

From: [GAES Assistance, FW4](#)
To: [Anna Ni](#)
Cc: [Morgan Rasmussen](#)
Subject: Re: [EXTERNAL] FWS Consultation for Proposed Telecommunication Project in Hall County, GA - IPaC Project Code: 2026-0051901 - Trileaf#782453
Date: Monday, March 9, 2026 10:55:49 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Anna,

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.

Scott Glassmeyer

Georgia Ecological Services

U.S. Fish and Wildlife Service

Main Office: 706-208-7524

Web: <https://www.fws.gov/office/georgia-ecological-services>

Our mission is to work with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.

From: Anna Ni <a.ni@trileaf.com>
Sent: Tuesday, March 3, 2026 8:29 AM
To: GAES Assistance, FW4 <gaes_assistance@fws.gov>
Cc: Morgan Rasmussen <m.rasmussen@trileaf.com>
Subject: [EXTERNAL] FWS Consultation for Proposed Telecommunication Project in Hall County, GA - IPaC Project Code: 2026-0051901 - Trileaf#782453

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern,

On behalf of Kelly Towers III LLC, Trileaf is performing a NEPA review on the proposed construction of a 199-foot monopole telecommunication tower located near 2378 Pine Circle Drive, Gainesville, Georgia 30503. The project site is located within wooded land. Please find attached a letter with a detailed description of the tower site, site location maps, an Informal Biological Assessment, and photographs of the site. We would like to consult with the FWS on this project and request Section 7 clearance. Please let me know if you need any additional information.

Thank you,

Anna Ni
Senior Project Scientist



1775 The Exchange SE, Suite 525
Atlanta, Georgia 30339
Direct: (347)-255-3360
Office: (678) 653-8673, ex. 655

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

Appendix E
Section 106 Review





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

March 12, 2026

Georgia Department of Community Affairs - Historic Preservation Division

Attn: Ms. Olivia Kendrick – Environmental Review Historian

60 Executive Park South, NE

Atlanta, Georgia 30329

Phone: 404-486-6425

Email: Olivia.Kendrick@dca.ga.gov

RE: **Kelly Towers III LLC – Gainesville / Client# 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

Dear Ms. Kendrick:

Trileaf Corporation is in the process of completing a NEPA review at the referenced property. Our client 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. The antenna will be licensed by the Federal Communications Commission (FCC).

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

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

We appreciate your cooperation in this regard and anticipate your concurrence with these findings. Please call me at (678) 653-8673 ext. 655 or email a.ni@trileaf.com if you need any additional information or have any questions. Thank you for your assistance.

Sincerely,

Anna Ni
Senior Project Scientist

Notification Date: **7AM EST 03/16/2026**File Number: **0011944275**

General Information

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

Applicant Information

3) FCC Registration Number (FRN): 0031780240
4) Name: Kelly Towers III LLC

Contact Name

5) First Name: Kathy	6) MI:	7) Last Name: Kelly	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 3708 Stonewall Circle	
12) City: Atlanta		13) State: GA	14) Zip Code: 30339
15) Telephone Number: [REDACTED]		16) Fax Number:	
17) E-mail Address: kathy.kelly@kellycomss.com			

Consultant Information

18) FCC Registration Number (FRN): 0011724176
19) Name: Trileaf Corporation

Principal Investigator

20) First Name: Michael	21) MI:	22) Last Name: Hart	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 1775 The Exchange SE Suite 525	
27) City: Atlanta		28) State: GA	29) Zip Code: 30339
30) Telephone Number: [REDACTED]		31) Fax Number:	
32) E-mail Address: a.ni@trileaf.com			

Professional Qualification

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

Additional Staff

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?	(☒) <u>Y</u> es () <u>N</u> o
--	--

If "YES," complete the following:

36) First Name: Mackenzie	37) MI:	38) Last Name: Mulkey	39) Suffix:
40) Title:			
41) Areas of Professional Qualification: (☒) Archaeologist () Architectural Historian () Historian () Architect () Other (Specify) _____			

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **306660**

Site Information

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

3) Site Name: **Gainesville**

4) Site Address: **2378 Pine Circle Drive**

5) Detailed Description of Project:

Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

6) City: **Gainesville**

7) State: **GA**

8) Zip Code: **30503**

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

10) Nearest Crossroads: **Pine Circle Drive and Spring Road**

11) NAD 83 Latitude (DD-MM-SS.S): **34-17-33.3**

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

12) NAD 83 Longitude (DD-MM-SS.S): **083-51-39.9**

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

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **60.7** () Feet (**X**) Meters

14) Tower Type (Select One):

() Guyed lattice tower

() Self-supporting lattice

(**X**) Monopole

() Other (Describe):

Project Status

15) Current Project Status (Select One):

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

() Construction has commenced, but is not completed

Construction commenced on: _____

() Construction has been completed

Construction commenced on: _____

Construction completed on: _____

Determination of Effect

14) Direct Effects (Select One):

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

15) Visual Effects (Select One):

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

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Alabama Quassarte Tribal Town

Contact Name

5) First Name: Brina	6) MI:	7) Last Name: Williams	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Coushatta Indian Tribe

Contact Name

5) First Name: Dakota	6) MI:	7) Last Name: John	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Eastern Band of Cherokee Indians

Contact Name

5) First Name: Stephen	6) MI:	7) Last Name: Yerka	8) Suffix:
9) Title: Tribal Historic Preservation Specialist			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Lora	6) MI:	7) Last Name: Nuckolls	8) Suffix:
9) Title: Director			

Dates & Response

10) Date Contacted <u>02/05/2026</u>	11) Date Replied <u>02/12/2026</u>
() No Reply	
(☒) Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Kialegee Tribal Town

Contact Name

5) First Name: Stephanie	6) MI:	7) Last Name: Yahola	8) Suffix:
9) Title: Tribal Administrator			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Muscogee (Creek) Nation

Contact Name

5) First Name: Jason	6) MI:	7) Last Name: Sawyer	8) Suffix: Mr
9) Title: TCNS Manager			

Dates & Response

10) Date Contacted <u>02/05/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Poarch Band of Creek Indians

Contact Name

5) First Name: William	6) MI:	7) Last Name: Bailey	8) Suffix: Jr
9) Title: THPO			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Seminole Nation of Oklahoma

Contact Name

5) First Name: Ben	6) MI:	7) Last Name: Yahola	8) Suffix:
9) Title: Tribal Historic Preservation Officer			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Seminole Tribe of Florida

Contact Name

5) First Name: THPO	6) MI:	7) Last Name: Compliance	8) Suffix:
9) Title: Compliance Review Supervisor			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u> Number of Tribes/NHOs: <u>13</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribal/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Tonya	6) MI:	7) Last Name: Tipton	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Thlopthlocco Tribal Town

Contact Name

5) First Name: Ryan	6) MI:	7) Last Name: Morrow	8) Suffix:
9) Title: Mekko			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>306660</u>		Number of Tribes/NHOs: <u>13</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: United Keetoowah Band of Cherokee Indians in Oklahoma

Contact Name

5) First Name: THPO	6) MI:	7) Last Name: Department	8) Suffix:
9) Title: THPO Dept			

Dates & Response

10) Date Contacted <u>02/04/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Other Tribes/NHOs Contacted

Tribe/NHO Information

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

Contact Name

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

Contact Information

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

Dates & Response

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

Historic Properties

Properties Identified

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

Historic Property

4) Property Name:
5) SHPO Site Number:

Property Address

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

Status & Eligibility

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

14) Direct Effects (Select One): ☐ No Effect on this Historic Property in APE ☐ No Adverse Effect on this Historic Property in APE ☐ Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One): ☐ No Effect on this Historic Property in APE ☐ No Adverse Effect on this Historic Property in APE ☐ Adverse Effect on this Historic Property in APE

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):
2) Name: Hall County Planning and Zoning

Contact Name

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

Contact Information

8) P.O. Box:	And /Or	9) Street Address: 2875 Browns Bridge Road	
10) City: Gainesville		11) State: GA	12) Zip Code: 30504
13) Telephone Number: (770)297-2649		14) Fax Number:	
15) E-mail Address: kahmed@hallcounty.org			
16) Preferred means of communication: () E-mail () Letter (X) Both			

Dates & Response

17) Date Contacted 03/12/2026	18) Date Replied _____
(X) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	(☒) <u>Yes</u> () <u>No</u>
--	---

Consulting Party

2) FCC Registration Number (FRN):
3) Name: Hall County Historical Society, Inc.

Contact Name

4) First Name: Ron	5) MI:	6) Last Name: Hollis	7) Suffix: Sr
8) Title: President			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 380 Green Street NE	
11) City: Gainesville		12) State: GA	13) Zip Code: 30501
14) Telephone Number: [REDACTED]		15) Fax Number:	
16) E-mail Address: [REDACTED]			
17) Preferred means of communication: () E-mail () Letter (☒) Both			

Dates & Response

18) Date Contacted 02/03/2026	19) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

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

Consulting Party

2) FCC Registration Number (FRN):
3) Name: Georgia Mountains Regional Commission

Contact Name

4) First Name: Joe	5) MI:	6) Last Name: Rothwell	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box: 1720	And /Or	10) Street Address:	
11) City: Gainesville		12) State: GA	13) Zip Code: 30503
14) Telephone Number: (770)538-2626		15) Fax Number:	
16) E-mail Address: jrothwell@gmrc.ga.gov			
17) Preferred means of communication: () E-mail () Letter (☒) Both			

Dates & Response

18) Date Contacted 02/03/2026	19) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Designation of SHPO/THPO

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

SHPO/THPO

Name: **Georgia Historic Preservation Division**

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

SHPO/THPO Name: _____

SHPO/THPO Name: _____

SHPO/THPO Name: _____

Certification

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

Party Authorized to Sign

First Name: **Anna**

MI:

Last Name: **Ni**

Suffix:

Signature: **Anna Ni**

Date: **03/13/2026**

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

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

Attachments :

Type	Description	Date Entered
Other	Cover Letter	03/13/2026
Resumes/Vitae	Resumes	03/13/2026
Map Documents	Maps	03/13/2026
Additional Site Information	Site information	03/13/2026
Area of Potential Effects	APE	03/13/2026
Tribal/NHO Involvement	Tribal	03/13/2026
Historic Properties for Direct Effects	Direct APE	03/13/2026
Historic Properties for Visual Effects	Visual APE	03/13/2026
State-Specific Forms	State Specific Forms	03/13/2026
Photographs	Photos	03/13/2026
Local Government Involvement	Local government	03/13/2026
Public Involvement	Public Involvement	03/13/2026

Attachment 1. Consultant Information

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

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

Applicant's Name: Kelly Towers III LLC

Project Name: Gainesville

Project Number: 782453

FCC Form 620



MICHAEL HART

ASSISTANT PROJECT MANAGER

SENIOR HISTORIAN/ARCHITECTURAL HISTORIAN

Education

History/Anthropology, B.A.
Social Science Education, M.S.
Florida State University / Tallahassee, FL

Areas of Expertise

Mr. Hart operates as the primary professional point-of-contact regarding History, Architectural History, and Historic Preservation. Mr. Hart is a Secretary of the Interior (SOI) qualified Architectural Historian and Historian with fourteen years of professional experience in Historic Preservation.

Architectural History and Historic Preservation service expertise include:

Architectural Impacts	Form 620/621 Submittals
National Register Nominations	Historical Topographic Maps and Aerial Imagery
Historical Marker Applications	Local Government Consultation
Historic Resource Reports and Forms	Native American Consultation
SHPO Consultation	Section 106 Compliance
Field Reconnaissance	

Certifications/Affiliations

Historic Sites Specialist/Historic Preservationist for Florida Division of Historical Resources,
Tallahassee, FL, 2008-2022
Adjunct Instructor, Tallahassee Community College, Tallahassee, FL, 2010-Present

Applicant's Name: Kelly Towers III LLC

Project Name: Gainesville

Project Number: 782453

FCC Form 620



MACKENZIE MULKEY

SENIOR PROJECT ARCHAEOLOGIST

Education

M.A. Anthropology
East Carolina University / Greenville, NC

B.A. Anthropology
Clemson University / Clemson, SC

Areas of Expertise

Mrs. Mulkey is a SOI-qualified professional archaeologist with over 2 years of experience in terrestrial cultural resources management in the Southeast region. She has directed several Phase I archaeological projects of varying complexity, conducted archaeological assessments, historic context development, and public outreach activities. She has completed historical and archival research; artifact conservation, identification and cataloging; report preparation; and environmental assessment of sites. Mrs. Mulkey specializes in the archaeological investigation of 18th and 19th century archaeological sites.

Environmental service expertise includes:

Archaeological and Architectural Impacts	Field Reconnaissance
Soil Characterization	Section 106 Compliance
Historical Topographic Maps and Aerial Imagery	NEPA Environmental Assessments
Land Use History	

Certifications/Affiliations

OSHA 10-Hour Construction
Register of Professional Archaeologists (RPA), member since 2022
Section 106 Essentials, February 2023

Applicant's Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620



Professional Resume

ANNA NI

SENIOR PROJECT SCIENTIST

Education

Biology, B. S.

Virginia Commonwealth University/ Richmond, VA

Areas of Expertise

Ms. Anna Ni has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Anna Ni has experience delineating and characterizing waters and wetlands that may be located within a project area in accordance with accepted United States Army Corps of Engineers guidance throughout the United States.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Soil Characterization

Field Reconnaissance
NEPA Environmental Assessments
Migratory Bird Evaluations
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Land Use History
Waters/Wetland Delineations
Habitat Surveys

Certifications/Affiliations

Wetland Delineator, The Swamp School, LLC

Attachment 2. Site Information – Photographs

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

Photograph Requirements:

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

- a. Photographs taken from the site should show views from the proposed location in all directions. The direction (e.g., north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed site.**

Please see below to review directional photographs of the project area, which were taken by Mackenzie Mulkey on March 2, 2026, unless otherwise noted.

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

N/A

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

N/A

Aerial photographs of the site were obtained via Google Earth, imagery is dated to 2025.



Photograph 1 – Looking north at project lease area



Photograph 2 – Looking east at project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 3 – Looking south at project lease area



Photograph 4 – Looking west at project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026





Photograph 5 – Looking north away from project lease area



Photograph 6 – Looking east away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026





Photograph 7 – Looking south away from project lease area



Photograph 8 – Looking west away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026





Photograph 9 – STP 1



Photograph 10 – Access Road, looking southwest away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026





Photograph 11 – Access Road, looking northeast towards project lease area



Photograph 12 – Access Road, looking southwest away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026

 **TRILEAF**
environmental architecture engineering



Photograph 13 – Access Road, looking southeast away from project lease area



Photograph 14 – Access Road, looking northeast towards project lease area from terminus

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026



Please refer to Appendix B for Site Maps



Attachment 3. Site Information – Map Requirements

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

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

The following maps have been attached to this report:

7.5-min Topographic Quad Map with Project Location, 2024

Aerial Imagery with Project Location and APE

Modern Soil Map with Project Location

Map of Archaeological Surveys within 1-mile of the Project Location

Map of Architectural Resources within the APE-VE

7.5-min Topographic Quad Map with Project Location, 1964

Map of Shovel Test Pit Locations and Project Boundary

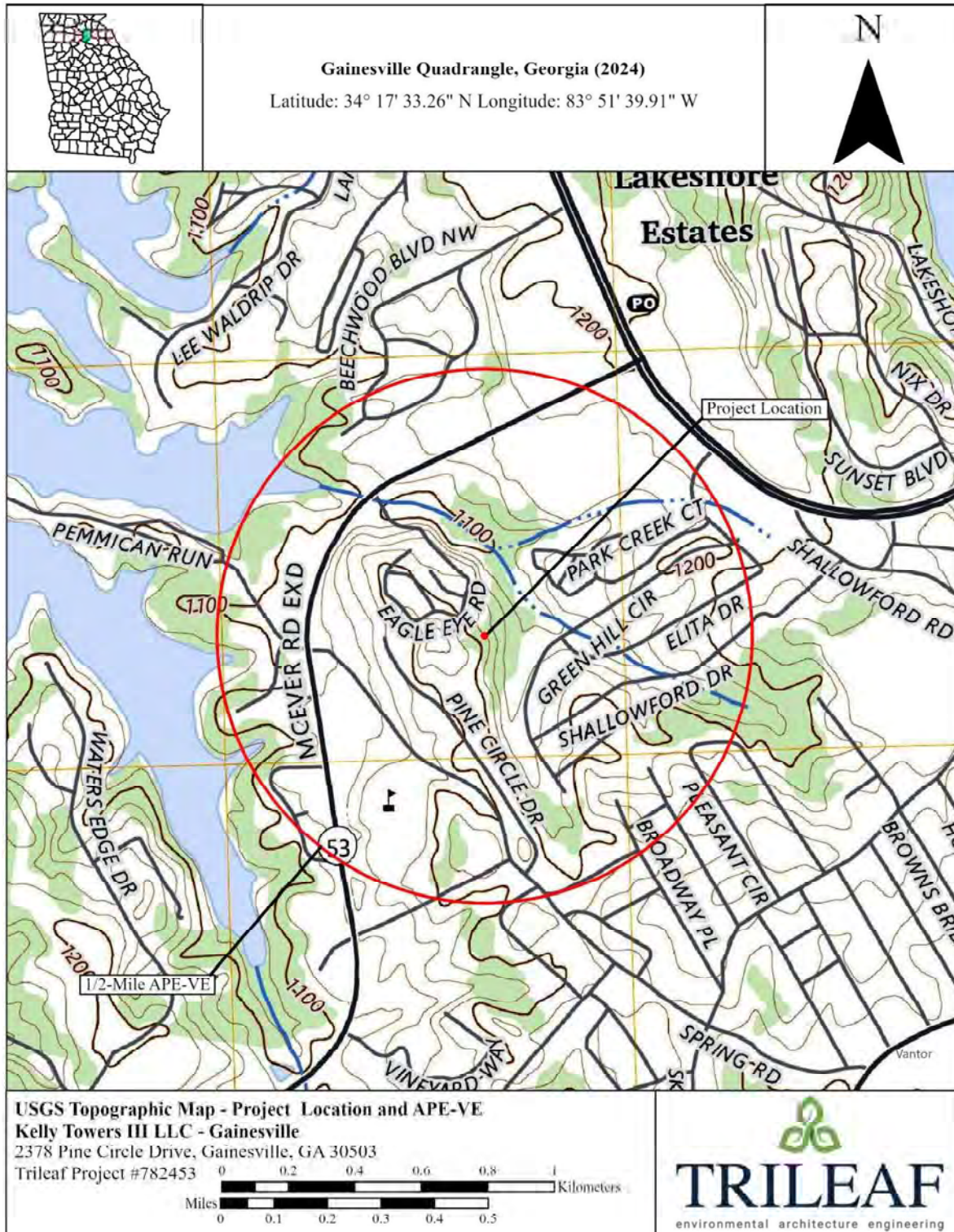
Photo Location Map

Please refer to Appendix B for Site Maps



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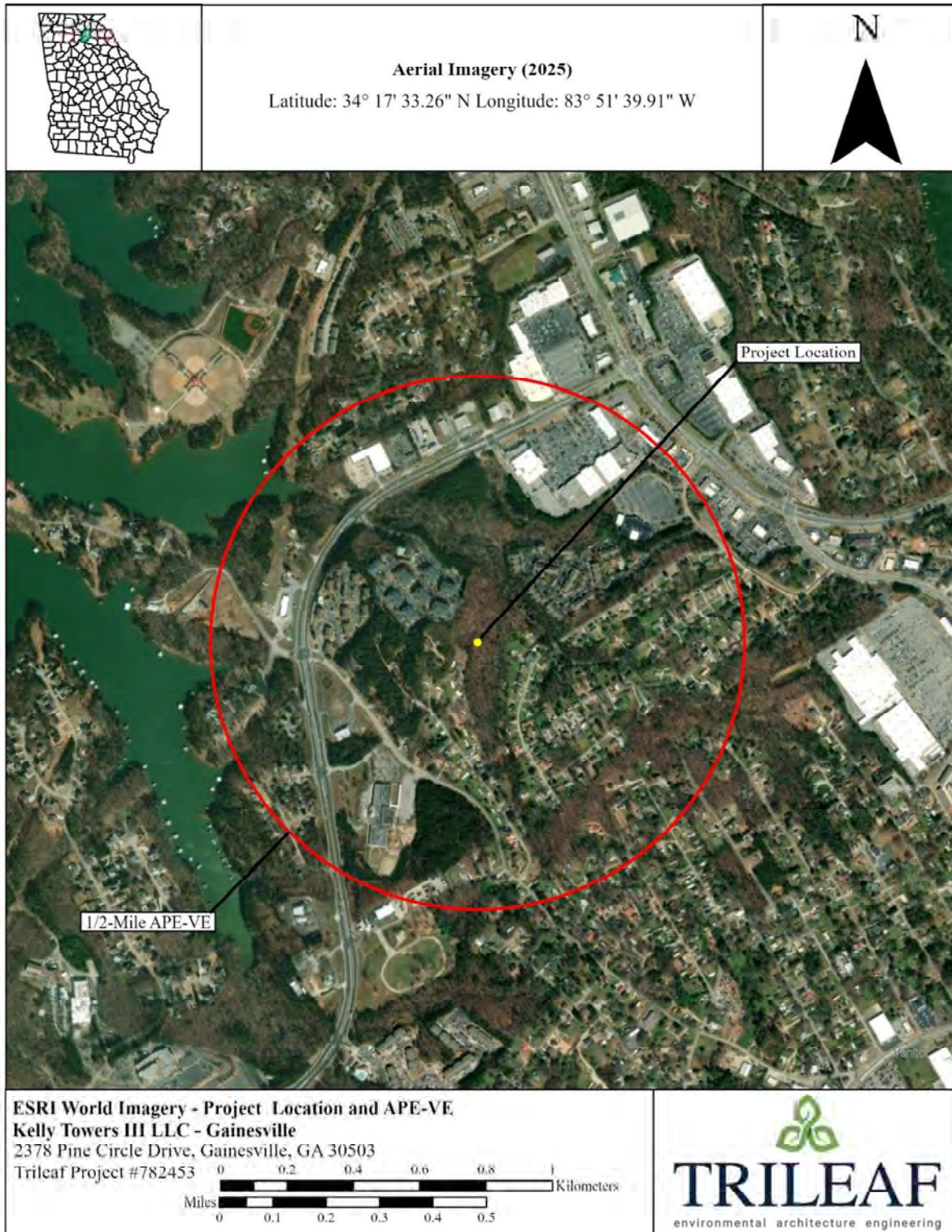
Approved by OMB
3060-1039
See instructions for
Public burden estimates



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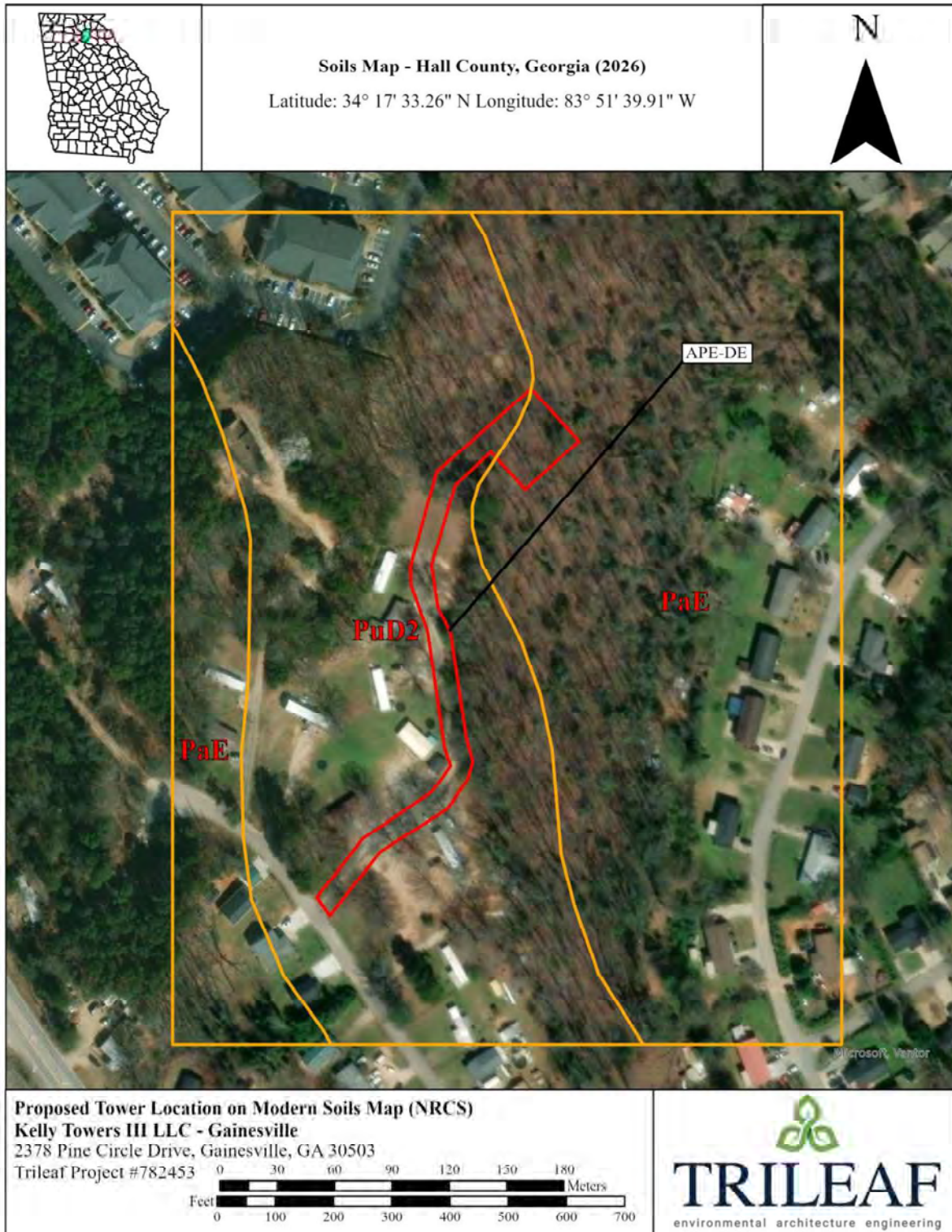
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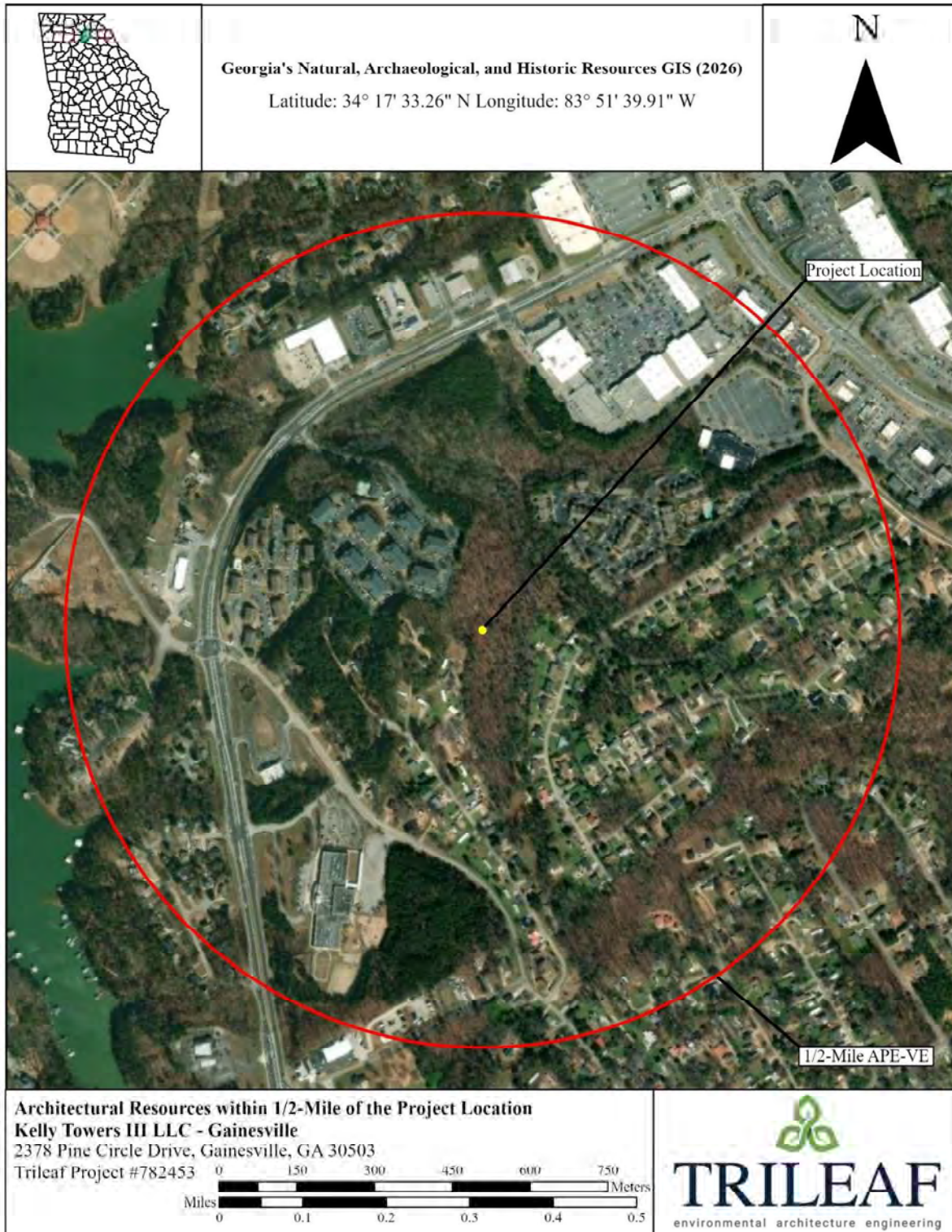
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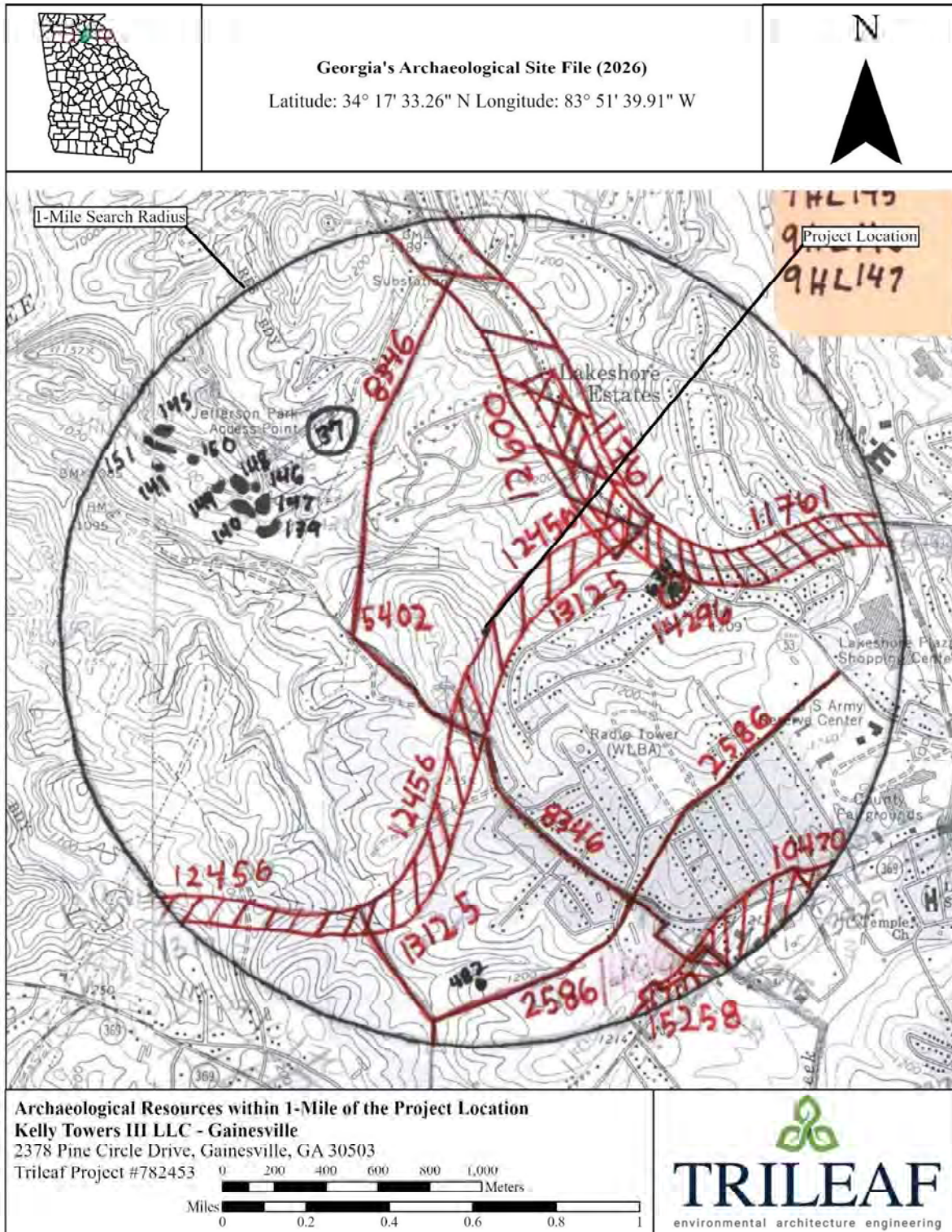
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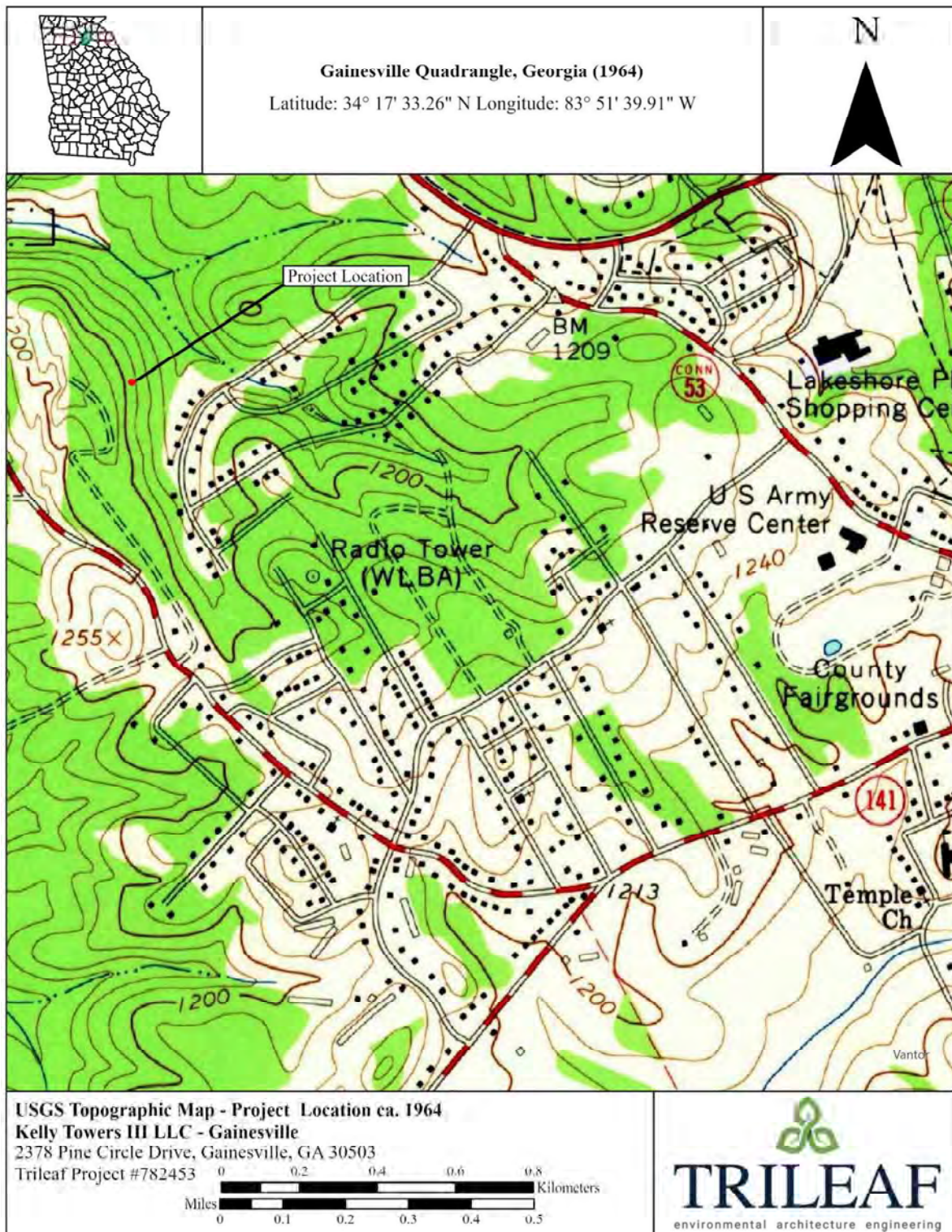
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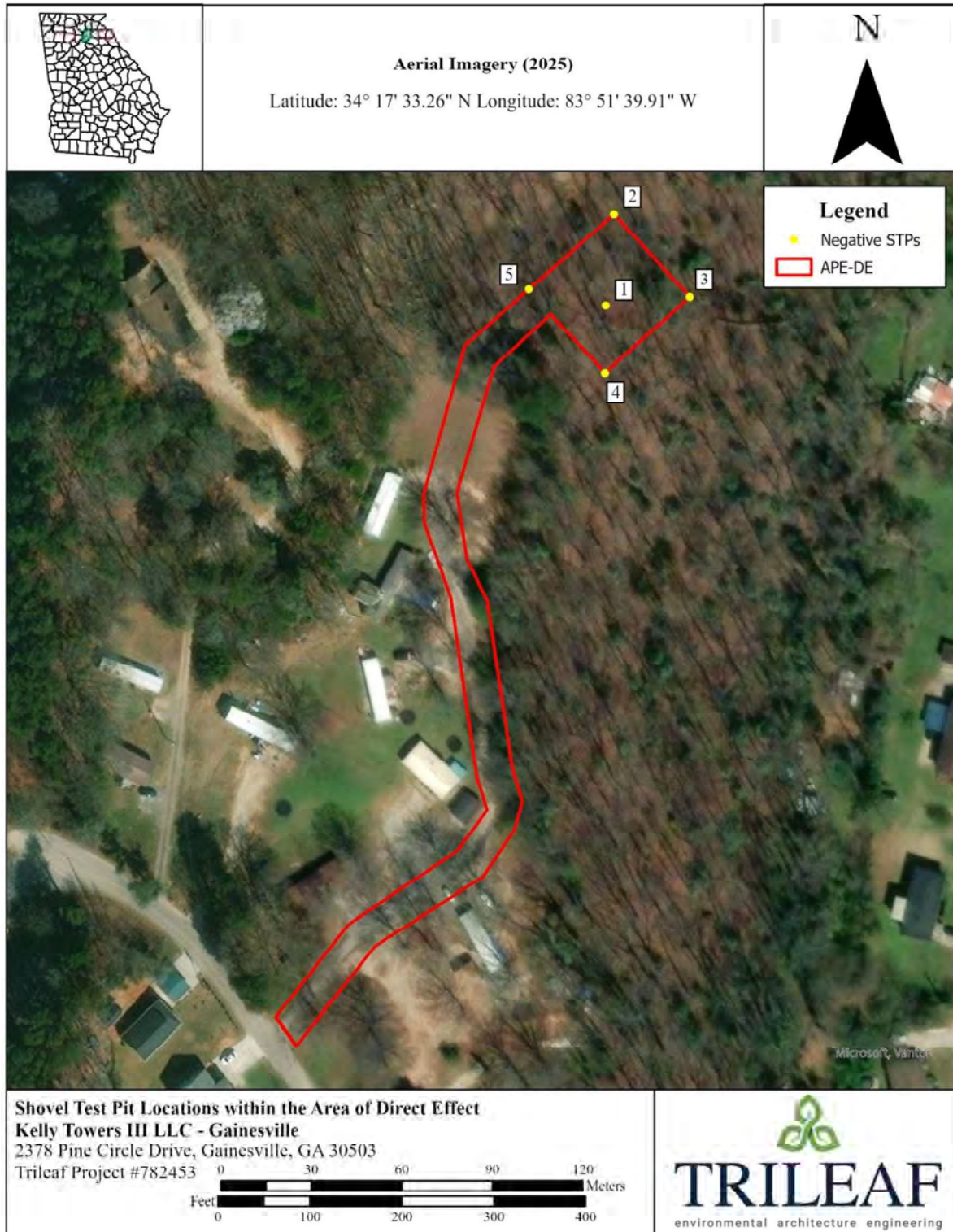
Project Name: Gainesville

Project Number: 782453

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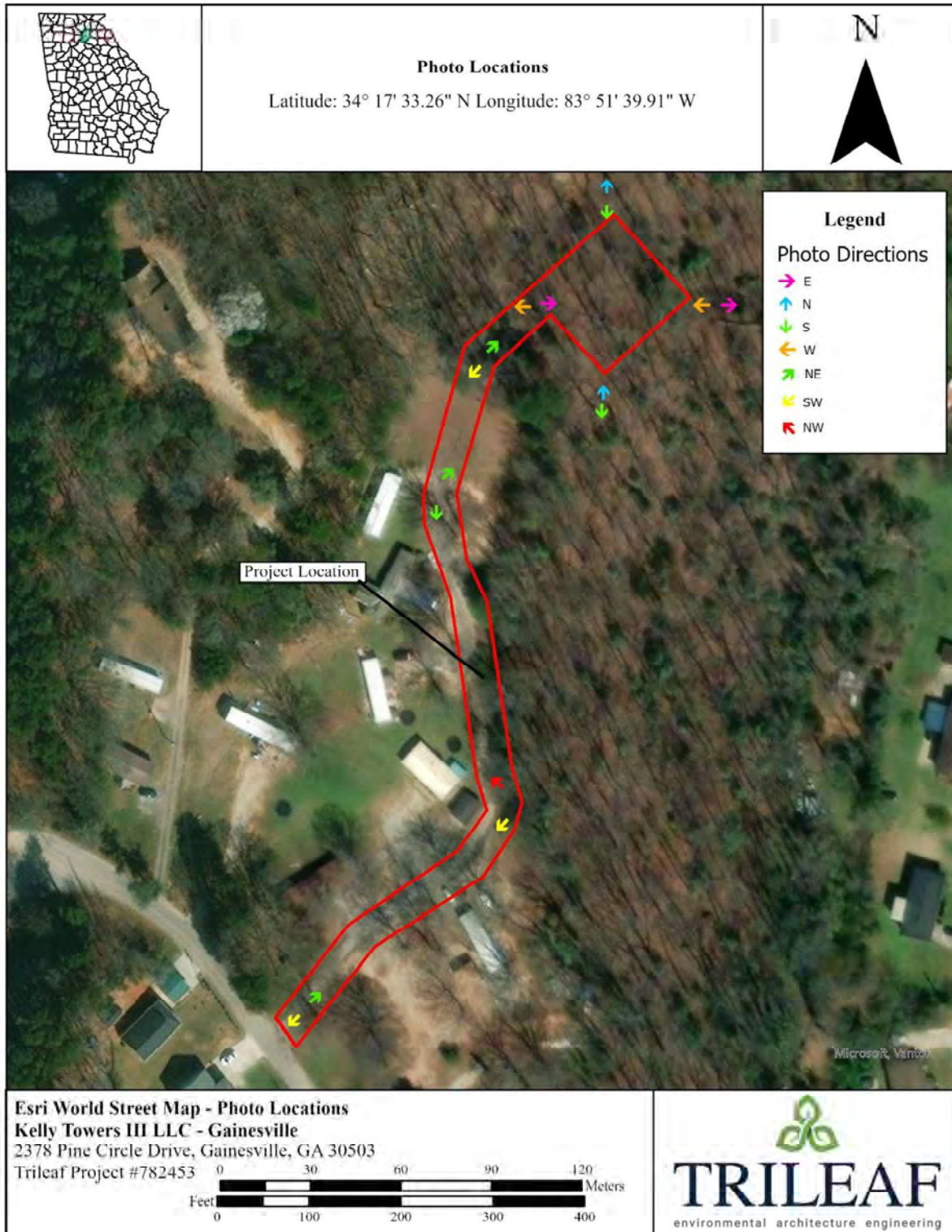
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See instructions for
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Applicant's Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620

Attachment 4. Site Information – Additional Site Information

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site.

The proposed project is for a monopole telecommunications tower site in Gainesville, Hall County, Georgia. Gainesville (34° 17' 33.263" N, 83° 51' 39.914" W), is within a wooded area, located northwest of the intersection of Pine Circle Drive and Spring Road.

With this project, *Kelly Towers III LLC* proposes 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.

Total acreage of the new construction area is approximately 0.74 acre (0.29 hectare).

The construction drawings provided by *Kelly Towers III LLC* are included in this attachment.

Please refer to Appendix A for Site Plans



Attachment 5. Area of Potential Effects

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

Areas of Potential Effect Guidelines:

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

Under the NPA for FCC Projects, the Direct APE (APE-DE) “is defined as the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the undertaking” (FCC 2004). On November 24, 2008, the FCC further clarified that the APE-DE is limited to the tower or non-tower structure on which the collocation will be mounted as well as the lease area including the access route and utility corridor. The APE-DE for this project consists of the 100-foot by 100-foot (10,000-square-feet) lease area and a 30-foot-wide access/utility easement that will extend approximately 750 feet generally southwest and southeast and terminate at Pine Circle Drive.

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

Per the NPA, the Visual APE (APE-VE) is the “geographic area in which the project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP)” (FCC 2004). The presumed APE-VE for construction of new facilities is the area from where the tower will be visible: a. Within a ½ mile from the tower site if the proposed tower is 200 feet or less in height; b. Within ¾ of a mile from the tower site if the proposed tower is more than 200 but no more than 400 feet in overall height; or c. Within 1½ miles from the tower site if the proposed tower is more than 400 feet in overall height.

Taking into consideration the maximum height of the proposed undertaking (199 feet) and the scale of the installation, Trileaf determined that the current project’s APE for visual effects will encompass a ½-mile radius from the subject property.

Attachment 5. Continued**Mitigation of Effect Guidelines:**

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

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

N/A

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

N/A

For each property identified as a Historic Property in the online e-106 form:

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

Trileaf archaeologist, Mackenzie Mulkey, performed this survey in response to the planned use of the above-described parcel and the potential impacts that such use might present to any archaeological and architectural cultural resources within the project area. Mrs. Mulkey meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Archaeology and is currently certified by the Register of Professional Archaeologists.

Field investigations were preceded by a period of archival research to determine what, if anything, could be predicted concerning precontact, contact, or post contact archaeological and/or architectural sensitivities prior to the onset of fieldwork. To assess these potentials, the Georgia Archaeological Site Files (GASF) and holdings were reviewed on March 6 2026. Trileaf reviewed numerous cartographic and ethnohistoric databases, including the NRHP and the USGS Earth Explorer data portal. Maps specifically referenced in our research included the USGS 1964 Gainesville, GA and 2024 Gainesville, GA 7.5-minute topographic quadrangles and aerial images captured by the USGS in 1955, 1963, 1981, 1993, 2007, 2017, and 2023. In 1955, the project area is a wooded area with surrounding wooded areas and small areas of open land, with Spring Road and Pine Circle Drive already existing to the south of the project area. In 1963, the project area remains wooded with residential development starting to the east of the project area with numerous completed structures. By 1981, there is more residential development south of the

Applicant's Name: Kelly Towers III LLC

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Attachment 5. Continued

project area off of Pine Circle Drive, while the project area remains wooded. There is gradual development in the area but no significant development until 2007, when an apartment complex was constructed to the west of the project area. The project area has remained wooded, with small development to the immediate south and the surrounding areas to the east, west and south. The current site visit confirms the project area is located within a wooded area north of an existing mobile home community off of Pine Circle Drive.

A review of the GASF files provided shows no previous archaeological surveys nor previously recorded sites in the project area. There are ten (10) archaeological surveys, and thirteen (13) archaeological sites previously recorded within 1-mile of the project area. No significant archaeological resources were located.

Additionally, a review of the GASF and NRHP databases was performed prior to fieldwork on February 5, 2026, by Trileaf Senior Historian Michael Hart, who meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Architectural History, has reviewed these results. There are no NRHP-listed or NRHP-eligible resources identified within the APE for Visual effects

Based on the findings of this survey, it is recommended that there will be ***No Historic Properties within both the Direct and Visual APE***. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area.

Please see the attached Cultural Resources Survey Report for additional information.



Gainesville

Trileaf Project #782453

Client #GA2012

2378 Pine Circle Drive
Gainesville, GA 30503

CULTURAL RESOURCES SURVEY



Prepared For:
Kelly Towers III LLC
3708 Stonewall Circle
Atlanta, GA 30339

**Cultural Resources Survey of the Gainesville
Telecommunication Project, Gainesville, Hall County, GA
Trileaf Project #782453**

PREPARED AND WRITTEN BY:

Trileaf Corporation

1775 The Exchange SE
Suite 525
Atlanta, Georgia 30339

Mackenzie Mulkey, M.A., RPA

Senior Project Archaeologist
864-630-4367
m.mulkey@trileaf.com

Michael Hart, M.S.

Senior Historian/Assistant Project Manager

Trileaf Project # 782453

Lead Agency

Federal Communications Commission (FCC)

March 2026

ABSTRACT AND MANAGEMENT SUMMARY

In March 2026, Trileaf Corporation (Trileaf) performed a cultural resource inventory survey for a proposed self-support telecommunications tower located in Gainesville, Hall County, Georgia. The proposed project is located within a wooded area and existing paved drive.

Kelly Towers III LLC proposes 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. Total acreage of the new construction area is approximately 0.74 acre (0.29 hectare).

Trileaf Senior Project Archaeologist Mackenzie Mulkey, M.A., RPA, performed this survey in response to the planned use of the above-described parcel and the potential impacts that such use might present to archaeological and architectural cultural resources. The Phase I cultural resource survey was designed to discover all prehistoric and historical period cultural resources that might be present within the project area.

The field survey of the project area, which included a pedestrian survey, shovel testing, and visual inspection, yielded no evidence for the presence of archaeological or above ground historic properties within the Direct APE for the current project. Archival research prior to field investigations was conducted by Senior Project Archaeologist Mackenzie Mulkey (B.A. Anthropology, Clemson University and M.A. Anthropology, East Carolina University), as was fieldwork, photography, maps, and the final report production. Mrs. Mulkey meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Archaeology and is currently certified by the Register of Professional Archaeologists. Architectural research was conducted by Michael Hart, Senior Historian/Assistant Project Manager (History/Anthropology, B.A. and Social Science Education, M.S., Florida State University). Mr. Hart meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards for Architectural History.

Background information provided by the Georgia Archaeological Site Files (GASF) identified the project area has not been previously surveyed. There are no (0) previously recorded archaeological sites in the project area. There are thirteen (13) previously recorded archaeological sites and ten (10) previously recorded archaeological surveys within 1-mile of the project area.

Senior Historian Michael Hart reviewed of The National Register of Historic Places, Georgia's Natural Archaeological and Historical Resources GIS (GNAHRGIS) files, and local lists of historic structures identified no (0) National Register of Historic Places (NRHP)-listed or NRHP-eligible properties within the Direct APE nor the 1/2-mile radius APE-VE.

The field investigation of the project areas, which included pedestrian reconnaissance and shovel testing, yielded no evidence for archaeological sites in the APE-DE. Additionally, no architectural properties within the APE-DE were identified within the proposed project's APE-VE.

Based on these findings, Trileaf recommends ***No Historic Properties within both the APE-DE and the APE-VE***. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area. All work on the current project was completed between January 28 – March 9, 2026.

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SECTION 1.0 - INTRODUCTION

The FCC requires licensees and their representatives to consider the effects of their actions on historic properties, in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the National Environmental Policy Act of 1969 (NEPA) (Federal Communications Commission 1996). The NHPA (54 U.S.C. § 300308) defines a historic property as any “prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on, the National Register of Historic Places, including artifacts, records, and material remains related to such a property or resource.” Applicants are required to assess and report all potential effects to Historic Properties as part of the Section 106 process prior to construction.

In March 2026, Trileaf Corporation (Trileaf) performed a cultural resource inventory survey for a proposed self-support tower located in Gainesville, Hall County, GA. The proposed project is located within a wooded area.

Kelly Towers III LLC proposes 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. Total acreage of the new construction area is approximately 0.74 acre (0.29 hectare).

Trileaf Senior Project Archaeologist Mackenzie Mulkey, M.A., performed the present cultural resources survey to identify and evaluate the potential impacts that the above-described Project might present to Historic Properties within both the Direct and Visual Areas of Potential Effects. As such, the present survey was designed to discover all NRHP-eligible or listed archaeological and above ground cultural resources present within the Project area.

Archival research prior to field investigations was conducted by Senior Project Archaeologist Mackenzie Mulkey (B.A. Anthropology, Clemson University and M.A. Anthropology, East Carolina University), as was fieldwork, photography, maps, and the final report production. Mrs. Mulkey meets the Secretary of the Interior’s Historic Preservation Professional Qualifications Standards for Archaeology and is currently certified by the Register of Professional Archaeologists. Architectural research was conducted by Michael Hart, Senior Historian/Assistant Project Manager (History/Anthropology, B.A. and Social Science Education, M.S., Florida State University). Mr. Hart meets the Secretary of the Interior’s Historic Preservation Professional Qualification Standards for Architectural History. All work on the current project was completed between January 28 – March 9, 2026.

1.1 AREA OF POTENTIAL EFFECTS (APE)

Under the NPA for FCC Projects, the Direct APE (APE-DE) “is defined as the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the undertaking” (FCC 2004). On November 24, 2008, the FCC further clarified that the APE-DE is limited to the tower or non-tower structure on which the collocation will be mounted as well as the lease area including the access route and utility corridor. The APE-DE for this project consists of the 100-foot by 100-foot (10,000-square-foot) lease area and a 30-foot-wide access/utility easement that will extend approximately 750 feet generally southwest and southeast and terminate at Pine Circle Drive.

Per the NPA, the Visual APE (APE-VE) is the “geographic area in which the project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP)” (FCC 2004). The presumed APE-VE for construction of new facilities is the area from where the tower will be visible: a. Within a 1/2 mile from the tower location if the proposed tower is 200 feet or less in height; b. Within 3/4 of a mile from the tower location if the proposed tower is more than

200 but no more than 400 feet in overall height; or c. Within 1½ miles from the tower location if the proposed tower is more than 400 feet in overall height.

Taking into consideration the maximum height of the proposed undertaking (199 feet) and the scale of the installation, Trileaf determined that the current project's APE for visual effects will encompass a ½-mile radius from the subject property (Figure 1 and Figure 2).

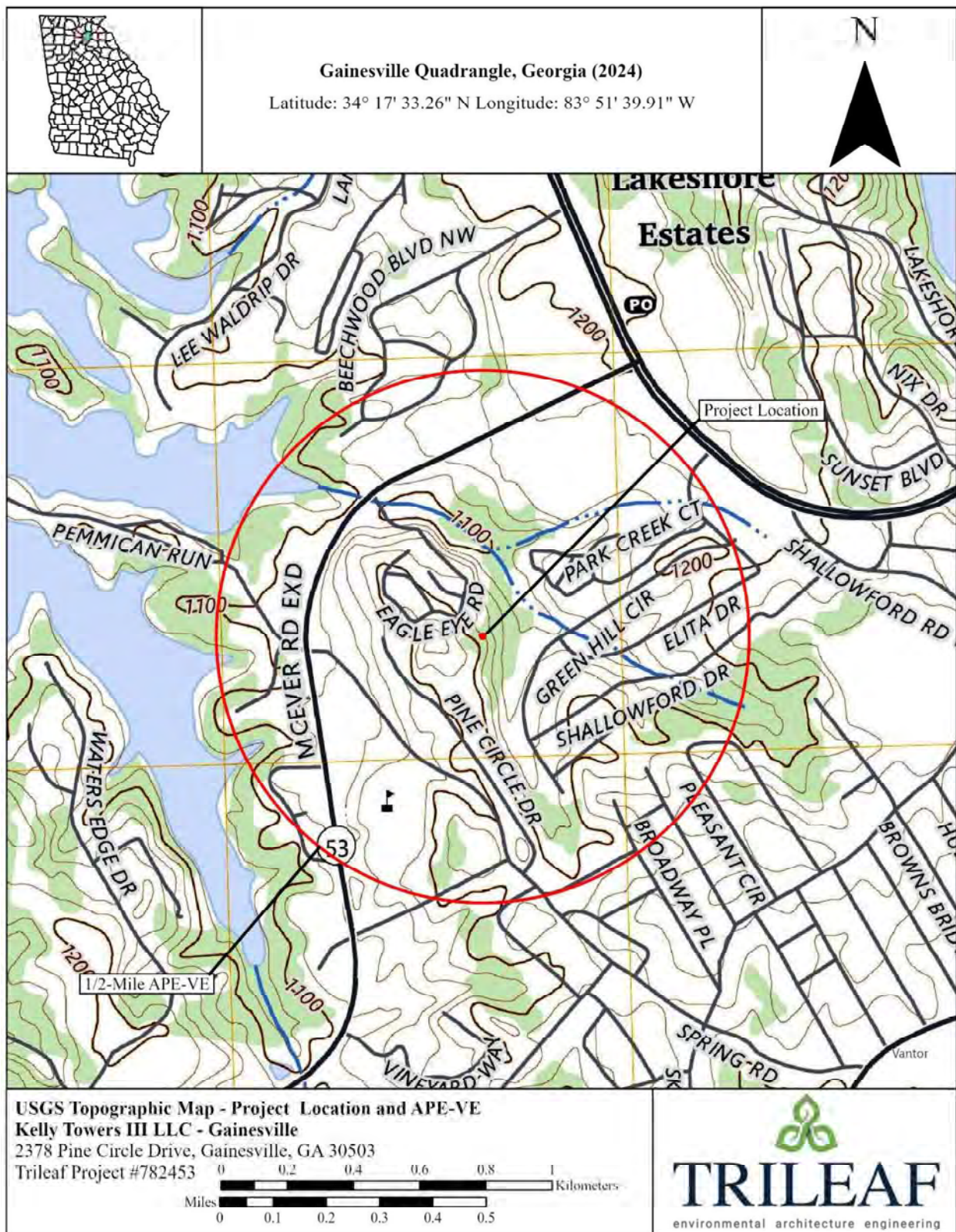


Figure 1: General Location of Proposed Cell Tower Installation



Figure 2: Aerial map of Project Location

1.2 PROJECT PLANS AND PHOTOGRAPHS

Please reference Figure 3 to review the construction drawing provided by *Kelly Towers III LLC*. Also, please reference Appendix A to review photographs of the project area, which were taken by Mackenzie Mulkey on March 2, 2026, unless otherwise noted.

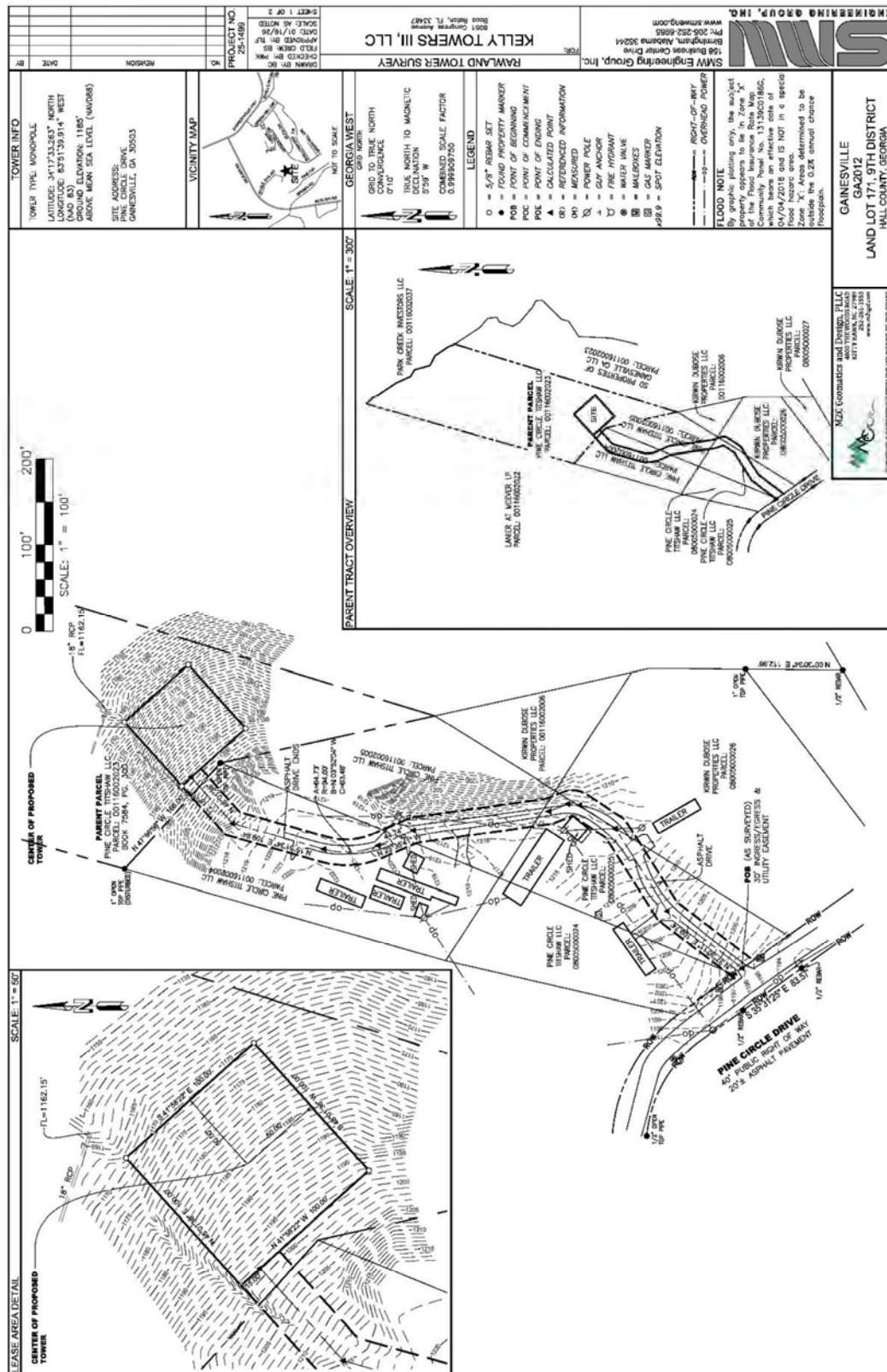


Figure 3: Site Plan of Proposed Cell Tower Location and Installation (Kelly Towers III LLC 2026)

SECTION 2.0 - PROJECT SETTING

2.1 SOILS

According to the U.S. Soil Conservation Service Soil Survey of Hall County, Georgia, the eastern three-fourths of the proposed lease area is underlain by Pacolet sandy loam with 15 to 25 percent slopes. Pacolet soils occur in the Piedmont uplands from residuum weathered from granite and gneiss and/or residuum weathered from schist, are well drained, with moderate permeability, and moderately high to high water storage capacity. They do not flood or pond and consist of one (1) layer of sandy loam from 0 to 3 inches, followed by one (1) layer of clay from 3 to 29 inches, followed by one (1) layer of sandy clay loam from 29 to 52 inches, followed by one (1) layer of loam from 52 to 70 inches, subsurface.

Approximately one fourth of the proposed lease area and the entire access/utility easement is underlain by Pacolet soils with 10 to 15 percent slopes. Pacolet soils occur in the Piedmont uplands from residuum weathered from granite and gneiss and/or residuum weathered from schist, are well drained, with moderate permeability, and moderately high to high water storage capacity. They do not flood or pond and consist of one (1) layer of clay loam from 0 to 3 inches, followed by one (1) layer of clay from 3 to 29 inches, followed by one (1) layer of sandy clay loam from 29 to 52 inches, followed by one (1) layer of loam from 52 to 70 inches, subsurface (Figure 4; USDA, NRCS 2026).

2.2 ELEVATIONS

Elevations range between 1100-1220 feet (335.3–371.8 meters) above mean sea level (AMSL) in the surrounding area, with the project area elevation at approximately 1186 feet (361.4 meters) AMSL. The project is located in the Chattahoochee River watershed boundary and drainage is generally north/northwest towards the Chattahoochee River and its tributaries (EPA 2026).

2.3 ENVIRONMENTAL SETTING

Hall County lies within the Southern Piedmont of the South Atlantic and Gulf Slope Cash Crops, Forest, and Livestock Region, in Georgia and is defined as a large piedmont with dissected landscape of metamorphic and igneous bedrock that is rolling to hilly and covered with mixed hardwood pine forest. Elevations range from 325 to 1,315 feet (100 to 400 meters). The average annual precipitation in most of this area is 40 to 70 inches (1,016 to 1,777 millimeters). The precipitation occurs evenly throughout the year, with occasional drought-like conditions from late summer into autumn. Rainfall is of high-intensity, convective thunderstorms during the growing season. Significant moisture also comes from the movement of warm and cold fronts across the MLRA from November to April. At the same time of year, high amounts of rain can occur during hurricanes. Snowfall is typically light. This area supports a variety of natural vegetation due to the climatic differences between the northern and southern regions. Loblolly and slash pine, white oak, red oak, gum, yellow-poplar, and sycamore are dominant overstory vegetation in the uplands. Water tupelo, swamp blackgum, bald cypress, sweet gum, and red maple are dominant overstory vegetation in the lowlands. Dogwood, honeysuckle, Pinehill bluestem, and briars are dominant understory vegetation. Some of the major wildlife species in this area are white-tailed deer, cottontail, squirrel, bobwhite quail, and mourning dove (MLRA Explorer 2022).

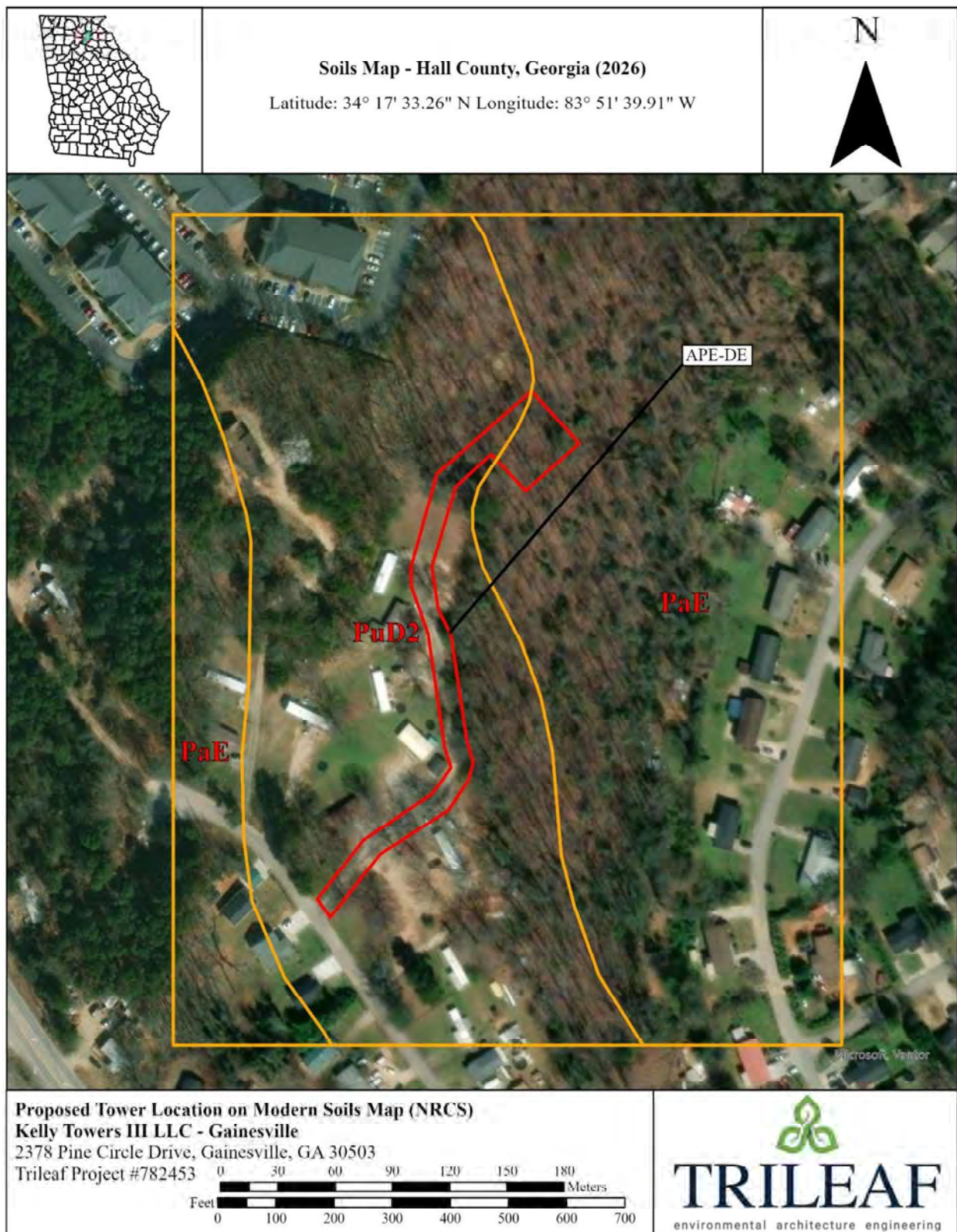


Figure 4: Location of Proposed Cell Tower Location on Modern Soil Map (USDA; NRCS 2026)

2.4 CULTURAL SETTING

The precontact occupation of Georgia has been generally established to include 10 temporal traditions. These traditions apply, in varying degrees, throughout the region. They are considered the cultural context in which the interpretation of cultural information is assessed, specifically in terms of NRHP eligibility. These dates should be accepted as broad, chronological reference points for Georgia's archaeological record that set the background for regional variations.

Paleoindian (>10,000-8,000 B.C.) and Early Archaic (8,000-6,000 B.C.) period. Native Americans were thought to have settled in North America prior to 10,000 B.C. By this time Clovis people were dispersed throughout the North American continent. Very little of the Paleoindian period in Georgia is known (Wettstaed 2010: 7).

Limited excavations of Early Archaic sites have occurred in Georgia and this period of history is poorly understood by researchers at this time. Several styles of projectile points are associated with Early Archaic Georgian sites. Patterns of settlement during the Early Archaic period in the Piedmont centered near uplands away from major floodplains. However, some sites cluster near shoals. Three site types characterize the Early Archaic period: seasonal camps, stone quarry sites, and larger settlement camps near shoals. Seasonal camps were established predominantly along small floodplains and spur ridges near fresh-water springs. Based on some of the non-local raw materials used for lithic tool production, Early Archaic people must have had extensive contact with others along major drainage systems (Wettstaed 2010: 8).

Middle Archaic period (6,000 - 3,000 B.C.). Significant changes in settlement patterns defined this period in Georgia. During this time the people of the Coastal Plain and the Piedmont began to adapt differently to their environment. During the Middle Archaic period archaeological evidence suggests the people of the region began to shift from a primarily hunter/gatherer society to a more sedentary lifestyle (Wettstaed 2010: 9). Morrow Mountain points are one of the best known Middle Archaic projectile types of this region and dates to around 5,500 and 3,000 B.C. Other tool kits found at similar sites in Georgia as well as excavation data indicate that these Middle Archaic sites were mainly used as short-term campsites (Wettstaed 2010: 9).

Late Archaic period (3,000 – 1,000 B.C.). Archaeological data relating to the Late Archaic period show an increase in storage and cooking technologies, most notably with ceramics. The Stallings culture, known for its fire-tempered pottery, first appears in Georgia in the coastal areas around 2,500 B.C., and spread northward along the Savannah River until approximately 1,200 B.C. (Wettstaed 2010: 9). Late Archaic habitations in north Georgia expanded in size and permanence, allowing for increased trade and an increase in commitment of surplus labor. Surplus labor provided items such as soapstone bowls, cooking slabs, ceramic vessels, and possibly even banner stones that could be used to bind neighboring groups together into a solid system of trade and reciprocity (Stanyard 2003: 51). The hafted biface most popular in the Late Archaic tradition in Georgia is the Savannah River projectile point. Savannah River points are large with either a straight or slightly contracting stem, straight base, and triangular blade; although slightly indented bases sometimes occur. These points are associated with the broad-spear tradition of the Late Archaic and covered all of the Eastern Woodlands (Stanyard 2003: 51-53).

Woodland period (1,000 B.C. - A.D. 900). The Woodland period was thought to have lasted from circa 1200 B.C. to A.D. 900. The period was divided into three sub periods; the Early, Middle, and Late, with each stage characterized by the development and widespread use of pottery, the rise and fall of regional ceremonial complexes, and an overall rise in population density with increased reliance on agriculture that eventually led to the Mississippian period in the Southeast. The Late Woodland period is generally believed to have occurred from approximately A.D. 400 to 1000 (Anderson and Mainfort 2002: 1-16). The Late Woodland period is best characterized as a time of cultural change, although Wynn et al (1994: D-8), states that the Late Woodland Period "remains one of the poorest known time periods in Georgia," which could be attributed to a lack of archaeological data. There is evidence of widespread population growth during this time as well as the technological advancement of the bow and arrow (Anderson and Mainfort 2002:

15). Artifacts characterizing the Late Woodland period in Georgia north of the Fall Line are the Late Swift Creek and Napier styles of pottery. Swift Creek ceramics are characterized by a variety of complicated stamping techniques ranging from concentric circular patterns to simplistic curvilinear designs. Earlier styles had notched and scalloped lips and small tetrapods with later varieties of Swift Creek ceramics having small to large folded rims. Napier style pottery evolved from the Middle Woodland Swift Creek designs which later developed into Woodstock pottery characteristic of the Early Mississippian period of North Georgia. Napier Complicated Stamped pottery is known for rectilinear stamping with parallel filler lines (Cable et al 1997: 57; Anderson 1996: 129; Rudolph 1991: 261; Wettstaed 2010: 12).

Early Mississippian period (A.D. 900-1200). Mississippian period sites are largely associated with earthen mounds situated within plazas near or on alluvial plains, and subsistence on a variety of agricultural foods, but centered on the cultivation of maize. However, not all Mississippian sites contain mounds. Smaller settlements in Georgia have included farmsteads and seasonal camps. Political hierarchy in the Mississippian period is thought to have been governed by hereditary chiefs controlling the mound centers with smaller sub-chiefs ruling periphery areas and controlling the flow of economic goods between chiefs and their lesser subjects. Mississippian communities utilized a variety of diverse agricultural as well as hunting and gathering techniques (Cable et al 1997: 59-60). The Early Mississippian period began circa A.D. 900 and lasted to approximately A.D. 1200. The Early Mississippian period in the Georgia Piedmont is characterized by Woodstock ceramics, a style similar to preceding Napier pottery, with sand tempered, wide-mouthed conoidal jars, and the Vining phase, which is sand tempered with plain or simple stamped finishing (Cable et al 1997: 59; Hally and Rudolph 1986: 19-29; Wettstaed 2010: 12).

Middle (A.D. 1200 – 1350) and Late Mississippian (A.D. 1350 – 1600) periods. More is known about the Middle to Late Mississippian periods in Georgia than any other of the precontact eras. The Middle and Late Mississippian periods are both categorized based on differing styles of pottery (Wettstaed 2010: 13). The Middle Mississippian period lasted in the Georgia Piedmont from A.D. 1200 to 1350. The Savannah culture is the only culture recognized in the Piedmont during this time. The Savannah culture is defined by four distinct pottery types: Savannah Complicated Stamped, Etowah Complicated Stamped, Savannah Checked Stamped, and Savannah Plain (Hally and Rudolph 1986: 51). Major characterizations in Middle Mississippian pottery are one and two bar concentric circle and concentric diamond motifs, figure eights, curvilinear designs, and cord marking (Cable et al 1997: 61; Hally and Rudolph 1986: 51). Archaeological evidence shows an abundance of burial goods and prestige items in Savannah culture assemblages suggesting that the Middle Mississippian period in the Piedmont of Georgia was at a high point of ceremonialism and maintained a flourishing economy. Many Savannah sites are located in upland environments suggesting that the Savannah culture was not limited to floodplain settings alone. At the end of the Middle Mississippian period an overall decline in ceremonialism and mound building took place and after circa A.D. 1350 the large mound centers were mostly abandoned (Cable et al 1997: 61-62).

The Late Mississippian period stretches from circa A.D. 1350 to 1600 and is most characterized in the Georgia Piedmont by the transition of the Savannah to the Lamar culture and ends with European contact (Williams and Shapiro 1990). The Lamar in Georgia is the only recognized culture during this time and is defined on the basis of three main pottery styles: Lamar Complicated Stamped, Lamar Incised, and Lamar Plain, as well as a particular vessel shape mode: the thickened jar rim (Hally and Rudolph 1986: 63). Additionally, Late Mississippian trends in Lamar ceramics can be divided into three distinctive time periods (Early, Middle, Late) and each major Lamar phase further subdivided into four temporal periods in relation to more defined attributes in pottery styles. The Scull Shoals phase, circa A.D. 1375, is the phase immediately preceding Lamar, and is identified by rolled and unmodified rims, sloppy Savannah and Etowah stamping, and red filming. The Duvall phase, circa A.D. 1450, is identified by narrow punctate rim folds or applied strips, fairly clear stamping, and very little incising. The Iron Horse phase, circa A.D. 1530, is identified by narrow folded rims, unrecognizable stamping designs, and 2-3-line bold incising. The Dyar phase, circa A.D. 1590, is identified by wide rim folds, bold to medium multiple line incising, and very little use of stamping. The Bell phase, circa A.D. 1650, is identified by rim folds wider than Dyar phase, medium to fine multiple line incising, very little use of stamping, and T-rims (Ledbetter and Wynn 1988: 11-16).

During the Late Mississippian period in the Georgia Piedmont ceremonialism began to decline, even disappearing in some areas altogether. However, some aspects of the Late Mississippian culture were carried over into the Historic Period (White 1988: 112). Archaeological evidence has shown that the Oconee River Valley in the Lower Piedmont was an important political district during the Lamar period. A total of five mound centers are located within the Oconee River Valley, with each center containing one to five mounds each. The mound centers include: Scull Shoals (9GE4), Dyar (9GE5), Shoulderbone (9HK1), Shinholser (9BL1), and Little River (9MG46). The spacing between these five sites show that Late Mississippian mound centers in north Georgia administered districts approximately 20 km (one day's walk) in radius (Smith and Kowalewski 1980: 1-13). The close proximity of these five mound centers could potentially have administered most of the lower Piedmont of the Oconee watershed. During the Dyar and Bell phases (A.D. 1520-ca. 1670), large portions of outlying terrain within 23km of the area's five mound centers were occupied as farmsteads. Farmsteads were generally built on level ground near tributary streams with one circular "winter house" and approximately one to four rectangular "summer houses". Surrounding woodlands were cleared for agriculture that could provide a variety of crops for the household (Hatch 1995: 135-155).

Local History (1770 to 1990). Hall County, in northeastern Georgia was formed in 1818 from Native American territories. Hall County was named after Lyman Hall, a signer of the Declaration of Independence and the governor of Georgia from 1783 to 1784. The early settlers of the area were mainly Scots Irish, English and Germans from the surrounding Carolinas and Virginia. When gold was discovered north of the county in 1828, thousands of settlers were attracted to the area, however once the gold rush passed, the area switched back to mainly small-farm grain and livestock agriculture economy. Hall County was not directly involved in the Civil War but did provide nine companies worth of men to the Southern cause and General James Longstreet moved to the area and purchased land in anticipation of it becoming a railroad hub. In 1871, railroads came to the county and contributed to the textile industry in which three large mills dominated employment of the county in the mid-1900's. After the Gainesville tornado of 1936 and the start of World War II, Gainesville was the location of the rise in the state's poultry industry. The poultry industry replaced the textile industry as the leading industry. In the 1950's, the Chattahoochee River was dammed, which flooded 38,000 acres to create Lake Lanier. Lake Lanier brings millions of visitors to the county each year, making the modern Hall County what it is today. Hall County serves as northeast Georgia's hub for banking, industry, health care, and culture (Gurr 2004).

According to the 2024 U.S. Census Bureau (USCB), the population of Hall County is 221,745. Hall County is home to Brenau University, University of North Georgia, Lank Lanier and Lanier Technical College (USCB 2024; Gurr 2004).

SECTION 3.0 – RESEARCH

3.1 BACKGROUND RESEARCH

Field investigations were preceded by a period of archival research to determine what, if anything, could be predicted concerning precontact, contact, or post contact archaeological and/or architectural sensitivities prior to the onset of fieldwork. To assess these potentials, the Georgia Archaeological Site Files (GASF) and holdings were reviewed on March 6 2026. Trileaf reviewed numerous cartographic and ethnohistoric databases, including the NRHP and the USGS Earth Explorer data portal. Maps specifically referenced in our research included the USGS 1964 Gainesville, GA and 2024 Gainesville, GA 7.5-minute topographic quadrangles and aerial images captured by the USGS in 1955, 1963, 1981, 1993, 2007, 2017, and 2023. In 1955, the project area is a wooded area with surrounding wooded areas and small areas of open land, with Spring Road and Pine Circle Drive already existing to the south of the project area. In 1963, the project area remains wooded with residential development starting to the east of the project area with numerous completed structures. By 1981, there is more residential development south of the project area off of Pine Circle Drive, while the project area remains wooded. There is gradual development in the area but no

significant development until 2007, when an apartment complex was constructed to the west of the project area. The project area has remained wooded, with small development to the immediate south and the surrounding areas to the east, west and south. The current site visit confirms the project area is located within a wooded area north of an existing mobile home community off of Pine Circle Drive.

A review of the GASF files provided shows no previous archaeological surveys nor previously recorded sites in the project area. There are ten (10) archaeological surveys, and thirteen (13) archaeological sites previously recorded within 1-mile of the project area. No significant archaeological resources were located (Figure 7; Tables 1 and 2).

Survey Number	Year	Title	Author
2586	2003	Phase I Archaeological Survey of Widening and New Alignment for Skeleton Road and Memorial Park Drive, Hall County, Georgia	Joseph, J.W., Mason W. Sheffield, Theresa M. Hamby, and Karen L. Serio
5402	1998	Archaeological Assessment of Project STP-9438(2), Dekalb/Rockdale/Newton Counties	Fleming, Sherry and Bob Entorf
8346	2002	Phase I Cultural Resource Survey for the Proposed Dawsonville Highway Regional Wastewater Facilities Project, Hall County, Georgia	D'Angelo, James, Lynn Marie Peitak, and Jeffery L. Holland
10470	2007	Archaeological Assessment of Various District I Resurfacing Projects	Duff, Eric Anthony
11761	1988	Archaeological Assessment of Project FR-065-3(35), Hall County	Entorf, Robert F.
12456	2001	Archaeological Reassessment of Project STP-2412(2), Hall County, HP980209-002	Jeter, Erica
12600	1986	Archaeological Assessment of Project FR-065-3(30), Hall County, P.I. No. 120955	Rotenstein, David S.
13125	1998	Archaeological Assessment of Project STP-2412(2), Hall County	Schoenberg, Erica
14296	2017	Archaeological Survey of the Webster Family Cemetery, Gainesville, Hall County, Georgia	Gresham, Thomas H.
15258	2022	Phase I Archaeological Resources Survey of the Proposed Gainesville Pedestrian Upgrades at Thirteen Locations in District I, Hall County, Georgia	Ondus, Lillian

Table 1. Archaeological Surveys within 1-mile of the Project Location.

Site Number	Year	Resource Type	Cultural Affiliation	NRHP Eligibility	Distance from Project (km)
9HL37	1979/1981	Lithic Scatter	Unknown Prehistoric	N/A	N/A
9HL139	1979/1981	Artifact Scatter	Early 19 th - 20 th century; Middle Archaic	Not Eligible	N/A
9HL140	1979/1981	Artifact Scatter	Middle Archaic; Unknown Historic	Not Eligible	N/A
9HL141	1979/1981	Lithic Scatter	Unknown Historic	Not Eligible	N/A
9HL145	1979/1981	Lithic Scatter	Middle or Late Archaic	Not Eligible	N/A
9HL146	1979/1981	Lithic Scatter	Unknown Prehistoric	Not Eligible	N/A
9HL147	1979/1981	Artifact Scatter	Late 19 th to Early 20 th Century	Not Eligible	N/A
9HL148	1979/1981	Lithic Scatter	Middle Archaic	Not Eligible	N/A
9HL149	1979/1981	House Site	Unknown Historic	Not Eligible	N/A
9HL150	1979/1981	Lithic Scatter	Unknown Prehistoric	Not Eligible	N/A
9HL151	1979/1981	Lithic Scatter	Unknown Prehistoric	Not Eligible	N/A
9HL482	2003	Lithic Scatter	Archaic	N/A	N/A
9HL634	2020	Cemetery	Late 19 th to Early 20 th Century	N/A	N/A

Table 2: Archaeological Sites within 1-mile of the Project Location

Additionally, a review of the GASF and NRHP databases was performed prior to fieldwork on February 5, 2026, by Trileaf Senior Historian Michael Hart, who meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Architectural History, has reviewed these results.

There are no NRHP-listed or NRHP-eligible resources identified within the APE for Visual effects (Figure 6; Table 4).

The National Park Service Historic Trails Interactive GIS map was also reviewed. A National Historic Trail is recognized by the National Park Service as carrying the same significance as being listed in the NRHP and is therefore considered a Historic Property. No known portion of a National Historic Trail intersects with the project or is located within a ½-mile of the project location.

3.2 RESEARCH DESIGN

Trileaf designed the Phase I archaeological survey to locate and identify all archaeological and above ground cultural resources within the direct APE, defined as the lease area, a n d new access, utility easement, and to evaluate the potential significance of any newly identified archaeological sites. A cultural resource is gauged to be significant if it meets at least one of four criteria for eligibility for listing in the NRHP:

- A. Associated with significant events in the broad patterns of national history,
- B. Associated with the lives of persons significant in our past,
- C. Representative of a type, period, or method of construction, or the work of a master,
- D. Capable of yielding important information about the past.

Criterion D typically applies to archaeological sites. In order to be capable of yielding important information about the past, generally a site must possess artifacts, soil strata, structural remains, or other cultural features that make it possible to test historical hypotheses, corroborate and amplify currently available information, or reconstruct the sequence of the local archaeological record. To be considered significant, archaeological sites must demonstrate sufficient integrity to answer important research questions. These questions are developed in association with temporally, regionally, and thematically defined historic contexts or study units (U.S. Department of the Interior 1997).

3.3 SITE PROBABILITY

In general, most predictive site location models include distance to a permanent water source as a major factor in determining the existence and probable density of archaeological sites. There is a higher probability of encountering precontact archaeological sites closer to a source of fresh water, although distance will vary from location to location depending on an area's topography and accessibility. There is a greater likelihood of encountering precontact sites on and around landforms located near rivers, streams, and natural freshwater lakes. In contrast, historic period sites, can be found more equally distributed across the uplands and valleys due to the ability to access water by excavating wells.

Based on the topography of the project area, historic aerial photographs, distance to a permanent water source, and taking into consideration current land use, historic and recent commercial and residential development in the region, we believe there is a low probability for encountering undisturbed archaeological artifacts or features within the proposed project's APE for direct effects.

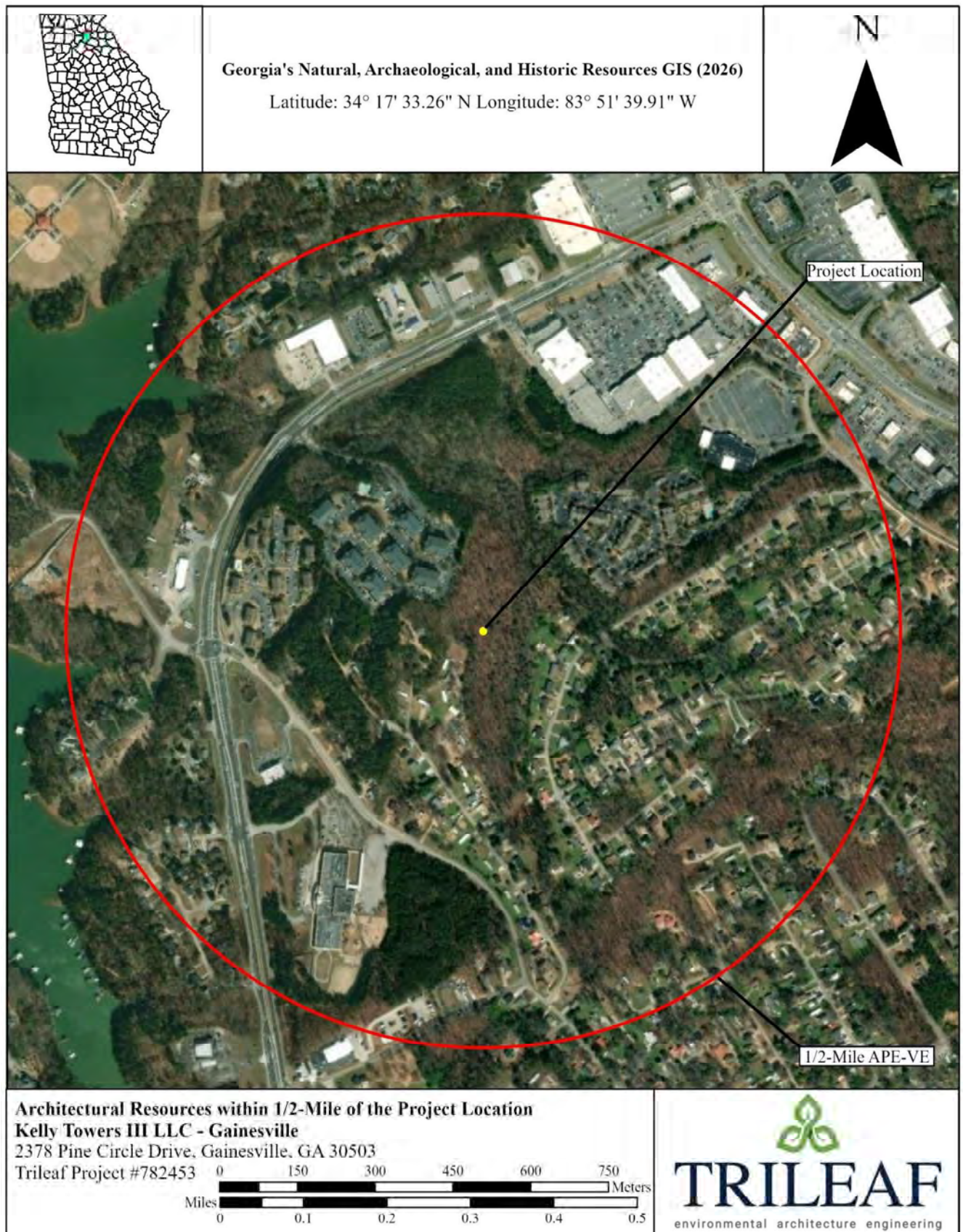


Figure 5: Architectural Resources within the 1/2-mile APE-VE

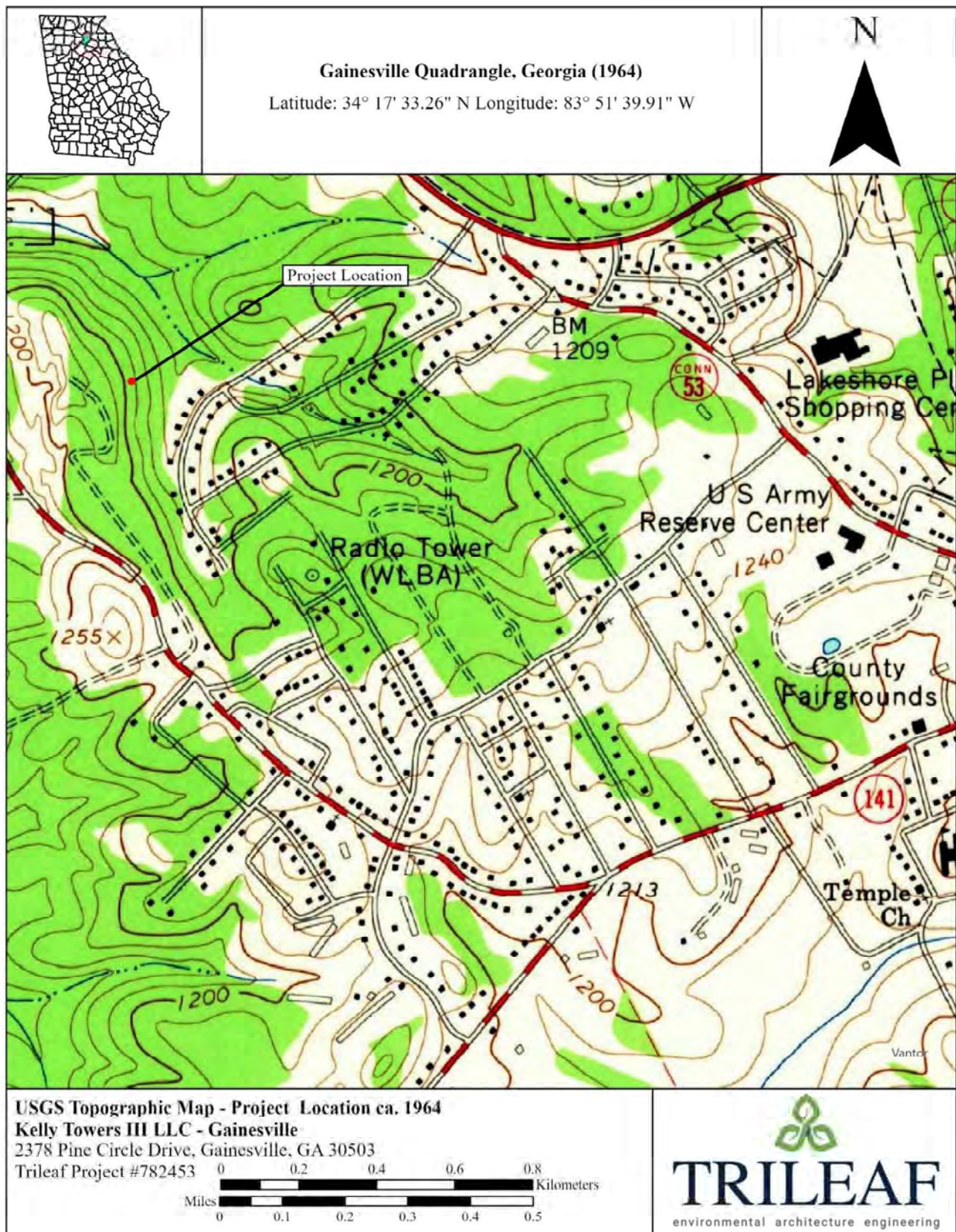


Figure 7: Project Location ca. 1964 (USGS 1964)

SECTION 4.0 – FIELD METHODS AND RESULTS

4.1 ARCHAEOLOGY

The field investigation at this location was conducted by Mackenzie Mulkey on March 2, 2026. Standard archaeological field equipment included shovels, trowels, and a quarter-inch wire mesh sifting screen. Based on the Georgia State Historic Preservation Office's *Georgia Standards and Guidelines for Archaeological Investigations*, the field survey techniques utilized were a combination pedestrian and visual survey at 5-meter intervals and/or shovel-testing at 30-meter intervals, with a standard shovel test unit consisting of a hand-excavated hole, approximately 30 cm in diameter and/or deep enough to reach culturally sterile subsoils. However, as surface visibility in some areas of the project was obscured or overgrown, the majority of the project area was surveyed using a shovel testing strategy.

Trileaf determined that five (5) shovel tests within the lease area and seven (7) shovel tests within the access/utility easement would effectively cover the project area (Figure 9; Table 3). Shovel tests in the access road were not excavated due to the presence of an existing asphalt drive and unknown buried utilities associated with the mobile home park. The shovel tests in the lease area were consistent with a layer of yellowish red (5YR 4/6) silty loam overlaying a layer of red (2.5YR 4/8) clay. The proposed lease area is located on a slope, with approximately 17 degree/30 percent slope. No cultural material was discovered during the course of this archaeological survey. Total archaeological field time: 1 person, 45 minutes.

STP No.	STP Location	Depth (cm below surface)	Soil Description	Artifacts Recovered	Latitude/ Longitude
1	Center	A: 0-20	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.26"N/83°51'39.91"W
		Bt: 20-30	2.5YR 4/8 clay	Natural rock/gravel	
2	North Corner	A: 0-15	5YR 4/6 silty loam	Natural rock/gravel	34°17'34.07"N/83°51'39.82"W
		Bt: 15-25	2.5YR 4/8 clay	Natural rock/gravel	
3	East Corner	A: 0-35	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.33"N/83°51'39.01"W
		Bt: 35-45	2.5YR 4/8 clay	Natural rock/gravel	
4	South Corner	A: 0-10	5YR 4/6 silty loam	Natural rock/gravel	34°17'32.66"N/83°51'39.92"W
		Bt: 10-20	2.5YR 4/8 clay	Natural rock/gravel	
5	West Corner	A: 0-25	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.40"N/83°51'40.74"W
		Bt: 25-35	2.5YR 4/8 clay	Natural rock/gravel	

Table 3: Shovel Test Pit Descriptions



Figure 8: Shovel Test Pit Location and Project Boundary Map

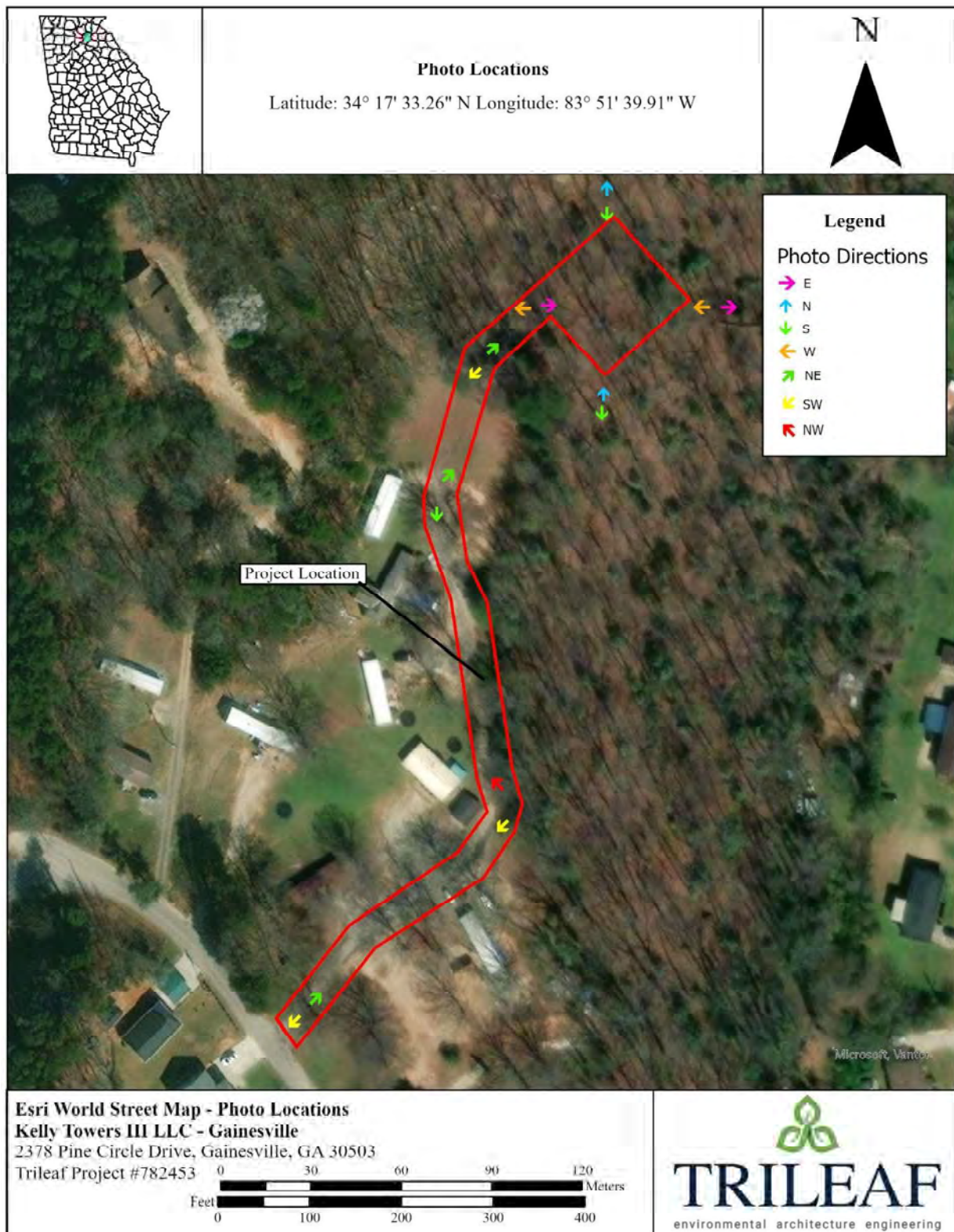


Figure 9. Photo Locations (Esri 2025)

4.2 ABOVE GROUND CULTURAL RESOURCES

As noted above, a review of the GA SHPO databases and the National Register Information System website (<http://www.nps.gov/>) was conducted on February 5, 2026 by Michael Hart, Senior Historian at Trileaf. Based upon this review, there are no NRHP-eligible or listed resources located within the APE for Direct or Visual effects. Additionally, no above ground cultural resources were identified during the current survey (Table 4).

Trileaf Architectural Historian Jill Johnson meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Architectural History and has reviewed those resources identified within the APE for the current project in Tables 3 and 4, below.

Project # and Status	Property Name and Address	Subject Property Photograph	Summary of Criteria and/or Description	Summary of Effects
782453 Not Contributing	Gainesville 2378 Pine Circle Drive Gainesville, GA 30503		The Subject Property structure is not an individually historic structure, neither is it a designated National Historic Landmark, nor a property listed in, or eligible for listing in the NRHP.	No Effect The proposed design is minor and necessary for the community. This will have no effect on the Subject Property.

Table 4: Description of Project Location Property

SECTION 5.0 – CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

The field survey of the project area, which included a pedestrian survey, shovel testing, and visual inspection, yielded no evidence for the presence of archaeological properties within the current project area or 25-foot (8.3 meter) boundary of the APE-DE.

There have been ten (10) previous archaeological surveys conducted within a mile of the current project area, and thirteen (13) previously recorded archaeological sites. Additionally, no NRHP-listed or eligible properties have been previously recorded within the project area's APE-DE or APE-VE.

5.2 RECOMMENDATIONS

Based on these findings, Trileaf recommends *No Historic Properties within both the APE-DE and the APE-VE*. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area. However, in the unlikely event that human remains are uncovered through the course of construction, work is to immediately cease, and proper area authorities notified.

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APPENDIX A: PROJECT LOCATION PHOTOGRAPHS



Photograph 1 – Looking north at project lease area



Photograph 2 – Looking east at project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 3 – Looking south at project lease area



Photograph 4 – Looking west at project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 5 – Looking north away from project lease area



Photograph 6 – Looking east away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 7 – Looking south away from project lease area



Photograph 8 – Looking west away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 9 – STP 1



Photograph 10 – Access Road, looking southwest away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026





Photograph 11 – Access Road, looking northeast towards project lease area



Photograph 12 – Access Road, looking southwest away from project lease area

Project Photographs

Kelly Towers III LLC – Gainesville
2378 Pine Circle Drive
Gainesville, Hall County, Georgia 30503
March 2, 2026





Photograph 13 – Access Road, looking southeast away from project lease area



Photograph 14 – Access Road, looking northeast towards project lease area from terminus

Project Photographs

Kelly Towers III LLC – Gainesville
 2378 Pine Circle Drive
 Gainesville, Hall County, Georgia 30503
 March 2, 2026



APPENDIX B: RESUMES



Professional Resume

MACKENZIE MULKEY

SENIOR PROJECT ARCHAEOLOGIST

Education

M.A. Anthropology
East Carolina University / Greenville, NC

B.A. Anthropology
Clemson University / Clemson, SC

Areas of Expertise

Mrs. Mulkey is a SOI-qualified professional archaeologist with over 2 years of experience in terrestrial cultural resources management in the Southeast region. She has directed several Phase I archaeological projects of varying complexity, conducted archaeological assessments, historic context development, and public outreach activities. She has completed historical and archival research; artifact conservation, identification and cataloging; report preparation; and environmental assessment of sites. Mrs. Mulkey specializes in the archaeological investigation of 18th and 19th century archaeological sites.

Environmental service expertise includes:

Archaeological and Architectural Impacts
Soil Characterization
Historical Topographic Maps and Aerial Imagery
Land Use History

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments

Certifications/Affiliations

OSHA 10-Hour Construction
Register of Professional Archaeologists (RPA), member since 2022
Section 106 Essentials, February 2023



Professional Resume

MICHAEL HART

ASSISTANT PROJECT MANAGER

SENIOR HISTORIAN/ARCHITECTURAL HISTORIAN

Education

History/Anthropology, B.A.
Social Science Education, M.S.
Florida State University / Tallahassee, FL

Areas of Expertise

Mr. Hart operates as the primary professional point-of-contact regarding History, Architectural History, and Historic Preservation. Mr. Hart is a Secretary of the Interior (SOI) qualified Architectural Historian and Historian with fourteen years of professional experience in Historic Preservation.

Architectural History and Historic Preservation service expertise include:

Architectural Impacts
National Register Nominations
Historical Marker Applications
Historic Resource Reports and Forms
SHPO Consultation
Field Reconnaissance

Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Section 106 Compliance

Certifications/Affiliations

Historic Sites Specialist/Historic Preservationist for Florida Division of Historical Resources,
Tallahassee, FL, 2008-2022
Adjunct Instructor, Tallahassee Community College, Tallahassee, FL, 2010-Present

Attachment 6. Tribal and NHO Involvement

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

Trileaf Corporation completed the Tower Construction Notification System (TCNS) on February 3, 2026, and received the notification of interested tribes on February 6, 2026. The attached FCC Notification email lists the Tribes identified through the TCNS process. A second notice will be sent to all interested tribes/organizations, after a period of 30 days and the consultation process will continue per the FCC’s guidelines. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

Applicant’s Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620

Evan Brotherton

From: towernotifyinfo@fcc.gov
Sent: Friday, February 6, 2026 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9432929

Categories: Evan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Applicant:

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

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

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

1. THPO Dakota John - Coughatta Indian Tribe - 1940 C.C Bel Road Elton, LA - dakotajohn@coughatta.org; kdawsey@coughatta.org - [REDACTED] - electronic mail

2. Tribal Historic Preservation Specialist Stephen Yerka - Eastern Band of Cherokee Indians - 2877 Governor's Island Road (PO Box: 455) Cherokee, NC - syerka@nc-chokeee.com - [REDACTED] - electronic mail

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

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

3. Compliance Review Supervisor THPO Compliance - Seminole Tribe of Florida - 30290 Josie Billie Hwy PMB 1004 Clewiston, FL - THPOcompliance@semtribe.com - 863-983-6549 (ext: 12245) - electronic mail

4. Tribal Administrator Stephanie Yahola - Kialegee Tribal Town - (PO Box: 332) Wetumka, OK - stephanie.yahola@kialegeetribes.com; jeremiah.hobia@kialegeetribes.net - [REDACTED] - electronic mail

5. Tribal Historic Preservation Officer Ben Yahola - Seminole Nation of Oklahoma - (PO Box: 1498) Wewoka, OK - tcns-sno@sno-nsn.gov - [REDACTED] - electronic mail
Exclusions: Please send all inquiries to email address: tcns-sno@sno-nsn.gov

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

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

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

Wado,
Cherokee Nation

7. TCNS Manager Jason Sawyer Mr - Muscogee (Creek) Nation - Highway 75 & Loop 56 (PO Box: 580) Okmulgee, OK - MCNTCNS@muscogeenation.com; Jsawyer@muscogeenation.com - [REDACTED] - regular mail

8. THPO Dept THPO Department - United Keetoowah Band of Cherokee Indians in Oklahoma - (PO Box: 746) Tahlequah, OK - tcns@ukb-nsn.gov; rcain@ukb-nsn.gov - [REDACTED] - electronic mail

9. Director Lora Nuckolls - Eastern Shawnee Tribe of Oklahoma - 70400 East HWY 60 Wyandotte, OK - celltower@estoo.net - 918-238-5151 (ext: 1840) - regular mail
Exclusions: Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

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

Provide a 1-page cover letter with the following information:

- a. TCNS Number
- b. Company Name
- c. Project Name, City, County, State
- d. Project type
- e. Project coordinates
- f. Contact information

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

If the applicant/tower builder receives no response from the Eastern Shawnee Tribe of Oklahoma within 30 days after notification through TCNS, the Eastern Shawnee Tribe of Oklahoma has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Eastern Shawnee Tribe of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

10. THPO Brina Williams - Alabama Quassarte Tribal Town - (PO Box: 218) Wetumka, OK - Brina.Williams@alabama-quassarte.org [REDACTED] - electronic mail

Exclusions: The Alabama Quassarte Tribal Town is unaware of any cultural or sacred sites located within the immediate project area. The AQTT's Historic Preservation Department concurs that there should be no adverse effect to any known historic properties and that work should proceed as planned. However, as the project is located in an area that is general historic interest to the Tribe, we request that work be stopped and our office contacted immediately if any Native American cultural materials or human remains are encountered.

If you have any questions, please contact our office at the number below.

Respectfully,

Alabama Quassarte Tribal Town
P.O. Box 187
Wetumka, Ok 74883
(P) 405-452-3881
(F) 405-452-3889

11. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - [REDACTED]
electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

12. THPO Tonya Tipton - Shawnee Tribe - 29 South 69A Highway Miami, OK - tcns@shawnee-tribe.com - 918-542-2441 (ext: 103) - electronic mail

Exclusions: In the case of projects with NO ground disturbance such as antennae on the sides of buildings or existing poles, the Shawnee Tribe concurs that no known historic properties will be negatively impacted by the project. The Shawnee Tribe DOES NOT wish to consult on those projects with NO ground disturbance.

If the project DOES involve ground disturbance at all, the Shawnee Tribe would like to ACCEPT your invitation for consultation and will provide a review.

If you have any questions, you may contact the Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

13. THPO William Bailey Jr - Poarch Band of Creek Indians - 5811 Jack Springs Road Atmore, AL - bbailey@pci-nns.gov - 251-368-9136 (ext: 2075) - electronic mail

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

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

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

14. Environmental Review Coordinator Renee Gledhill Earley - NC State Historic Preservation Office - 4617 Mail Service Center Raleigh, NC - renee.gledhill-earley@ncmail.net - [REDACTED] - electronic mail

15. Deputy SHPO David Brook - Historic Preservation Office - 4610 Mail Service Center Raleigh, NC - david.brook@ncmail.net [REDACTED] - electronic mail

16. Program Manager Jennifer Dixon - Georgia Historic Preservation Division - 2610 Georgia Highway 155 SW Stockbridge, GA - jennifer.dixon@dnr.ga.us - [REDACTED] - electronic mail

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

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

Notification Received: 02/03/2026

Notification ID: 306660

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Kelly Towers III LLC

Consultant Name: Michael Romanoski

Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: [REDACTED]
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 34 deg 17 min 33.3 sec N
Longitude: 83 deg 51 min 39.9 sec W
Location Description: 2378 Pine Circle Drive
City: Gainesville
State: GEORGIA
County: HALL

Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

Ground Elevation: 361.2 meters
Support Structure: 59.4 meters above ground level
Overall Structure: 60.7 meters above ground level
Overall Height AMSL: 421.9 meters above mean sea level

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

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwlFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_ltk39MNoGtgWe1vmeedh3_FbFk&m=kByrKDEwPZ81-kAKF6LzKRdeajPC3pbPu73TRmH8QdnZW_zSKyr5I3jgZsuBHcl2&s=_6Zsgkr1HCbOvZnFpv-uYWr3n75XI8A7VBclCZYH7Uk&e=

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

Thank you,
Federal Communications Commission

This email has been scanned for spam and viruses by Proofpoint Essentials. Visit the following link to report this email as spam:

https://us1.proofpointessentials.com/app/report_spam.php?mod_id=11&mod_option=logitem&report=1&type=easyspam&k=k1&payload=53616c7465645f5f69db5a2e70616ecff59a8d3c9ad589b82523ffdd35264290882353ea371515f9d729e436b386267fca2e9c067dc01a37889341a81c739dd10c7cd837ed7a557b1ad527601ae6239b4a27735e9e675950741a2e8bac2367480e3a1752ab025d68600aecb7729220d38a8048b6cbe4ae1b40a4a23c3377f1212839612bcd3c8495068753ac40c5b24dd260370830d9750f99f8dd0a028dc442

NT SUBMISSION PACKET – FCC FORM 620

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

Attachment 7. Historic Properties Direct Effects

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

Project # and Status	Property Name and Address	Subject Property Photograph	Summary of Criteria and/or Description	Summary of Effects
782453 Not Contributing	Gainesville 2378 Pine Circle Drive Gainesville, GA 30503		The Subject Property structure is not an individually historic structure, neither is it a designated National Historic Landmark, nor a property listed in, or eligible for listing in the NRHP.	No Effect The proposed design is minor and necessary for the community. This will have no effect on the Subject Property.

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

There are no additional properties in the APE for direct effects not listed in part “a.”

Applicant’s Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620

Attachment 7. Historic Properties Direct Effects

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

The field investigation at this location was conducted by Mackenzie Mulkey on March 2, 2026. Standard archaeological field equipment included shovels, trowels, and a quarter-inch wire mesh sifting screen. Based on the Georgia State Historic Preservation Office's Georgia Standards and Guidelines for Archaeological Investigations, the field survey techniques utilized were a combination pedestrian and visual survey at 5-meter intervals and/or shovel-testing at 30-meter intervals, with a standard shovel test unit consisting of a hand-excavated hole, approximately 30 cm in diameter and/or deep enough to reach culturally sterile subsoils. However, as surface visibility in some areas of the project was obscured or overgrown, the majority of the project area was surveyed using a shovel testing strategy.

Trileaf determined that five (5) shovel tests within the lease area and seven (7) shovel tests within the access/utility easement would effectively cover the project area. Shovel tests in the access road were not excavated due to the presence of an existing asphalt drive and unknown buried utilities associated with the mobile home park. The shovel tests in the lease area were consistent with a layer of yellowish red (5YR 4/6) silty loam overlaying a layer of red (2.5YR 4/8) clay. The proposed lease area is located on a slope, with approximately 17 degree/30 percent slope. No cultural material was discovered during the course of this archaeological survey. Total archaeological field time: 1 person, 45 minutes.

STP No.	STP Location	Depth (cm below surface)	Soil Description	Artifacts Recovered	Latitude/ Longitude
1	Center	A: 0-20	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.26"N/ 83°51'39.91"W

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

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

Applicant's Name: Kelly Towers III LLC

Project Name: Gainesville

Project Number: 782453

FCC Form 620

NT SUBMISSION PACKET – FCC FORM 620

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

STP No.	STP Location	Depth (cm below surface)	Soil Description	Artifacts Recovered	Latitude/ Longitude
		Bt: 20-30	2.5YR 4/8 clay	Natural rock/gravel	
2	North Corner	A: 0-15	5YR 4/6 silty loam	Natural rock/gravel	34°17'34.07"N/ 83°51'39.82"W
		Bt: 15-25	2.5YR 4/8 clay	Natural rock/gravel	
3	East Corner	A: 0-35	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.33"N/ 83°51'39.01"W
		Bt: 35-45	2.5YR 4/8 clay	Natural rock/gravel	
4	South Corner	A: 0-10	5YR 4/6 silty loam	Natural rock/gravel	34°17'32.66"N/ 83°51'39.92"W
		Bt: 10-20	2.5YR 4/8 clay	Natural rock/gravel	
5	West Corner	A: 0-25	5YR 4/6 silty loam	Natural rock/gravel	34°17'33.40"N/ 83°51'40.74"W
		Bt: 25-35	2.5YR 4/8 clay	Natural rock/gravel	

Based on the findings of this survey, Trileaf recommends that there are ***No Historic Properties in the Direct APE***. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area.

Please refer to the Cultural Resources Report provided in Attachment 5 for additional information.

Applicant's Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620

Attachment 8. Historic Properties Visual Effects

Historic Properties Identified for Visual Effects Guidelines

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

A review of the GA SHPO database of National Register Sites and Districts, Certified Local Districts and Architectural Surveys, Archaeology Viewer, National Register Information System website (<http://www.nr.nps.gov/>) and interactive map was conducted on February 5, 2026, by Michael Hart, Senior Historian at Trileaf. Based upon this review, Trileaf recommends that there are ***No Historic Properties in the APE-VE.***

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

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

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

N/A

NT SUBMISSION PACKET – FCC FORM 620

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

Attachment 9. Local Government

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

On March 12, 2026, Ms. KatieeAhmed, Planning and Zoning Administrator attthe Hall County Planning and Zoning,Department, was notified of the proposed project. They have been invited to comment on the proposed project’s potential effect on Historic Properties and to indicate whether they are interested in consulting further on the proposed project. A copy of Trileaf Corporation’s correspondence with Ms. Ahmed is attached. As of this date, no response has been received from Ms. Ahmed. Should a response be received, a copy will be forwarded to all consulting parties as an addendum to this packet.

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

N/A

Applicant’s Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620



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

March 12, 2026

Hall County Planning and Zoning

Attn: Ms. Katie Ahmed – Planning and Zoning Administrator

2875 Browns Bridge Road

Gainesville, GA 30504-5635

Phone: 770-297-2649

Email: kahmed@hallcounty.org

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

2378 Pine Circle Drive, Gainesville, GA 30503

Hall County, Gainesville Quadrangle (USGS)

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

Dear Ms. Ahmed:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client 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. The antenna will be licensed by the Federal Communications Commission (FCC).

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

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

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

Please call me at (678) 653-8673, ex. 655 or email a.ni@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Anna Ni
Senior Project Scientist

NT SUBMISSION PACKET – FCC FORM 620

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

Attachment 10. Other Consulting Parties and Public Notice

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

On February 3, 2026, Mr. Ron Hollis,s,Senior,President at Hall County Historical Society, Inc and Mr. Joe Rothwell, at the Georgia mountains Regional Commission, were notified of the proposed project. They were invited to comment on the proposed project's potential effect on Historic Properties and to indicate whether they are interested in consulting further on the proposed project. A copy of Trileaf's correspondence with Mr. Ron Hollissand Mr. Rothwell is attached. As of this date, no response has been received from Mr. Ron Hollissand Mr. Rothwell. Should a response be received, a copy will be forwarded to all consulting parties as an addendum to this packet.

You are required to provide a Public Notice Attachment.

Attached, please find a copy of a legal notice regarding the proposed telecommunications tower construction that was posted in the *The Gainesville Times* on March 18, 2026. As of the date of this submission packet, no comments regarding this notice have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name: Kelly Towers III LLC
Project Name: Gainesville
Project Number: 782453
FCC Form 620



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

February 3, 2026

Hall County Historical Society, Inc.

Attn: Ron Hollis, Sr. - President

380 Green Street NE

Gainesville, GA 30501

Email: hchsgeorgia@gmail.com

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

2378 Pine Circle Drive, Gainesville, GA 30503

Hall County, Gainesville Quadrangle (USGS)

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

Dear Mr. Hollis:

Trileaf Corporation is in the process of completing a NEPA Review at the 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. The antenna will be licensed by the Federal Communications Commission (FCC).

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

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

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

Please call me at (678) 653-8673, ex. 655 or email a.ni@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

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

Anna Ni
Senior Project Scientist



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

February 3, 2026

Georgia Mountains Regional Commission

Attn: Joe Rothwell
P.O. Box 1720
Gainesville, GA 30503
Phone: 770-538-2626
Email: jrothwell@gmrc.ga.gov

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

2378 Pine Circle Drive, Gainesville, GA 30503
Hall County, Gainesville Quadrangle (USGS)
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W

Dear Mr. Rothwell:

Trileaf Corporation is in the process of completing a NEPA Review at the 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. The antenna will be licensed by the Federal Communications Commission (FCC).

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

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

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

Please call me at (678) 653-8673, ex. 655 or email a.ni@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

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

Anna Ni
Senior Project Scientist

AFFIDAVIT OF PUBLICATION

State of Georgia

County of Hall

Personally appeared before the undersigned, Stephanie Woody, who having been duly sworn, on oath, says that she is the Group Publisher of THE TIMES, FORSYTH COUNTY NEWS, and DAWSON COUNTY NEWS, and that the Advertisement was Published in THE TIMES:

Ad# 158020

Construction/Service Bids

Kelly Towers III LLC proposes to build a 199-foot monopole communications tower

Published: The Times: 3/18/2026

Stephanie Woody
Stephanie Woody, Affiant
Verified X

Sworn to and Subscribed before me

This 18 day of March, 2026

Jacqueline Wildes
Notary Public



The Times

classifieds

770.535.1199

Services

Electricians

AE Electrical Services
Service Work, New
Installation and more.
Industrial, Commercial
and Residential. Call now
for a free quote at
706-344-2074.

Jobs

JOBS - Adult Care- Help Wanted

Seeking part-time help
senior care for our mother in
Dahlonega 2-3 days or
nights per week
Companionship, medication
monitoring, fall safety
prevention. Must be
comfortable with pets that
are harmless and very nice.
CNA certified preferable but
not required. Private
sleeping quarters provided
with full private bath.
Call Ralph 404-886-9780

JOBS - Medical

Occupational Therapist
Bilingual Pediatric OT.
Call 770-615-7676

JOBS - Office/Clerical

Medical Secretary Admin
Asst
Yoruba Speaking Medical
Asst
Call 770-615-7676

JOBS - Professional

Business Development
Manager for Conta North
America Inc. in Gainesville,
GA. Oversee daily operations
(shipping, sales,
inbound/outbound product
operations). Coordinate
production with Turkish
parent company. Travel to
customers in U.S. monthly &
Turkey biannually. Ability to
speak & write Turkish.
\$151,000/year. Send resume
& cover letter to A. Mizrakli,
CEO,
amizrakli@contausa.com.

Stuff

Misc. For Sale

SAVE MONEY HERE
Bargain Mart & Rug Deals
3174 Cleveland Hwy.
Gainesville
A Little Bit of Everything.

Open Monday - Saturday
9am - 6pm
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New apartments for rent
in Oakwood!
877-294-7917

Houses For Rent- Unfurnished

2bd/1ba w/d connection
central heat/air in Newtown,
accept section 8 vouchers
certificates
770-572-9217

Legals

inheritance, and that the child be committed to the custody of the adoptive parent, with the right to proceed for adoption by the Petitioner. A copy of the petition may be obtained by filing a Petition to Legitimate with the Clerk of the Superior Court of Hall County, Hall County Courthouse, Gainesville, Georgia on any day, Monday through Friday, during normal business hours. Pursuant to O.C.G.A. § 19-8-12 (c) et. seq., you will lose all rights to the child and will neither receive notice nor be entitled to object to the adoption of the child, unless, within 30 days of receipt of such notice, you file a Petition to Legitimate with the Court and copy the attorney of record. Pursuant to O.C.G.A. § 19-8-12 (e) you must file a Petition for Legitimation and give notice as required. The Petitioner has alleged that you have: that you have failed to exercise proper parental care or control due to misconduct or inability, as set out in paragraph (5) of subsection (a) of Code Section 15-11-310. Be Governed Accordingly. This the _____ day of _____, 20____.

Judy D. Sartain
Attorney for the Petitioner
3630 Thompson Bridge Road
Ste 21-332
Gainesville, GA 30506
judy@judydsartainlaw.com
157760 3/11, 18, 25

Alcoholic Beverage

Alcoholic Beverage License. This legal notice states that Joel Ferrer and Chef Joel Coco Cabana, DBA, Cuban Cafe by Chef Joel, will apply to the City of Oakwood Council at its next regular meeting for a liquor and beer license for consumption on the premises, located at 3640 Wallis Road, Flowery Branch, GA 30542.
157776 3/11, 18, 25

Construction/Service Bids

ADVERTISEMENT FOR 26-007 FY2027 CHEMICALS FOR WASTEWATER AND DRINKING WATER TREATMENT
Sealed Solicitations: Sealed Solicitations for the project entitled **FY2027 Chemicals for Wastewater and Drinking Water Treatment** will be received until Tuesday, April 21, 2026 at 1:00 p.m. EST at City Hall, 5410 Pine Street, Flowery Branch, GA 30542, at which time and place they will be opened and reviewed privately by the City. No Solicitation may be withdrawn after the closing time for the receipt of Solicitations for a period of ninety (90) days.
Work To Be Done: The Work to be completed for **FY2027 Chemicals for**

to NSF/ANSI/CAN 60. Purchases will be made strictly on an as-needed basis, with no guaranteed order volumes. Vendors must use box trucks equipped with liftgates for all drinking water deliveries, and all deliveries must occur at designated City facilities with City staff present.

Specifications and Documents: A mandatory pre-bid meeting will be held on Tuesday, March 24, 2026, at 9:30 a.m. EST at City Hall Community Room, 5410 Pine Street, Flowery Branch, GA 30542. Complete specifications and documents are available at www.flowerybranchga.org/bids. All communication regarding this solicitation must be directed to the Finance Department contact, Nancy Rodriguez, at 770-967-6371 ext. 111 or Nrodriguez@flowerybranchga.org. Contact with any other City of Flowery Branch employee is unauthorized and may result in disqualification. Oral statements are unofficial and non-binding; respondents should rely solely on written communications issued by the designated correspondent.

Reservation of Rights: The Owner reserves the right to reject any or all Solicitations, including, without limitation, the right to reject any nonconforming, nonresponsive, unbalanced, or conditional submissions. The Owner may also reject the Solicitation of any Respondent if it is determined that an award would not be in the best interest of the Project, whether due to lack of responsiveness, insufficient qualifications, doubtful financial ability, or failure to meet any other standard or criterion established by the Owner. Respondents must comply with all applicable Federal, State, and Local laws.
157490 3/4, 3/18

Request for Proposals WATER TREATMENT PLANT CHEMICAL IMPROVEMENTS (PROCUREMENT DATES EXTENDED)
CITY OF GAINESVILLE, GEORGIA

The City of Gainesville is requesting proposals for the Water Treatment Plant Chemical Improvements Project. The Project will consist of the chemical system improvements at the Riverside WTP and the Lakeside WTP. The Riverside WTP improvements consist of the replacement of the fluoride and polyphosphate feed systems with bulk storage tanks, chemical day tanks, and chemical transfer and feed pumps. The Lakeside WTP improvements consist of the installation of a pre-purchased onsite sodium hypochlorite

April 23, 2026.
158022 3/18, 3/25

Request for Proposal FY 26 New Water Meter Installations

City of Gainesville, Georgia
The City of Gainesville is requesting individual Proposals for furnishing materials, labor, tools, equipment and appurtenances necessary for the FY 26 New Water Meter Installations project. This Project will consist of the installation of new ¾-inch water meters, on an as needed basis by the City of Gainesville, Department of Water Resources. Beginning on **Thursday, March 5, 2026**, a copy of the request for proposal and contract documents can be obtained, via email from Chris Thornhill at CThornhill@gainesvillega.gov. There will be a mandatory Pre-Proposal meeting for this project on **Thursday, March 12, 2026 at 2:00 p.m.** in the 3rd Floor Conference Room at the Department of Water Resources, 757 Queen City Parkway, Gainesville, Georgia 30501. Sealed proposals may be submitted until 2:00 p.m., local time, on **Thursday, April 2, 2026**, to Chris Thornhill, City of Gainesville, Department of Water Resources Administration Building, 1st Floor, Engineering and Construction Services Division, 757 Queen City Parkway, Gainesville, GA 30501
157418 3/4, 11, 18

Request for Proposals RIVERSIDE WTP RAW WATER PUMP NO. 5
CITY OF GAINESVILLE, GEORGIA
The City of Gainesville is requesting proposals for the Riverside WTP Raw Water Pump No. 5. The Project will consist of a new 1,000-hp vertical turbine pump, equipped with a VFD. New pump discharge piping and valving which shall include a swing check valve, combination air-vacuum release valve, and butterfly valve. New electrical line-up in the raw water pump station electrical building for the new pump. New supplemental HVAC and roofing upgrades for the raw water pump station and the raw water pump station electrical building. Integration of the new pump and VFD into the existing SCADA system and replacement of the site-wide fiber optic network with single mode fiber optic cable and components. Beginning on **Monday, April 6, 2026**, Contract Documents can be obtained from QuestCDN (Project #10097279). Visit the Quest CDN webpage (www.questcdn.com). Prior to downloading the Proposal Documents, Proposers will be required to

Improvements project. Beginning on February 25, 2026, a copy of the contract documents can be obtained, via the City of Gainesville website, www.gainesville.org. Bids are to be submitted to the Financial Services Department Attn: Mr. Kevin Hutcheson, 300 Henry Ward Way, Suite 201, Gainesville, GA 30501, until 200 p.m., local time, on Thursday, March 26, 2026. For more information visit www.gainesville.org "current bid opportunities". The City of Gainesville is an equal opportunity owner/employer and will not discriminate against any vendor because of race, creed, color, religion, sex, national origin, or ADA disability status.
CITY OF GAINESVILLE
Bryan Lackey, City Manager
157245 2/25, 3/4, 11, 18

Kelly Towers III LLC proposes to build a 199-foot monopole communications tower at the approx. vicinity of 2378 Pine Circle Drive, Gainesville, Hall County, GA 30503. Public comments regarding potential effects from this site or historic properties may be submitted within 30 days from the date of this publication to: Trileaf Corp., Anna Ni, a.ni@trileaf.com, 1775 The Exchange SE, Suite 525, Atlanta, GA 30339, 678-653-8673, ex. 615. 158020 3/18

M. B. Kahn Waterworks LLC is

in some instances waiving of credit that may be ordinarily required, obtaining unit pricing to help establish credit, and offer payment terms to assist in meeting cash-flow demands. M. B. Kahn can also arrange to pay requesting minority contractors and suppliers twice monthly on submission of qualified invoice to assist with cash flow demands. Subs must self-perform at least 50% of their portion of the work. M. B. Kahn does not discriminate in the recruitment of subs or hiring based on race, creed, color, religion, ancestry, sex, sexual orientation, or national origin and will take affirmative steps to ensure against discrimination in all aspects of operations including subs for service work.
156744 2/11, 18, 25, 3/4, 11, 18

CITY OF GAINESVILLE
Bryan Lackey, City Manager
157245 2/25, 3/4, 11, 18

Millside Parkway at Clubside Drive / Mundy Mill Academy Intersection Improvements. Bid No. 26011
City of Gainesville, Georgia
The City of Gainesville is requesting individual sealed Bids for furnishing all materials, labor, tools, equipment and appurtenances necessary to construct the Millside Parkway at Clubside Drive / Mundy Mill Academy Intersection Improvements project.

Beginning on February 25, 2026, a copy of the contract documents can be obtained, via the City of Gainesville website, www.gainesville.org. Bids are to be submitted to the Financial Services Department Attn: Mr. Kevin Hutcheson, 300 Henry Ward Way, Suite 201, Gainesville, GA 30501, until 200 p.m., local time, on Thursday, March 26, 2026. For more information visit www.gainesville.org "current bid opportunities". The City of Gainesville is an equal opportunity owner/employer and will not discriminate against any vendor because of race, creed, color, religion, sex, national origin, or ADA disability status.
CITY OF GAINESVILLE
Bryan Lackey, City Manager
157253 2/25, 3/4, 11, 18

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN THAT A TRADENAME REGISTRATION STATEMENT, VERIFIED BY AFFIDAVIT OF **STEPHANIE N BERBERICH** HAS BEEN FILED IN THIS OFFICE, WHICH AFFIDAVIT STATES THAT **TOTAL RENAL CARE INC** IS CONDUCTING A BUSINESS IN THE CITY OF **GAINESVILLE**, HALL COUNTY, GEORGIA UNDER THE TRADENAME OF **JESSE JEWELL DIALYSIS** AND THAT THE NATURE OF SAID BUSINESS IS **KIDNEY CARE SERVICES**. WITNESS MY OFFICIAL SIGNATURE AND SEAL OF THE SUPERIOR COURT. THIS 2 DAY OF MARCH, 2026.
MARK PETTITT, CLERK
157829 3/11, 3/18

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN

in some instances waiving of credit that may be ordinarily required, obtaining unit pricing to help establish credit, and offer payment terms to assist in meeting cash-flow demands. M. B. Kahn can also arrange to pay requesting minority contractors and suppliers twice monthly on submission of qualified invoice to assist with cash flow demands. Subs must self-perform at least 50% of their portion of the work. M. B. Kahn does not discriminate in the recruitment of subs or hiring based on race, creed, color, religion, ancestry, sex, sexual orientation, or national origin and will take affirmative steps to ensure against discrimination in all aspects of operations including subs for service work.
156744 2/11, 18, 25, 3/4, 11, 18

Corporations & Business Organizations
GEORGIA, HALL COUNTY TRADE NAME REGISTRATION
NOTICE IS HEREBY GIVEN THAT A TRADENAME REGISTRATION STATEMENT, VERIFIED BY AFFIDAVIT OF **SEAN NICHOLAS JOHNSON** HAS BEEN FILED IN THIS OFFICE, WHICH AFFIDAVIT STATES THAT **SEAN NICHOLAS JOHNSON** IS CONDUCTING A BUSINESS IN THE CITY OF **FLOWERY BRANCH**, HALL COUNTY, GEORGIA UNDER THE TRADENAME OF **JOHNSON BOYS WINDOW CLEANING** AND THAT THE NATURE OF SAID BUSINESS IS **RESIDENTIAL AND COMMERCIAL WINDOW CLEANING**. WITNESS MY OFFICIAL SIGNATURE AND SEAL OF THE SUPERIOR COURT. THIS 27 DAY OF FEBRUARY, 2026.
MARK PETTITT, CLERK
157827 3/11, 18

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN THAT A TRADENAME REGISTRATION STATEMENT, VERIFIED BY AFFIDAVIT OF **STEPHANIE N BERBERICH** HAS BEEN FILED IN THIS OFFICE, WHICH AFFIDAVIT STATES THAT **TOTAL RENAL CARE INC** IS CONDUCTING A BUSINESS IN THE CITY OF **GAINESVILLE**, HALL COUNTY, GEORGIA UNDER THE TRADENAME OF **JESSE JEWELL DIALYSIS** AND THAT THE NATURE OF SAID BUSINESS IS **KIDNEY CARE SERVICES**. WITNESS MY OFFICIAL SIGNATURE AND SEAL OF THE SUPERIOR COURT. THIS 2 DAY OF MARCH, 2026.
MARK PETTITT, CLERK
157829 3/11, 3/18

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN THAT A TRADENAME REGISTRATION STATEMENT, VERIFIED BY AFFIDAVIT OF **STEPHANIE N BERBERICH** HAS BEEN FILED IN THIS OFFICE, WHICH AFFIDAVIT STATES THAT **TOTAL RENAL CARE INC** IS CONDUCTING A BUSINESS IN THE CITY OF **GAINESVILLE**, HALL COUNTY, GEORGIA UNDER THE TRADENAME OF **JESSE JEWELL DIALYSIS** AND THAT THE NATURE OF SAID BUSINESS IS **KIDNEY CARE SERVICES**. WITNESS MY OFFICIAL SIGNATURE AND SEAL OF THE SUPERIOR COURT. THIS 2 DAY OF MARCH, 2026.
MARK PETTITT, CLERK
157829 3/11, 3/18

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN

Georgia, Hall County Trade Name Registration
NOTICE IS HEREBY GIVEN

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156744 2/11, 18, 25, 3/4, 11, 18

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB

3060-1039

See instructions for

Public burden estimates

Attachment 11. SHPO Specific Forms

GA HPD Research File Checklist

Applicant's Name: Kelly Towers III LLC

Project Name: Gainesville

Project Number: 782453

FCC Form 620

HPD Research File Checklist

For Tower Project Consultants

Please fill out and check off the following form, which will allow HPD to better evaluate and review your tower project (Form 620 or 621). **Attach this to your project submission packet or cover letter.**

Name and Title: Mackenzie Mulkey, M.A., RPA, Senior Project Archaeologist

Company: Trileaf Corporation

Tower Address (include city and county): 2378 Pine Circle Drive, Gainesville, Hall County, Georgia 30503

Date Research was compiled at HPD: 03/06/26

Please check off that you have researched the project site and APE in the following locations. Please write or attach your findings (maps, survey forms, etc.) from these records, as applicable:

☒ GA Archaeological Site File (UGA, Athens)

☒ Historic Resources Survey Files (HPD)

☒ National Register Files (HPD)

☒ Identified Sites Files (HPD)

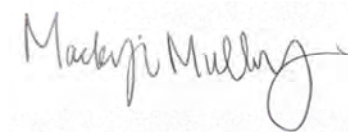
☒ Centennial Farms Files (HPD)

☒ Topical Files (HPD)

☒ Environmental Review Files (HPD)

☒ NAHRGIS (online)

Signature and Date:



03/09/2026



GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

April 13, 2026

Anna Ni
Senior Project Scientist
Trileaf Corporation
1775 The Exchange SE, Suite 525
Atlanta, Georgia 30339

**RE: Cell Tower: 199' Monopole, Green Hill Circle near Pine Circle Drive, Gainesville
Hall County, Georgia
HP-260313-006**

Dear Ms. Ni:

The Historic Preservation Division (HPD) has received the information submitted concerning the proposed construction of a cellular communications facility at the above location. Our review is in accordance with the 2005 *Nationwide Programmatic Agreement among the Federal Communications Commission, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation* (NPA), for review under the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of constructing a 199-foot (ft) overall height monopole cellular communications tower on a portion of the vacant parcel 00116 002023 on Green Hill Circle near Pine Circle Drive in Gainesville. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the tower, as proposed, will have **no adverse effect** to historic resources within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the tower location, distance, and intervening vegetation.

Please note that NRHP-eligible historic properties that have not been previously identified may be among the above-noted historic resources located within this project's APE. In the Section 106 process, it is the responsibility of the federal agency and its applicants to account for historic resources in the APE. However, requirements for identification and evaluation of historic properties established by the NPA do not address circumstances where only dated, incomplete, inadequate, or questionable resource identification information is available. Therefore, determinations noted herein are specific to FCC involvement as the federal agency and are in accordance with the requirements of the NPA.

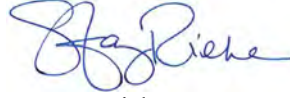
This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any future changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning. For your information, as the above referenced report appears to serve as a final report, HPD will transmit an electronic copy of the report to the Georgia Archaeological Site File at the University of Georgia-Athens for permanent retention.

Please reference project number **HP-260313-006** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, at Michelle.Bard@dca.ga.gov or (404) 327-6812 or Lucas Chapman, Compliance Review Archaeologist, at Lucas.Chapman@dca.ga.gov or (404) 679-0649.



Ms. Ni
HP-260313-006
April 13, 2026
Page 2

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Joe Rothwell, Georgia Mountains Regional Commission
Kathy Papa, DCA Regional Services, Region 2

From: towernotifyinfo@fcc.gov
To: [Anna Ni](#)
Subject: Section 106 New Filing Submitted- Email ID #12257876
Date: Friday, March 13, 2026 10:16:57 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The following new Section 106 filing has been submitted:

File Number: 0011944275
TCNS Number: 306660
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 03/16/2026

Applicant: Kelly Towers III LLC
Consultant: Trileaf Corporation
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: Gainesville
Site Address: 2378 Pine Circle Drive
Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.
Site Coordinates: 34-17-33.3 N, 83-51-39.9 W
City: Gainesville
County: HALL
State: GA
Lead SHPO/THPO: Georgia Historic Preservation Division

Consultant Contact Information:

Name: Trileaf Corporation
Title:
PO Box:
Address: 1775 The Exchange SE
Suite 525
City: Atlanta
State: GA
Zip: 30339
Phone: 347-255-3360
Fax:
Email: a.ni@trileaf.com

NOTICE OF FRAUDULENT USE OF SYSTEM, ABUSE OF PASSWORD AND RELATED MISUSE

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

Appendix F

Native American Correspondence



Tribal Summary Table									
Site: Gainesville					Site ID: GA2012				
TCNS Number: 306660					FCC Start: February 6, 2026				
Tribe	TCNS auto-reply	Follow Up Request from Tribe		Follow Up(s) to Tribe		Final Reply		FCC Referral	Standing Agreements & Comments
		Date	Requested Information	Date	Sent	Date	Comments		
Alabama Quassarte Tribal Town	Notify of inadvertent discovery					2/6/2026	Cleared per NOO		
Cherokee Nation				3/16/2026	Sent Letter & Form 620/621	4/22/2026	The Nation does not object to the project proceeding. Requests scope change and inadvertent discovery notification.		
Coushatta Indian Tribe				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	
Eastern Band of Cherokee Indians	30 days no interest Notify of inadvertent discovery			3/16/2026	Sent Letter & Form 620/621	4/15/2026	Cleared per NOO		
Eastern Shawnee Tribe of Oklahoma	30 days no interest Notify of inadvertent discovery					2/12/2026	We have no interest in this site. Requests inadvertent discovery notification.		
Kialegee Tribal Town				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	
Muscogee Creek Nation				3/16/2026	Sent Letter & Form 620/621	3/30/2026	We recommend a finding of "No Historic in the APE" for the proposed. Requests inadvertent discovery notification.		
Poarch Band of Creek Indians	30 days no interest Notify of inadvertent discovery			3/16/2026	Sent Letter & Form 620/621	4/15/2026	Cleared per NOO		
Seminole Nation of Oklahoma	30 days no interest Notify of inadvertent discovery			3/16/2026	Sent Letter & Form 620/621	4/15/2026	Cleared per NOO		
Seminole Tribe of Florida				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	
Shawnee Tribe				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	
Thlopthlocco Tribal Town				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	
United Keetoowah Band of Cherokee Indians in Oklahoma				3/16/2026	Sent Letter & Form 620/621	5/8/2026	Cleared by Referral	4/23/2026	

Evan Brotherton

From: towernotifyinfo@fcc.gov
Sent: Friday, February 6, 2026 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9432929

Categories: Evan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Applicant:

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

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

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

1. THPO Dakota John - Coughatta Indian Tribe - 1940 C.C Bel Road Elton, LA - dakotajohn@coughatta.org; kdawsey@coughatta.org - 337-584-1401 - electronic mail

2. Tribal Historic Preservation Specialist Stephen Yerka - Eastern Band of Cherokee Indians - 2877 Governor's Island Road (PO Box: 455) Cherokee, NC - syerka@nc-chokeee.com - 828-359-6852 - electronic mail

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

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

3. Compliance Review Supervisor THPO Compliance - Seminole Tribe of Florida - 30290 Josie Billie Hwy PMB 1004 Clewiston, FL - THPOcompliance@semtribe.com - 863-983-6549 (ext: 12245) - electronic mail

4. Tribal Administrator Stephanie Yahola - Kialegee Tribal Town - (PO Box: 332) Wetumka, OK - stephanie.yahola@kialegeetribes.com; jeremiah.hobia@kialegeetribes.net - 405-452-3262 - electronic mail

5. Tribal Historic Preservation Officer Ben Yahola - Seminole Nation of Oklahoma - (PO Box: 1498) Wewoka, OK - tcns-sno@sno-nsn.gov - 405-234-5218 - electronic mail
Exclusions: Please send all inquiries to email address: tcns-sno@sno-nsn.gov

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

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

6. Gwen Terrapin - Cherokee Nation - (PO Box: 948) Tahlequah, OK - historicpreservation@cherokee.org; gwen-terrapin@cherokee.org - 918-772-4165 - electronic mail
Exclusions: Please email all review documents for FCC Form 620/621 (i.e. archeologist report, photos, SHPO response, etc.) to historicpreservation@cherokee.org or gwen-terrapin@cherokee.org. You may also mail a cover letter and a CD or flash drive containing the review documents and FCC forms to: Cherokee Nation: Attn: Gwen Terrapin, PO Box 948, Tahlequah, OK 74465. Should you have any questions, please do not hesitate to email or call 918.772.4165.

Wado,
Cherokee Nation

7. TCNS Manager Jason Sawyer Mr - Muscogee (Creek) Nation - Highway 75 & Loop 56 (PO Box: 580) Okmulgee, OK - MCNTCNS@muscogeenation.com; Jsawyer@muscogeenation.com - 918-732-7835 - regular mail

8. THPO Dept THPO Department - United Keetoowah Band of Cherokee Indians in Oklahoma - (PO Box: 746) Tahlequah, OK - tcns@ukb-nsn.gov; rcain@ukb-nsn.gov - 918-871-2852 - electronic mail

9. Director Lora Nuckolls - Eastern Shawnee Tribe of Oklahoma - 70400 East HWY 60 Wyandotte, OK - celltower@estoo.net - 918-238-5151 (ext: 1840) - regular mail
Exclusions: Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

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

Provide a 1-page cover letter with the following information:

- a. TCNS Number
- b. Company Name
- c. Project Name, City, County, State
- d. Project type
- e. Project coordinates
- f. Contact information

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

If the applicant/tower builder receives no response from the Eastern Shawnee Tribe of Oklahoma within 30 days after notification through TCNS, the Eastern Shawnee Tribe of Oklahoma has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Eastern Shawnee Tribe of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

10. THPO Brina Williams - Alabama Quassarte Tribal Town - (PO Box: 218) Wetumka, OK - Brina.Williams@alabama-quassarte.org - 405-452-3987 - electronic mail

Exclusions: The Alabama Quassarte Tribal Town is unaware of any cultural or sacred sites located within the immediate project area. The AQTT's Historic Preservation Department concurs that there should be no adverse effect to any known historic properties and that work should proceed as planned. However, as the project is located in an area that is general historic interest to the Tribe, we request that work be stopped and our office contacted immediately if any Native American cultural materials or human remains are encountered.

If you have any questions, please contact our office at the number below.

Respectfully,

Alabama Quassarte Tribal Town
P.O. Box 187
Wetumka, Ok 74883
(P) 405-452-3881
(F) 405-452-3889

11. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - 000-000-0000 - electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

12. THPO Tonya Tipton - Shawnee Tribe - 29 South 69A Highway Miami, OK - tcns@shawnee-tribe.com - 918-542-2441 (ext: 103) - electronic mail

Exclusions: In the case of projects with NO ground disturbance such as antennae on the sides of buildings or existing poles, the Shawnee Tribe concurs that no known historic properties will be negatively impacted by the project. The Shawnee Tribe DOES NOT wish to consult on those projects with NO ground disturbance.

If the project DOES involve ground disturbance at all, the Shawnee Tribe would like to ACCEPT your invitation for consultation and will provide a review.

If you have any questions, you may contact the Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

13. THPO William Bailey Jr - Poarch Band of Creek Indians - 5811 Jack Springs Road Atmore, AL - bbailey@pci-nsn.gov - 251-368-9136 (ext: 2075) - electronic mail

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

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

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

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

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

16. Program Manager Jennifer Dixon - Georgia Historic Preservation Division - 2610 Georgia Highway 155 SW Stockbridge, GA - jennifer.dixon@dnr.ga.us - 770-389-7851 - electronic mail

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

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

Notification Received: 02/03/2026

Notification ID: 306660

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Kelly Towers III LLC

Consultant Name: Michael Romanoski

Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 34 deg 17 min 33.3 sec N
Longitude: 83 deg 51 min 39.9 sec W
Location Description: 2378 Pine Circle Drive
City: Gainesville
State: GEORGIA
County: HALL

Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

Ground Elevation: 361.2 meters
Support Structure: 59.4 meters above ground level
Overall Structure: 60.7 meters above ground level
Overall Height AMSL: 421.9 meters above mean sea level

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

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwlFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_ltk39MNoGtgWe1vmeedh3_FbFk&m=kByrKDEwPZ81-kAKF6LzKRdeajPC3pbPu73TRmH8QdnZW_zSKyr5I3jgZsuBHcl2&s=_6ZsgkR1HCbOvZnFpv-uYWr3n75Xl8A7VBclCZYH7Uk&e=

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

Thank you,
Federal Communications Commission

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1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Cherokee Nation

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

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Ms. Terrapin:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Romanoski", written over a large, faint green leaf graphic.

Michael Romanoski
Tribal Consultation Manager

From: towernotifyinfo@fcc.gov
Sent: Wednesday, April 22, 2026 6:57 PM
To: Tribal
Cc: tcns.fccarchive@fcc.gov; historicpreservation@cherokee.org; gwen-terrapin@cherokee.org
Subject: Reply to Proposed Tower Structure (Notification ID: 306660) - Email ID #9498307

Categories:

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Dear Michael Romanoski,

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

The following message has been sent to you from Gwen Terrapin of the Cherokee Nation in reference to Notification ID #306660:

The Cherokee Nation (Nation) is in receipt of your correspondence for pole project, TCNS No. 306660 located in Hall County, GA and appreciates the opportunity to provide comments upon this project.

The National Historic Preservation Act (NHPA, 54 U.S.C. § 300101 et seq), and its implementing regulations (36 CFR part 800), provide that undertakings subject to the Section 106 review process are referred to in 54 U.S.C. § 306108, which clarifies that historic properties may have religious and cultural significance to Indian tribes.

The Nation maintains proprietary databases and records of cultural, pre-contact, and post-contact archeological resources in this area. Upon completion of our Section 106 review the Nation's Historic Preservation Office researched and cross-referenced the project's legal description against our information and found instances where this project intersects or adjoins such resources. However, the Nation does not object to the project proceeding as long as the following mitigative procedures are followed:

- The Nation requests that Trileaf re-contact this Office if there are any amendments or edits to this project; and
- The Nation requests that Trileaf contact this Office if there are any pre-contact or post-contact artifacts located throughout the course of this project. Examples of pre-contact artifacts may include but are not limited to arrowheads, stone-ground tools, mortars, pestles, pottery shards, or fire pits. Post-contact artifacts may include but are not limited to cellars, cabins, or ceramic vessels.

If the above procedures are observed, the Nation does not object to this project proceeding.

Additionally, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur, we request all

work cease and Cherokee Nation be notified immediately at (918) 931-7161. In such discovery, other appropriate agencies will need to be contacted immediately as well.

Should you have any further questions, please do not hesitate to call.

Wado,
Cherokee Nation

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

Notification Received: 02/03/2026
Notification ID: 306660
Tower Owner Individual or Entity Name: Kelly Towers III LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 34 deg 17 min 33.3 sec N
Longitude: 83 deg 51 min 39.9 sec W
Location Description: 2378 Pine Circle Drive
City: Gainesville
State: GEORGIA
County: HALL

Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

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Support Structure: 59.4 meters above ground level
Overall Structure: 60.7 meters above ground level
Overall Height AMSL: 421.9 meters above mean sea level

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CHEROKEE NATION®
P.O. Box 948 • Tahlequah, OK 74465-0948
918-453-5000 • www.cherokee.org

Office of the Principal Chief

Chuck Hoskin Jr.
Principal Chief
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Bryan Warner
Deputy Principal Chief
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March 18, 2026

Trileaf
Attn: Michael Romanoski

VIA: Email: tribal@trileaf.com

Re: TCNS 306660

The Cherokee Nation (Nation) is in receipt of your correspondence about **TCNS 306660** and appreciates the opportunity to provide comment upon this proposed facility deployment.

The Nation possesses, maintains, and updates databases and records of cultural, pre-contact, and post-contact historic and archeological resources in this area that are unique to the Nation and the removed Cherokees. In order to ensure that your project review is accurate and complete, the Nation can cross-reference your project and its associated activities against these databases and records. The Nation can provide this review and submit the documentation necessary for your project to move forward without delay.

Please contact the Nation directly at the information provided below this letter to discuss this compensable service. If you require additional information or have any questions, please contact me at your convenience. Thank you for your time and attention to this matter.

Wado,

Elizabeth Toombs, Tribal Historic Preservation Officer
Cherokee Nation Tribal Historic Preservation Office
elizabeth-toombs@cherokee.org
918.453.5389



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Coushatta Indian Tribe

Mr. Dakota John
1940 C.C Bel Road
Elton, LA 70532

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Mr. John:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Romanoski", is written over a large, faint green leaf graphic in the background.

Michael Romanoski
Tribal Consultation Manager

Lee Castile

From: towernotifyinfo@fcc.gov
Sent: Thursday, April 23, 2026 8:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #39641

Categories: Lee

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Michael Romanoski
1515 Des Peres Rd. Ste 200
Suite 200
St. Louis, MO 63131

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 04/16/2026 and 04/23/2026. Our contact with these Tribal Nations or NHOs was sent on 04/23/2026.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 04/23/2026, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

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

Sincerely,
Ellen Saint Onge
Federal Preservation Officer
Federal Communications Commission

Tribe Name: Lower Sioux Indian Community of Minnesota

TCNS# 306704 Referred Date: 04/22/2026 Location: 50 Citation Boulevard, Palm Coast, FL

Detailed Description of Project: Our client proposes to construct a 150-ft monopole telecommunications tower with an overall height of 170 ft within a proposed 75-ft by 75-ft compound lease area. Access/utilities will be granted via a proposed 15-foot easement extending north.

Tribe Name: Coushatta Indian Tribe

Tribe Name: Seminole Tribe of Florida

Tribe Name: Thlopthlocco Tribal Town

TCNS# 306681 Referred Date: 04/22/2026 Location: 1411 Grove Avenue, Richmond, VA

Detailed Description of Project: Our client proposes to install new antennas at overall heights of 43 feet and 47 feet on a 42-foot building with a current overall height of 46 feet. No ground disturbance is proposed. This building is an existing telecommunications facility.

Tribe Name: Chickahominy Indian Tribe

Tribe Name: Delaware Nation

Tribe Name: Nansemond Indian Tribe

Tribe Name: Ponca Tribe of Indians of Oklahoma

Tribe Name: Rappahannock Tribe / HK Law

Tribe Name: The Upper Mattaponi Indian Tribe

TCNS# 306660 Referred Date: 04/22/2026 Location: 2378 Pine Circle Drive, Gainesville, GA

Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

Tribe Name: Coushatta Indian Tribe

Tribe Name: Kialegee Tribal Town

Tribe Name: Seminole Tribe of Florida

Tribe Name: Shawnee Tribe

Tribe Name: Thlopthlocco Tribal Town

Tribe Name: United Keetoowah Band of Cherokee Indians in Oklahoma

TCNS# 306656 Referred Date: 04/22/2026 Location: East of 1063 190th Street, Victor, IA

Detailed Description of Project: The Towers, LLC proposes to build a 255ft (265.5ft overall) lattice telecom tower and assoc equip in a 10,000sqft lease area. A 30ft-wide access/utility easement and 10ft utility easement will extend S to connect to 190th Street. Site is an ag field.

Tribe Name: Crow Tribe

Tribe Name: Ho-Chunk Nation

Tribe Name: Iowa Tribe of Oklahoma

Tribe Name: Kaw Nation

Tribe Name: Lower Brule Sioux Tribe

Tribe Name: Omaha Tribe of Nebraska

Tribe Name: Otoe-Missouria Tribe of Indians

Tribe Name: Ottawa Tribe of Oklahoma

Tribe Name: Ponca Tribe of Indians of Oklahoma

Tribe Name: Ponca Tribe of Nebraska

Tribe Name: Rosebud Sioux Tribe

Tribe Name: Sac and Fox Nation

Tribe Name: Santee Sioux Nation of Nebraska

Tribe Name: Sisseton-Wahpeton Oyate of the Lake Traverse Reservation

Tribe Name: Yankton Sioux Tribe

TCNS# 306626 Referred Date: 04/22/2026 Location: 3173 East 2nd Avenue, Denver, CO



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Eastern Band of Cherokee Indians

Mr. Stephen Yerka
P.O. Box 455
Cherokee, NC 28719

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Mr. Yerka:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Romanoski", is written over a large, faint green leaf graphic in the background.

Michael Romanoski
Tribal Consultation Manager

Evan Brotherton

From: towernotifyinfo@fcc.gov
Sent: Thursday, February 12, 2026 9:54 AM
To: Tribal
Cc: tcns.fccarchive@fcc.gov; celltower@estoo.net
Subject: Reply to Proposed Tower Structure (Notification ID: 306660) - Email ID #9440928

Categories: Responses to File

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Michael Romanoski,

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

The following message has been sent to you from Director Lora Nuckolls of the Eastern Shawnee Tribe of Oklahoma in reference to Notification ID #306660:

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

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

Notification Received: 02/03/2026
Notification ID: 306660
Tower Owner Individual or Entity Name: Kelly Towers III LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 34 deg 17 min 33.3 sec N
Longitude: 83 deg 51 min 39.9 sec W

Location Description: 2378 Pine Circle Drive
City: Gainesville
State: GEORGIA
County: HALL

Detailed Description of Project: Our client proposed to construct a 199-foot monopole communications structure within a 100-foot by 100-foot lease area.

Ground Elevation: 361.2 meters

Support Structure: 59.4 meters above ground level

Overall Structure: 60.7 meters above ground level

Overall Height AMSL: 421.9 meters above mean sea level

This email has been scanned for spam and viruses by Proofpoint Essentials. Visit the following link to report this email as spam:

https://us1.proofpointessentials.com/app/report_spam.php?mod_id=11&mod_option=logitem&report=1&type=easyspam&k=k1&payload=53616c7465645f5fdda949cdd40c5d8409d0447f5d1bdcc5c4f2244d8e651e19724c4d89bf3a336109840b01154e3f2a45a307275c8352ddc59111d5a576cd66b2e2046e89952f19ab71691a13972885d0a4e2a4247252c32828da962ba510e22cba48be3357507e0314a22563b32fff11ac0c115a0222ffe39b07e8f5ec2abf4fe105e91d0ccf902c1d3c30ecee6a04ac23d73ff8ad8434656d5ccdbea6



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Kialegee Tribal Town

Stephanie Yahola
P.O. Box 332
Wetumka, OK 74883

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Yahola:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client 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.

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

Sincerely,

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Muscogee Creek Nation

Mr. Jason Sawyer
P.O. Box 580

Okmulgee, OK 74447

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Mr. Sawyer:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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Sincerely,

A handwritten signature in black ink, appearing to read "Michael Romanoski".

Michael Romanoski
Tribal Consultation Manager



March 30, 2025

DAVID W. HILL
PRINCIPAL CHIEF

DEL BEAVER
SECOND CHIEF

Historic and Cultural Preservation
P.O. Box 580 | Okmulgee, OK 74447
T. 918.732.7732 | F 918.758.0649

TRILEAF
1515 Des Peres Rd Suite 200
Saint Louis, MO 32803

TCNS# 306660
Gainesville
2378 pine Circle Dr, Gainseville, Hall Co, GA

Dear Mr. Romanoski,

In keeping with the Federal Communications Commission (FCC), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA), 36 CFR Part 800, this letter is to acknowledge that the Muscogee (Creek) Nation has received notice of for TCNS # 306660 60.7 meter monopole.

After reviewing all pertinent information and our records, at this time we are currently unaware of any historic, cultural, religious or sacred sites at this exact location. Therefore, we recommend a finding of "No Historic in the APE" for the proposed Thank you for contacting the Muscogee (Creek) Nation Historic and Cultural Preservation Department.

Furthermore, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur, we request all work cease and the Muscogee (Creek) Nation and other appropriate agencies be notified immediately.

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

Sincerely,
J.Sawyer, TCNS Manager
Muscogee (Creek) Nation



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Poarch Band of Creek Indians

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

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear :

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Sincerely,

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Seminole Nation of Oklahoma

Mr. Ben Yahola
P.O.Box 1498
Wewoka, OK 74884

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Mr. Yahola:

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Seminole Tribe of Florida

Compliance Review Supervisor THPO Compliance
30290 Josie Billie Hwy PMB 1004

Clewiston, FL 33440

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Compliance Review Supervisor THPO Compliance:

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Sincerely,

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Shawnee Tribe

Ms. Tonya Tipton
29 South Highway 69A
Miami, OK 74354

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Ms. Tipton:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

Thlopthlocco Tribal Town

Mekko Ryan Morrow

P.O. Box 188

Okemah, OK 74859

RE: Kelly Towers III LLC

Trileaf Project # 782453 / GA2012 / Gainesville

2378 Pine Circle Drive, Gainesville, Hall County, GA 30503

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

TCNS # 306660

Dear Mekko Morrow:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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Sincerely,

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Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

March 16, 2026

United Keetoowah Band of Cherokee Indians in Oklahoma

Ms. Whitney Warrior
ATTN: Cultural Resource Dept.
P.O. Box 746
Tahlequah, OK 74464

RE: Kelly Towers III LLC
Trileaf Project # 782453 / GA2012 / Gainesville
2378 Pine Circle Drive, Gainesville, Hall County, GA 30503
Latitude: 34° 17' 33.26" N, Longitude: 83° 51' 39.91" W
TCNS # 306660

Dear Ms. Warrior:

This project was originally submitted in TCNS on 2/6/2026. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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Sincerely,

A handwritten signature in black ink, appearing to read "Michael Romanoski".

Michael Romanoski
Tribal Consultation Manager

Appendix G

Resumes





Professional Resume

ANNA NI

SENIOR PROJECT SCIENTIST

Education

Biology, B. S.

Virginia Commonwealth University/ Richmond, VA

Areas of Expertise

Ms. Anna Ni has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Anna Ni has experience delineating and characterizing waters and wetlands that may be located within a project area in accordance with accepted United States Army Corps of Engineers guidance throughout the United States.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Soil Characterization

Field Reconnaissance
NEPA Environmental Assessments
Migratory Bird Evaluations
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Land Use History
Waters/Wetland Delineations
Habitat Surveys

Certifications/Affiliations

Wetland Delineator, The Swamp School, LLC



Professional Resume

MORGAN RASMUSSEN

SENIOR PROJECT MANAGER

Education

Environmental Science, B. S.
Georgia College & State University / Milledgeville, GA

Areas of Expertise

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

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

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

Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person

Dionne Joubert (Planning)

From: Lisa Poole <LPoole@gainesvillega.gov>
Sent: Tuesday, July 7, 2026 5:02 PM
To: Kathy Kelly
Subject: Re: [EXTERNAL] FW: Online Form Submittal: Contact Us - Public Works - Lisa Poole
Attachments: ~WRD0000.jpg

Good afternoon Kathy,

We don't see any reason for this to not move forward.

Thanks
Lisa Poole
Sent from my iPhone

On Jun 30, 2026, at 2:21 PM, Kathy Kelly <kathy.kelly@kellycomss.com> wrote:

CAUTION:*This email originated from outside the City of Gainesville networks. Be aware of phishing, and remember CoG DoIT will never ask for your password or other personal information in email. Do not open up attachments or click on links unless you are absolutely sure it is legit and safe.. When in doubt, click the Phish Alert button or contact the CoG DoIT Help Desk*****

Good afternoon!

Please let me know if you need any additional information for review.

Do you know when I can expect a response? This is the last piece I need for our zoning submittal.

Thank you!

Kathy Kelly
[REDACTED]

From: Kathy Kelly
Sent: Thursday, June 25, 2026 3:32 PM
To: 'Lisa Poole' <LPoole@gainesvillega.gov>
Cc: Phil Eberly <peberly@leadedgedesign.com>
Subject: RE: Online Form Submittal: Contact Us - Public Works - Lisa Poole

Hi Lisa!

Thank you for the quick response! Please find attached the 1A Survey along with our FAA Determination. We are seeking to build a 175' monopole.

If you need anything else for review, please let me know. Upon review, if you could email me back your response, I will forward to the county for our zoning file.

Thank you!

Kathy Kelly
[REDACTED]

From: Lisa Poole <LPoole@gainesvillega.gov>
Sent: Thursday, June 25, 2026 2:56 PM
To: Kathy Kelly <kathy.kelly@kellycomss.com>
Cc: Phil Eberly <peberly@leadedgedesign.com>
Subject: Fwd: Online Form Submittal: Contact Us - Public Works - Lisa Poole

Kathy,

Thank you for your email. Please send the information. I have copied my airport engineers for their expertise as well.

Thanks
Lisa Poole

Sent from my iPhone

Begin forwarded message:

From: noreply@civicplus.com
Date: June 25, 2026 at 2:04:27 PM EDT
To: Lisa Poole <LPoole@gainesvillega.gov>
Subject: Online Form Submittal: Contact Us - Public Works - Lisa Poole
Reply-To: noreply@civicplus.com

Contact Us - Public Works - Lisa Poole

Thank you for reaching out to the City of Gainesville, Georgia. Please fill out the form below to contact Lisa Poole.

First Name	Kathy
Last Name	Kelly
Phone Number	[REDACTED]

Email Address Kathy.kelly@kellycomss.com

Comments / Questions Good Afternoon! I am in the process of zoning a cell tower in Hall county. The property is approximately 2.25 miles Northwest of the airport. As part of our zoning review, they have asked that I sent the tower information to the local airport for review. Can you please respond to this email so that I may include attachments? I appreciate your assistance. You can reach me at [REDACTED] Kathy Kelly

Email not displaying correctly? [View it in your browser.](#)

<~WRD0000.jpg>

<GA2012_1A 122325.pdf>

<GA2012_Gainesville_FAA 042026.pdf>