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June 25, 2026

Vamsee Polamarasetty
Senior Planner
Hall County Planning & Zoning
2829 Browns Bridge Road
Gainesville, GA 30503

Re: Completeness Report – Proposed T-Mobile Tower-Site ID 9AT5639 (Gainesville)

Dear Vamsee:

Our company, River Oaks Communications Corporation (“Company”), was retained by Hall County (“County”) to perform a completeness review regarding the Application and supporting documents for a new tower to be owned by T-Mobile. Specifically, T-Mobile’s proposed tower is to be constructed on property owned by Pine Circle Titshaw, LLC. The land is located in Hall County near Gainesville, Georgia.

At the outset, it is worth noting that the applicant, Kelly Towers III, LLC, submitted a very thorough Application packet. It is also apparent that the applicant was very familiar with Section 7.4.5 (Telecommunications Antennas and Towers) of the Unified Development Code (“UDC”). We in turn also reviewed Section 7.4.5 of the UDC and documents to determine if the Application was complete, taking into account the purpose and goals of that Section.

As you know, our Scope with the County does not include any type of engineering review (for example, frequency coverage analysis, RF emissions or structural capacity of the tower).

The proposed project includes:

TOWER: Installing a monopole 175 feet in height which, inclusive of a lightning rod, will be 179 feet in height.

ZONING: The applicant is seeking approval for rezoning of parcel 00116 002023 from R-1 to S-S.

PERMIT: The applicant is also requesting the issuance of a Tall Structure Permit.

VARIANCE: The applicant is seeking a variance from certain setback requirements in the UDC.

TOPOGRAPHY AND FOLIAGE: The parcel is not usable for residential purposes, and the proposed tower will be built in a wooded area. Based on photographs provided, that will obviate the need for separate landscaping.

DRIVEWAY AND EASEMENT: The parcel contains an existing driveway along with a 20-foot easement for ingress and egress.

LIGHTING: Lighting is not required by the FAA.

NO HAZARD FINDING: The FAA issued a finding of no hazard regarding the location of the proposed tower.

ENVIRONMENTAL: From the applicant's cover letter, there was a NEPA review pending. We do not know if that has been completed.

HISTORIC PRESERVATION: Although there are multiple historic resources in the area, the HPD letter which was provided indicated that there will be no adverse effect to historic resources.

INVENTORY: An Affidavit accompanied by an extensive list of towers within Hall County, within municipalities located within the County or within one mile of the border of the County, was provided. Also, according to another Affidavit submitted by the applicant, one tower (Jackson EMC Tower) was not structurally suitable for collocation, while T-Mobile is already on a Crown Castle tower (however, that location is not capable of filling in existing coverage and capacity gaps). In addition, the proposed tower has been designed to accommodate at least four (4) providers.

STEALTH FEATURES: The monopole will have stealth panels to diminish the view of tower-mounted equipment.

SAFETY and APPEARANCE: There will be a 6-foot chain link fence with green privacy slats around the facility. An anti-climbing device will be installed for public safety, and the tower will have a galvanized steel finish.

SITE PLAN AND ELEVATION DRAWINGS: A site plan, elevation views and supporting drawings signed and sealed by a licensed professional engineer or land surveyor were submitted.

COMMERCIAL SIGNAGE ON THE TOWER: None.

BOND OR LETTER OF CREDIT: Before a permit is issued, a bond or letter of credit in an amount not less than \$25,000 will be procured to cover the cost of removal of the tower should it be abandoned, and the security will be renewed every two years.

FEDERAL REQUIREMENTS: The applicant has indicated that the proposed tower will meet current standards and regulations of the FAA and FCC.

We previously had a meeting with County Staff and Kathy Kelly of Kelly Towers III, LLC. A follow-up discussion occurred with Kathy today to address our remaining questions.

From an overall standpoint, we are satisfied with the completeness of the Application packet. We would, though, encourage the County to get a copy of the NEPA review and letter from the Lee Gilmer Memorial Airport indicating that it has no objection to the proposed tower.

Sincerely,



Robert M. Duchon
Vice President