

EXHIBIT “E”



Zoning Coverage Justification

9AT5639B – Hall County

04/23/2026

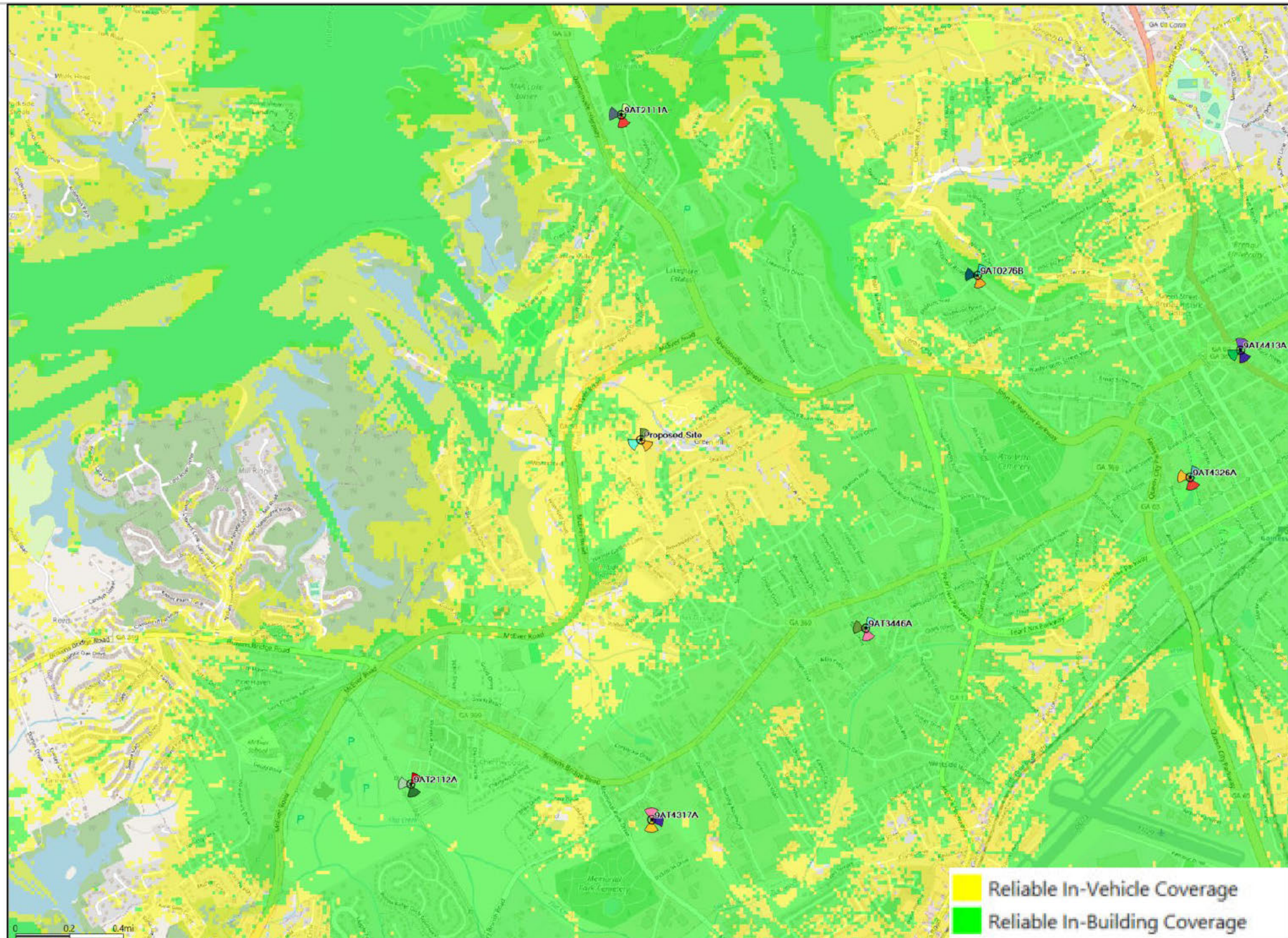
The intent of this letter is to confirm the necessity of T-Mobile installation of radio transceiver equipment on the proposed telecommunication tower and to provide supporting documentary evidence.

As part of the company's mandate to provide high quality service throughout the Atlanta market, the network density of wireless facilities must continue developing to meet the expectations of customers and communities alike, for both voice and data services.

The primary purpose for the installation of this facility is to improve in-vehicle coverage along McEver Road and Dawsonville Highway. It will also improve the in-building residential coverage along these roads. A coverage gap in this vicinity signifies an area where users may experience call connection or quality issues, especially in indoor locations and during busy hours.

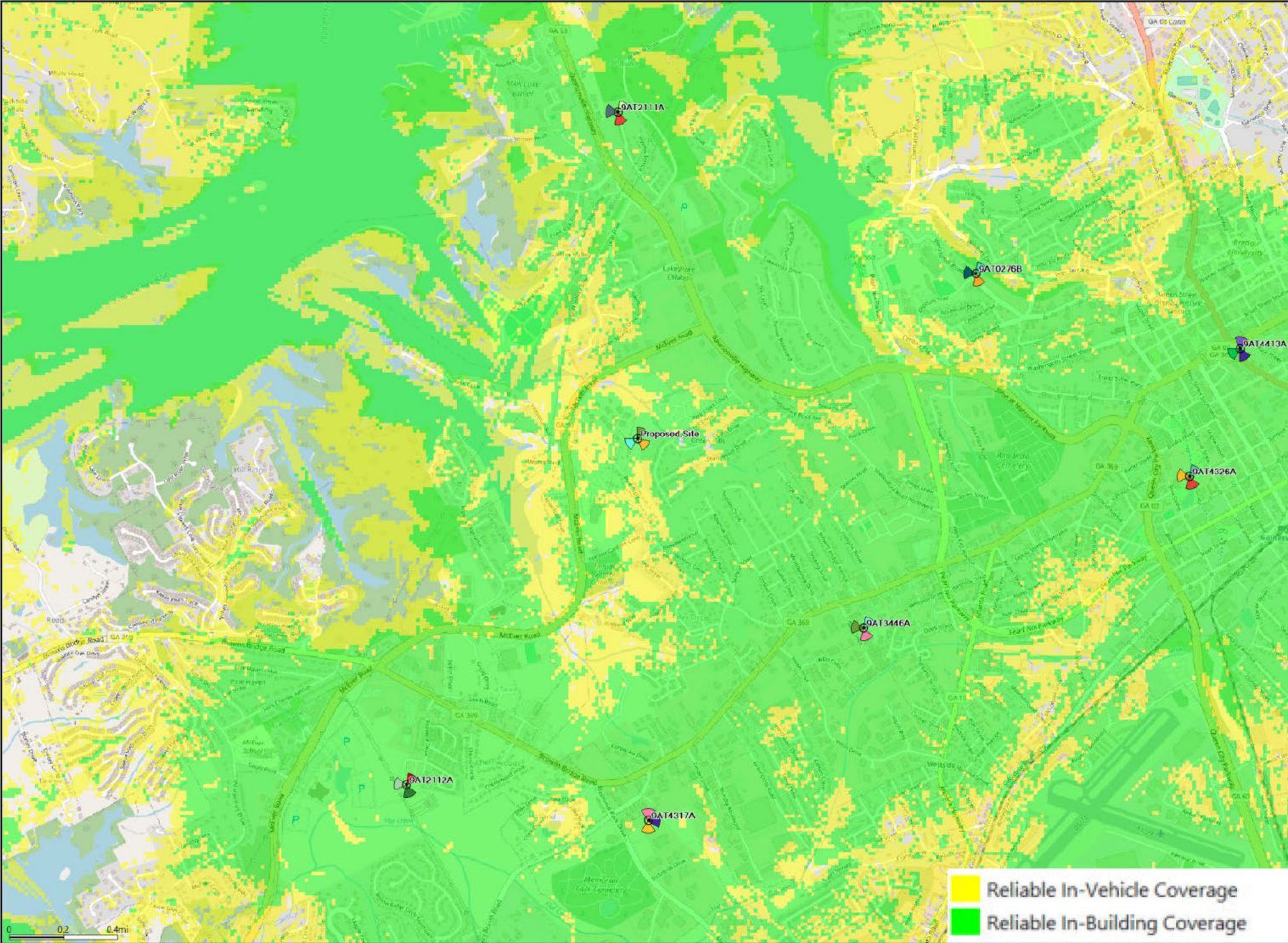
Because of the proposed location for the new tower, the quality and strength of the T-Mobile signal will increase and provide a better user experience for customers and non-customers alike. In particular, in-building service levels in some of the aforementioned areas may be poor or non-existent. With the introduction of a new serving tower, these issues would essentially disappear. Signal and network access would improve, especially for being able to call 911 in buildings or in traffic in case of emergencies.

5G Voice Service without the Proposed Site MID BAND (1900 MHZ) NR COVERAGE MAP (RSRP)



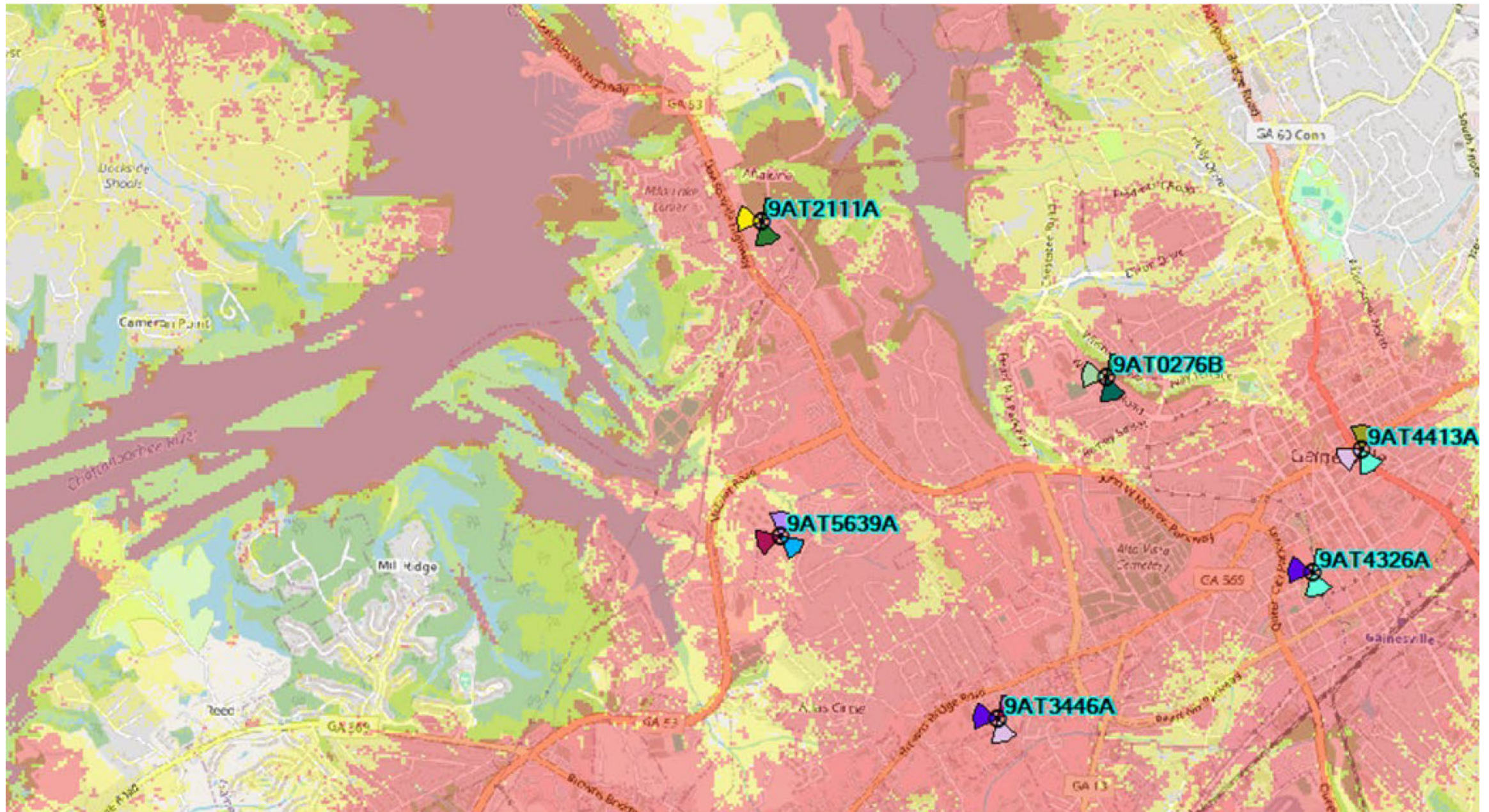
This plot shows a large gap in in-building and in-vehicle coverage.

**5G Voice Service with the Proposed Site @ 175' AGL
MID BAND (1900 MHZ) NR COVERAGE MAP (RSRP)**



This plot shows improved in-building and in-vehicle coverage along McEver Rd and Dawsonville Highway.

**5G Voice Service with the Proposed Site @ 195' AGL
MID BAND (1900 MHZ) NR COVERAGE MAP (RSRP)**



Thank You



April 23, 2026

Hall County Board of Commissioners

RE: Proposed Construction of T-Mobile Cell Site – 9AT5639B located at: 2378 Pine Circle Drive, Gainesville, GA 30504

To Whom It May Concern,

T-Mobile has made every effort to utilize existing infrastructure to support its network with no success. Request for collocation was made to Jackson EMC for their structure located at 1000 Dawsonville Hwy, but our request was denied. Given the geographic area, the T-Mobile Engineering team determined that the current proposed site location would be adequate to provide the necessary coverage and enhance wireless coverage, capacity, and reliability throughout key areas of Gainesville, and the surrounding communities along McEver Rd and Dawsonville Highway. This strategically placed site will deliver stronger, faster, and more consistent connectivity for nearby neighborhoods, including Green Hills. T-Mobile's coverage gap in this area is substantial, and it compromises our ability to provide service, as a result users may experience dropped calls, slower data speeds, and reduced signal quality, especially in-building and during periods of high network demand.

The proposed site location for the new tower will significantly enhance the quality and strength of the T-Mobile signal, providing better user experience for both customers and non-customers. Specifically, in-building service levels in some of the aforementioned areas may currently be poor or non-existent. The introduction of a new serving tower will effectively eliminate these issues, improving signal and network access.

Additionally, this upgraded facility will improve the access to T-Mobile's enhanced E911 services as required by the FCC and local PSAP and improve safety to the citizens of Gainesville, GA.

If you have any further technical questions related to this application, you may contact me on the following phone number 404-784-2828.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Purnell'.

Anthony Purnell
RF Engineer

T-Mobile USA, Inc.
One Ravinia Drive, Suite 800, Atlanta, GA 30346

EXHIBIT “F”



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2026-ASO-1028-OE

Issued Date: 04/20/2026

KELLY TOWERS III LLC
KATHY J KELLY
3708 STONEWALL CIR SE
ATLANTA, GA 30339

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Monopole GA2012_Gainesville
County, State: Hall, Georgia

Collected Point(s):

Label	Latitude	Longitude	SE	DET AGL	AMSL
pt-1	34-17-33.26N	83-51-39.91W	1185 Ft	199 Ft	1384 Ft

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

☐ At least 10 days prior to start of construction (7460-2, Part 1)
☒ Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M Change 1.

This determination expires on 10/20/2027 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Communications Commission (FCC) because the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at 1-816-329-2525, or natalie.schmalbeck@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2026-ASO-1028-OE.

Signature Control No: 690335954-700924055

(DNE)

Natalie Schmalbeck
Technician

Attachment(s)
Frequency Data
Map(s)

cc: FCC

Frequency Data for ASN 2026-ASO-1028-OE

LOW FREQUENCY	HIGH FREQUENCY	FREQUENCY UNIT	ERP	ERP UNIT
6	7	GHz	42	dBW
6	7	GHz	55	dBW
10	11.7	GHz	42	dBW
10	11.7	GHz	55	dBW
17.7	19.7	GHz	42	dBW
17.7	19.7	GHz	55	dBW
21.2	23.6	GHz	42	dBW
21.2	23.6	GHz	55	dBW
614	698	MHz	1000	W
614	698	MHz	2000	W
698	806	MHz	1000	W
806	824	MHz	500	W
806	901	MHz	500	W
824	849	MHz	500	W
851	866	MHz	500	W
869	894	MHz	500	W
896	901	MHz	500	W
901	902	MHz	7	W
929	932	MHz	3500	W
930	931	MHz	3500	W
931	932	MHz	3500	W
932	932.5	MHz	17	dBW
935	940	MHz	1000	W
940	941	MHz	3500	W
1670	1675	MHz	500	W
1710	1755	MHz	500	W
1850	1910	MHz	1640	W
1850	1990	MHz	1640	W
1930	1990	MHz	1640	W
1990	2025	MHz	500	W
2110	2200	MHz	500	W
2305	2360	MHz	2000	W
2305	2310	MHz	2000	W
2345	2360	MHz	2000	W
2496	2690	MHz	500	W

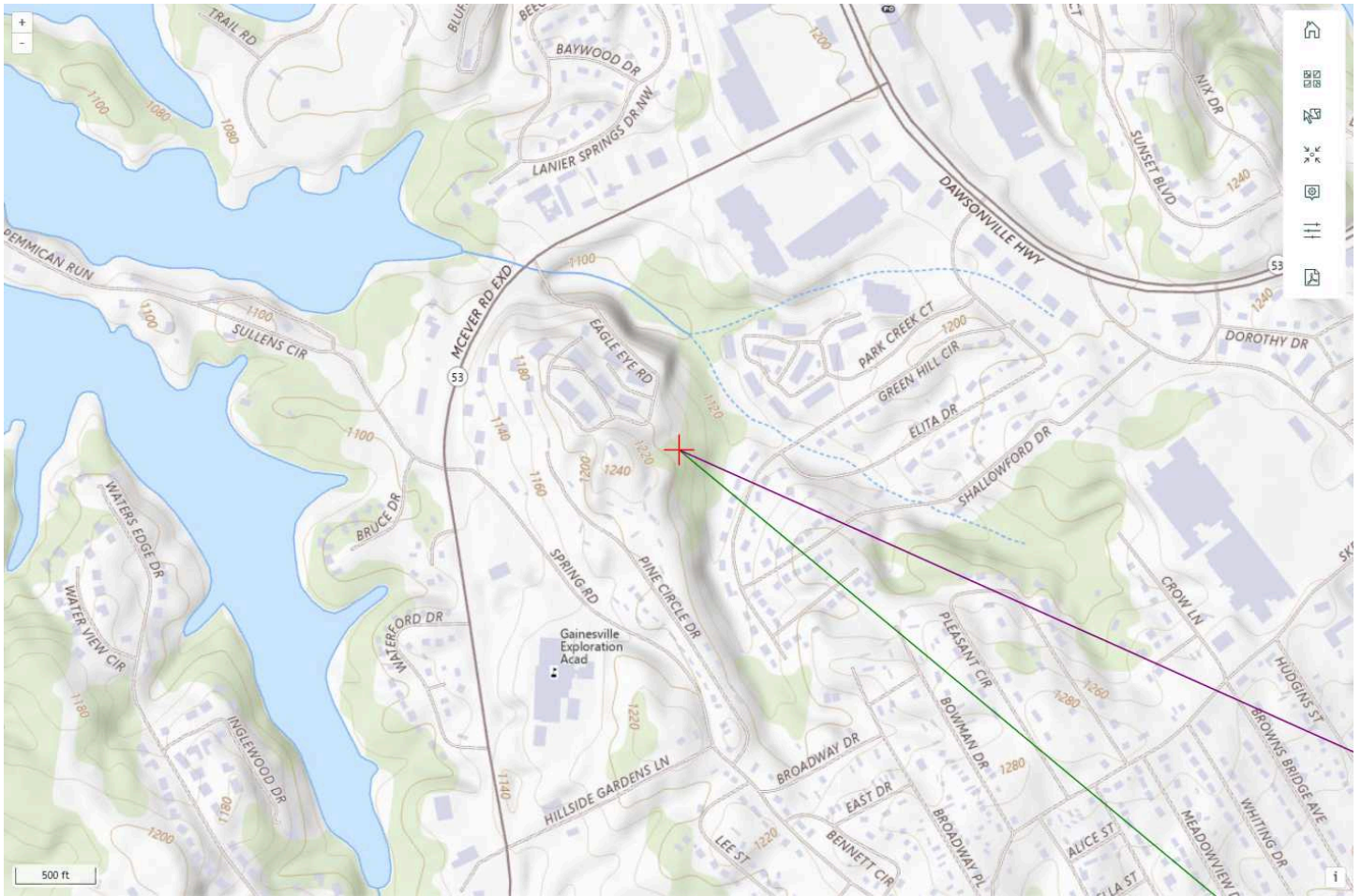


EXHIBIT “G”

SITE PHOTOS



Looking In North



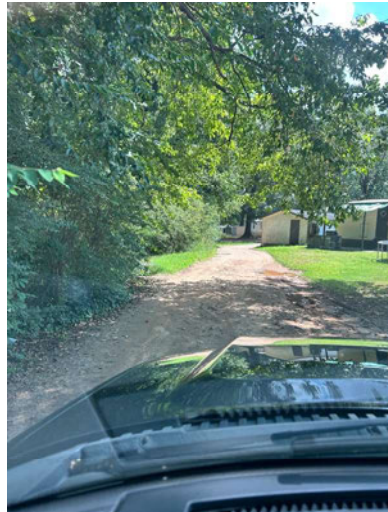
Looking In South



Looking In West



Looking East



Egress



Ingress

Power pole can be seen in Ingress pic. Located at the edge of the wooded area. Fiber to be located.

EXHIBIT “H”

9AT5639 Pine Circle Drive Site Simulation Map



+ Site
• Photograph #



· **T** · · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
SIMULATION**

Sim #1 from McEver Business Center
approx. 1,600ft. north-northwest of site



Existing View



· **T** · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
SIMULATION**

Sim #2 from McEver Road

approx. 2,025ft. north-northeast of site



Existing View



· **T** · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
SIMULATION**

Sim #3 from Shallowford Drive

approximately 1,015ft. southeast of site

Existing View





· T · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
NOT VISIBLE**

Sim #4 from Spring Road

approx. 1,200ft. south-southwest of site



· **T** · · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
SIMULATION**

Sim #5 from Waters Edge Drive
approx. 3,460ft. west-southwest of site

Existing View





· **T** · Mobile ·

9AT5639

PINE CIRCLE DR

2378 Pine Circle Dr, Gainesville, GA

**175ft. MONOPOLE
SIMULATION**

Sim #6 from Sullens Circle
approx. 3,350ft. west-northwest of site





NEPA Report

May 8, 2026



Gainesville

Client# GA2012

2378 Pine Circle Drive

Gainesville, Hall County, Georgia 30503

Trileaf #782453

Prepared For:

Kelly Towers III LLC

3708 Stonewall Circle

Atlanta, GA 30339

Prepared By:

Trileaf Corporation

1775 The Exchange SE, Suite 525

Atlanta, GA 30339

NEPA Report Summary

Site Name/Location:

Gainesville /Client #GA2012/ Trileaf #782453
2378 Pine Circle Drive, Gainesville, Hall County, Georgia 30503
Latitude: 34° 17' 33.263" N, Longitude: 83° 51' 39.914" W

Project Description:

Kelly Towers III LLC proposed to construct a 195-foot monopole communications tower with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends approximately 750-feet generally northeast from Pine Circle Drive to the lease area. The project area is within wooded land.

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

Yes ☐ No ☒

Data Sources: 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: 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 ☒

**Conditional
Clearance**

Data Sources: 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: 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: 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: 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: 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: Construction Drawings (Appendix A)
It is assumed that clients will not utilize high intensity white lights in residential areas

9. Will the facility cause human exposure to levels of radiofrequency radiation in excess of Commission-adopted guidelines?

Yes ☐ No ☒

Data Sources: Construction Drawings (Appendix A) and/or interviews with clients
Clients will comply with the established criteria regarding radio frequency exposure limits, as established at the time of this report



Signature

May 8, 2026

Date

Writer Signature

Name

Trileaf Corporation

Company



NEPA Report

Introduction

Trileaf Corporation (Trileaf) completed a NEPA Review for the above-referenced Kelly Towers III LLC (Kelly Towers III LLC) 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.

Kelly Towers III LLC proposed to construct a 195-foot monopole communications tower with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends approximately 750-feet generally northeast from Pine Circle Drive to the lease area. The proposed project site is located at approximately 2378 Pine Circle Drive, Gainesville, Hall County, Georgia 30503 at 34° 17' 33.263" North latitude and 83° 51' 39.914" West longitude.

During Trileaf's site reconnaissance, it was observed that the site is currently wooded land and an existing partially paved access road associated with several trailer homes, and the areas surrounding the site are currently residential and commercial development.

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

Trileaf reviewed the USGS 7.5-minute topographic map titled "Gainesville" Quadrangle, Georgia 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 14 officially designated wilderness areas in the State of Georgia. The closest wilderness area to the project site is the Raven Cliffs Wilderness Area, which is located approximately 26 miles north 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 "Gainesville" Quadrangle, Georgia, 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 February 12, 2026, 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, potential habitat for the Tricolored Bat (*Perimyotis subflavus*) was observed within the project footprint. Due to the small scope of the project, the proposed undertaking will not fracture a contiguous forested area and will not diminish the overall quality of the forested area. It is Trileaf's opinion that the removal of the trees within the project footprint will not significantly impact the Tricolored Bat's ability to roost, forage, or navigate within the landscape. Additionally, Kelly Towers III LLC has confirmed that tree removal activities will be prohibited from May 1 to July 15 and December 15 to February 15 of any given year. Therefore, it is Trileaf's opinion that the proposed project may affect but is not likely to adversely affect the Tricolored Bat. Impacts to the remainder of the listed and/or proposed threatened and endangered species or critical habitat resulting from the proposed action are not anticipated. Copies of the IBA and critical habitat review are located in Appendix D.

FEDERAL

On March 3, 2026, Trileaf submitted the project information to the USFWS – Georgia Ecological Services Field Office for review. The USFWS replied on March 9, 2026, indicating that “Based on information you provided, no further action is required under S7(a)(2) of the Endangered Species Act. However, if new information or changes in the project involve federally-listed species, further consultation with the Service may be necessary.” A copy of the USFWS' response is located in Appendix D.

Conditional Clearance: In order to reduce impacts to the Tricolored Bat, all tree removal activities are prohibited between May 1 to July 15 and December 15 to February 15 of any given year.

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 Mr. Michael Hart, Secretary of Interior-qualified Architectural Historian of Trileaf, and Ms. Mackenzie Mulkey, Secretary of Interior-qualified Archaeologist of Trileaf, to identify any cultural resources within the area of direct effects and within a 0.50-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 March 12, 2026. The SHPO concurred that the proposed undertaking would have no direct or visual effects on historic properties in a response letter dated April 13, 2026. A copy of the SHPO concurrence letter, Form 620, and associated documents are located in Appendix E.

On February 3, 2026, March 12, 2026, Ms. Katie Ahmed, Planning and Zoning Administrator at the Hall County Planning and Zoning Department, Mr. Ron Hollis, Senior, President at Hall County Historical Society, Inc, and Mr. Joe Rothwell at the Georgia Mountains Regional Commission 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. Additionally, a legal notice regarding the proposed telecommunications tower construction was posted in *The Gainesville Times* on March 18, 2026. No comments from the local government, historical society, or 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 February 3, 2026, Trileaf submitted project information through the Tower Construction Notification System (TCNS) to the FCC who initiated contact with the tribes on February 6, 2026. As of May 8, 2026, 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.

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 #13139C0186G, dated April 4, 2018, 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 “Gainesville” Quadrangle, Georgia, 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 did not reveal any evidence of potential wetlands or hydrophytic vegetation located on or in the immediate vicinity of the project site. Additionally, a review of the United States Department of Agriculture (USDA) Soil Survey (<http://websoilsurvey.sc.egov.usda.gov>) did not indicate hydric soils at the project site.

Based on this review, no designated wetland areas 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 and wetlands map are located in Appendix B.

8. Zoning/High Intensity White Lights/Radio Frequency

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

9. Radio Frequency

FCC licensees transmitting from antennas mounted on Kelly Towers III LLC owned antenna structures will comply with the established criteria regarding radio frequency exposure limits in accordance with the *Second Report and Order*, as well as the FCC Code of Federal Regulations [47 CFR § 1.1307, § 1.1310] published at the time of this report.

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.

Conditional Clearance: In order to reduce impacts to the Tricolored Bat (Per, all tree removal activities are prohibited between May 1 to July 15 and December 15 to February 15 of any given year.

Qualifications



Anna Ni
Senior Project Scientist



Morgan Rasmussen
Project Manager

Appendix A

Site Plans



SURVEYOR'S NOTES

1. This is a Rawland Tower Survey, made on the ground under the supervision of a Georgia Registered Land Surveyor. Date of field survey is December 29, 2025.
2. The following surveying instruments were used at time of field visit: Topcon GM-55 and Topcon Hiper SR G.P.S. receiver, (R.T.K. network capable).
3. Bearings are based on Georgia West State Plane Coordinates NAD 83 by GPS observation.
4. No underground utilities, underground encroachments or building foundations were measured or located as a part of this survey, unless otherwise shown. Trees and shrubs not located, unless otherwise shown.
5. Benchmark used is a GPS Continuously Operating Reference Station, PID ED2699. Onsite benchmark is as shown hereon. Elevations shown are in feet and refer to NAVD 88.
6. This survey was conducted for the purpose of a Rawland Tower Survey only, and is not intended to delineate the regulatory jurisdiction of any federal, state, regional or local agency, board, commission or other similar entity.
7. Attention is directed to the fact that this survey may have been reduced or enlarged in size due to reproduction. This should be taken into consideration when obtaining scaled data.
8. This Survey was conducted without the benefit of an Abstract Title search.
9. Surveyor hereby states the Geodetic Coordinates and the elevation shown for the proposed centerline of the tower are accurate to within +/- 20 feet horizontally and to within +/- 3 feet vertically (FAA Accuracy Code 1A).
10. Survey shown hereon conforms to the Minimum Requirements as set forth by the State Board for a Class "A" Survey.
11. Field data upon which this map or plat is based has a closure precision of not less than one-foot in 15,000 feet (1":15,000') and an angular error that does not exceed 10 seconds times the square root of the number of angles turned. Field traverse was not adjusted.
12. This survey is not valid without the original signature and the original seal of a state licensed surveyor.
13. This survey does not constitute a boundary survey of the Parent Tract. Any parent tract property lines shown hereon are from supplied information and may not be field verified.
14. Zoning: AG
Zoning Jurisdiction: Hall County
Zoning District: Residential
Surrounding Zoning: North-R-2, South-R-2, East-R-1, West-R-2
Setbacks: Will require a tall tower permit.

LEGAL DESCRIPTIONS

PARENT PARCEL (BOOK 7584, PAGE 300)

ALL THAT TRACT OR PARCEL OF LAND LYING AND BEING IN LAND LOT 171 OF THE 9TH LAND DISTRICT OF HALL COUNTY, GEORGIA, AND BEING ALL OF TRACT 1, CONSISTING OF 4.77 ACRES, MORE OR LESS, AS SHOWN ON A PLAT PREPARED FOR SHERRY DUBOSE BY THOMAS WOOD AND ASSOCIATES, REGISTERED LAND SURVEYOR, DATED JUNE 15, 2015, WHICH IS ATTACHED HERETO AND INCORPORATED HEREIN BY THIS REFERENCE FOR A MORE COMPLETE DESCRIPTION.

SURVEYOR'S CERTIFICATION

I hereby certify to Kelly Towers III, LLC., a Delaware Limited Liability Company and _____ Title Insurance Company, the following:

This surveyor has received and reviewed that certain Title Commitment No. _____ issued by _____ Title Insurance Company with an effective date of _____, which proposes to insure the lands described under its Schedule A.

This surveyor knows of his own knowledge that the lands described under said Schedule A of the Title Commitment contain or include the lands described in and depicted on this survey.

This surveyor further knows to the best of his knowledge that the easements of record and identified under Schedule B-2 of said Title Commitment encumber the lands described on this survey, but said easements will not interfere with the location of the proposed insured lands, including the leased area and any and all access, utility and guy wire easement parcels.

I further certify that all parts of this survey and drawing have been completed in accordance with the current requirements of the Standards of Practice for Surveying in the State of Georgia to the best of my knowledge, information, and belief.



M2C Geomatics and Design, PLLC
4800 THE WOODS ROAD
KITTY HAWK, NC 27949
252-261-1555
www.m2cgd.com

SURVEYING & ENGINEERING FROM THE MOUNTAINS TO THE COAST

GAINESVILLE
GA2012
LAND LOT 171, 9TH DISTRICT
HALL COUNTY, GEORGIA

SMW ENGINEERING GROUP, INC.

SMW Engineering Group, Inc.
158 Business Center Drive
Birmingham, Alabama 35244
Ph: 205-252-6985
www.smweng.com

FOR: RAWLAND TOWER SURVEY

KELLY TOWERS III, LLC
8051 Congress Avenue
Boca Raton, FL 33487

DRAWN BY: BC
CHECKED BY: PWK
FIELD CREW: BS
APPROVED BY: TLF
DATE: 01/16/26
SCALE: NO SCALE
SHEET 2 OF 2

PROJECT NO.
25-1499

NO.

REVISION

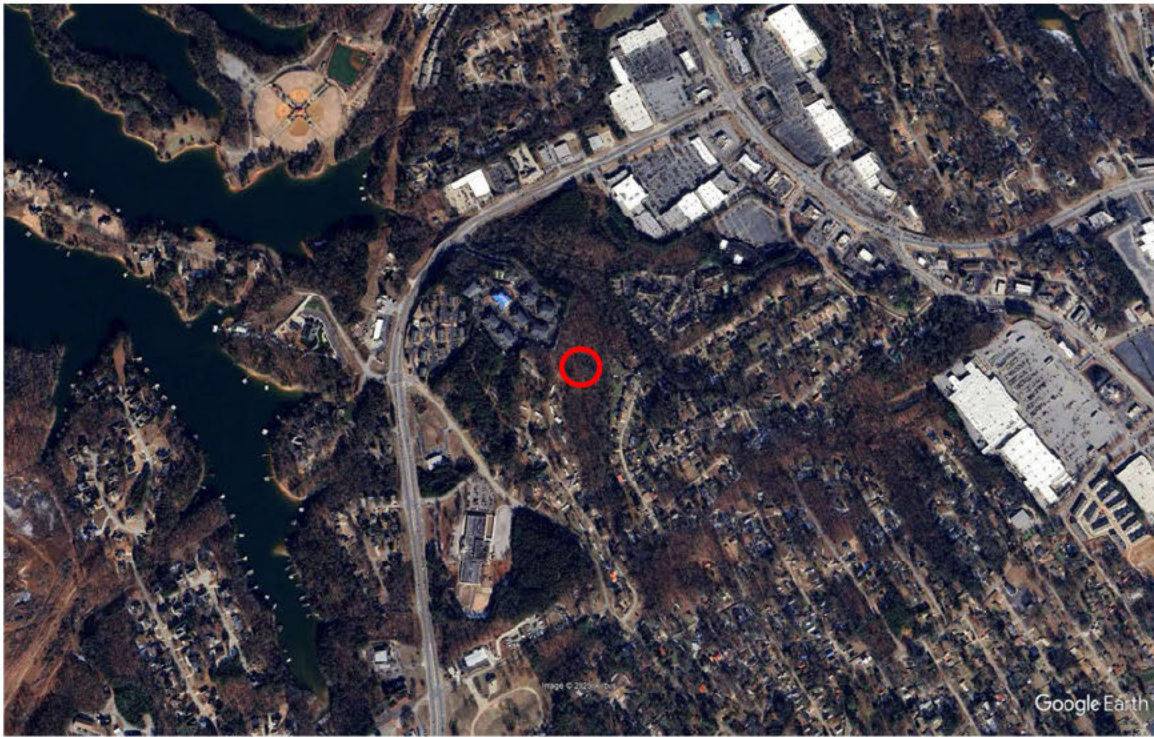
DATE

BY

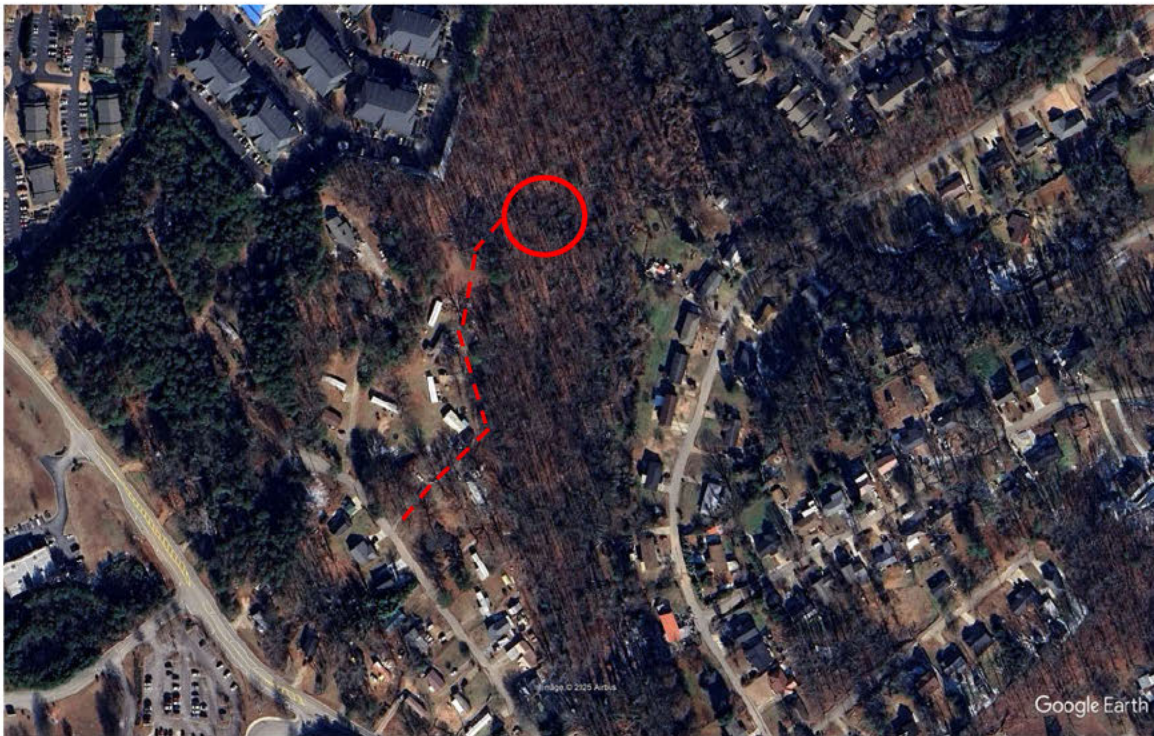
Appendix B

Site Maps





Site Location & Surrounding Properties



Site Location



Easement

Aerial Photographs (2025)

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503



Gainesville Quadrangle, Georgia (2024)

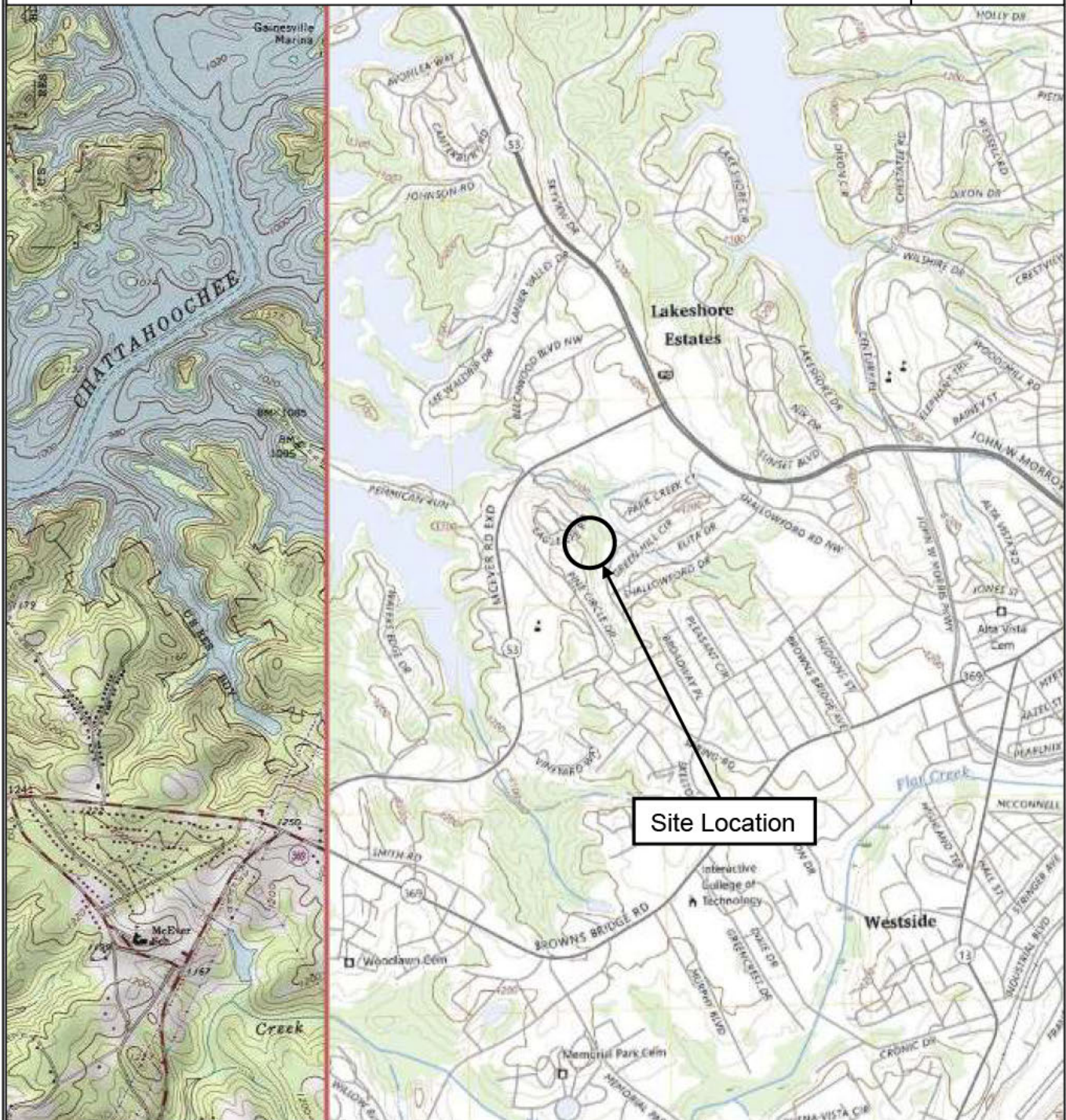
Contour Interval = 20 Feet

Scale 1 Inch = ~2,000 Feet

Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W



North



Site Vicinity Map

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

 **TRILEAF**
environmental architecture engineering

National Flood Hazard Layer FIRMMette



83°51'59"W 34°17'48"N



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

1:6,000

83°51'21"W 34°17'18"N

Basemap Imagery Source: USGS National Map 2023

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
		17.5 Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
MAP PANELS		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
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 1/29/2026 at 9:17 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.



U.S. Fish and Wildlife Service

National Wetlands Inventory

Gainesville



January 29, 2026

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

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

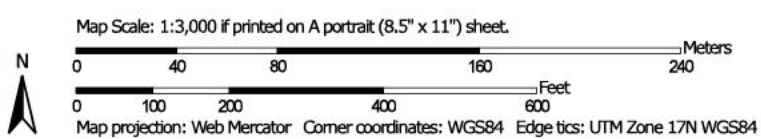
- Lake
- Other
- Riverine

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—Barrow, Hall, and Jackson Counties, Georgia (Gainesville)



Soil Map may not be valid at this scale.



Soil Map—Barrow, Hall, and Jackson Counties, Georgia
(Gainesville)

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 1:20,000.

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: Barrow, Hall, and Jackson Counties, Georgia
Survey Area Data: Version 20, Sep 5, 2025

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

Date(s) aerial images were photographed: Mar 19, 2022—Apr 20, 2022

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.

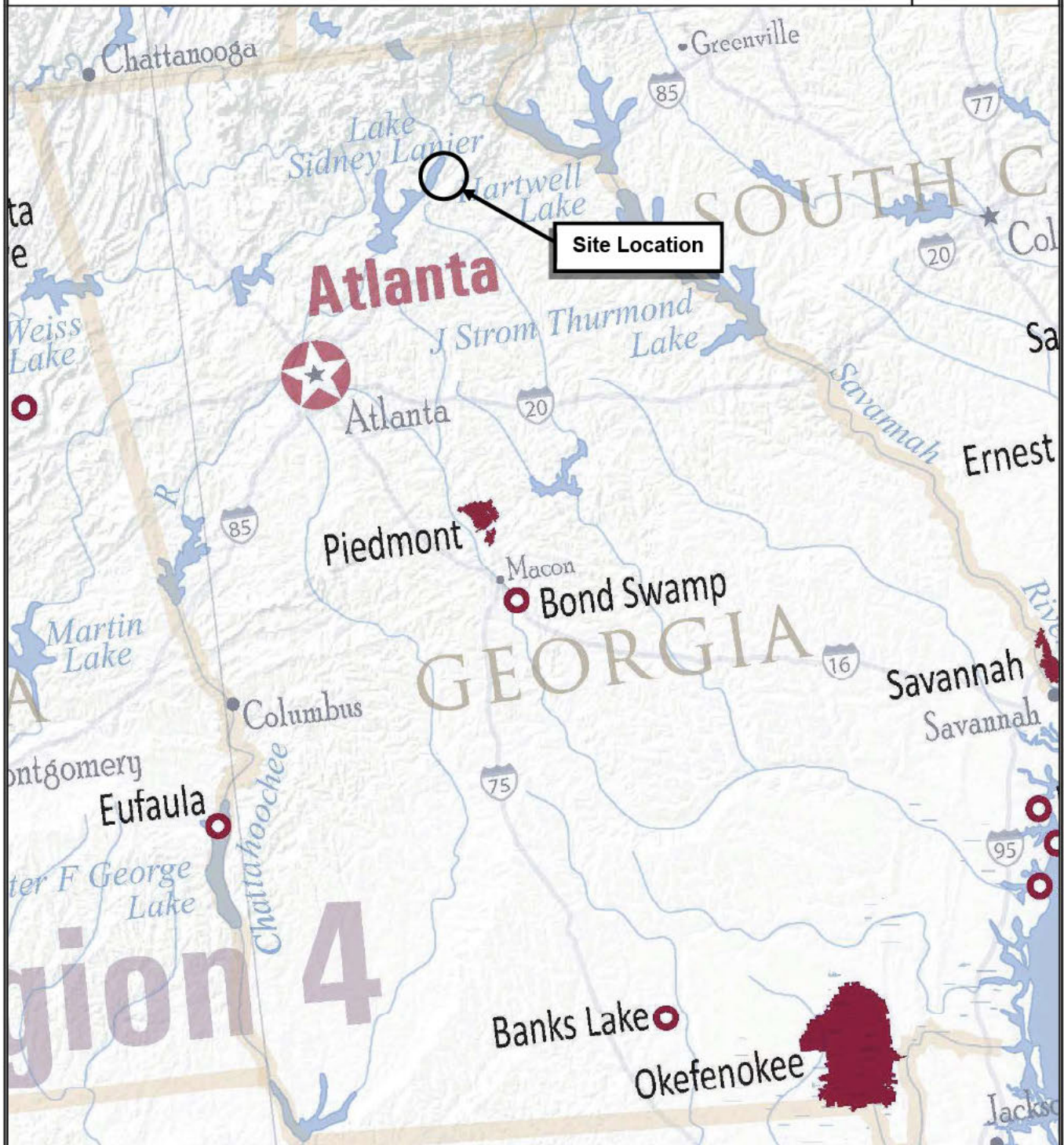
Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
PaE	Pacolet sandy loam, 15 to 25 percent slopes	1.9	37.7%
PuD2	Pacolet soils, 10 to 15 percent slopes, eroded	3.1	62.3%
Totals for Area of Interest		4.9	100.0%

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



North



USFWS – Wildlife Refuge Map

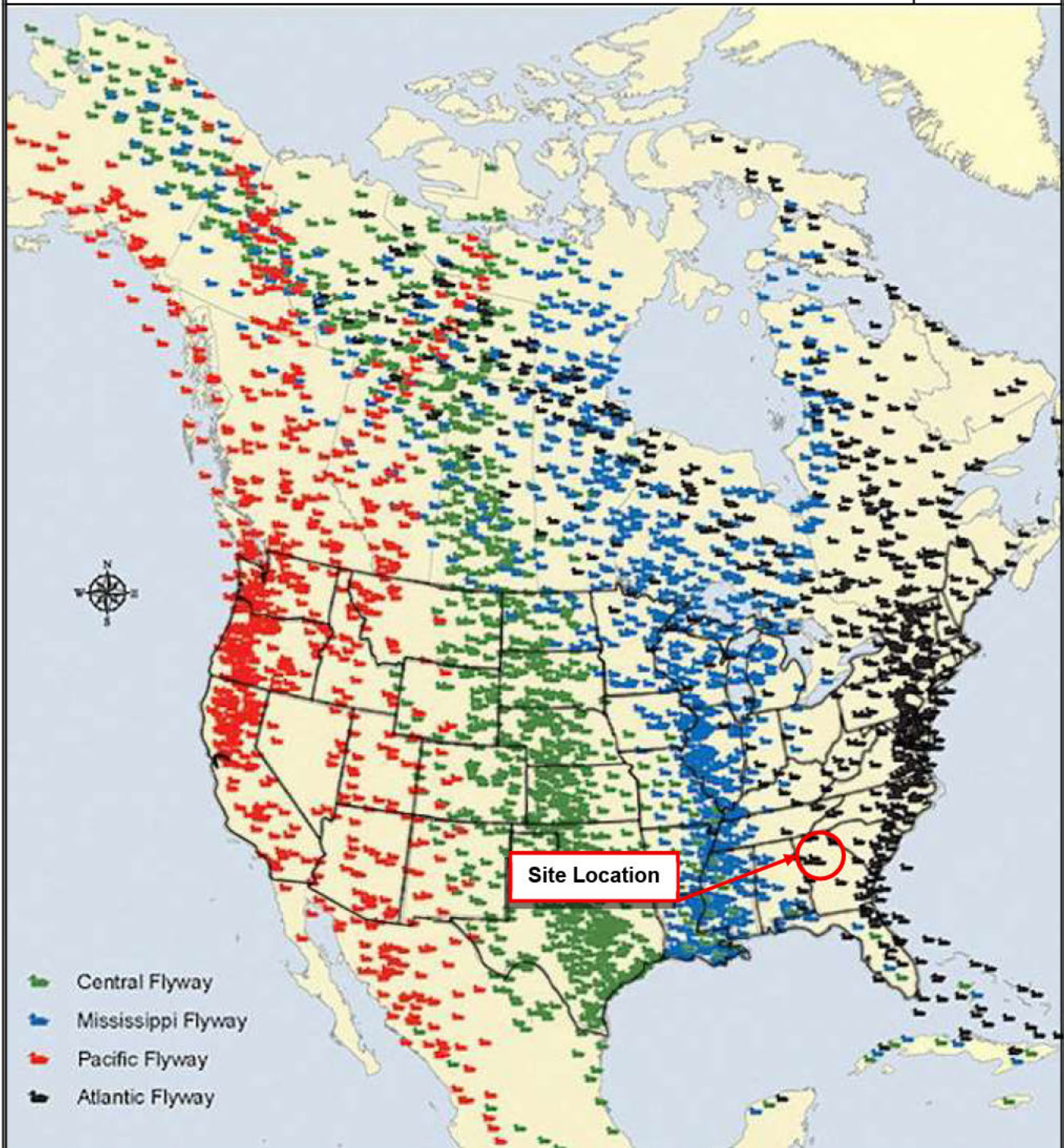
Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

 **TRILEAF**
environmental architecture engineering

North American Migration Flyways



North



Migratory Bird Flyways – Location Map

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

 **TRILEAF**
environmental architecture engineering

National Park Service
National Historic Trails and Scenic Routes



North



National Park Service – Trails and Routes Map

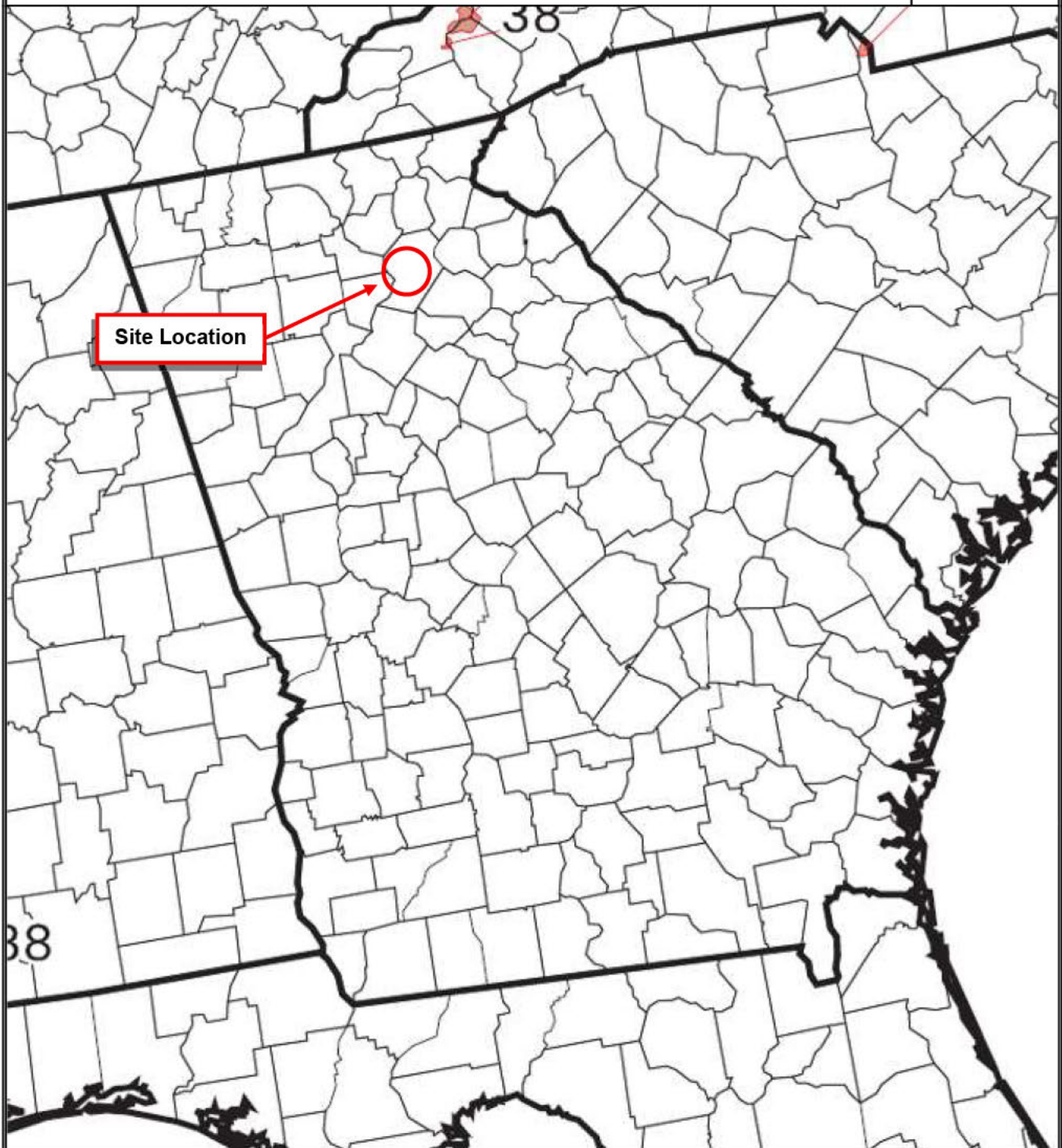
Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

 **TRILEAF**
environmental architecture engineering

Bureau of Indian Affairs
Indian Reservation Map



North



Bureau of Indian Affairs – Reservation Map

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503



Appendix C
Site Photographs





Site Photograph 1 – Looking north at the Subject Property



Site Photograph 2 – Looking east at the Subject Property

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 3 – Looking south at the Subject Property



Site Photograph 4 – Looking west at the Subject Property

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 5 – Looking north away from the Subject Property



Site Photograph 6 – Looking east away from the Subject Property

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 7 – Looking south away from the Subject Property



Site Photograph 8 – Looking west away from the Subject Property

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 9 – Looking south along the easement from the lease area



Site Photograph 10 – Looking south along the easement near the lease area

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 11 – Looking south along the easement



Site Photograph 12 – Looking south along the easement towards the terminus

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed On:
February 12, 2026



Site Photograph 13 – Looking north along the easement from the terminus



Site Photograph 14 – Canopy cover at the Site

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed:
February 12, 2026



Site Photograph 15 – Ground cover at the Site



Site Photograph 16 – Average DBH of trees at the Site

Site Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Georgia 30503

Photographed:
February 12, 2026

Appendix D

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





1775 The Exchange SE, Suite 525, Atlanta, GA 30339 - 678-653-8673 - www.trileaf.com

March 3, 2026

US Fish and Wildlife Services - Georgia Ecological Services

355 East Hancock Avenue

Room 320, Box 7

Athens, Georgia 30601

Phone: (706) 460-7161

Email: gaes_assistance@fws.gov

RE: **Kelly Towers III LLC – Gainesville / GA2012 – Trileaf Project #782453**

2378 Pine Circle Drive, Gainesville, Georgia 30503

Hall County, Gainesville Quadrangle (USGS)

Latitude: 34° 17' 33.263" N, Longitude: 83° 51' 39.914" W

IPaC Project Code: 2026-0051901

To Whom It May Concern,

Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our client proposed to construct a 195-foot monopole communications structure with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends 750-feet generally northeast from Pine Circle Drive. The project area is within wooded land. 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 for the Tricolored Bat (*Perimyotis subflavus*) was observed within the project footprint. Due to the access/utility utilizing previously disturbed/developed areas and with just the lease area located within wooded land, only a small portion of potential habitat for *P. subflavus* will be removed leaving a greater portion of the wooded area to be utilized for potential roosting and foraging by *P. subflavus*. Additionally, the applicant has confirmed that tree removal activities will be prohibited from May 1 to July 15 and December 15 to February 15 of any given year. Therefore, it is Trileaf's opinion that the proposed project may affect but is not likely to adversely affect the Tricolored Bat.

Trileaf is requesting concurrence from the USFWS with the finding of "may affect, 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 (678) 653-8673 ext. 655 or email a.ni@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

A handwritten signature in black ink, appearing to be 'Anna Ni', written above a horizontal line.

Anna Ni
Senior Project Scientist



Informal Biological Assessment

Kelly Towers III LLC

Project Name: Gainesville / GA2012 - Trileaf #782453

Latitude: 34° 17' 33.263" N, Longitude: 83° 51' 39.914" 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, topographical maps, wetland maps, and soil maps are included in this report.

Proposed Project Description:

The Site is located at 2378 Pine Circle Drive, Gainesville, Hall County, Georgia 30503, and consists of the construction of a 195-foot monopole communications structure with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends 750-feet generally northeast from Pine Circle Drive. The proposed structure site is approximately 1,185 feet above mean sea level.

Site and Surrounding Habitat:

The Site is currently located within wooded land and an existing partially paved access road associated with several trailer homes. During the area reconnaissance, trees generally throughout the area were identified to be removed. A tree survey was not conducted, however using the provided photographs, the area appears to be predominantly oak and pine species that have an average diameter at breast height (DBH) of 15-25 inches.

The surrounding habitat within a 0.5-mile radius of the proposed site consists predominantly of residential and commercial development. To the north is wooded land, followed by commercial development, followed by Highway 53, followed by more commercial development, followed by residential development. To the east is residential development, followed by commercial development. To the south is wooded land, followed by residential development and Pine Circle Drive, followed by more residential development. To the west is wooded land, followed by residential development, followed by Highway 53, followed by more residential development. 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 Structure	Distance from Structure
Riverine Wetland	Unnamed	NE	0.10 miles
Riverine Wetland	Unnamed	NNE	0.15 miles

Lake	Lake Lanier	NW	0.37 miles
Lake	Lake Lanier	W	0.38 miles
Lake	Lake Lanier	NW	0.40 miles
Lake	Lake Lanier	NW	0.42 miles
Lake	Lake Lanier	W	0.42 miles
Lake	Lake Lanier	SW	0.42 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 structure placement within minimally sensitive areas, avoiding placement near wetlands and large water bodies, limiting structure height to 199 feet, and eliminating the need for guy wires or FAA obstruction lighting. 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 or forest area, ridgeline, 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. Department of Agriculture Natural Resources Conservation Service Web Soil Survey of Hall County, Georgia, the majority of the lease area is underlain by Pacolet sandy loam, 15 to 25 percent slopes. The remainder of the lease area and proposed access/utility easement is underlain by Pacolet soils, 10 to 15 percent slopes, eroded. Pacolet sandy loam and Pacolet soils have no frequency of flooding or ponding. Additionally, Pacolet sandy loam, 15 to 25 percent slopes, and Pacolet soils, 10 to 15 percent slopes, eroded, are not considered hydric soils, 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) and is site specific. 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
Gray Bat (<i>Myotis grisescens</i>)	Federal-Endangered	Roosts in caves almost exclusively, and typically located close to rivers or lakes where it feeds	No Effect	Habitat assessment indicated no potential habitat present
Tricolored Bat (<i>Perimyotis subflavus</i>)	Federal-Proposed Endangered	Landscapes that are partly open, with large trees and plentiful woodland edges. That include grasslands, old fields, urban areas and woodlands	May affect, not likely to adversely affect	Habitat assessment indicated potential habitat present
Whooping Crane (<i>Grus americana</i>)	Experimental Population, Non-Essential	Breeds in freshwater marshes, wetlands, and prairies. Uses grain fields, shallow lakes, lagoons, and saltwater marshes on migration and in winter; prefers areas away from human activity with low to sparse vegetation.	No Effect	Habitat assessment indicated no potential habitat present
Monarch Butterfly (<i>Danaus plexippus</i>)	Federal-Proposed Threatened	Open places, native prairie, foothills, open valley bottoms, open weedy fields, roadsides, pastures, marshes, suburban areas, rarely above treeline in alpine terrain during migration.	No Effect	Habitat assessment indicated no potential habitat present

Conclusions:

Based on the efforts undertaken during our IBA, project specifications, and the current data made available, we have concluded that potential habitat may be present within the project area for the Tricolored Bat (*Perimyotis subflavus*). However, the areas representing potential habitat within the Site footprint are relatively small, the overall suitability of the potential habitat has been diminished by surrounding developments, and there will be remaining habitat to the north and the south of the proposed project area. In addition, our client will abide by seasonal tree clearing restrictions. Tree clearing will not occur between May 1st to July 15th, and December 15th to February 15th.

Therefore, Trileaf recommends a determination of “may affect, not likely to adversely affect” for the Tricolored Bat. No effects are anticipated to the remaining listed species. Based on the documents reviewed, and the scope of work procedure outlined above, the proposed project is not likely to adversely affect threatened/endangered species or designated critical habitat. Finally, no significant effects to migratory birds or wetlands are anticipated by this project.

Gainesville
Trileaf# 782453

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).

A handwritten signature in black ink, appearing to read 'Anna Ni', with a long horizontal line extending to the right.

Anna Ni
Natural Resource Specialist

Please refer to Appendix B for Site Maps



Please refer to Appendix C for Site Photographs



Barrow, Hall, and Jackson Counties, Georgia

PaE—Pacolet sandy loam, 15 to 25 percent slopes

Map Unit Setting

National map unit symbol: 46dw
Landscape: Piedmonts
Elevation: 200 to 1,400 feet
Mean annual precipitation: 44 to 60 inches
Mean annual air temperature: 59 to 64 degrees F
Frost-free period: 190 to 230 days
Farmland classification: Not prime farmland

Map Unit Composition

Pacolet and similar soils: 100 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Pacolet

Setting

Landscape: Piedmonts
Landform: Hills
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Residuum weathered from granite and gneiss and/or residuum weathered from schist

Typical profile

H1 - 0 to 3 inches: sandy loam
H2 - 3 to 29 inches: clay
H3 - 29 to 52 inches: sandy clay loam
H4 - 52 to 70 inches: loam

Properties and qualities

Slope: 15 to 25 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.57 to 1.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Available water supply, 0 to 60 inches: Moderate (about 7.6 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 6e
Hydrologic Soil Group: B
Ecological site: F136XY820GA - Acidic upland forest, moist
Hydric soil rating: No

PuD2—Pacolet soils, 10 to 15 percent slopes, eroded

Map Unit Setting

National map unit symbol: 46dy
Landscape: Piedmonts
Elevation: 200 to 1,400 feet
Mean annual precipitation: 44 to 60 inches
Mean annual air temperature: 59 to 64 degrees F
Frost-free period: 190 to 230 days
Farmland classification: Not prime farmland

Map Unit Composition

Pacolet and similar soils: 100 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Pacolet

Setting

Landscape: Piedmonts
Landform: Hills
Landform position (two-dimensional): Shoulder, backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Residuum weathered from granite and gneiss and/or residuum weathered from schist

Typical profile

H1 - 0 to 3 inches: clay loam
H2 - 3 to 29 inches: clay
H3 - 29 to 52 inches: sandy clay loam
H4 - 52 to 70 inches: loam

Properties and qualities

Slope: 10 to 15 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.57 to 1.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Available water supply, 0 to 60 inches: Moderate (about 7.7 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 6e
Hydrologic Soil Group: B
Ecological site: F136XY820GA - Acidic upland forest, moist
Hydric soil rating: No



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601-2523
Phone: (706) 613-9493 Fax: (706) 613-6059
Email Address: gaes_assistance@fws.gov

In Reply Refer To:

05/08/2026 16:00:23 UTC

Project Code: 2026-0051901

Project Name: #782453 Gainesville

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

To Whom It May Concern:

Thank you for requesting information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) is responsible for managing certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and Bald and Golden Eagle Protection Act as amended (16 USC 668-668c). We provide the following guidance for understanding which federally protected species and critical habitats may occur within your project area and to recommend conservation measures for your project if you determine those species or designated critical habitats may be affected by the project activities.

Federally-listed Species and Critical Habitat

Under the ESA, it is the responsibility of the Federal action agency, their designated non-Federal representative, or a project proponent to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally listed threatened or endangered fish or wildlife species without the appropriate permit. If you need additional guidance to inform your effect determination, please contact the Service.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation (for projects seeking Federal funding or permitting) or technical assistance (for non-Federal projects) process, we will work with you to evaluate

information contained in a biological assessment or equivalent documents that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a) (1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt "take" of federally listed threatened or endangered fish or wildlife species when it cannot be avoided.

Action Area. The scope of ESA compliance includes direct and indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The "action area" is the spatial extent of an action's direct and indirect modifications or impacts to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint. Please note that a lead federal agency may consider an action area that excludes portions of the project footprint. In these cases, further coordination with our office may be required to ensure compliance with the ESA. It is the responsibility of the project proponent to coordinate with the lead federal agency to understand the action and action area being reviewed as part of ESA Section 7 consultation.

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 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. An updated list may be requested through IPaC.

How to Submit a Project Review

If your action may affect any federally listed species and you would like technical assistance from our office, please send us a complete project review package. A step-by-step guide is available below and supplemental guidance is available at the Georgia Ecological Services Project Planning and Review page (<https://www.fws.gov/office/georgia-ecological-services/project-planning-review>).

Requests for threatened and endangered species project reviews must be submitted to our office using the process described below. All steps must be completed to ensure your project is reviewed by a biologist in our office and you receive a timely response.

Step 1. Request an official species list for your project through IPaC. You have just completed this step.

Step 2. Complete applicable Determination Keys (DKey's, for short)

Step 3. Send your complete project review package to gaes_assistance@fws.gov for review if no DKey is applicable or certain project components have not been addressed (i.e. a

species returned by IPaC does not have a DKey). A complete project review package should include:

1. A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. The description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, such as the purpose of the action; duration and timing of the action; location (latitude and longitude); specific activities involving disturbance to land, water, and air, and how they will be carried out; current description of areas to be affected directly or indirectly by the action; and maps, drawings, or similar schematics of the action. Please submit all areas of a project as one single submission and do not separate into smaller components/submissions.
2. An updated Official Species List and Determination Key results
3. Biological Assessments (may include habitat assessments and information on the presence of listed species in the action area);
4. Description of effects of the action on species in the action area and, if relevant, effect determinations for species and critical habitat;
5. Conservation measures and any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (e.g., management plans related to stormwater, vegetation, erosion and sediment plans). Visit the [Georgia Conservation Planning Toolbox](#) for more information.
6. In the email subject line, use the following format to include the Project Code from your IPaC species list and the county in which the project is located (Example: Project Code: 2023-0049730 Gwinnett Co.). For Georgia Department of Transportation related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

Our team will respond within approximately 30 days of receipt with technical assistance and recommendations.

Wetlands and Floodplains

Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value. We encourage you to use the [National Wetland Inventory \(NWI\)](#) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

Migratory Birds

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the [Service's Migratory Birds Program](#). To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged. Information related to

industry best practices and migratory birds can be found at the Service's [Reducing Impacts to Migratory Birds](#) page.

Bald and Golden Eagles

The Service works to manage and conserve both bald eagle and golden eagle populations. We provide guidance on living and working near eagles, updates on the status of the populations of bald and golden eagles, and permits for the take, possession, or transportation of eagles and their parts, nests, and eggs. For more information, please visit the Service's [Eagle Management](#) page.

Other Species Considerations

Bats. If your species list includes Indiana bat (*Myotis sodalis*), northern long-eared bat (*M. septentrionalis*), or tricolored bat (*Perimyotis subflavus*) and the project is expected to impact forested habitat, tree clearing should occur outside of the periods when bats may be present and most vulnerable. Federally listed bats could be actively present in forested landscapes from spring through fall of any year. In much of Georgia, our winters are mild enough that tricolored bats are likely active on the landscape to some extent year-round. Pups are incapable of flight and vulnerable to disturbance from the spring to summer. Our recommended seasonal clearing restriction windows depend on species and region in Georgia. Please reach out to us for guidance.

Indiana, northern long-eared, tricolored, and gray (*M. grisescens*) bats are all known to utilize bridges and culverts in Georgia. If your project includes maintenance, construction, or any other modification or demolition to transportation structures, a qualified individual should complete a survey of these structures for bats and submit your findings via the “GADNR Bats in Bridges” form in the Survey123 App, free on Apple and Android devices. Please include these findings in any biological assessment(s) or other documentation that is submitted to our office for technical assistance or consultation.

Eastern Indigo Snake. The [Standard Protection Measures for the Eastern Indigo Snake \(*Drymarchon couperi*\)](#) include educational materials and training that can help protect the species by making staff working on a project site aware of their presence and traits. In Georgia, indigo snakes are closely associated with the state-listed gopher tortoise (*Gopherus polyphemus*), a reptile that excavates extensive underground burrows that provide the snake shelter from winter cold and summer desiccation. To assist project proponents in avoiding and minimizing potential impact to the eastern indigo snake, the Service provides the [Visual Encounter Survey Protocol for the Eastern Indigo Snake \(*Drymarchon couperi*\) in Georgia](#) for project proponents or their designees to evaluate the possible presence of the Eastern indigo snake at a proposed project site.

Solar Energy Development

The [Recommended Practices for the Responsible Siting and Design of Solar Development in Georgia, Version 2.0](#) (published in May 2024) are intended to provide voluntary guidance to support consideration of natural resources during the development of photovoltaic solar in Georgia. Furthermore, the [Georgia Low Impact Solar Siting Tool \(LISST\)](#) is also available as a map layer in IPaC (Find it in the “Layers” Box > “Environmental Data”) to provide project managers with the data to identify areas that may be preferred for low-impact development. The

tool seeks to support the acceleration of large-scale solar development in areas with less impact to the environment.

State Agency Coordination

Environmental review staff at the Georgia Department of Natural Resources (GA DNR) Wildlife Conservation Section can assist with information requests and the review of Georgia rare species and natural community data for specific projects or actions within the state. Please visit their [Environmental Review](#) page. Additional information that addresses at-risk or high priority natural resources can be found in the [Georgia State Wildlife Action Plan](#), at Georgia Department of Natural Resources, [Wildlife Resources Division Biodiversity Portal](#), [Georgia's Natural, Archaeological, and Historic Resources GIS portal](#) pages.

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email gaes_assistance@fws.gov and reference the project county and your FWS Project Number. This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

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:

Georgia Ecological Services Field Office

355 East Hancock Avenue

Room 320

Athens, GA 30601-2523

(706) 613-9493

PROJECT SUMMARY

Project Code: 2026-0051901

Project Name: #782453 Gainesville

Project Type: Communication Tower New Construction

Project Description: Our client proposed to construct a 195-foot monopole communications structure with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends 750-feet generally northeast from Pine Circle Drive. The project area is within wooded land.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.291878999999994,-83.86153713430838,14z>



Counties: Hall County, Georgia

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 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.

MAMMALS

NAME	STATUS
Gray Bat <i>Myotis grisescens</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6329	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: Eastern Migratory NEP - U.S.A. (AL, AR, FL, GA, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, OH, SC, TN, VA, WI, WV) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non- Essential

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

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

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Trileaf Corporation
Name: Anna Ni
Address: 1775 The Exchange SE
Address Line 2: Suite 525
City: Atlanta
State: GA
Zip: 30339
Email: a.ni@trileaf.com
Phone: 3472553360

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601-2523
Phone: (706) 613-9493 Fax: (706) 613-6059
Email Address: gaes_assistance@fws.gov

In Reply Refer To:

03/03/2026 13:23:37 UTC

Project code: 2026-0051901

Project Name: #782453 Gainesville

Federal Nexus: yes

Federal Action Agency (if applicable): Federal Communications Commission

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for
'#782453 Gainesville'

Dear Anna Ni:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on March 03, 2026, for '#782453 Gainesville' (here forward, Project). This project has been assigned Project Code 2026-0051901 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements may not be complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid. Note that conservation measures for northern long-eared bat and tricolored bat may differ. If both bat species are present in the action area and the key suggests more conservative measures for one of the species for your Project, the Project may need to apply***

the most conservative measures in order to avoid adverse effects. If unsure which conservation measures should be applied, please contact the appropriate Ecological Services Field Office.

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed Endangered	NLAA

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

Unless the Service advises you within 15 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that consultation on the Action is complete for northern long-eared bat and/or tricolored bat and no further action is necessary unless either of the following occurs:

- new information reveals effects of the action that may affect the northern long-eared bat or tricolored bat in a manner or to an extent not previously considered; or,
- the identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tricolored bat that was not considered when completing the determination key.

15-Day Review Period

As indicated above, the Service will notify you within 15 calendar days if we determine that this proposed Action does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for the northern long-eared bat and/or tricolored bat. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the identified Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that we did not anticipate when developing the key. In such cases, the identified Ecological Services Field Office may request additional information to verify the effects determination reached through the Northern Long-eared Bat and Tricolored Bat DKey.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Gray Bat *Myotis grisescens* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Whooping Crane *Grus americana* Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may affect the species and/or critical habitat listed above. Note that reinitiation of consultation would be necessary if a new species is listed or critical habitat designated that may be affected by the identified action before it is complete.

If you have any questions regarding this letter or need further assistance, please contact the Georgia Ecological Services Field Office and reference Project Code 2026-0051901 associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

#782453 Gainesville

2. Description

The following description was provided for the project '#782453 Gainesville':

Our client proposed to construct a 195-foot monopole communications structure with an overall height of 199-feet within a 100-foot by 100-foot (10,000 square-foot) lease area. The project will include a 30-foot wide access/utility easement, including an asphalt drive, that extends 750-feet generally northeast from Pine Circle Drive. The project area is within wooded land.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.291878999999994,-83.86153713430838,14z>



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect, but not likely to adversely affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

Yes

4. Your project overlaps with an area where northern long-eared bats or tricolored bats may be present and roosting in trees year-round.

Do you understand that your project may impact bats roosting in trees at any time during the year?

Yes

5. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

No

6. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer 'yes' to this question.

Yes

7. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

8. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

Yes

9. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

Yes

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

No

12. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

No

13. Will the action cause effects to a bridge?

Note: Covered bridges should be considered as bridges in this question.

No

14. Will the action result in effects to a culvert or tunnel at any time of year?

No

15. Are trees present within 1000 feet of the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

16. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

No

17. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

No

18. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

19. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

21. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

Note: For information regarding NSF/ANSI 60 please visit <https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects>

No

22. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

23. Will the action include drilling or blasting?

Yes

24. Your project overlaps with an area where northern long-eared and tricolored bats may be present year-round.

Will the drilling or blasting produce noise or vibrations above existing background levels that will affect suitable habitat within the active year-round portion for NLEB and/or TCB?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and/or tricolored bat, can be found in Appendix A in the USFWS' Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>

No

25. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

No

26. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

No

27. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

28. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

29. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

Yes

30. Is the project related to the production of coal, including projects that support the mining of coal, as well as the production and/or distribution of energy produced from coal?

No

31. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

No

32. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

No

33. Does the project intersect with the 0- 9.9% forest density category?

Automatically answered

No

34. Does the project intersect with the 10.0- 19.9% forest density category map?

Automatically answered

No

35. Does the project intersect with the 20.0- 29.9% forest density category map?

Automatically answered

Yes

36. Does the project intersect with the 30.0- 100% forest density category map?

Automatically answered

No

37. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 40 acres in total extent?

No

38. Will the proposed action result in the use of prescribed fire?

Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

No

39. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

40. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

No

41. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

42. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

43. Do any of the trees proposed for cutting or other means of knocking down, bringing down, topping, or trimming provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pine trees)?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

44. Will tree cutting/trimming or other knocking or bringing down of trees occur during Winter Torpor and/or the Pup Season?

Note: Bat activity periods for your state can be found in Appendix L of the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#)

No

45. Do you have any documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

0.2

IPAC USER CONTACT INFORMATION

Agency: Trileaf Corporation
Name: Anna Ni
Address: 1775 The Exchange SE
Address Line 2: Suite 525
City: Atlanta
State: GA
Zip: 30339
Email: a.ni@trileaf.com
Phone: 3472553360

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission