the access easement, where appropriate. The project area is in a wooded lot in a sparsely developed area. The proposed project area will be accessible via a proposed 30’-wide access/utility easement that extends approximately 96’ east to an existing driveway on the adjacent property, where it will utilize approximately 260 feet of existing driveway to meet Old U.S. Highway 1. The testing strategy for the Phase I archaeological survey of the APE was determined by archival research, field observations, and a consideration of the engineering design plans for the project. The archaeological testing was accomplished through the systematic

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

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

Applicant’s Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

NT SUBMISSION PACKET - FCC FORM 620

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

use of STPs placed in a grid pattern around portions of the lease area and buffer, approximately every 15-30m. All STPs measured approximately 30 cm (approximately 1ft) in diameter and were excavated by hand. Each STP was excavated following observable changes in soil color, texture, and rock content. Excavated soil was sifted through 0.25-inch hardware cloth. Excavation continued to a depth of at least 10cm into culturally sterile soil or the water table. Fieldwork was performed on November 27, 2019 and one day was spent in the field. No artifacts were uncovered, no archaeological sites were identified, and no additional archaeological testing is recommended at this location.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

ATTACHMENT 8. HISTORIC PROPERTIES VISUAL EFFECTS

Historic Properties Identified for Visual Effects Guidelines

- a. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.1.a. of the Nationwide Agreement.**

On November 16, 2019, JMT completed a review of the available records as required per Section VI.D.1 of the Federal Communications Commission’s 2004 Nationwide Programmatic Agreement to identify historic properties in the APE for Visual Effects. Based on this review, no Historic Properties were identified within the APE for visual effects.

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

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

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

N/A

Applicant’s Name: Pyramid Network Services
 Project Name: Moncure
 Project Number: 657434

ATTACHMENT 9. LOCAL GOVERNMENT

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

On November 20, 2019, the Chatham County Zoning Board of Adjustment was notified of the proposed project and has been invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. A copy of Trileaf Corporation's correspondence with the local government's office is attached.

On December 3, 2019, Ms. Angela Birchett, Chatham County's Zoning Administrator, responded with no comments related to historic properties.

- b. **If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.**

N/A

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434



ENVIRONMENTAL • ARCHITECTURE • ENGINEERING

1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

November 20, 2019

Chatham County Zoning Board of Adjustment

Attn: Ms. Angela Birchett, Administrator
12 East Street
Pittsboro, NC 27312
Phone: (919) 542-8285
Email: angela.birchett@chathamnc.org

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

Dear Ms. Birchett:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area. The project includes an access/utility easement, measuring 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1. The proposed access/utility easement and proposed tower compound lease area are located within wooded land. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (404) 993-1760 or email m.rasmussen@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Morgan Rasmussen
Project Scientist

Morgan Rasmussen

From: Angela Birchett <angela.birchett@chathamnc.org>
Sent: Tuesday, December 3, 2019 11:23 AM
To: Morgan Rasmussen
Subject: RE: [Ext] Additional proposal for consultation- proposed cell tower in Moncure, NC

We are aware of this proposed tower for our emergency operations department. Please forward a completed application packet and we will review it for accuracy and zoning approval. The fee is \$250.00.

Thank you,

Angela Birchett, CZO
Planner II / Zoning Administrator
Chatham County Planning Department
919-542-8285
angela.birchett@chathamnc.org

Please let us know how we are doing by completing a short survey!

<https://seam.ly/uR2vfwN6>

From: Morgan Rasmussen [mailto:m.rasmussen@trileaf.com]
Sent: Wednesday, November 20, 2019 11:23 AM
To: Angela Birchett <angela.birchett@chathamnc.org>
Subject: [Ext] Additional proposal for consultation- proposed cell tower in Moncure, NC

CAUTION: This email originated from outside of the Chatham County network. Do not reply, click links, or open attachments unless you recognize the sender and know the content is safe. When in doubt, please call the sender (do not use the number listed on the email in question).

Ms. Birchett,

Thank you for referring me to the correct point of contact for the projects discussed in our previous email chain. Additionally, I have another tower proposal project that I believe is within Chatham County's zoning jurisdiction. The information for the project and the request to consult is stated below.

On behalf of Pyramid Network Services, Trileaf is performing a NEPA review on a proposed Self-Support Telecommunications tower site located in Chatham County, NC. The tower is located at the approximate address of 2389 Old U.S. Highway 1, Moncure, NC 27559; Coordinates: 35° 37' 0.13" N, 79° 3' 9.96" W.

As part of this review, we are required to contact a local government contact and provide the option to comment on the projects. Please note that this invitation to comment is separate from any local planning/zoning process that may apply to this project.

Please find attached a letter for the proposed tower site with project details, a topographic site map, and an aerial photograph to assist in your review. If you have any questions or require additional information, please feel free to call or e-mail.

Thank you so much!

Morgan Rasmussen
Project Scientist



1395 South Marietta Parkway
Building 400, Suite 209
Marietta, GA 30067
(404) 993-1760 Cell

ATTACHMENT 10. OTHER CONSULTING PARTIES AND PUBLIC NOTICE

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

Please see the attached correspondence with the Chatham County Historical Museum.

On November 28, 2019, Ms. Beverly Wiggins, a volunteer at the Chatham County Historical Association, responded with no interest in consulting further on the proposed project.

You are required to provide a Public Notice Attachment.

Attached, please find a copy of a legal notice regarding the proposed telecommunications tower construction that was posted in the *Chatham News and Record* on November 21, 2019. As of the date of this submission packet, no comments regarding this notice have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434



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1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

November 20, 2019

Chatham Historical Museum

9 Hillsboro St
Pittsboro, NC
Phone: (919) 542-6222
Email: Preservation@chathamhistory.org

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

To Whom It May Concern:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area. The project includes an access/utility easement, measuring 30 feet wide, extending approximately 185 feet east from the southeastern portion of the lease area, then meeting an existing asphalt lot, and extending approximately 268 feet south towards Old U.S. Highway 1. The proposed access/utility easement and proposed tower compound lease area are located within wooded land. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (404) 993-1760 or email m.rasmussen@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Morgan Rasmussen
Project Scientist

Morgan Rasmussen

From: preservation@chathamhistory.org
Sent: Thursday, November 28, 2019 5:16 PM
To: Morgan Rasmussen
Cc: Kimberly Tyson
Subject: Re: Additional request to consult- proposed cell tower in Moncure, NC

Good afternoon,

According to available information, there are not historic structures near this proposed tower site.

Thank you,

Beverly Wiggins
Chatham County Historical Association volunteer

On 2019-11-20 12:17, Morgan Rasmussen wrote:

> Good afternoon,
>
> In addition to my previous email regarding the request to
> consult/comment on two proposed telecommunications tower sites located
> in Siler City, NC, I am requesting consultation on another proposed
> telecommunications tower site located in Chatham County. The
> information for the project and the request to consult is stated
> below.
>
> On behalf of Pyramid Network Services, Trileaf is performing a NEPA
> review on a proposed Self-Support Telecommunications tower site
> located in Chatham County, NC. The tower is located at the approximate
> address of 2389 Old U.S. Highway 1, Moncure, NC 27559; Coordinates:
> 35° 37' 0.13" N, 79° 3' 9.96" W.
>
> As part of this review, we are required to contact a local government
> contact and provide the option to comment on the projects. Please note
> that this invitation to comment is separate from any local
> planning/zoning process that may apply to this project.
>
> Please find attached a letter for the proposed tower site with project
> details, a topographic site map, and an aerial photograph to assist in
> your review. If you have any questions or require additional
> information, please feel free to call or e-mail.
>
> Thank you so much!
>
> MORGAN RASMUSSEN
>

- > PROJECT SCIENTIST
- >
- > 1395 South Marietta Parkway
- >
- > Building 400, Suite 209
- >
- > Marietta, GA 30067
- >
- > (404) 993-1760 Cell

Chatham News + Record

**NORTH CAROLINA
CHATHAM COUNTY**

**CLIPPING OF LEGAL
ADVERTISEMENT
ATTACHED HERETO**

AFFIDAVIT OF PUBLICATION

Before the undersigned, a Notary Public of said County and State, duly commissioned, qualified and authorized by law to administer oaths, personally appeared Florence Turner

_____, who

being first duly sworn, deposes and says: that he (she) is

Accounts Receivable Clerk

(Owner, partner, publisher, or other officer or employee authorized to make this affidavit)

of the Chatham Media Group, LLC., engaged in the publication of a newspaper known as, Chatham News+Record, published, issued, and entered as second class mail in the Town of Siler City, in said County and State; that he (she) is authorized to make this affidavit and sworn statement; that the notice or legal advertisement, a true copy of which is attached hereto, was published in the Chatham News+Record on the following dates:

November 21 2019

and that the said newspaper in which such notice, paper, document, or legal advertisement was published was, at the time of each and every such publication, a newspaper meeting all of the requirements and qualifications of Section 1-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of Section 1-597 of the General Statutes of North Carolina.

This 21 day of November, 2019

Florence Turner

(Signature of person making affidavit)

Sworn to and subscribed before me, this 21st

day of November, 2019

Karen W. Pyrtle

Notary Public

My Commission expires: June 19th, 2024

PUBLIC NOTICE
"Pyramid Network Services, LLC proposes to build three self-support telecommunication towers.
A 310-foot-tall self-support telecommunication tower will be located at the approx. vicinity of 400 Progress Boulevard, Siler City, NC 27344.
A 360-foot-tall self-support telecommunication tower will be located at the approx. vicinity of 2389 Old U.S. Highway 1, Moncure, NC 27559.
A 335-foot-tall self-support telecommunication tower will be located at the approx. vicinity of 5226 Silk Hope Liberty Road, Siler City, NC 27344.
Public comments regarding potential effects from these sites on historic properties may be submitted within 30 days from the date of this publication to: Trileaf Corp, Morgan Rasmussen, m.rasmussen@trileaf.com, 1395 South Marietta Pkwy, Building 400 Suite 209, Marietta, GA 30067, (678) 653-8673."

N21,1tp



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

ATTACHMENT 11. SHPO SPECIFIC FORMS

North Carolina SHPO - Telecommunications Tower Review Form

Applicant's Name: Pyramid Network Services
Project Name: Moncure
Project Number: 657434

Communications Tower Review Form

I. Applicant Information:

Preparer/Company: Johnson, Mirmiran & Thompson, Inc.

Address: 1600 Market Street #520, Philadelphia PA 19103

Phone/Fax/E-mail: 708-574-9330 / aheller@jmt.com

For North Carolina HPO
Use Only

II. Tower Information: (Attach copy of USGS map or photocopy of quad on reverse; include 1 and 2 mile radius around site)

Raw Land (New) Co-Location Applicant's Identification # 657434

Address: 2389 Old U.S. Highway 1, Moncure, 27559

County: Chatham FCC Registration No. _____

Tower type and height: 360' self-support Quad Name: Moncure (1982)

III. Identification of Historic Properties

List sites by site number and status: NR = National Register listed; SL = Study List; DOE = Determination of Eligibility;
LD = Local Designation; UA = Unassessed

Archaeology

of recorded sites in immediate area of tower: 0
2 within approx 0.75 miles - neither 31CH23/31CH33
are eligible/listed

Architecture

of recorded sites within .75-mile radius: 8
All surveyed only/UA: CH0148, CH0147, CH0137.
CH0140, CH0702, CH---, CH0141, CH0143

IV. Additional Information/Investigation Needed:

Survey

Testing of sites _____

Recommended by/on: _____
(Office of State Archaeology)

Photo Reconnaissance

Balloon Test

Recommended by/on: _____
(Survey & Planning Branch)

V. Recommendations/Final Determination:

Recommendations for additional work are shown above.

The proposed communication tower will _____ affect historic properties in the area of potential effect.

Renee Gledhill-Earley, Environmental Review Coordinator

Date

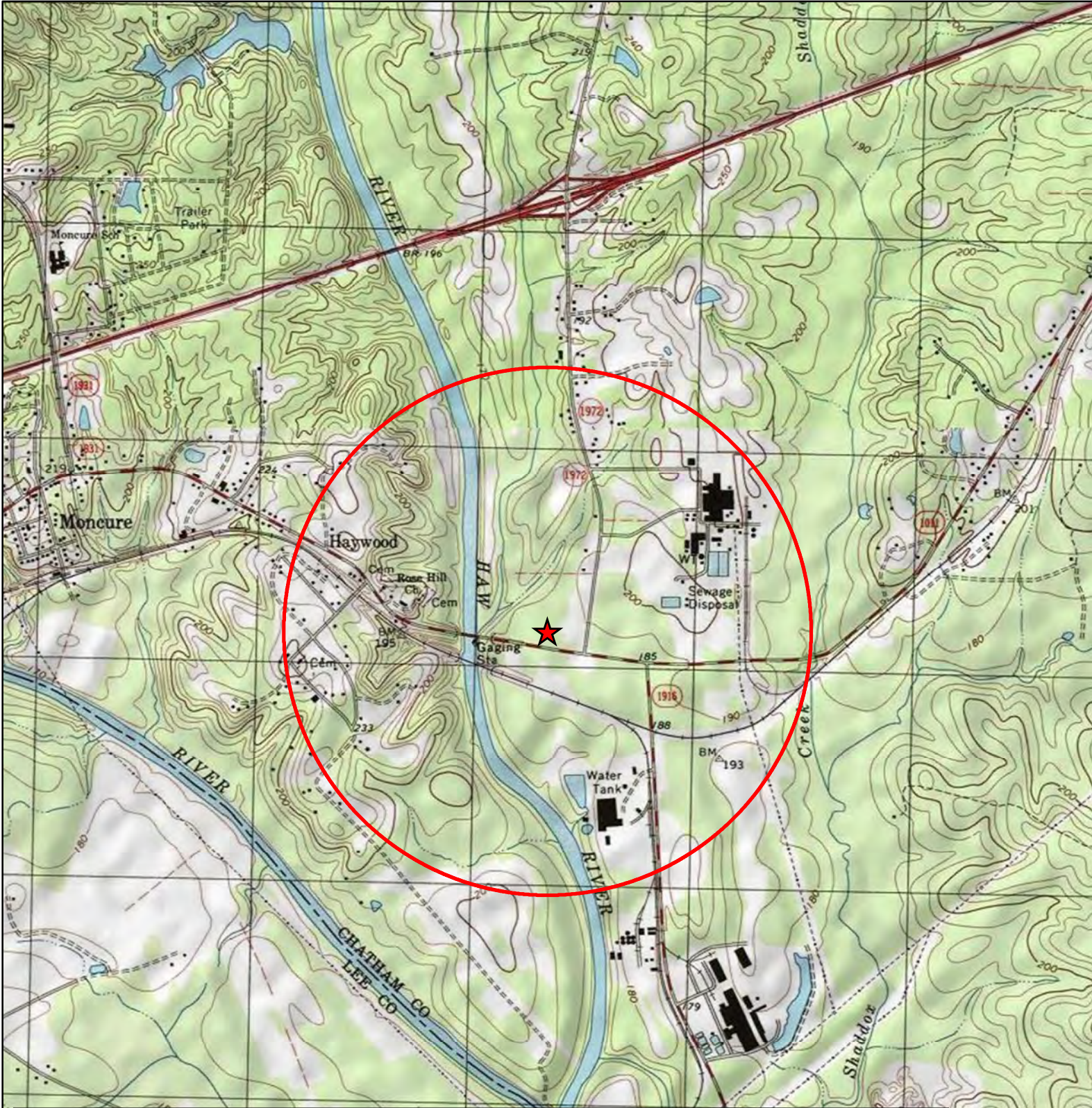
cc: FCC

February, 2001





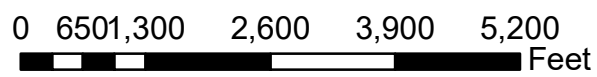
Project Location Map

Trileaf Project # 657434 (Moncure)



Legend

-  Project Location
-  0.75-Mile APE



Source: Moncure, NC Quad. USGS 1982.

Chatham

(1)

Received: 12/10/2019
State Historic Preservation Office

Communications Tower Review Form

I. Applicant Information:

Preparer/Company: Johnson, Mirmiran & Thompson, Inc.
Address: 1600 Market Street #520, Philadelphia PA 19103
Phone/Fax/E-mail: 708-574-9330 / aheller@jmt.com

For North Carolina HPO
Use Only
CT 19-5321

II. Tower Information: (Attach copy of USGS map or photocopy of quad on reverse; include 1 and 2 mile radius around site)

Raw Land (New) Co-Location Applicant's Identification # 657434
Address: 2389 Old U.S. Highway 1, Moncure, 27559
County: Chatham FCC Registration No. _____
Tower type and height: 360' self-support Quad Name: Moncure (1982)

III. Identification of Historic Properties

List sites by site number and status: NR = National Register listed; SL = Study List; DOE = Determination of Eligibility;
LD = Local Designation; UA = Unassessed

Due -- 12/18/19

Archaeology

of recorded sites in immediate area of tower: 0
2 within approx 0.75 miles - neither 31CH23/31CH33
are eligible/listed

Architecture

of recorded sites within .75 mile radius: 8
All surveyed only/UA: CH0148, CH0147, CH0137,
CH0140, CH0702, CH---, CH0141, CH0143

IV. Additional Information/Investigation Needed:

Survey
 Testing of sites _____
Recommended by/on: NC/CDP 12/12/19
(Office of State Archaeology)

Photo Reconnaissance
 Balloon Test
Recommended by/on: DWB 12/17/19
(Survey & Planning Branch)

V. Recommendations/Final Determination:

Recommendations for additional work are shown above.
 The proposed communication tower will NOT affect historic properties in the area of potential effect.

Renee Gledhill-Earley
Renee Gledhill-Earley, Environmental Review Coordinator

12.17.19
Date

cc: FCC

February, 2001
DEC 11 2019

Morgan Rasmussen

From: towernotifyinfo@fcc.gov
Sent: Thursday, December 5, 2019 11:16 AM
To: Morgan Rasmussen
Subject: Section 106 New Filing Submitted- Email ID #4155212

The following new Section 106 filing has been submitted:

File Number: 0008903733
TCNS Number: 192744
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 12/06/2019

Applicant: Pyramid Network Services
Consultant: Johnson, Mirmiran & Thompson, Inc. on behalf of Trileaf Corporation
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: Moncure
Site Address: 2389 Old U.S. Highway 1
Detailed Description of Project: No township found.
Site Coordinates: 35-37-0.1 N, 79-3-10.0 W
City: Moncure
County: CHATHAM
State: NC
Lead SHPO/THPO: NC Historic Preservation Office (Deputy SHPO)

Consultant Contact Information:
Name: Johnson, Mirmiran & Thompson, Inc. on behalf of Trileaf Corporation
Title: Archaeologist
PO Box:
Address: 1600 Market Street, Suite 520
City: Philadelphia
State: PA
Zip: 19103
Phone: 404-993-1760
Fax:
Email: m.rasmussen@trileaf.com

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

Appendix F

Native American Correspondence

Tribal Summary Table										
Site: Moncure					Site ID: 657434					
TCNS Number: 192744					TCNS Initial Notification Date: November 22, 2019					
Tribe	TCNS auto-reply	Follow Up Request from Tribe		Follow Up(s) to Tribe		Final Reply		FCC Referral	Standing Agreements & Comments	GFP Utilized?
		Date	Requested Information	Date	Sent	Date	Comments			
Catawba Indian Nation				12/6/2019	Sent Letter & Form 620/621	1/10/2020	No immediate concerns with regard to traditional cultural properties, sacred sites or Native American archeological sites within the boundaries of the proposed project areas. Requests inadvertent discovery notification.			No
Cherokee Nation				12/6/2019	Sent Letter & Form 620/621	12/17/2019	We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.			No
Crow Creek Sioux Tribal Council		12/2/2019	Interested to consult	12/6/2019	Sent Letter & Form 620/621	12/2/2019	Requests Tribal Monitor to be present during any and all ground disturbing activities. We require a 7 day notice before any activity is conducted.			No
Eastern Shawnee Tribe of Oklahoma		11/21/2019	Interested to consult	12/6/2019	Sent Letter & Form 620/621	12/26/2019	We find that this project will have No Adverse Effect on properties of sacred and/or cultural significance to the Tribe. However, ESTO has no objection to the project proceeding as described. Please note that any future changes to this project will require additional consultation. Requests inadvertent discovery notification.			No
Flandreau Santee Sioux Tribe				12/6/2019	Sent Letter & Form 620/621	1/31/2020	Cleared by Referral	1/16/2020		No
Prairie Island Indian Community	30 days no interest Notify of inadvertent discovery			12/6/2019	Sent Letter & Form 620/621	1/5/2020	Cleared per NOO			No
Shawnee Tribe				12/6/2019	Sent Letter & Form 620/621	1/14/2020	The Shawnee Tribe is not currently aware of any specific Shawnee cultural or historic sites in this project area. We therefore offer no objection to the proposed construction. If plans are considered to expand or modify this tower and cause additional ground disturbance in the future, please let us know. Requests inadvertent discovery notification.			No

From: towernotifyinfo@fcc.gov
To: [tribal](#)
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #6509097
Date: Friday, November 22, 2019 2:03:30 AM

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

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

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. Attorney Montana & Associates LLC - Crow Creek Sioux Tribe - N12923 N Prairie Rd Osseo, WI - ccstfctcns@outlook.com; garymontana@montanaandassociates.com - 715-597-6464 (ext: 1) - electronic mail
Exclusions: As of AUGUST 16th 2019 - The Crow Creek Sioux Tribe has updated procedures. Please email us at ccstfctcns@outlook.com about these procedures.

2. THPO Officer Garrie Kills a Hundred - Flandreau Santee Sioux Tribe - 603 W. Broad Avenue (PO Box: 283) Flandreau, SD - garrie.killsahundred@FSST.org - 605-997-3891 (ext: 1240) - electronic mail and regular mail

3. THPO Noah C White III - Prairie Island Indian Community - 5636 Sturgeon Lake Road Welch, MN -

celltower@piic.org - 651-385-4175 - electronic mail

If the applicant/tower builder receives no response from the Prairie Island Indian Community within 30 days after notification through TCNS, the Prairie Island Indian Community has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Prairie Island Indian Community in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

4. Gwen Terrapin - Cherokee Nation - (PO Box: 948) Tahlequah, OK - historicpreservation@cherokee.org; gwen-terrapin@cherokee.org - 918-772-4165 - electronic mail

Exclusions: Please email all review documents for FCC Form 620/621 (i.e. archeologist report, photos, SHPO response, etc.) to historicpreservation@cherokee.org or gwen-terrapin@cherokee.org. You may also mail a cover letter and a CD or flash drive containing the review documents and FCC forms to: Cherokee Nation: Attn: Gwen Terrapin, PO Box 948, Tahlequah, OK 74465. Should you have any questions, please do not hesitate to email or call 918.772.4165.

Wado,
Cherokee Nation

5. Cell Tower Coordinator Kelly Nelson - Eastern Shawnee Tribe of Oklahoma - 70500 East 128 Road Wyandotte, OK - celltower@estoo.net - 918-666-2435 (ext: 1861) - regular mail

Exclusions: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened. Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe
Attn: Cell Tower Program
70500 E. 128 Rd.
Wyandotte, OK 74370

Provide 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. Project coordinates
- f. Contact information

The Eastern Shawnee Procedures document is available and highly recommended for guidance; send an email to celltower@estoo.net requesting our most current copy.

6. THPO Kim Jumper - Shawnee Tribe - 29 South 69A Highway Miami, OK - kim.jumper@shawnee-tribe.com - 918-542-2441 - regular mail

7. THPO and Executive Director Dr. Wenonah G Haire - Catawba Indian Nation - 1536 Tom Steven Road
CIN-THPO Rock Hill, SC - wenonahh@ccppcrafts.com - 803-328-2427 (ext: 224) - regular mail

Exclusions: Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation to address:

Dr. Wenonah G. Haire
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, SC 29730

Please submit by US Postal mail or other parcel carrier complete information for all telecommunication projects:

1. Please provide 1 page cover letter with following information
 - a. TCNS Number
 - b. Company Name
 - c. Project Name, City, County, State
 - d. Project Type
 - e. Project coordinates
 - f. Contact information
2. We also request photographs of project area, previous land use history and copy of SHPO Letter.

If you have any questions about our process or timeline of project notifications you can email Caitlin Rogers at Caitlinh@ccppcrafts.com

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

8. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - 4617
Mail Service Center Raleigh, NC - renee.gledhill-earley@ncmail.net - 919-733-4763 - electronic mail

9. Deputy SHPO David Brook - Historic Preservation Office - 4610 Mail Service Center Raleigh, NC -
david.brook@ncmail.net - 919-807-7283 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-

construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tenshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/15/2019

Notification ID: 192744

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Pyramid Network Services

Consultant Name: Mindi L Okai

Street Address: 10845 Olive Blvd.

Suite 260

City: St. Louis

State: MISSOURI

Zip Code: 63141

Phone: 314-997-6111

Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower

Latitude: 35 deg 37 min 0.1 sec N

Longitude: 79 deg 3 min 10.0 sec W

Location Description: 2389 Old U.S. Highway 1

City: Moncure

State: NORTH CAROLINA

County: CHATHAM

Detailed Description of Project: No township found.

Ground Elevation: 55.8 meters

Support Structure: 106.7 meters above ground level

Overall Structure: 109.7 meters above ground level

Overall Height AMSL: 165.5 meters above mean sea level

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

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.fcc.gov%2fwireless%2favailable-support-services&c=E.1.APwkV7CPaxg4yoMUeevnAyzatmf4Edfpx6pL096NJGE-Tf7esCil-afH-IXU4MqTxZj2T6JQd3QOFdYC4Li1sHz8LeGWrYPEYYZBWYjk16hM1Ot6Q..&typo=1>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission



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10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 www.trileaf.com

December 6, 2019

Catawba Indian Nation

Dr. Wenonah G. Haire
1536 Tom Steven Road
Rock Hill, SC 29730

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Dr. Haire:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



January 10, 2020

Attention: Mindi Okai
Trileaf
10845 Olive Boulevard, Suite 260
Saint Louis, Missouri 63141

Re. THPO #	TCNS #	Project Description
2020-160-42	192744	2389 Old US Highway 1, Chatham County, Moncure NC

Dear Ms. Okai,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



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December 6, 2019

Cherokee Nation

Ms. Gwen Terrapin
P.O. Box 948
Tahlequah, OK 74465

RE: Pyramid Network Services – Moncure – Trileaf Project #657434

2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Ms. Terrapin:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

From: towernotifyinfo@fcc.gov
To: tribal
Cc: tcns.fccarchive@fcc.gov; historicpreservation@cherokee.org; gwen-terrapin@cherokee.org
Subject: Reply to Proposed Tower Structure (Notification ID: 192744) - Email ID #6551134
Date: Tuesday, December 17, 2019 2:50:15 PM

Dear Mindi L Okai,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Gwen Terrapin of the Cherokee Nation in reference to Notification ID #192744:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 11/15/2019
Notification ID: 192744
Tower Owner Individual or Entity Name: Pyramid Network Services
Consultant Name: Mindi L Okai
Street Address: 10845 Olive Blvd.
Suite 260
City: St. Louis
State: MISSOURI
Zip Code: 63141
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower
Latitude: 35 deg 37 min 0.1 sec N
Longitude: 79 deg 3 min 10.0 sec W
Location Description: 2389 Old U.S. Highway 1
City: Moncure
State: NORTH CAROLINA
County: CHATHAM

Detailed Description of Project: No township found.
Ground Elevation: 55.8 meters
Support Structure: 106.7 meters above ground level
Overall Structure: 109.7 meters above ground level
Overall Height AMSL: 165.5 meters above mean sea level



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December 6, 2019

Crow Creek Sioux Tribal Council

Montana & Associates, LLC
P.O. Box 50
Ft. Thompson, SD 57339

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Montana & Associates, LLC:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

From: [Gary Montana](mailto:garymontana@montanaandassociates.com)
To: towernotifyinfo@fcc.gov; jill.springer@fcc.gov; [Mindi Okai](mailto:Mindi.Okai)
Subject: Re: Reply to Proposed Tower Structure (Notification ID: 192744) - Email ID #6529786
Date: Monday, December 2, 2019 1:48:26 PM

On behalf of our Tribal clients we require a monitor from each tribe we represent that have an interest in this area to be present during any and all ground disturbance activity as we believe there may be TCP present. You may contact me at garymontana@montanaandassociates.com for monitor information and our tribal clients require a 7 day notice before any activity is conducted. Furthermore, it has been held that only tribal entities are to only entity that can determine their own cultural landscapes - not non-native specialists. (See Keetoowah et al. v. F.C.C., (2019) that overturned WT 17-79) and consequently, we have interest in this site.

Gary J. Montana, Senior Attorney
Montana & Associates, LLC

For: Crow Creek Sioux Tribe of South Dakota, Northwest Band of Shoshone Nation, Skull Valley Band of Goshutes and the Omaha Tribe of Nebraska.

On 12/2/2019 11:51 AM, towernotifyinfo@fcc.gov wrote:

> Dear Mindi L Okai,

>

> Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

>

> The following message has been sent to you from Attorney Montana & Associates LLC of the Crow Creek Sioux Tribe in reference to Notification ID #192744:

>

> We have an interest in this site and would like the applicant to contact us.

> Gary Montana, Attorney

> 715-597-6464

>

> On behalf of our clients we believe all those indicated TCNS Numbers we have selected are of interest and we would require further information to determine whether an adverse effects exist to tribal cultural properties. Also if you do not indicate a description of the project i.e. size of installation we will select your project for further information and will not clear the project. The D.C. Court of Appeals decision in United Keetoowah v. F.C.C., (2019) – the Court indicated that tribal cultural properties may only be identified and determined by tribes themselves and that non-natives are not equipped to identify tribal cultural landscape.

>

>

>

> For your convenience, the information you submitted for this notification is detailed below.

>

>

>

> Notification Received: 11/15/2019

> Notification ID: 192744

> Tower Owner Individual or Entity Name: Pyramid Network Services

> Consultant Name: Mindi L Okai

> Street Address: 10845 Olive Blvd.

> Suite 260

> City: St. Louis

> State: MISSOURI



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December 6, 2019

Eastern Shawnee Tribe of Oklahoma

Ms. Kelly Nelson
70500 East 128 Road
Wyandotte, OK 74370

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Ms. Nelson:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

From: [Tiffany White](#)
To: [Mindi Okai](#)
Subject: tcns192744
Date: Thursday, December 26, 2019 1:35:19 PM

The Cultural Preservation Department of the Eastern Shawnee Tribe of Oklahoma (ESTO) has received the documentation for the referenced TCNS project. ESTO has reviewed the project in accordance with Section 106 of the National Historic Preservation Act (NHPA). Based on the information provided and a review of our records, we find that this project will have No Adverse Effect on properties of sacred and/or cultural significance to the Tribe. The project site is within the known regional area of the Shawnee prehistorically and historically, be aware of inadvertent discoveries. However, ESTO has no objection to the project proceeding as described. Please note that any future changes to this project will require additional consultation.

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).

However, if during construction cultural objects or human remains are inadvertently discovered, please stop work immediately and contact the Cultural Preservation Department of the Eastern Shawnee Tribe of Oklahoma.



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December 6, 2019

Flandreau Santee Sioux Tribe

Mr. Garrie Kills a Hundred

P.O. Box 283

Flandreau, SD 57028

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**

2389 Old U.S. Highway 1, Moncure, NC 27559

Chatham County, Moncure Quadrangle (USGS)

Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W

TCNS# 192744

Dear Mr. Kills a Hundred:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

From: towernotifyinfo@fcc.gov
To: [tribal](#)
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #25735
Date: Thursday, January 16, 2020 8:02:15 AM

Verizon Wireless
Mindi L Okai
10845 Olive Blvd.
Suite 260
St. Louis, MO 63141

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 01/09/2020 and 01/16/2020. Our contact with these Tribal Nations or NHOs was sent on 01/16/2020.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 01/16/2020, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review. In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Tribal Nation or NHO. A Tribal Nation's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Tribal Nation or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,
Jill Springer
Federal Preservation Officer
Federal Communications Commission
jill.springer@fcc.gov

1) See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, Second Report and Order, FCC 18-30 (Mar. 30, 2018) (Wireless Infrastructure Second Report and Order).

2) See *id.* at paras. 111-112.

LIST OF PROPOSED COMMUNICATIONS TOWERS

TCNS# 191629 Referred Date: 01/16/2020 Location: 6441 2/3 Gulfton Street, Houston, TX
Detailed Description of Project: Legal Description: No Township Found.
Tribe Name: Alabama Quassarte Tribal Town

Tribe Name: Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
Tribe Name: Wyandotte Nation

TCNS# 192733 Referred Date: 01/15/2020 Location: 1603 Jackson Street, Dallas, TX
Detailed Description of Project: Legal Description: No Township Found.

Tribe Name: Alabama Quassarte Tribal Town
Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Coushatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Tonkawa Tribe
Tribe Name: Wichita and Affiliated Tribes

TCNS# 192080 Referred Date: 01/15/2020 Location: 8550 Dempsey Road, Leavenworth, WA
Detailed Description of Project:

Tribe Name: Eastern Shoshone Tribe

TCNS# 192744 Referred Date: 01/15/2020 Location: 2389 Old U.S. Highway 1, Moncure, NC
Detailed Description of Project: No township found.

Tribe Name: Flandreau Santee Sioux Tribe

TCNS# 191596 Referred Date: 01/15/2020 Location: 447 South Ervay Street, Dallas, TX
Detailed Description of Project: Legal Description: No Township Found.
Project Description: Project is a collocation with less than 500 square feet of ground disturbance in already disturbed ground.

Tribe Name: Alabama Quassarte Tribal Town
Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Coushatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Tonkawa Tribe
Tribe Name: Wichita and Affiliated Tribes

TCNS# 191620 Referred Date: 01/15/2020 Location: 6252 2/3 Dashwood Drive, Houston, TX
Detailed Description of Project: Legal Description: No Township Found.

Tribe Name: Alabama Quassarte Tribal Town
Tribe Name: Alabama-Coushatta Tribe of Texas
Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Coushatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Tonkawa Tribe
Tribe Name: United Keetoowah Band of Cherokee Indians in Oklahoma
Tribe Name: Wichita and Affiliated Tribes

TCNS# 192161 Referred Date: 01/15/2020 Location: 397 E Las Colinas Boulevard, Irving, TX
Detailed Description of Project:

Tribe Name: Alabama Quassarte Tribal Town
Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Coushatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO



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December 6, 2019

Prairie Island Indian Community

Mr. Noah White III
5636 Sturgeon Lake Road
Welch, MN 55089

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Mr. White III:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager



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December 6, 2019

Shawnee Tribe

Ms. Kim Jumper
29 South Highway 69A
Miami, OK 74354

RE: **Pyramid Network Services – Moncure – Trileaf Project #657434**
2389 Old U.S. Highway 1, Moncure, NC 27559
Chatham County, Moncure Quadrangle (USGS)
Latitude: 35° 37' 0.13" N, Longitude: 79° 3' 9.96" W
TCNS# 192744

Dear Ms. Jumper:

This project was originally submitted in TCNS on November 22, 2019; TCNS #192744. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 360-foot Self-Support Communications Tower and associated equipment within a 60-foot by 60-foot (3,600-square-foot) lease area at the above property. The project includes a 30-foot wide proposed access and utility easement that extends east to an existing asphalt lot, then south towards Old U.S. Highway 1. Currently the site habitat consists of wooded land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email m.okai@trileaf.com or tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai
Tribal Consultation Manager

From: [Kim Jumper](#)
To: [Mindi Okai](#)
Subject: TCNS RESPONSES
Date: Tuesday, January 14, 2020 1:23:03 PM

191239

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The Shawnee Tribe is satisfied with efforts conducted to be sure that no Shawnee Tribe historic properties or other cultural resources will likely be adversely affected by construction and use of this tower. The Shawnee Tribe is not currently aware of any specific Shawnee Tribe cultural or historic sites in this project area. We therefore offer no objection to the proposed construction.

Because this tower lies in the homelands of the Shawnee Tribe, in the event that archaeological materials, including human remains, are discovered during construction or later ground-disturbing activities at this location, please re-open consultation at that time by contacting Kim Jumper at kim.jumper@shawnee-tribe.com or 918-542-2441. Similarly, if plans are considered to expand or modify this tower and cause additional ground disturbance in the future, please let us know. Please forward our concerns regarding any such future work and unanticipated discoveries, as well as our contact information, to the appropriate parties.

We urge everyone involved with tower development to construct and maintain their projects in keeping with best practices for minimizing environmental impact - particularly on species, such as birds and bats, who might incur negative impacts from tower development and use. Please also re-vegetate with species native to the area.

We appreciate your efforts to consult with us.

Regards,
Kim Jumper, THPO
Shawnee Tribe

Appendix G

Resumes



MORGAN RASMUSSEN

PROJECT SCIENTIST

Education

B.S. in Environmental Science
Georgia College / Milledgeville, GA

Areas of Expertise

Ms. Morgan Rasmussen has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects.

Environmental service expertise includes the preparations and/or review of:

Phase I Environmental Site Assessments
Historical City Directories
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

Georgia Adopt-A-Stream Macroinvertebrate and Chemical QA/QC Certification



JOHN HUTER

PROJECT MANAGER

Education

MBA, Business Administration
University of Louisiana at Lafayette / Lafayette, LA

B.S. Biology / Minor Chemistry
University of Louisiana at Lafayette / Lafayette, LA

Areas of Expertise

Mr. Huter has experience performing site inspections and conducting environmental due diligence pursuant to all EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications and commercial real estate/lending projects.

Environmental service expertise includes the preparation and/or review of:

Phase I Environmental Site Assessments
Historical City Directories
Asbestos Inspections
National Wetlands Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Soil Characterization
Migratory Bird Evaluations

Field Reconnaissance
Historical Topographic Maps and Aerial Imagery
NEPA Environmental Assessments
Form 620/621 Submittals
Local Government Consultation
Land Use History
Preliminary Risk Assessments
Soil and Groundwater Management Plans
Native American Consultation

Certifications/Affiliations

Wetland Delineation Training (2013)
Certified Asbestos Inspector - Texas (License No. 603676)
ANSI/FCC Radiation Safety Competency