



# Environmental Assessment

**RURAL BROADBAND INFRASTRUCTURE EXPANSION IN THE ALLEGHENIES:  
HESSTON AND MT. UNION COLLOCATIONS AND PROPOSED GIBBS LANE  
TOWER**

Department of  
Commerce

**MIFFLIN AND HUNTINGDON COUNTIES, PENNSYLVANIA**

National  
Telecommunications  
and Information  
Administration

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## 1.0 Executive Summary

Terracon Consultants, Inc. (Terracon) has prepared this Environmental Assessment (EA) on behalf of Ambassador Tower LLC and Upward Broadband as the National Environmental Policy Act (NEPA) review of the proposed Rural Broadband Infrastructure Expansion in the Alleghenies Project (RBIEAP). The RBIEAP has been awarded grant funding from the National Telecommunications and Information Administration (NTIA)'s Broadband Infrastructure Program (BIP) to expand broadband access to unserved/underserved areas comprised of 977 census blocks in the Pennsylvania counties of Huntingdon, Fulton, Bedford, Franklin, Perry and Mifflin. The larger overall proposed broadband grant will deploy fixed wireless broadband service across 31 communications towers, which are divided into 9 separate and independent projects. The "Grantee" is a covered partnership comprised of Pennsylvania county governments for Huntingdon (lead applicant), Bedford and Fulton counties, two internet providers, Upward Broadband and Crowsnest Broadband, and a Pennsylvania nonprofit, Alleghenies Broadband, Inc. (ABI) (collectively referred to as Huntingdon County).

This EA's proposed action addresses the seventh component of the total project and comprises three communication tower locations: the Hesston and Mt. Union collocations and the proposed Gibbs Lane tower, all located in Huntingdon and Mifflin County, Pennsylvania (the Proposed Action). The proposed action is being implemented by Ambassador Tower LLC, who will own the tower assets, and Upward Broadband, who will own the communications equipment (collectively referred to hereafter as the "Responsible Party").

Hesston Tower is an existing 305-foot self-supporting lattice communication tower located 1,900ft SE of 12951 Raystown Rd, Penn Township (Huntingdon), Huntingdon County, Pennsylvania (NAD83: 40° 25' 40.37" N / 78° 6' 35.27" W). The tower is currently owned by American Tower Company (ATC). The Mt. Union Tower is an existing 245-foot self-supporting lattice communication tower located at the north terminus of Barren Trail Rd, Wayne Township (Mount Union), Mifflin County, Pennsylvania (NAD83: 40° 24' 53.43" N / 77° 54' 7.32" W). The tower is currently owned by Hilltop Tower Leasing, INC. Gibbs Lane Tower is the proposed construction of a new 199-foot self-supporting lattice communication tower and compound including access and utilities easements. The proposed tower will be located at 7387 Gibbs Lane, Union Township (Huntingdon), Huntingdon County, Pennsylvania (NAD83: 40° 23' 21.37" N / 78° 1' 26.32" W). Gibbs Lane Tower will be constructed and owned by Ambassador Tower LLC.

The proposed action is based on the lack of broadband access in Mifflin and Huntingdon Counties and uses the most reasonably accessible areas. Based on the proposed projects, a total of four alternatives were considered during the EA process:

1. Proposed Action Alternative: The collocation/modification of Hesston and Mt. Union Towers and the construction of Gibbs Lane Tower and associated compound/equipment and access/utility easements.



2. Fiber to the Premise - Underground Cable: The consideration of using buried fiber-optic cable as a viable technology for project implementation presented significant readily apparent barriers that eliminated the technology from further discussion.
3. Fiber to the Premise - Aerial Cable: The covered partnership would enter into a joint pole agreement with existing utility providers in order to acquire necessary access to attach fiber optic cabling to existing utility pole infrastructures.
4. No Action Alternative: No collocation/modification of Hesston and Mt. Union Towers and the construction of Gibbs Lane Tower; broadband coverage in certain areas of Mifflin and Huntingdon Counties would remain underserved.

While all alternatives were considered, the Proposed Action Alternative was selected for comprehensive analysis and final design because it would provide telecommunications enhancement to the community with few infrastructure constraints, less cost, and low environmental impact.

Because the proposed project utilizes federal funds, NTIA must fulfill obligations under the NEPA and other applicable local, state, and federal regulations. In compliance with these regulations, the following EA has been prepared. The implementation of NEPA requires a systematic, interdisciplinary approach to project planning and implementation, and emphasizes that the environmental impacts of federally funded projects be given serious consideration in the decision-making process. The EA evaluates the potential social, economic, and environmental effects from the proposed project, and was prepared with input from stakeholder agencies. The EA addresses the following:

- Noise
- Air Quality
- Geology and Soils
- Water Resources
- Biological Resources
- Historic and Cultural Resources
- Aesthetic and Visual Resources
- Land Use
- Infrastructure
- Socioeconomic Resources
- Human Health and Safety

The results of the EA indicate that, with appropriate mitigation and conservation measures, the Proposed Action Alternative would not result in any significant adverse effects to the natural, cultural, or human environment. The findings of the EA are summarized in the following table:

Table 1.0 Effect Comparison of Alternatives

Resource Area	Proposed Action Alternative	No Action Alternative
Noise	Short term impacts during construction would be temporary and minor. Mitigation methods include limiting the hours of construction to occur only during permissible construction hours (6am to 9pm) in accordance with Huntington County Zoning Ordinance. The on-going operations of telecommunications towers are not considered significant sources of noise. Less than significant noise impacts are anticipated.	No impacts.
Air Quality	Short term impacts during construction would be temporary and minor, including fugitive dust emissions from vehicular movement and facility construction. Dust suppression techniques via water trucks or other methods can be used reduce fugitive dust emissions during construction. The Gibbs Lane proposed tower includes a propane-powered generator, which would only operate during the case of emergencies and falls under a Pennsylvania Department of Environmental Protection (PA DEP) permit exemption. Less significant Impacts to air quality are anticipated.	No impacts.
Geology and Soils	Minimal impact to soils will occur during construction of the Gibbs Lane tower. Dust suppression techniques via water trucks or other methods can be used to reduce fugitive dust emissions. The Mt. Union and Hesston collocations include only minor ground disturbance (underground conduit and equipment) which will occur within the previously developed tower compound. No significant impacts to geology or soils are anticipated.	No impacts.
Water Resources	There are no water features in the vicinity of either site location. No Impacts to water resources are anticipated.	No impacts.

Resource Area	Proposed Action Alternative	No Action Alternative
Biological Resources	<p>A Pennsylvania Natural Diversity Inventory (PNDI) environmental review was completed for the projects. The environmental review tool is utilized to coordinate concurrent project reviews with the Pennsylvania Department of Conservation and Natural Resources (DCNR), the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the United States Fish and Wildlife Service (USFWS).</p> <p>Review of the Hesston tower collocation indicated no environmental concerns with any agencies and no further ESA consultation was required for the proposed collocation. The PFBC requested Conservation measures for the Timber Rattlesnake (<i>Crotalus horridus</i>, Species of Special Concern) for the Mt. Union tower site. To avoid impacts to the rattlesnake, the PFBC requires a series of mitigation measures which are outlined above in Section 6.0. The PGC requested further review for the Allegheny woodrat (<i>Neotoma magister</i>, threatened) for the Gibbs Lane proposed tower site. PGC concluded that no impact is anticipated.</p> <p>Less than significant impacts with BMPs and/or mitigation incorporated are expected for all of the identified species.</p>	No impacts.
Historic and Cultural Resources	<p>No historic or archeological resources were identified at the Mt. Union and Hesston Collocations and Gibbs Lane project locations. Cultural resources in the viewshed of both projects were not determined to be adversely affected by the project implementation. The State Historic Preservation Office (SHPO) and federally recognized tribes were consulted and at this time, have not identified any cultural resources that would be adversely impacted at any of the locations.</p> <p>No impacts to historic and cultural resources are anticipated. In the unlikely event that unanticipated historic properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the bore program excavation activities, all ground disturbing activities must halt immediately, and NTIA along with the appropriate state and/or tribal agencies must be contacted, in accordance with applicable state law and federal regulation (36 C.F.R. § 800.13(b)).</p>	No impacts.
Aesthetic and Visual Resources	<p>The Gibbs Lane proposed tower site and Mt. Union and Hesston collocation sites are located in a wooded, rural area. Less than significant impacts to aesthetic and visual resources are anticipated.</p>	No impacts.

Resource Area	Proposed Action Alternative	No Action Alternative
Land Use	The proposed Mt. Union and Hesston collocations would not impact the current land use and the proposed Gibbs Lane tower is a compatible land use with the surrounding environment. Less than significant impacts to land use are anticipated.	No impacts.
Infrastructure	The project will overall provide beneficial impacts to the infrastructure of Mifflin and Huntingdon Counties by providing valuable broadband coverage and services.	Less than Significant Impacts.
Socioeconomic Resources	Beneficial impacts to socioeconomics will result in the form of better communication capabilities, increased educational opportunities, economic development potential, higher security, and improved access to health care due to broadband access.	Communities in rural Huntingdon County would continue to lack access to broadband infrastructure. Significant Impact.
Human Health and Safety	No sources of significant contamination were identified at either of the tower locations. The Responsible Party will identify buried utilities prior to subsurface construction methods using 811 (Call Before You Dig) and permit only workers qualified by training or experience to operate heavy machinery and equipment. Coordination with the Federal Aviation Administration (FAA) will be completed to ensure the proposed tower will pose no hazards to air navigation. Beneficial impacts to human health and safety will result in the form of better communication capabilities, higher security, and improved access to health care due to broadband access.	Less than Significant Impacts.

This EA has been completed based upon site information and the review of readily available information obtained from commercial services, government agencies, and/or other sources as described herein. This EA was prepared in accordance with the NEPA implementing procedures of the Council on Environmental Quality (CEQ; 40 CFR Parts 1500-1508), Federal Communications Commission (FCC; 47 CFR §1.1301-1 .1320), and guidance provided by NTIA. The objective of the EA is to assess whether the proposed action is likely to result in a significant environmental impact, for which an Environmental Impact Statement (EIS) would be required. The U.S. Department of Commerce, NTIA is the agency responsible for awarding BIP grant funds for the proposed covered project including this proposed action and is lead agency for NEPA. In addition, Section 106 of the National Historic Preservation Act of 1966 (NHPA), as codified at 36 CFR Part 800, regulates assessment of cultural resources for all federal undertakings. FCC’s Nationwide Programmatic Agreement for the Collocation of Wireless Antennas (47 CFR Part 1, Appendix B) and the Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process (47 CFR Part 1, Appendix C) further stipulate the review process for cultural resources and amend 47 CFR, Part 1, Subpart I, rule section 1.1307(a)(4).

## 2.0 Purpose and Need

The purpose of the project is to deploy internet to underserved populations of Huntingdon and Mifflin Counties and the action is needed due to insufficient access to broadband. On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act into law, which included a significant investment of \$65 billion to help close the digital divide and ensure that all Americans have access to reliable, high speed, and affordable broadband. According to NTIA, the purpose of the Act is to lay critical groundwork for widespread access and affordability of broadband, creating new jobs and economic opportunities, providing increased access to healthcare services, enriching educational experiences of students, and improving overall quality of life for all Americans. According to the Pennsylvania Broadband Development Authority (PBDA), broadband connectivity:

- Fosters economic growth and innovation
- Provides the critical infrastructure for the future
- Grow workforce development and educational achievement opportunities
- Provides adequate, reliable emergency services
- Enhances community health, well-being, access to health care services, and quality of life

Under the Infrastructure Investment and Jobs Act, the BIP program's purpose is to use grant funding to expand broadband access to unserved/underserved areas of the Country. Huntingdon County, Pennsylvania has been identified as having a significant deficiency of broadband coverage. This installation will improve wireless communications and connectivity coverage in the immediate vicinity of Mt. Union and Hesston towers as well as improve the coverage to areas of the county that currently do not have access. By providing this coverage, Huntingdon and Mifflin Counties, their businesses, citizens, and students will receive the high level of access consistent with larger urban areas. The project will provide much-needed wireless communications and connectivity coverage to public institutions and create opportunities for broadband connections to both businesses and households in this underserved region of Pennsylvania. By providing wireless communications and connectivity coverage, the project is expected to facilitate rural economic development, job creation, education, and improve access to health care and emergency services.

## 3.0 Description of Proposed Action and Alternatives

This Chapter includes a description of the Proposed Action and project alternatives as well as the justification for the alternatives selected for further study.

### 3.1 Introduction

The larger overall proposed broadband grant will deploy fixed wireless broadband service across 31 communications towers providing high-speed broadband internet to the proposed service area comprised of 977 census blocks in the Pennsylvania counties of Huntingdon, Fulton, Bedford, Franklin, Perry, and Mifflin. This EA's proposed action addresses the seventh component of the total project and comprises three communication tower locations: the Hesston and Mt. Union tower collocations and the proposed Gibbs Lane tower, all located in Mifflin and Huntingdon Counties, Pennsylvania. The proposed communication facilities will improve cellular connectivity and the overall project will provide much-needed high-speed internet connectivity to public institutions and create opportunities for broadband connections to both businesses and households in these rural areas. By providing high-speed connectivity, the project is expected to facilitate rural economic development, job creation, education, and improve access to health care and emergency services.

### 3.2 Proposed Action

The Proposed Action comprises three communication facilities, the Mt. Union and Hesston tower collocations and the proposed Gibbs Lane tower.

#### Mt. Union Tower Collocation

The Mt. Union Tower is an existing 240-foot self-supporting lattice communication tower (245 feet with appurtenances) located at North terminus of Barren Trail Road, Wayne Township (Mount Union), Mifflin County, Pennsylvania (NAD83: 40° 24' 53.43" N / 77° 54' 7.32" W). The tower is currently owned by Hilltop Tower Leasing, INC and was constructed on August 9, 2017 with a Federal Communications Commission (FCC) Antenna Structure Registration system (ASR) file number of 1305561. This site was chosen due to the fact that the existing lease would allow for collocation over a new build, which reduces operational costs and environmental impacts. The existing tower site is located atop a mountain ridge with dense wooded land, existing above ground utilities. The adjacent land use is a mixture of wooded land and low density residential. All ground disturbance anticipated at this site will occur within the approximate 10,000 square-foot graveled and fenced tower compound. Equipment staging will occur within the existing gravel access road, which extends southeast from the site.

#### Hesston Tower Collocation

The Hesston Tower is an existing 300-foot self-supporting lattice communication tower (305 feet with appurtenances) located 1,900-ft SE of 12951 Raystown Rd, Penn Township (Huntingdon), Huntingdon County, Pennsylvania (NAD83: 40° 25' 40.37" N / 78° 6' 35.27" W). The tower is currently owned by ATC and was constructed on September 5, 2002 with a Federal

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Communications Commission (FCC) Antenna Structure Registration system (ASR) file number of 1234521. This site was chosen due to the fact that the existing lease would allow for collocation over a new build, which reduces operational costs and environmental impacts. The existing tower site is located atop a mountain ridge with dense wooded land, existing above ground utilities. The adjacent land use is a mixture of wooded and grassed land and low density residential. All ground disturbance anticipated at this site will occur within the approximate 10,000 square-foot graveled and fenced tower compound. Equipment staging will occur within the existing gravel access road, which extends northwest from the site.

#### Proposed Gibbs Lane Tower

Gibbs Lane Tower is the proposed new construction of a 199-foot self-supporting lattice communications tower located at 7387 Gibbs Ln, Union Township (Huntingdon) Huntingdon County, Pennsylvania (NAD83: 40° 23' 21.37" N / 78° 1' 26.32" W). The parcel is owned by the Terry L McClain ETAL and is identified as Huntingdon County Tax Parcel Map No. 50-08-01. Development consists of an approximate 10,000 square-foot tower compound and an approximate 30-foot by 3,795-foot access/utility easement that connects proposed utilities to the southeast. The compound will be accessed via an existing access road that extends to the southeast; however, a portion of the proposed access road is an existing two track dirt access road that will require widening to allow equipment to the proposed tower compound location. New electric service cable will additionally be installed underground along the access easement from an existing Valley Rural Electric Cooperative pad-mounted transformer to the site. The tower will likely be installed on a mat foundation within the fenced compound. The compound will also house an 8-foot by 8-foot equipment shelter and ice bridge, a propane aboveground storage tank, and associated emergency backup generator. Gibbs Lane Tower will be constructed and owned by the Responsible Party. Preliminary site drawings are included in Appendix B and photographs are included in Appendix F.

This tower site was chosen because it provided the best coverage for the area in need and was already located adjacent to a power easement with feasible sources for power in close proximity. It was also chosen in consideration of construction access, subsurface conditions, zoning considerations, and cooperation of property owner.

The area proposed for the Gibbs Lane Tower and compound has dense vegetation and is forested with mixed deciduous trees adjacent to an existing two track dirt access road. Anticipated site work includes the removal of trees and vegetation within the proposed compound, geotechnical core boring and soil resistivity testing, installation of the mat tower foundation, 8-foot compound fencing, gravel for compound area, installation of the self-support lattice tower, a grounding ring for the tower, and installation of the 8-foot by 8-foot shelter and ice bridge. Ground disturbance is estimated to be approximately 47,860 square foot (approximately 1 acres). Examples of equipment that will likely be used during construction include cranes, backhoes, excavators, and bulldozers. The proposed equipment staging area utilized will be along the access road to the south of the site.

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### 3.3 No Action Alternative

Under the no action alternative, the project would not move forward, and Huntingdon and Mifflin County would remain underserved with regards to wireless communications and connectivity coverage. No construction impacts would occur, as described under the proposed action alternative. None of the benefits outlined in 2.0 would occur under the no action alternative.

### 3.4 Alternatives

Based on the proposed project, a total of four alternatives were considered during the EA process:

1. Proposed Action Alternative: The collocation/modification of Hesston and Mt. Union Towers and the construction of Gibbs Lane Tower and associated compound/equipment.
2. Fiber to the Premise - Underground Cable: The consideration of using buried fiber-optic cable as a viable technology for project implementation presented significant readily apparent barriers that eliminated the technology from further discussion.
3. Fiber to the Premise - Aerial Cable: The covered partnership would enter into a joint pole agreement with existing utility providers in order to acquire necessary access to attach fiber optic cabling to existing utility pole infrastructures.
4. No Action Alternative: No collocation/modification of Hesston and Mt. Union Towers and the construction of Gibbs Lane Tower; broadband coverage in certain areas of Huntingdon County would remain underserved.

While all four alternatives were considered, the Proposed Action Alternative is being proposed for comprehensive analysis and final design because it would have fewer infrastructure constraints, less environmental impact, lower cost, and fulfill the requirements of the grant.

### 3.5 Alternatives Considered but Eliminated from Further Discussion

As discussed in Section 3.4, four alternatives were considered but eliminated from further study (the overhead cable alternative and the underground cable alternative).

#### Fiber to the Premise-Underground Cable

The consideration of using buried fiber-optic cable as a viable technology for project implementation presented significant readily apparent barriers that eliminated the technology from further discussion. In rural areas, the cost of laying fiber cables can be at least five times higher than fixed wireless. In contrast, fixed wireless technology can be deployed faster and with lower costs, making it a more feasible option for delivering high-speed internet to remote communities. Compared to fiber, fixed wireless technology also offers faster installation times, further reducing costs. Fixed wireless technology installations can often be completed within days, if there is a clear line of sight between the antenna and the user's location. This means that fixed wireless technology offers a cost-effective solution for both urban and rural areas that require fast and reliable internet access without incurring the excessive costs of fiber installation. The administration and real property (land) acquisition burden would also be far greater for

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buried fiber-optic cable as the undertaking of such a project would require the extensive acquisition of easements and/or right-of-way. The time required to obtain hundreds of rights of way and environmental clearance would likely prevent project before the BIP implementation deadline. Therefore, the buried fiber-optic cable alternative could not be developed affordably, efficiently, or in an environmentally sensitive manner. For these reasons, the buried fiber optic cable alternative would not be considered feasible, and it is not discussed further in this EA..

#### Fiber to the Premise-Aerial Cable

This alternative would result in construction of hundreds of miles of new, aerial fiber optic cable using traditional installation techniques on existing or new utility poles or towers. Under this alternative, the covered partnership would enter into a joint pole agreement with existing utility providers in order to acquire necessary access to attach fiber-optic cabling to the existing utility pole infrastructure. Several factors led to elimination of using aerial cable as a viable alternative for project implementation. The total project cost of installing aerial fiber-optic cable would be expected to be much greater than those costs anticipated for activities described under the Proposed Action. In rural areas, the cost of installing aerial fiber-optic cable would be at least five times higher than fixed wireless.

The administrative and planning burden would also be far greater for aerial fiber-optic cable as the undertaking of such a project would require the extensive acquisition of easements and/or right-of-way. The time required to assess existing infrastructure including engineering review of all existing poles and their capacity to hold additional cable associated with this project could not be ascertained without a detailed system study by the affected utilities that would again delay the implementation of this project beyond the BIP implementation deadline. Further, application of new cable to existing or new poles and towers has its own significant inherent environmental impacts and a far more extensive permitting process, affecting both urban and rural areas. The costs of system-wide installation and ongoing maintenance of aerial cable would be expected to be much greater than the Proposed Action. In contrast, fixed wireless technology can be deployed faster and with lower costs, making it a more feasible option for delivering high-speed internet to remote communities. Compared to aerial fiber-optic cable, fixed wireless technology also offers faster installation times, further reducing costs. This means that fixed wireless technology offers a cost-effective solution for both urban and rural areas that require fast and reliable internet access without incurring the excessive costs of fiber installation. For these reasons, the aerial fiber-optic cable alternative would not be considered feasible, and it is not discussed further in this EA.

## 4.0 Description of the Affected Environment

A screening process was used to determine which environmental resources are likely to be impacted by the proposed action. Because the project is specifically designed to produce certain environmental benefits and to avoid or mitigate others, some environmental resources required less discussion. In some cases, environmental resources may be dismissed from analysis if they are unlikely to be significantly impacted by the proposed project. The remaining resources are

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analyzed further to assess the established baseline, likely impacts of the proposed action, and to determine what actions should be taken to mitigate adverse impacts.

### 4.1 Noise

Noise pollution is sound that becomes unwanted with normal activities, disrupts normal activities, or diminishes one’s quality of life. Noise pollution can adversely affect a person’s health and lead to several stress related issues. Sound is usually represented on a logarithmic scale with a unit called the decibel (dB). Sound on the decibel scale is referred to as sound level. According to EPA (US EPA, 1974), noise Levels of 45 decibels are associated with indoor residential areas, hospitals, and schools. Noise levels of 55 decibels are identified for certain outdoor areas where human activity takes place. The level of 70 decibels is identified as a threshold for all areas in order to prevent hearing loss.

According to the Huntingdon County Model Zoning Ordinance set by the Huntingdon County Planning & Development Department, no principal or accessory use, or operations or activities on its lot, shall generate a sound level exceeding the limits established in the table below, when measured at the locations specified in the table below. The term dBA means “A-weighted decibel”. A-weighting is a curve relating to the measurement of sound pressure level. A-weighting is applied to instrument-measured sound levels in an effort to account for the relative loudness perceived by the human ear (Meyer-Bisch, Christian, 2005).

Table 4.1 Sound Level Limits by Receiving Land Use / District for Huntingdon County

Land Use Zone District Receiving the Noise	Hours/Days	Maximum Sound Level
1. At Lot Line of Residential Use in a Residential District	1. 6am-9pm other than Sundays, Christmas Day, Thanksgiving Day, New Years Day, Labor Day, and Memorial Day 2. 9pm-7am plus all of the following days: Sundays, Christmas, Thanksgiving, New Years, Easter Sunday, Labor Day, and Memorial Day	1. 62 dBA 2. 55dBA
2. Lot Line of a Principal Residential Use that is not in a Residential District	3. Same as above 4. Same as above	3. 65 dBA 4. 62 dBA
3. Any Lot Line other than 1 or 2 (referenced above)	All times and days	70 dBA

The above-listed maximum permissible sound level limits shall not apply to several listed noise sources, which include *repair or installation of utilities or construction of structures, sidewalks or streets between the hours of 6am and 9pm, except for clearly emergency repairs which are not restricted by time* (Huntingdon County Model Zoning Ordinance, 2008).

The Hesston and Mt. Union collocations will occur within an existing telecommunications tower compounds which utilizes existing access roads. The surrounding area contains a mixture of

wooded/grassed land and low-density residential development. While there is some residential development in the area, it is separated from the tower site by wooded buffers.

The Gibbs Lane Tower project area consists of wooded land and a portion of an existing access road. The surrounding area contains a mixture of wooded/grassed land and low-density residential development. While there is some residential development in the area, it is separated from the tower site by wooded buffers.

## 4.2 Air Quality

Air quality at the project area is regulated by the Pennsylvania Department of Environmental Protection (PA DEP), which administers federal and state air quality standards. The EPA has set national ambient air quality standards (NAAQS) for six of the following criteria pollutants (US EPA, 2022): ozone (O<sub>3</sub>), particulate matter (PM 2.5 and 10), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). Under these standards, a geographic location with pollutant levels below air quality standards is said to be in "attainment," while higher levels are in "non-attainment." New construction and conversion activities which are located in "non-attainment" or "maintenance" areas, as determined by the EPA, may need to be modified or mitigation measures developed and implemented to conform to the State Implementation Plan (US EPA, 2022e). The Clean Air Act (42 U.S.C. 7401 et seq.) prohibits federal assistance to projects that are not in conformance with the SIP. According to the EPA Green Book Nonattainment Areas for Criteria Pollutants, Huntingdon County, Pennsylvania is not located within a non-attainment area for any major pollutants (US EPA, 2022c). In accordance with Executive Order (EO) 13990, this EA also takes into consideration the potential emission of greenhouse gases (GHG) associated with the project.

## 4.3 Geology and Soils

According to the United States Geological Survey (USGS) Ground Water Atlas of the United States Section L, all project areas fall within The Valley and Ridge Province, which is characterized by layered sedimentary rock that has been complexly folded and locally thrust faulted. As the result of repeated cycles of uplift and erosion, resistant layers of well-cemented sandstone and conglomerate form elongate mountain ridges and less resistant, easily eroded layers of limestone, dolomite, and shale form valleys. The rocks of the province range in age from Cambrian to Pennsylvanian. Parts of this province from central Pennsylvania into New Jersey have been glaciated, and glacial deposits fill or partially fill some of the valleys.

According to the United States Department of Agriculture (USDA) Natural Resource Conservation Service's (NRCS) Web Soil Survey, soils beneath the Gibbs Lane Tower are defined as Hazleton-Dekalb complex, 0 to 8 percent slope, rubbly and Clymer very stony loam, 8 to 15 percent slopes. The Hazleton-Dekalb series of soils consists of well drained soils formed in residuum weathered from sandstone. The Clymer series of soils consist of well drained soils formed in residuum weathered from sandstone and shale. Construction at Gibbs Lane Tower will necessitate about 1

acre of ground disturbance for the new tower location compound and access road/utility easement. Ground disturbance is anticipated for the installation of an electric utility easement.

The Mt. Union and Hesston tower locations are a previously developed tower compounds and access roads. The soils beneath the compounds were previously disturbed with the construction of the existing tower, compound, and access road.

#### 4.4 Water Resources and Wetlands

The *US Army Corps of Engineers (USACE) Wetland Delineation Manual* (USACE, 1987) defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area either lacks vegetation or the vegetation is dominated by hydrophytes.

The definition of a Waters of the US (WOTUS) is: Waters, which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; Territorial waters; Interstate waters; Impoundments of waters defined as waters of the United States; Tributaries of the above waters that are relatively permanent, standing, or continuously flowing bodies of water; Wetlands adjacent to and having a continuous surface connection to the above waters, which have relatively permanent, standing, or continuously flowing bodies of water (other than waters that are themselves wetlands); or Interstate lakes and ponds not identified above that are relatively permanent, standing, or continuously flowing bodies of water with a continuous connection to the waters above, except those that are wetlands. (33 CFR 328.3).

Typically, the USACE and the U.S. Environmental Protection Agency (EPA) will assert jurisdiction over the following waters:

- Traditional navigable waters (TNWs),
- Wetlands adjacent to TNWs,
- Non-navigable tributaries of TNWs that are relatively permanent where the tributaries have continuous flow,
- Wetlands directly abutting non-navigable tributaries of TNWs,
- Non-navigable tributaries that are not relatively permanent,
- Wetlands displaying a continuous surface connection to TNWs, and
- Wetlands adjacent to do not directly abutting a relatively permanent non-navigable tributary.

Any person, firm, or agency planning to alter or work in waters of the U.S., including the discharge of dredged or fill material, must first obtain authorization from the USACE under Section 404 of the Clean Water Act (CWA; 33 United States Code [USC] 1344). Permits, licenses, variances, or

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similar authorization may also be required by other federal, state, and local statutes. Section 10 of the Rivers and Harbors Act of 1899 prohibits the obstruction or alteration of navigable waters of the U.S. without a permit from the USACE (33 USC 403).

On-site visual observations and a review of the representative USFWS National Wetlands Inventory (NWI) map and USGS topographic maps did not identify any readily identifiable wetlands or wetland characteristics (e.g. standing water, hydrophytic vegetation, soil saturation and inundation, drainage patterns and sediment deposition, watermarks and drift lines on trees and vegetation, or water stained leaves) or surface waters within the footprint of the tower sites.

According to the NWI Online Mapper, the nearest mapped wetland to the Mt. Union tower site is a Riverine wetland located approximately 2,060 feet to the southeast. The Mt. Union tower site consists of a previously developed tower compound and access road on a wooded mountain ridge. No wetlands are mapped on or within the vicinity of the site. Additionally, the installation of equipment will only disturb areas within the previously developed gravel equipment compound.

The nearest identified wetland to the Hesston tower site is a Riverine wetland located approximately 1,795 feet to the southwest. The Hesston tower site consists of a previously developed tower compound and access road on a wooded mountain ridge. No wetlands are mapped on or within the vicinity of the site. Additionally, the installation of equipment will only disturb areas within the previously developed gravel equipment compound.

According to the NWI Online Mapper, the nearest mapped wetland to the proposed Gibbs Lane tower site is a Riverine wetland located approximately 2,755 feet to the southeast. The Gibbs Lane proposed tower site consists of wooded land along the ridgeline of a mountain top and an existing two track dirt access road. No wetlands, surface waters, or drainage features are mapped on or in the vicinity of the tower site or utility easement.

#### **4.4.1 Surface Water (i.e., Lakes and Rivers)**

According to the Susquehanna River Basin Commission (SRBC), Huntingdon County, Pennsylvania falls within the Juniata Subbasin of the Susquehanna River Basin. The Susquehanna River Basin covers 27,510 square miles of drainage area, covering half the land area of Pennsylvania and portions of New York and Maryland, and includes all or portions of 66 counties. The Juniata subbasin drains an area of approximately 3,400 square miles. The basin supplies water to the population of significant portions of Bedford, Blair, Fulton, Huntingdon, Perry, Juniata and Mifflin Counties. This expansive basin originates from the confluence of the Little Juniata River and the Frankstown Branch Juniata River in Blair and Huntingdon counties. As indicated in Section 4.4, no wetlands or surface waters are mapped on either site.

#### **4.4.2 Groundwater**

According to the USGS Pennsylvania Water Science Center, the nearest ground water monitoring station in Huntingdon County, Pennsylvania shows the water level on average at 52.8 feet below

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the surface. No sole source aquifers are mapped within the state of Pennsylvania. No groundwater recharge areas are known to exist on either project site (USGS, 2023).

#### 4.4.3 Coastal Zone, Estuary, and Inter-tidal Areas

Huntingdon County is located within an inland portion of Pennsylvania and is not mapped within a coastal zone, estuary, or inter-tidal area. As such, neither project site is mapped within a coastal zone, estuary or inter-tidal area.

#### 4.4.4 Flood Plains

EO 11988, "Floodplain Management", requires Federal agencies to avoid actions, to the extent practicable that will result in the location of facilities in floodplains and/or affect floodplain values. Executive Order (EO) 14030, *Climate-Related Financial Risk*, reinstates EO 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*. EO 13690 requires practitioners to use the Federal Flood Risk Management Standard (FFRMS)-established approaches for identification of floodplains for federally funded projects.

Facilities located in a floodplain may be damaged or destroyed by a flood or may change the flood handle capability of the floodplain, or the pattern, or magnitude of the flood flow. The relevant floodplain for most applicant projects is an area, which has a 1-percent chance of a flood occurrence in a given year. The flood of this interval is referred to as the 100-year flood or the base flood. The floodplain management guidelines require Federal agencies to apply the 0.2 percent or 500-year flood occurrence standard to the location of "critical facilities." Critical facilities include health care facilities, emergency service facilities, and areas used for the storage of hazardous materials.

According to the applicable Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) maps, none of the project sites are mapped within a floodplain.

#### 4.4.5 Wild and Scenic Rivers

According to the National Park Service (NPS) Wild and Scenic Rivers Map, none of the project sites are located near a wild or scenic river. Additionally, the Susquehanna and Juniata Rivers are not considered wild and scenic rivers. Therefore, the project area does not contain any wild and scenic rivers (National Wild and Scenic Rivers, 2023).

### 4.5 Biological Resources

The Mt. Union and Hesston collocations will take place within an existing telecommunications tower compound which contains a self-support lattice tower, support equipment, and buried connection to utilities. The existing compounds are contained within a chain link fenced area and are accessible via a gravel driveway. The proposed project involves the installation of antennas on the existing towers and placement of associated equipment within the tower compounds.



The area proposed for the Gibbs Lane Tower and compound has dense vegetation and is forested with mixed deciduous trees adjacent to an existing access road. The United States Forest Service (USFS) individual tree species parameter map was consulted and identified the following species as typically within the proposed area: sweet birch (*Betula lenta*), red maple (*Acer rubrum*), chestnut oak (*Quercus prinus*), and black cherry (*Prunus serotina*). Wildlife in the vicinity of Huntingdon County typically include those associated with forested and rural areas throughout the northeastern United States.

#### 4.5.1 Threatened and Endangered Species

Informal Biological Assessments were performed by Terracon Consultants, Inc. (Terracon) regarding the proposed project. As part of the assessment, a preliminary review was completed using the U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation System (IPaC) Endangered Species Act species list to identify listed and proposed threatened and endangered species, as well as critical habitats that may be located on or near the proposed project (Appendix D). According to the IPaC report, the following species are listed to have the potential to be present in the vicinity of the Mt. Union and Hesston collocations and Gibbs Lane Tower sites:

Table 4.5.1 Federally-Listed Species

Taxon	Name	Species Habitat	Status
Mammals	Indiana Bat ( <i>Myotis sodalis</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees. (USFWS)	Endangered (Federal)
	Northern Long-eared Bat ( <i>Myotis septentrionalis</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines, called hibernacula. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees (USFWS).	Endangered (Federal)
	Tricolored Bat ( <i>Perimyotis subflavus</i> )	Found in forested landscapes, where they forage near trees (including forest perimeters) and along waterways. Maternity colonies also may utilize human-made structures (buildings, bridges, etc.) or tree cavities.	Proposed Endangered
Insect	Monarch Butterfly ( <i>Danaus plexippus</i> )	Found in open prairies, meadows, and grasslands. Sometimes along roadsides and disturbed areas but almost always in the vicinity of milkweed populations. Breeding areas are virtually all patches of milkweed in North America and some other regions. (NatureServe)	Candidate (Federal)
Flowering Plants	Northeastern Bulrush ( <i>Scirpus ancistrochaetus</i> )	Found in open, tall herb-dominated wetlands. Often it grows at the water's edge, or in a few centimeters of water, but it may also be in fairly deep water (0.3-0.9 m) or away from standing water. (NatureServe)	Endangered (Federal)

Terracon also utilized the Pennsylvania Natural Diversity Inventory (PNDI) online database environmental review tool to further refine the environmental review process for both federally and Pennsylvania-state protected species. The PNDI system is managed by the Pennsylvania Department of Conservation and Natural Resources (DCNR) in order to build, maintain, and provide accurate and accessible ecological information needed for conservation, development planning, natural resources management, and for the protection of threatened and endangered species, special concern species, and rare and significant ecological features. The PNDI environmental review tool analyzes proposed project footprints against known species locations and recommends conservation measures and other actions that may be needed to maintain compliance with the Federal Endangered Species Act, as well as allied Pennsylvania state species protection laws.

Within Pennsylvania, the PNDI environmental review tool takes primacy in the project environmental review process over IPaC. The environmental review tool is utilized to coordinate concurrent project reviews with the DCNR, the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the USFWS. For the Hesston tower collocation, the PNDI environmental review tool project response indicates the DCNR, PFBC, PGC, and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies."

For the Mt. Union tower collocation, the PNDI environmental review tool project response indicates the DCNR, PGC, and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies." Within the PNDI response, the PFBC provided recommended conservation measures for the Timber Rattlesnake (*Crotalus horridus*, Species of Special Concern). The PFBC recommended conservation measures were primarily with regard to ground-disturbing construction activities. Terracon provided additional documentation regarding the proposed project to the PFBC summarizing that the project site consists of an existing telecommunications compound and no ground disturbance is planned. As such, it is not anticipated that the collocation activities associated with the site will affect the timber rattlesnake. On November 16, 2023, the PFBC replied with the following recommendations:

*There have been observations of Timber Rattlesnakes in the vicinity of the project area, but based on our review of the information you sent as well as mapping overlays, we do not anticipate any direct adverse impacts to the Timber Rattlesnake from the proposed project. However, the project areas could be used as foraging habitat for Timber Rattlesnakes and this warrants some concern about rattlesnake-human conflicts. Although the nature of the Timber Rattlesnake is rather docile, it can be dangerous if cornered or handled. Therefore, the workers should be mindful of the presence of the snakes in the area. Rattlesnakes are attracted to open, rocky, log-strewn areas for basking and forested areas with thick deciduous leaf litter that tend to support high populations*

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of rodents. We recommend that the workers responsible for implementing this project be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. These workers should also be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes without a proper permit is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6. If any Timber Rattlesnakes are observed on-site, please notify this office.

Based on Terracon's analysis and reconnaissance, the proposed site activities are not anticipated to effect other listed or proposed protected species or critical habitats. Except for notifying the PFBC if any Timber Rattlesnakes are observed on site, no further coordination is required with jurisdictional agencies at this time.

For the Gibbs Lane Proposed Towers, the PNDI environmental review tool project response indicates the DCNR, PFBC and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies." The PGC indicated further review was required for the Allegheny Woodrat (*Neotoma magister*, threatened). PGC subsequently concluded that no impact is anticipated.

The Migratory Bird Treaty Act of 1918 (MBTA) decrees that migratory birds and their parts (including eggs, nests, and feathers) are federally protected. The MBTA is the domestic law that affirms, or implements, the United States' commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource. Each of the conventions protect selected species of birds that are common to these countries (i.e., they occur in these countries at some point during their annual life cycle). Bald and Golden Eagles are protected by the MBTA as well as the Bald and Golden Eagle Protection Act (BGEPA), enacted in 1940, which prohibits anyone, without a permit issued by the USFWS, from "taking" bald or golden eagles, including their parts (including feathers), nests, or eggs. The following migratory birds of concern were identified within the vicinity of the site on the IPaC:

Table 4.5.2 Migratory Birds

Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	No	January through December
Black-capped Chickadee ( <i>Poecile atricapillus</i> )	Yes	April through July
Cerulean Warbler ( <i>Dendroica cerulea</i> )	Yes	April through July
Chimney Swift ( <i>Chaetura pelagica</i> )	Yes	March through August
Golden-winged Warbler ( <i>Vermivora chrysoptera</i> )	Yes	May through July

Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
Kentucky Warbler ( <i>Oporornis formosus</i> )	Yes	April through August
Prairie Warbler ( <i>Setophaga discolor</i> )	Yes	May through July
Wood Thrush ( <i>Hylocichla mustelina</i> )	Yes	May through August

Mitigation measures for migratory birds protected under the MTBA are outlined in Chapter 5.

#### 4.5.2 Critical or Threatened / Endangered Habitat

There are no critical habitats mapped at the site. No wildlife refuges or fish hatcheries are documented at the site. There were no water features identified in the project areas. The site is not mapped within a wilderness area of wildlife preserve. As discussed in Section 4.5.1, the proposed project will not affect listed or protected species.

#### 4.5.3 Wetland Habitats

Due to the scope of the proposed project activities, the current conditions and review of applicable source data, significant changes in surface features such as wetland fill, water diversion or deforestation will not be required at the Hesston, Mt. Union, and Gibbs Lane Towers. No wetlands or water features are located on the site. As discussed in Section 4.4, no wetlands are mapped on the site locations and no wetlands characteristics were observed on either site.

### 4.6 Historic and Cultural Resources

The NHPA and the Advisory Council on Historic Preservation's implementing regulations, 36 CFR Part 800, require Federal agencies to take into account the effect their actions may have on historic properties prior to carrying out such actions.

#### 4.6.1 Archaeological Resources

Due to prior ground disturbing activities within the Mt. Union and Hesston Tower sites, and the small footprint of the proposed collocation, there is a low probability that archaeological materials would be found in an undisturbed context. Therefore, no further archaeological investigations were performed for the proposed project. Project documents were submitted through the PA-SHARE website the Pennsylvania State Historic Preservation Office (SHPO). Based on the information provided, SHPO found that this project will have no effect on cultural resources eligible for or listed in the National Register of Historic Places. See SHPO documentation included in Appendix E for additional details.

A Phase I cultural resource survey was conducted at the proposed Gibbs Lane Tower site. A pedestrian survey was conducted of the project area, which did not encounter artifacts, historic structural remains, or surface level evidence of cultural deposits. Shovel testing was conducted within the location of the proposed communications compound and did not encounter

subsurface cultural deposits. Based on the results of the pedestrian survey and subsurface testing, it is unlikely that unknown, NRHP eligible cultural resources are present within the direct APE. Therefore, Terracon recommends a finding of no historic properties for the direct APE. No historic properties have been previously recorded within the project area, or within 0.5-mile of the project area.

No significant archaeological resources (determined to be listed or eligible for the NRHP) were identified within any of the specific project area boundaries. Two historic paths, the Warrior's Path (2019RE13386) and the Standing Stone – Fort Littleton Path (2019RE13918), run through a portion of the Hesston collocation project area, and one historic path, the Frankstown Path, runs through a portion of the 0.75-mile APE for visual effects of the Mount Union Collocation site. All three of these historic paths are considered undetermined for the NRHP according to the PA-SHARE website and are therefore considered insignificant to the Hesston and Mount Union collocations, as the project areas has been subjected to prior ground disturbance. Additionally, the PA SHPO was consulted with regarding the proposed project and issued a response that they are not aware of any historic resources in the project area that would be affected by the proposed project (Appendix E). Federally recognized Tribal Nations were also consulted regarding the project and did not identify any potential concerns with the project.

#### 4.6.2 Architectural Resources

Project documents were submitted through the PA-SHARE website the Pennsylvania State Historic Preservation Office (SHPO). Based on the information provided, SHPO found that this project will have no effect on cultural resources eligible for or listed in the National Register of Historic Places. See SHPO documentation included in Appendix E for additional details.

A records search was conducted of the PA-SHARE GIS database maintained by SHPO for information regarding previously recorded historic properties within each of the project areas and the 0.5-mile APE for visual effects (0.75-mile, in the case of the Hesston Collocation). According to the results of the records search, no historic properties that are listed or eligible for the National Register of Historic Places (NRHP) have previously been recorded within the project areas, or within the APE for visual effects of each of the project areas. Several structures within the 0.5-mile APE for visual effects of the Hesston collocation have an undetermined status regarding the NRHP and therefore will have no effect on the proposed collocation at the Hesston project area. Based on the information provided, SHPO found that the project will have no effect on cultural resources eligible for or listed in the National Register of Historic Places. See SHPO documentation included in Appendix E for additional details.

#### 4.6.3 Native American Traditional, Cultural or Religious Resources

The NHPA requires that federal agencies must consult with any Federally recognized Tribal Nation that attaches religious and cultural significant to historic properties affected by an undertaking in carrying out the Section 106 review process. NTIA has teamed with the FCC to use their Tower Construction Notification System (TCNS), an on-line, password-protected system that notifies all Tribal Nations and Native Hawaiian Organizations (NHOs) of proposed communication tower

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construction in their areas of interest. NTIA initiated tribal consultation using Responsible Party prepared information/documentation to notify Tribal Nations of the project and provided The Responsible Party a Notice of Organization (NOO) listing out the tribes consulted and their procedures. Through the TCNS system, NTIA consulted with the following Federally recognized tribes:

- Omaha Tribe of Nebraska
- Delaware Nation
- Absentee-Shawnee Tribe of Indians of Oklahoma
- Tuscarora Nation
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
- Seneca-Cayuga Nation
- Eastern Shawnee Tribe of Oklahoma
- Wyandotte Nation
- Shawnee Tribe
- Chippewa Cree Tribe of the Rocky Boy's Reservation
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Delaware Tribe of Indians

Based on NTIA's engagement with the tribes, three tribes (Eastern Shawnee Tribe of Oklahoma, Shawnee Tribe, and Lac du Flambeau Band of Lake Superior Chippewa Indians) replied that they have no concerns with the project. The remainder of the tribes did not respond within the allotted time period, indicating no interest in the project. No Native American Traditional, Cultural or Religious Resources have been identified in the project area. A copy of the project tribal summary table and responses received as part of consultation are included in Appendix C.

#### 4.7 Aesthetic and Visual Resources

The project sites are not located in a national and state park. No national scenic trails are mapped within either of the project sites (NPS, 2023b). The NRHP-listed properties identified in Huntingdon County are further discussed in Section 4.6 (Cultural Resources). The Mt. Union and Hesston collocations will occur on an existing tower. There are no parks or designated recreational areas located at the Gibbs Lane Tower proposed location area of potential effects.

#### 4.8 Land Use

According to the Mifflin and Huntingdon County Tax Assessor's website, Mt. Union Tower's parent parcel is zoned as agricultural, Hesston Tower's parent parcel is zoned as agricultural, and Gibbs Lane parent parcel is zoned agricultural (Huntingdon County, 2023c). Hesston and Mt. Union Towers has a current land use of an existing communications tower on privately owned land surrounded by undeveloped land and low-density residential land use. No change to land use is anticipated. Gibbs Lane Tower has a current land use of undeveloped wooded land on

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privately owned land adjacent to an existing access road. The Shade Mountain Tower will involve converting approximately 1 acre of wooded area for the tower compound and easement.

The Farmland Protection Policy Act (FPPA) regulates federal actions with the potential to convert important farmland to non-agricultural uses under 7 CFR Parts 657-658. Important farmland includes all pasturelands, croplands, and forests considered to be prime, unique, or of statewide or locally important lands. Farmland does not have to be currently used for cropland, but land committed to “urban development or water storage” is not subject to FPPA requirements. It assures that to the extent practicable federal programs are administered to be compatible with state/local units of government, and private programs and policies to protect farmland. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed or assisted by a federal agency, including providing financing or loans. Therefore, only areas designated as “Important” in active agricultural use or not yet developed need to be evaluated.

A consultation of the Soil Survey Geographic Database (SSURGO) shows Gibbs Lane, Mt. Union and Hesston Towers as located within an area considered as “not prime farmland” as defined by 7 CFR §658.2.

According to federal lands mapping data maintained by the USGS, USFS, and the National Park Service (NPS) the project sites are not located in an officially designated wilderness area and/or wildlife preserve (i.e. refuge). All sites, Mt. Union Tower (existing), Hesston (existing), and Gibbs Lane Tower (proposed new construction) are located on privately owned land and are therein not in an officially designated wilderness area or wildlife preserve.

#### 4.9 Infrastructure

The Mt. Union and Hesston Towers are existing communications towers with connections to electrical and fiber optic utilities. As the project is to collocate equipment on this tower, no change or impact is anticipated.

Gibbs Lane Tower is a proposed new construction communications tower that is adjacent to an existing access road. Development consists of an approximate 10,000 square-foot tower compound and an approximate 30-foot by 3,795-foot access/utility easement that connects proposed utilities to the southeast. The compound will be accessed via an existing access road that extends to the southeast; however, a portion of the proposed access road is an existing two track dirt access road that will require widening to allow equipment to the proposed tower compound location. Aside from the tower itself and associated equipment to be installed within the proposed tower compound, no other forms of infrastructure are significant for the purposes of this project. The Responsible Party will contact 811 (Call Before You Dig) prior to installing subsurface utilities to ensure the installation does not conflict with other utilities already located within the adjacent power easement.

#### 4.10 Socioeconomic Resources

Under EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires that federal agencies, whenever practical and appropriate, maintain information of populations by race, national origin, or income and shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects. Based on a review the EPA Environmental Justice Screening Tool census report (US EPA, 2023a), Huntingdon County has a population density of 50 people per square mile. The demographics of the community consist of 91% White, 5% Black, and 2% Hispanic. The population is 54% male and 46% female. Age ranges for the population include 4% under the age of 4, 18% under 18, 82% over the age of 18, and 20% over the age of 65. Education statistics for the area indicate 10% of the population have less than a high school diploma. Linguistically, 96% of the population speaks only English and 4% includes non-English languages at home. Economically, 32% of the population is low income and unemployment is 6%. A total of 78% of properties are owner occupied.

Based on the results of the EJSCREEN report for Huntingdon County, the county is ranked lower than both the state and USA average for particulate matter, ozone, diesel particulate matter, air toxics cancer risk, air toxics respiratory HI, traffic proximity, superfund proximity, RMP facility proximity, hazardous waste proximity, underground storage tanks and wastewater discharge. Huntingdon County also has a lower demographic index, less people of color, higher income, the average unemployment rate, and lower-to-average education rates in comparison to the state and USA averages. Huntingdon is a predominantly rural community of Pennsylvania. According to the Climate and Economic Justice Screening Tool, Huntingdon County includes census tracts that are both denoted as disadvantaged and not disadvantaged.

#### 4.11 Human Health and Safety

The most significant concern to human health and safety for the project is proximity to existing overhead and buried utilities. The Responsible Party will identify buried utilities in the existing ROW and power easement prior to subsurface construction methods through the use of 811 (Call Before You Dig) and permit only workers qualified by training or experience to operate heavy machinery and equipment. Occupational Health and Safety (OSHA) standards will be followed with regarding to all construction activities.

On August 29, 2023, an electronic search using the Commonwealth of Pennsylvania, DEP Environmental Site Assessment Search Tool was performed for both sites to examine facilities in proximity. Layers examined include: Beneficial Land, Use Coal Mining Operation, Coal Pillar Mining, Commercial Hazardous Waste Operation, GP12 Prep Plant Emissions Operation, Mine Drainage Treatment Land Recycling Project, Oil and Gas Entity, Residual Waste Operation, Water Pollution Control Facility, AML Point Feature, AML Inventory Site, AML Polygon Feature, Air Emission Plant, Captive Hazardous Waste Operation, Coal Pillar Oil and Gas, Encroachment Location, Erosion and Sedimentation Control Facility, Industrial Mineral Mining Operation, Land Recycling Cleanup Location, Municipal Waste Operation, Oil and Gas Encroachment Location, Oil

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and Gas Location, Oil and Gas Water Pollution Control Facility, Storage Tanks-Active, and Storage Tanks-Inactive and Water Resources. No facilities were located within a 500-foot radius of either site. No potentially hazardous land uses have been identified on or adjacent to either site location.

The Mt. Union proposed collocation site will utilize an existing equipment building located in the tower compound. An asbestos containing materials (ACM) or lead-based paint (LBP) evaluation has not been performed at this time. Installation activities that may impact asbestos containing building materials or painted surfaces are regulated by the U.S. Occupational Health and Safety Administration (OSHA) through the Asbestos in Construction Standard and asbestos air emissions from asbestos abatements are regulated by the EPA as a hazardous air pollutant under the Clean Air Act (CAA).

As the client proposed to renovate the existing buildings for their operations, Terracon recommends an asbestos and lead-based paint survey be completed before any installation activities occur in the existing building. Any proposed renovation or demolition will require a National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos survey prior construction. Confirmed ACM or LBP in the project impact areas may require abatement prior to construction.

In accordance with Title 14 of the Code of Federal Regulations (14 CFR) Part 77, the proposed Gibbs Lane tower will require Federal Aviation Administration (FAA) filing to ensure it does not pose a hazard to air navigation. FAA Part 77 filing typically applies to proposed structures greater than 200' or within the glide slope of an airport. The collocation of antennas on the existing Mt. Union and Hesston tower collocations will not increase the height of the tower and will not require FAA filing.

## 5.0 Analysis of Environmental Impacts

The level of NEPA analysis depends on the potential significance of the project's environmental impacts. The term 'significance' as used in NEPA requires considerations of both context and intensity. Context means that the significance of an action must be analyzed in several contexts, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Intensity refers to the severity of the impact, the cumulative effects, and the degree of controversy surrounding the proposed action. Significance varies with the setting of the proposed action. Both short-term and long-term effects are relevant. Impacts that are routinely handled through issuance of permits, consultations, modifications to design, or other agreements are generally not considered to be significant unless there are exceptional circumstances and/or a potential for generating substantial controversy. It should be noted that minimal discussion is provided within the table and following sections regarding areas of the affected environment where little to no consequence is anticipated regarding the proposed action.

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## 5.1 Noise

Under the Proposed Action Alternative, short term direct impacts from mechanized construction equipment (pickup trucks, installation equipment, etc.) would occur during the tower and equipment installation phase. Typical construction equipment can cause noise levels above 70 dB (ANSI, 2018). These impacts would be temporary and minor and would be most impactful at the location of the noise-generating equipment. On-going operations at telecommunications tower sites are not considered significant sources of noise. Sound generation may occasionally occur from emergency generators utilized at the project locations in the case of power loss. The Mt. Union and Hesston tower sites already contain an emergency backup generator within the existing tower compound. The Gibbs Lane proposed tower site will include a new generator. The surrounding area contains a mixture of wooded/grassed land and low density residential development. While there is some residential development in the area, it is separated from the tower site by wooded buffers.

The Huntingdon County Model Zoning Ordinance maximum permissible sound level limits do not apply to the *repair or installation of utilities or construction of structures, sidewalks or streets between the hours of 6am and 9pm*. As such, mitigation methods include limiting the hours of construction to occur only during normal business hours (6am to 9pm). Workers should follow OSHA requirements for worker protection (i.e. wearing hearing protection). The Proposed Action would not introduce significant long-term changes to the noise environment at each location. Noise impacts resulting from the project are considered to be less than significant. No indirect impacts are anticipated.

Under the No Action Alternative, no impacts would occur to noise levels.

## 5.2 Air Quality

Construction activities associated with the proposed project would generate particulate matter from soil disturbances and diesel-powered equipment (direct impacts). Air emissions from construction vehicles and equipment would be minor and temporary resulting in negligible impacts to air quality. Ground disturbing activities such as tree clearing, and trenching would temporarily generate fugitive dust emissions. To minimize the effects of fugitive dust during construction, dust suppression via water trucks or other methods may be implemented. Post-construction, the construction-scarred areas would be re-vegetated where necessary. The re-establishing vegetation would also serve to reduce fugitive dust.

Post-construction during the operational period, there would not be significant emissions of air pollutants at either site. The Mt. Union and Hesston collocation sites contain an existing emergency generator already in-use, and the proposed Gibbs Lane tower site includes the installation of a new emergency backup generator. The proposed 24 horsepower (hp) generator will run on a two-cylinder engine and be fueled by an adjacent propane storage tank. Based on these specifications, the proposed generator is below the 100 hp threshold under 25 Pennsylvania Code Section 127.14(a)(8) Air Permit Exemptions. As such, a PA DEP air permit for



the proposed generator is not required and mitigation measures are not anticipated. Air quality impacts directly resulting from the project are considered to be less than significant.

Under the No Action Alternative, no impacts would occur to air quality.

### 5.3 Geology and Soils

The proposed collocation involves the installation of equipment on the existing towers and within the previously disturbed and gravel-covered tower compound. Construction of the new tower at Gibbs Lane Tower will necessitate about 1 acres of ground disturbance for the new tower location compound and access road/utility easement. During construction, soil erosion and sedimentation can be avoided or minimized through best management practices (BMPs). Site watering can serve to suppress fugitive dust along with seeding and stabilization required for compliance with SWPPP BMPs. Post-construction, the construction-scarred areas would be re-vegetated where necessary. The re-establishing vegetation would serve to reduce erosion and fugitive dust. Geologic and soil impacts resulting from the project are considered to be less than significant.

Under the No Action Alternative, no impacts would occur to geology and soils.

### 5.4 Water Resources

As discussed in Chapter 4, no wetlands; surface waters; groundwater recharge areas; sole source aquifers; 100-year floodplains; wild and scenic rivers; or other water resources were identified on the Mt. Union and Hesston collocations and Gibbs Lane tower site. Significant impacts to water resources are not anticipated as no on-site or adjacent water features will be crossed, filled, or otherwise impacted by the proposed project. As currently proposed, no water resource impacts resulting from the project are anticipated.

Under the No Action Alternative, no impacts would occur to water resources.

### 5.5 Biological Resources

An Informal Biological Assessment was performed by Terracon Consultants regarding the proposed project. Habitat for threatened and endangered species, PDNI species of concern, and Birds of Conservation Concern/migratory birds were compared to the conditions on the site. For the Hesston collocation project, the PNDI environmental review tool project response indicates the DCNR, PFBC, PGC, and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies."

For the Mt. Union tower collocation, the PNDI environmental review tool project response indicates the DCNR, PGC, and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies. The PFBC provided the following guidance for the Mt. Union project:

*There have been observations of Timber Rattlesnakes in the vicinity of the project area, but based on our review of the information you sent as well as mapping overlays, we do not anticipate any direct adverse impacts to the Timber Rattlesnake from the proposed project. However, the project areas could be used as foraging habitat for Timber Rattlesnakes and this warrants some concern about rattlesnake-human conflicts. Although the nature of the Timber Rattlesnake is rather docile, it can be dangerous if cornered or handled. Therefore, the workers should be mindful of the presence of the snakes in the area. Rattlesnakes are attracted to open, rocky, log-strewn areas for basking and forested areas with thick deciduous leaf litter that tend to support high populations of rodents. We recommend that the workers responsible for implementing this project be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. These workers should also be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes without a proper permit is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6. If any Timber Rattlesnakes are observed on-site, please notify this office.*

Based on Terracon's analysis and reconnaissance, the proposed site activities are not anticipated to effect other listed or proposed protected species or critical habitats. Except for notifying the PFBC if any Timber Rattlesnakes are observed on site, no further coordination is required with jurisdictional agencies at this time.

For the Gibbs Lane Proposed Towers, the PNDI environmental review tool project response indicates the DCNR, PFBC and USFWS concluded: "No Impact is anticipated to threatened and endangered species and/or special concern species and resources. Therefore, no further coordination is required with these state jurisdictional agencies." The PGC indicated further review was required for the Allegheny Woodrat (*Neotoma magister*, threatened). PGC subsequently concluded that no impact is anticipated.

Based on a review of the habitat for the above-listed species, compared to an analysis of the habitat present on the site location, and the implementation of the referenced PFBC precautions, it is not anticipated that the proposed Gibbs Lane telecommunications tower or Mt. Union and Hesston collocations will result in less than significant direct or indirect impacts to protected species or critical habitats.

No bald or golden eagle nests have been documented within 660 feet of any of the sites; however, several migratory birds were identified with the potential to occur in the vicinity of the proposed Gibbs Lane tower site. If construction is to occur during a breeding season, a preconstruction nesting survey is recommended as a mitigation measure. Additionally, USFWS recommendations published in Revised Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning (2021) state the preferred tower height to decrease potential effects on migratory birds is less than 200 feet tall. Siting and design

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process for this project could not conform to all the USFWS recommendations; however, mitigating factors proposed for implementation at the site include the following: limiting the tower height to 199 feet, location in minimally sensitive areas, and eliminating the need for guy wires. While migratory birds are not anticipated to be a concern for the Mt. Union and Hesston collocation sites, the Responsible Party should confirm the towers do not contain any avian nests or activities prior to commencing with the equipment installation.

Based on the above mitigation measures, it is anticipated that the proposed Gibbs Lane telecommunications tower or proposed Mt. Union and Hesston collocations will result in less than direct or indirect impacts to migratory birds protected under the MTBA.

Under the No Action Alternative, no impacts would occur to biological resources.

## 5.6 Historic and Cultural Resources

No significant archaeological resources (determined to be listed or eligible for the NRHP) were identified within any of the specific project area boundaries. Two historic paths, the Warrior's Path (2019RE13386) and the Standing Stone – Fort Littleton Path (2019RE13918), run through a portion of the Hesston collocation project area, and one historic path, the Frankstown Path, runs through a portion of the 0.75-mile APE for visual effects of the Mount Union Collocation site. All three of these historic paths are considered undetermined for the NRHP according to the PA-SHARE website and are therefore considered insignificant to the Hesston and Mount Union collocations, as the project areas has been subjected to prior ground disturbance. A records search was conducted of the PA-SHARE GIS database maintained by SHPO for information regarding previously recorded historic properties within each of the project areas and the 0.5-mile APE for visual effects (0.75-mile, in the case of the Hesston Collocation). According to the results of the records search, no historic properties that are listed or eligible for the National Register of Historic Places (NRHP) have previously been recorded within the project areas, or within the APE for visual effects of each of the project areas. Several structures within the 0.5-mile APE for visual effects of the Hesston collocation have an undetermined status regarding the NRHP and therefore will have no effect on the proposed collocation at the Hesston project area. Both the State Historic Preservation Office (SHPO) and Federally-recognized tribes with ancestral interest in the region have been contacted regarding the project and did not identify any adverse impacts or concerns.

In the unlikely event that unanticipated historic properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the bore program excavation activities, all ground disturbing activities must halt immediately, and NTIA along with the appropriate state and/or tribal agencies must be contacted, in accordance with applicable state law and federal regulation (36 C.F.R. § 800.13(b)). The proposed action will result in no direct or indirect impact to historic and cultural resources.

Under the No Action Alternative, no impacts would occur to cultural resources.

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## 5.7 Aesthetic and Visual Resources

The collocation of antenna arrays and ground-based equipment at the location of Mt. Union and Hesston will not have a significant aesthetic or visual impact on the surrounding viewshed. No significant resources were identified in the viewshed of the proposed Gibbs Lane tower. The proposed action will result in no significant direct or indirect impact to aesthetic and visual resources.

Under the No Action Alternative, no impacts would occur to aesthetic and visual resources.

## 5.8 Land Use

The project sites are classified as agricultural land in a predominantly rural area. Rural areas have historically lacked the access to broadband that is available to more urban locations. The proposed project is anticipated to have a beneficial impact on occupants of surrounding areas. This Project will involve the permanent change equating to approximately 1 acre of wooded land for the proposed Gibbs Lane Tower compound, which will be conducted consistent with local land use requirements. Additionally, the proposed action will not impact prime farmland. The proposed action will result in less than significant direct or indirect impacts to land use.

Under the No Action Alternative, no impacts would occur to land use.

## 5.9 Infrastructure

The proposed action involves two tower collocations and a proposed tower. The project will not involve any infrastructure alterations of these areas outside of their designated use. Overall, the project is anticipated to provide a beneficial impact to the community of Huntingdon County that currently lack access to broadband. To ensure minimal conflict with other utilities in the area, the Responsible Party will utilize 811 (Call Before You Dig) to identify potentially buried utilities in the power easement prior to any construction activities. The proposed action will result in no significant direct or indirect impacts to infrastructure.

Under the No Action Alternative, no installation or upgrades to broadband would occur in Mifflin and Huntingdon Counties. Although the existing communities could continue as is and the no action alternative does not preclude the potential for future upgrades/installations to occur, installation or upgrades to broadband would be a beneficial impact; therefore, less than significant impacts would occur to infrastructure.

## 5.10 Socioeconomic Resources

The proposed sites are located in predominantly rural communities of Mifflin and Huntingdon Counties, some of which are considered disadvantaged populations. The proposed action will not generate any negative environmental conditions that would adversely impact surrounding populations or communities. Alternatively, the proposed project is anticipated to have a beneficial impact on the occupants of these rural and residential areas, who have previously

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lacked access to broadband that is available in more urban/populated areas. The proposed action will result in no significant direct or indirect impacts to socioeconomic resources.

Under the No Action Alternative, communities in rural and residential Huntingdon and Mifflin Counties would continue to lack access to broadband infrastructure, which would result in a significant impact.

### 5.11 Human Health and Safety

No potential environmental concerns have been identified in the vicinity of the sites that would potentially impact soil or groundwater. The Responsible Party will additionally identify buried utilities in the ROW prior to subsurface construction methods through the use of 811 (call before you dig) and permit only workers qualified by training or experience to operate heavy machinery and equipment. FAA Part 77 filing will be completed for the proposed Gibbs Lane tower site to ensure the tower does not pose a hazard to air navigation.

The Mt. Union proposed collocation site will utilize an existing equipment building located in the tower compound. As the client proposed to renovate the existing buildings for their operations, an asbestos and lead-based paint survey should be completed before any installation activities occur in the existing building. Any proposed renovation or demolition will require a NESHAP asbestos survey prior construction. Confirmed ACM or LBP in the project impact areas may require abatement prior to construction. The proposed action will result in no significant impact to human health and safety.

Under the No Action Alternative, no impacts would occur to human health and safety.

### 5.12 Cumulative impacts

Cumulative impacts take into consideration reasonably foreseeable future actions that will occur in the project region as well as reasonably close causal relationships to the proposed action. Based on a review of documents from the local jurisdictional planning and development groups, the proposed action fits within the broader goals of the community through providing gaps of broadband and internet coverage that will allow for economic development, job creation, and education opportunities. Additionally, the work will be performed in compliance with applicable county's planning and zoning requirements.

In addition to the local planning and development guidelines, the proposed action (the construction of one tower and the collocation of equipment on another) is part of an overall project that includes the development of multiple other towers and additional collocations within the region. The overall project will provide further expansion and eliminate gaps in rural internet coverage. Sections of the overall project were created in accordance with the proposed buildout requirements of the grant. While each portion of this project will be considered in within own Environmental Assessment, the cumulative effect of this collective portfolio are not anticipated to result in significant adverse environmental impacts.

## 6.0 Applicable Environmental Permits and Regulatory Requirements

The following Special Requirements shall be implemented as part of the proposed action to retain a finding of no significant impact:

- To avoid impacts to the Timber Rattlesnake, work should be conducted between April 15-October 15 the following precautions should be taken to safeguard workers and rattlesnakes:
  1. A PFBC approved Timber Rattlesnake biologist who has the proper permits (Scientific Collector's Permit), and the proper skills to handle this venomous species will be on-site prior to and during construction.
  2. The PFBC approved Timber Rattlesnake biologist will be on-site prior to and during construction activities, during the above time frame, to inspect and clear the area (including staging areas and access roads) of Timber Rattlesnakes and to capture and remove any rattlesnakes that may interfere with work activities.
  3. Timber Rattlesnakes observed on-site are to be measured, sexed, and the habitat characterized where the snake was found. All captured snakes should be released within close proximity (under 100 meters) of the capture site if possible. Rattlesnake captures and relocations are to be documented by photographs, habitat descriptions, in addition to being mapped and labeled accordingly. The biologist is to submit a report to this office (Natural Diversity Section) following the completion of the project documenting all of the activity and herpetofauna encountered.
  4. If erosion control fabric is to be used at this site, materials that are known to reduce the risk of snake entrapment should be selected, such as loosely woven natural fiber ECM. Use of monofilament/plastic netting should be avoided.
  5. Workers responsible for implementing this project should be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. It is suggested a procedure be implemented for Timber Rattlesnake encounters and workers are to be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6.
  6. The well pad area appears to have some basking habitat for snakes. Basking rocks for gestating females can be replaced using the habitat creation guidance document attached.
  7. During the construction period, PFBC personnel may communicate with the on-site biologist and may visit the site area periodically to view the progression of the project and answer any questions or concerns that may arise. For safety purposes, PFBC personnel will register with the on-site manager upon entering the construction area.

- It should be confirmed that there are no active nests on the Mt. Union and Hesston existing towers prior to collocation activities, to ensure the protection of migratory birds during project implementation.
- Pre-construction nesting surveys for migratory birds should be completed at the Gibbs Lane site before ground disturbing activities that occur with migratory bird nesting seasons.
- An asbestos and lead-based paint survey should be completed before any installation activities occur in the existing building at the Mt. Union collocation site.
- In the unlikely event that unanticipated historic properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the bore program excavation activities, all ground disturbing activities must halt immediately, and NTIA along with the appropriate state and/or tribal agencies must be contacted, in accordance with applicable state law and federal regulation (36 C.F.R. § 800.13(b)).
- Limiting the hours of construction to occur only during designated construction hours (6am and 9pm) to reduce off-site noise impacts to sensitive receptors and comply with County Noise Ordinances.
- Use of dust suppression techniques via water trucks or other methods may be implemented to reduce fugitive dust emissions during construction.
- The Responsible Party will screen the project location for existing buried utilities by calling 811 (Call Before You Dig) and permit only workers qualified by training or experience to operate heavy machinery and equipment. Workers should follow OSHA requirements for worker protection (i.e. wearing hearing protection, etc.).
- Coordination with the Federal Aviation Administration (FAA) will be completed to ensure the proposed Gibbs Lane tower will pose no hazards to air navigation.

Table 6.0 Potential Applicable Statutory, Regulatory, and Other Requirements

Regulation	Project Information / Applicability
All Resources	
National Environmental Policy Act (NEPA) of 1969 42 U.S.C. § 4321 et seq.	NEPA EA and associated public involvement procedures are underway.
Vegetation, Wildlife, and Fish	
Endangered Species Act of 1973 16 U.S.C. § 1531 et seq.	Review of the Hesston tower collocation indicated no environmental concerns with any agencies and no further ESA consultation was required for the proposed collocation. The PFBC requested Conservation measures for the Timber Rattlesnake ( <i>Crotalus horridus</i> , Species of Special Concern) for the Mt. Union tower site. To avoid impacts to the rattlesnake, the PFBC requires a series of mitigation measures which are outlined above in Section 6.0. The PGC requested further review for the Allegheny woodrat ( <i>Neotoma magister</i> , threatened) for the Gibbs Lane proposed tower site. PGC concluded that no impact is anticipated.



Regulation	Project Information / Applicability
Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) of 1976 16 U.S.C. 1801 et seq.	The project as currently proposed will have no effect on fisheries.
Bald Eagle and Golden Eagle Protection Act (Eagle Act) of 1940 16 U.S.C. § 668-668d	No bald or Golden Eagles nests are documented within 660 feet of either project site. The project as currently proposed will have no effect on Bald or Golden Eagles. See mitigation measures below regarding migratory birds.
Migratory Bird Treaty Act (MBTA) of 1918 16 U.S.C. § 703-712  Responsibilities to Federal Agencies to Protect Migratory Birds Executive Order 13186	It should be confirmed that there are no active nests on the tower prior to collocation activities, to ensure the protection of migratory birds during project implementation. Pre-construction nesting surveys for migratory birds should be completed at the proposed Gibbs Lane site before ground disturbing activities. The project as currently proposed will have no effect on migratory birds.
Fish and Wildlife Conservation Act 16 U.S.C. § 2901 et seq.  Fish and Wildlife Coordination Act 16 U.S.C. § 661 et seq.	The project as currently proposed will not affect wildlife resources as long as mitigation measures are followed regarding the Timber Rattlesnake and migratory birds.
<b>Waters, Wetlands, and Floodplain Protection</b>	
Clean Water Act 33 U.S.C. § 1251 et seq.  Floodplain/Wetlands Environmental Review Requirements 10 CFR 1022.12  Floodplain Management Executive Order 11988  Protection of Wetlands Executive Order 11990	No wetlands, floodplains, surface waters, or WOTUS have been identified on or near either site. The project will not impact these features.
Coastal Zone Management Act (CZMA) 16 U.S.C. § 1451 et seq.	The project is not located in a coastal zone requiring coordination under the CZMA.
<b>Air Quality and Greenhouse Gases</b>	
The Clean Air Act, as revised in 1990 42 U.S.C. § 4701	The project is not anticipated to require any air permits. To minimize the effects of fugitive dust during construction, dust suppression techniques via water trucks or other methods would be implemented.



Regulation	Project Information / Applicability
<p>Final Mandatory Reporting of Greenhouse Gases Rule 40 CFR 98</p> <p>Federal Leadership in Environmental, Energy, and Economic Performance Executive Order 13514</p>	<p>The project is not anticipated to require any air permits. To minimize the effects of fugitive dust during construction, dust suppression techniques via water trucks or other methods would be implemented.</p>
<p>Cultural and Historic Resources</p>	
<p>Antiquities Act of 1906 16 U.S.C. § 431-433</p> <p>Historic Sites Act of 1935 16 U.S.C. § 461-467</p> <p>National Historic Preservation Act (NHPA), as amended, inclusive of Section 106 54 U.S.C. § 306108 et seq.</p> <p>Archaeological Data Preservation Act of 1974 (16 U.S.C. § 469 – 469-1)</p> <p>Archaeological Resources Protection Act of 1979, as amended 16 U.S.C. § 469 a-c</p> <p>Native American Graves Protection and Repatriation Act 25 U.S.C. § 3001 et seq.</p> <p>Indian Sacred Sites Executive Order 13007</p> <p>American Indian Religious Freedom Act of 1978 (42 U.S.C. § 1996)</p>	<p>Impacts to cultural resources are not anticipated. In the unlikely event that unanticipated historic properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the bore program excavation activities, all ground disturbing activities must halt immediately, and NTIA along with the appropriate state and/or tribal agencies must be contacted, in accordance with applicable state law and federal regulation (36 C.F.R. § 800.13(b)).</p>
<p>Noise, Public Health, and Safety</p>	
<p>Noise Control Act of 1972 42 U.S.C. § 4901 et seq.</p>	<p>Construction work will be performed during construction hours of 6am to 9pm to reduce construction noise to off-site sensitive receptors.</p>

Noise, Public Health, and Safety	
<p>Spill Prevention Control and Countermeasures Rule 40 CFR 112</p> <p>Comprehensive Environmental Response, Compensation, and Liability Act 42 U.S.C. § 9601 et seq.</p> <p>Resource Conservation and Recovery Act 42 U.S.C. § 6901 et seq.</p> <p>The Toxic Substances Control Act 15 U.S.C. 2601 et seq.</p>	<p>Construction work will be performed during construction hours of 6am to 9pm to reduce construction noise to off-site sensitive receptors. Workers should follow OSHA requirements for worker protection (i.e. wearing hearing protection, etc.). The Responsible Party will identify buried utilities prior to subsurface construction methods using 811 (Call Before You Dig) and permit only workers qualified by training or experience to operate heavy machinery and equipment. Coordination with the Federal Aviation Administration (FAA) will be completed to ensure the proposed tower will pose no hazards to air navigation.</p>
Environmental Justice	
Environmental Justice	No additional requirements apply to the project for Environmental Justice.
State, County, and Local Plan Consistency	
NPDES Permit	A NPDES permit is not anticipated due to construction less than one acre.

## 7.0 Consultations

Table 7.0 Agency Consultations:

Agency and Name	Consultation	Status
Proposed Gibbs Lane Tower		
PA Department of Conservation and Natural Resources	Environmental Review	No further review required, no know impact
PA Fish and Boat Commission Josh Brown	Environmental Review	No further review required, no know impact
Pennsylvania Game Commission	Environmental Review	Further Review is Required, PGC concluded that no impact is anticipated.
United States Fish and Wildlife Service	Environmental Review	No further review required, no know impact
PA SHPO Emma Diehl	Section 106 of the NHPA	SHPO Concurrence received
Union Township	Section 106 of the NHPA	No response received
Huntingdon County Historical Society Margaret Skrivseth	Section 106 of the NHPA	No response received

Agency and Name	Consultation	Status
Hesston Collocation		
PA Department of Conservation and Natural Resources	Environmental Review	No further review required, no know impact
PA Fish and Boat Commission Josh Brown	Environmental Review	No further review required, no know impact
Pennsylvania Game Commission	Environmental Review	No further review required, no know impact
United States Fish and Wildlife Service	Environmental Review	No further review required, no know impact
PA SHPO Emma Diehl	Section 106 of the NHPA	SHPO Concurrence received
Penn Township Jim Wikert	Section 106 of the NHPA	No response received
Huntingdon County Historical Society Margaret Skrivseth	Section 106 of the NHPA	No response received
Mt. Union Collocation		
PA Department of Conservation and Natural Resources	Environmental Review	No further review required, no know impact
PA Fish and Boat Commission Josh Brown	Environmental Review	No further review required, Conservation Measure
Pennsylvania Game Commission	Environmental Review	No further review required, no know impact
United States Fish and Wildlife Service	Environmental Review	No further review required, no know impact
PA SHPO Emma Diehl	Section 106 of the NHPA	SHPO Concurrence received
Wayne Township	Section 106 of the NHPA	No response received
Mifflin County Historical Society	Section 106 of the NHPA	No response received

### Tribal Nation Consultation

NTIA initiated tribal consultation using Responsible Party prepared information/documentation to notify Tribal Nations of the project and provided The Responsible Party a NOO listing out the tribes consulted and their procedures. Through the TCNS system, NTIA consulted with the following Federally-recognized tribes:

- Omaha Tribe of Nebraska
- Delaware Nation
- Absentee-Shawnee Tribe of Indians of Oklahoma
- Tuscarora Nation
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
- Seneca-Cayuga Nation
- Eastern Shawnee Tribe of Oklahoma

- Wyandotte Nation
- Shawnee Tribe
- Chippewa Cree Tribe of the Rocky Boy's Reservation
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Delaware Tribe of Indians

Based on NTIA's engagement with the tribes, three tribes (Eastern Shawnee Tribe of Oklahoma, Shawnee Tribe, and Lac du Flambeau Band of Lake Superior Chippewa Indians) replied that they have no concerns with the project. The remainder of the tribes did not respond within the allotted time period, indicating no interest in the project. No Native American Traditional, Cultural or Religious Resources have been identified in the project area.

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# **APPENDIX A**

**List of Preparers**

Name	Title	Role
Emily Kosmalski	Environmental Planning Manager	Author / Special Study Coordinator
Kathy Eisele	Senior Environmental Planner	Author / Tribal and Agency Consultation Coordinator
JoAnn Ivey	Senior Environmental Planner	Author
Jennifer Wood Cyra Malec	Environmental Planner	Authors
Paul DeAngelo	Senior Biologist	Biological and Wetland Resource Reviewer
Suzanne Reece	Senior Archeologist, Principal Investigator	Cultural Resources Reviewer
Patricia Davenport – Jacobs Meghan Browning	Architectural Historian, Principal Investigator	Cultural Resources Researchers
Josh Duncan	Archeologist	Cultural Resources Research
Bill Kaufell	Air and Noise Specialist	Air and Noise Review
Woo Smith	Environmental Planning Manager	Report Review and QA/QC



# **APPENDIX B**



AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager:	KAE	Project No.	J8237078
Drawn by:	ORB	Scale:	AS SHOWN
Checked by:	KAE	File Name:	J8237078
Approved by:	KAE	Date:	August 2023



844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

VICINITY MAP

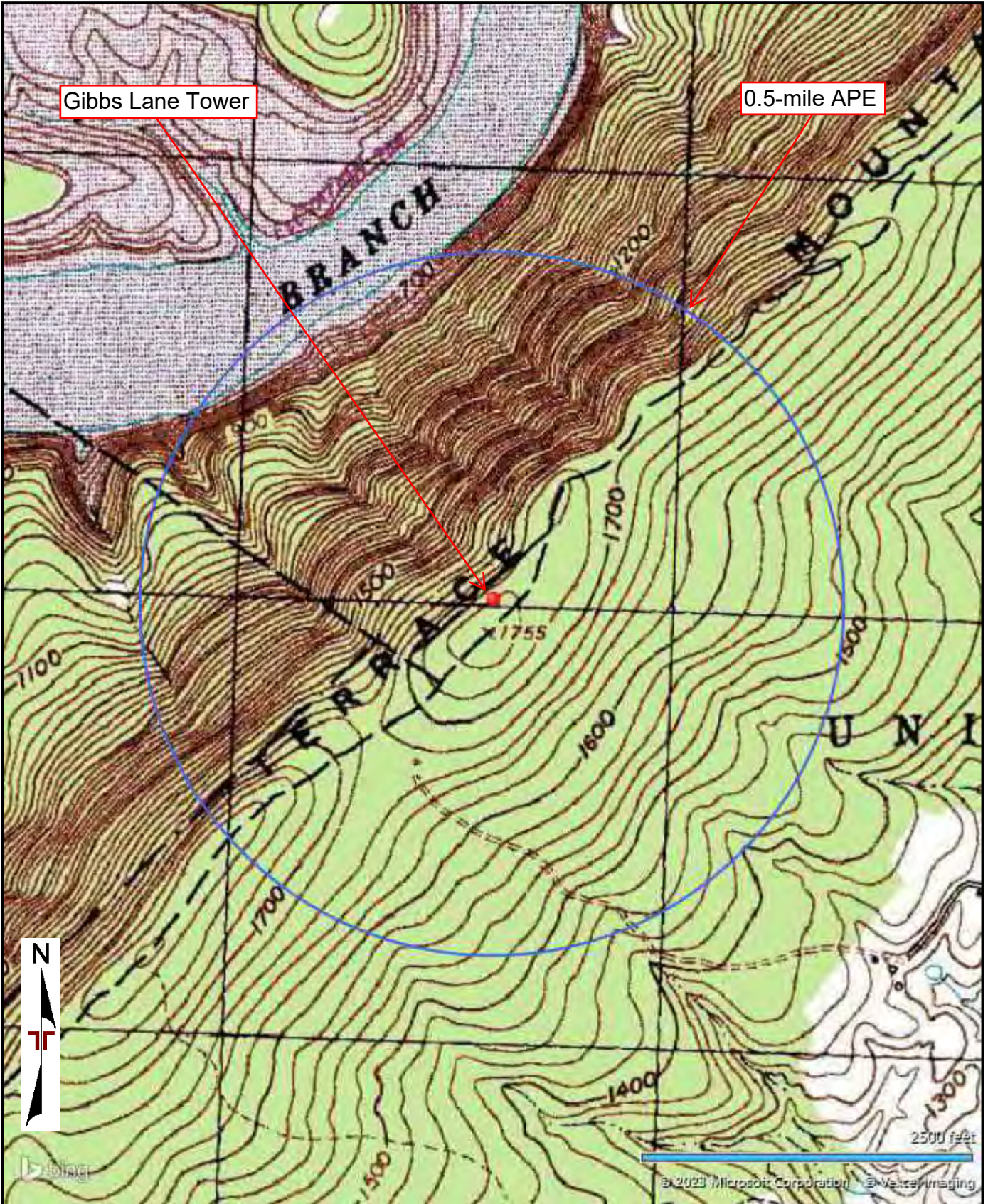
Gibbs Lane Tower, Hesston Collocation,  
Mount Union Collocation

Exhibit

1

*Gibbs Lane*  
*New Tower Figures*





Gibbs Lane Tower

0.5-mile APE

BRANCH

MOUNT UNION

TOWER PLACE

1755



2500 feet

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TOPOGRAPHIC MAP IMAGE COURTESY OF THE U.S. GEOLOGICAL SURVEY  
 QUADRANGLES INCLUDE: HUNTINGDON, PA (1/1/1994), MOUNT UNION, PA (1/1/1971), CASSVILLE, PA (1/1/1994) and BUTLER KNOB, PA (1/1/1971).

Project Manager:  
KAE

Drawn by:  
JPD

Checked by:  
KAE

Approved by:  
KAE

Project No.  
J8237078

Scale:  
AS SHOWN

File Name:  
J8237078

Date:  
August 2023

**Terracon**

844 N Lenola Rd, Ste 1  
 Moorestown, NJ 08057-1052

Topographic Map

Gibbs Lane Tower  
 Union Township, Huntingdon County, PA  
 Coordinates: 40.38927, -78.02398

Exhibit

2a





Project Manager: KAE  
 Drawn by: JPD  
 Checked by: KAE  
 Approved by: KAE

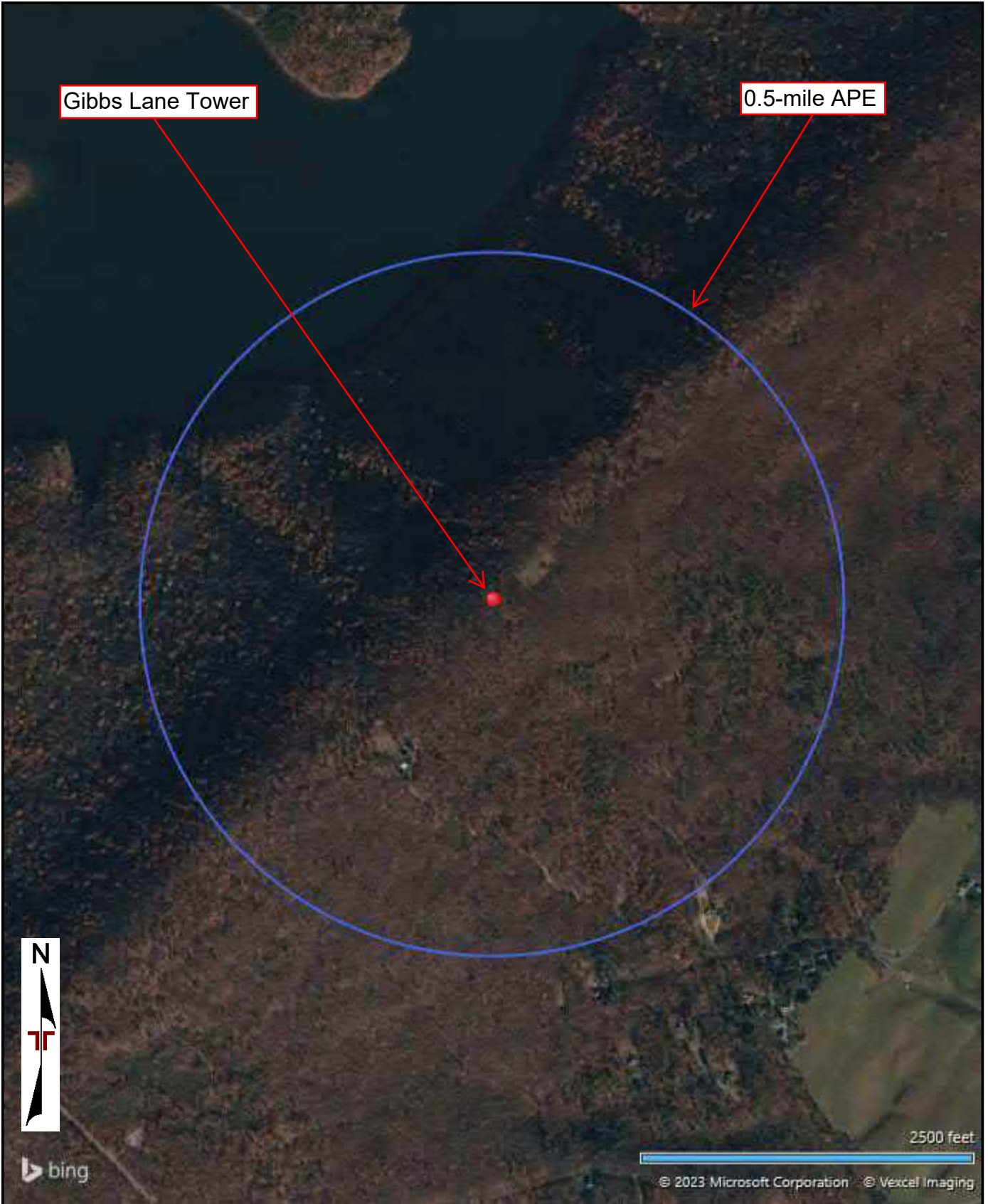
Project No. J8237078  
 Scale: AS SHOWN  
 File Name: J8237078  
 Date: August 2023



844 N Lenola Rd, Ste 1  
 Moorestown, NJ 08057-1052

Proposed Site Plans  
 Gibbs Lane Tower  
 Union Township, Huntingdon County, PA  
 Coordinates: 40.38927, -78.02398

Exhibit  
 3a



AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

Project Manager:	KAE
Drawn by:	JPD
Checked by:	KAE
Approved by:	KAE

Project No.	J8237078
Scale:	AS SHOWN
File Name:	J8237078
Date:	August 2023



**844 N Lenola Rd, Ste 1**  
**Moorestown, NJ 08057-1052**

**Aerial Location Map**

---

**Gibbs Lane Tower**  
**Union Township, Huntingdon County, PA**  
**Coordinates: 40.38927, -78.02398**

Exhibit	<b>4a</b>
---------	-----------



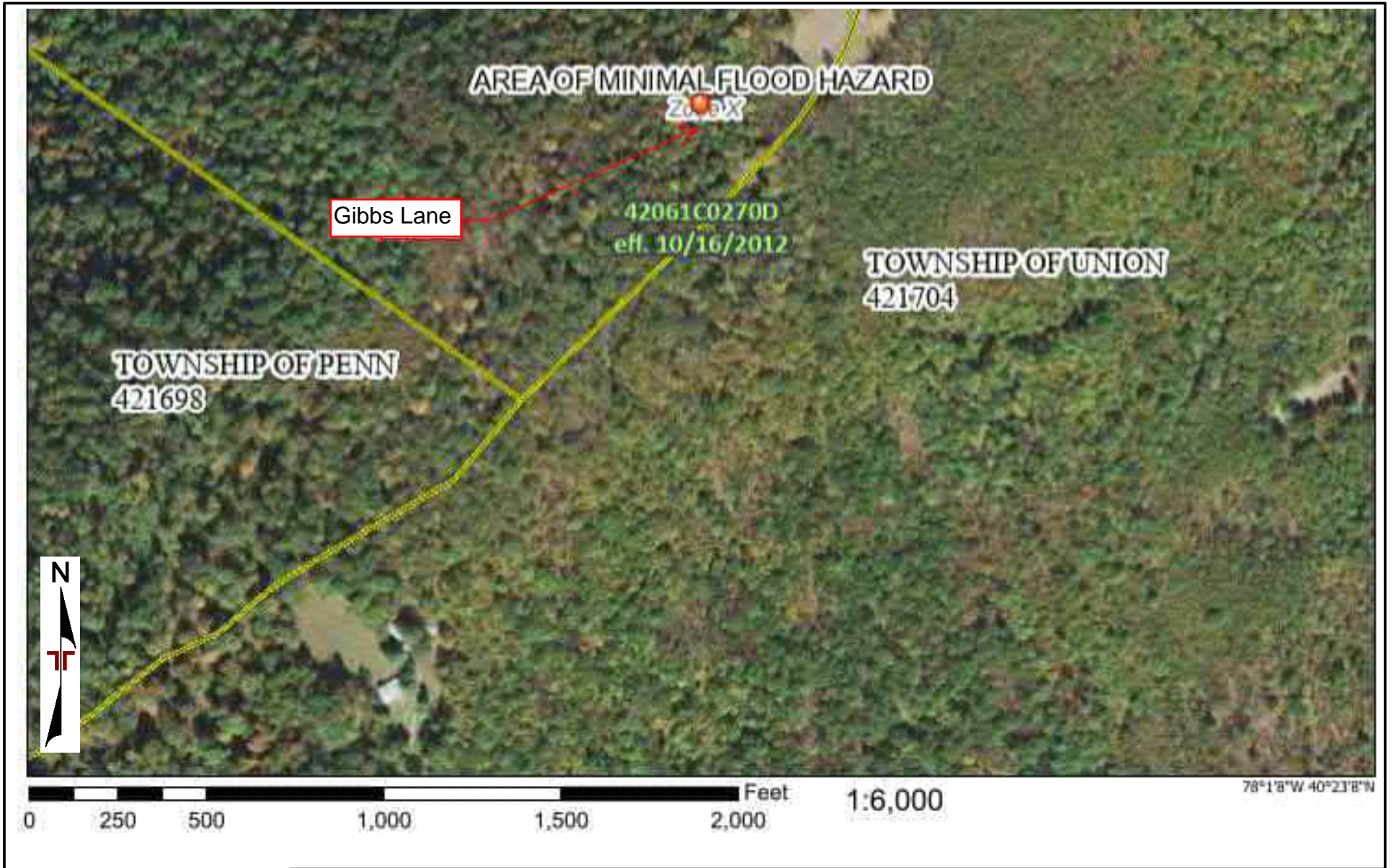


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: KAE	Project No. J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

**Terracon**  
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

FEMA Flood Plain Map
Gibbs Lane Tower Union Township, Huntingdon County, PA Coordinates: 40.38927, -78.02398

Exhibit
5a





U.S. Fish and Wildlife Service, National Wetlands Inventory Support Team  
 wetlands\_team@fws.gov

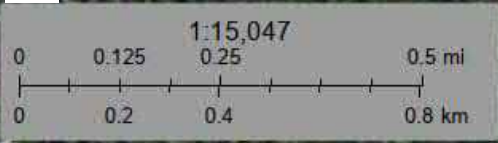


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
 AND IS NOT INTENDED FOR CONSTRUCTION  
 PURPOSES

Project Manager: <b>KAE</b>	Project No: <b>J8237078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>



**844 N Lenola Rd, Ste 1**  
**Moorestown, NJ 08057-1052**

<b>National Wetlands Inventory Map</b>
<b>Gibbs Lane Tower</b> <b>Union Township, Huntingdon County, PA</b> <b>Coordinates: 40.38927, -78.02398</b>

<b>Exhibit</b>
<b>6a</b>



MAP 13



# PHYSIOGRAPHIC PROVINCES OF PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF  
CONSERVATION AND NATURAL RESOURCES  
BUREAU OF TOPOGRAPHIC AND GEOLOGIC SURVEY  
www.dcnr.pa.gov/Geology

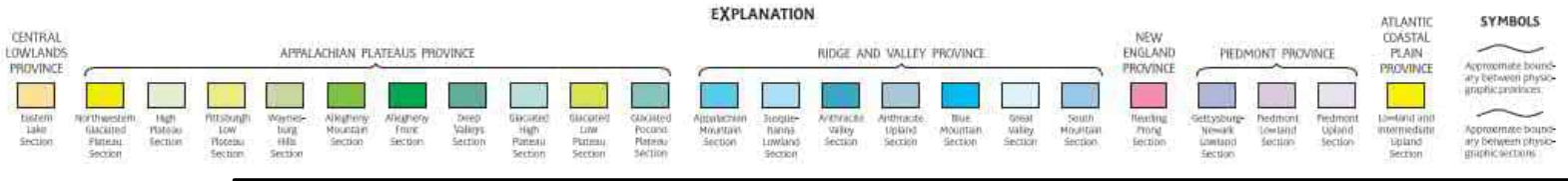
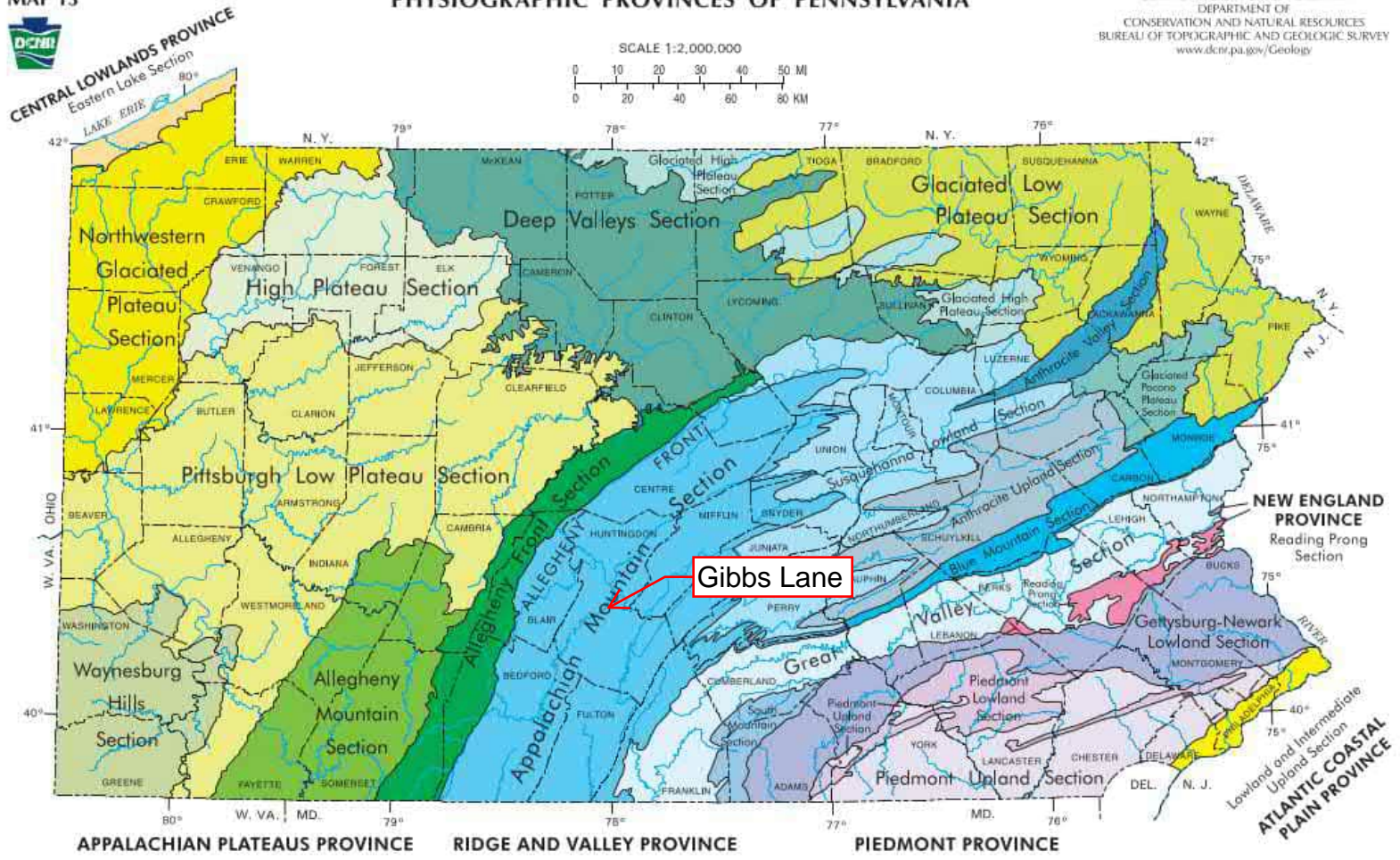
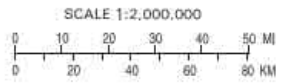


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: <b>KAE</b>	Project No: <b>J8237078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>

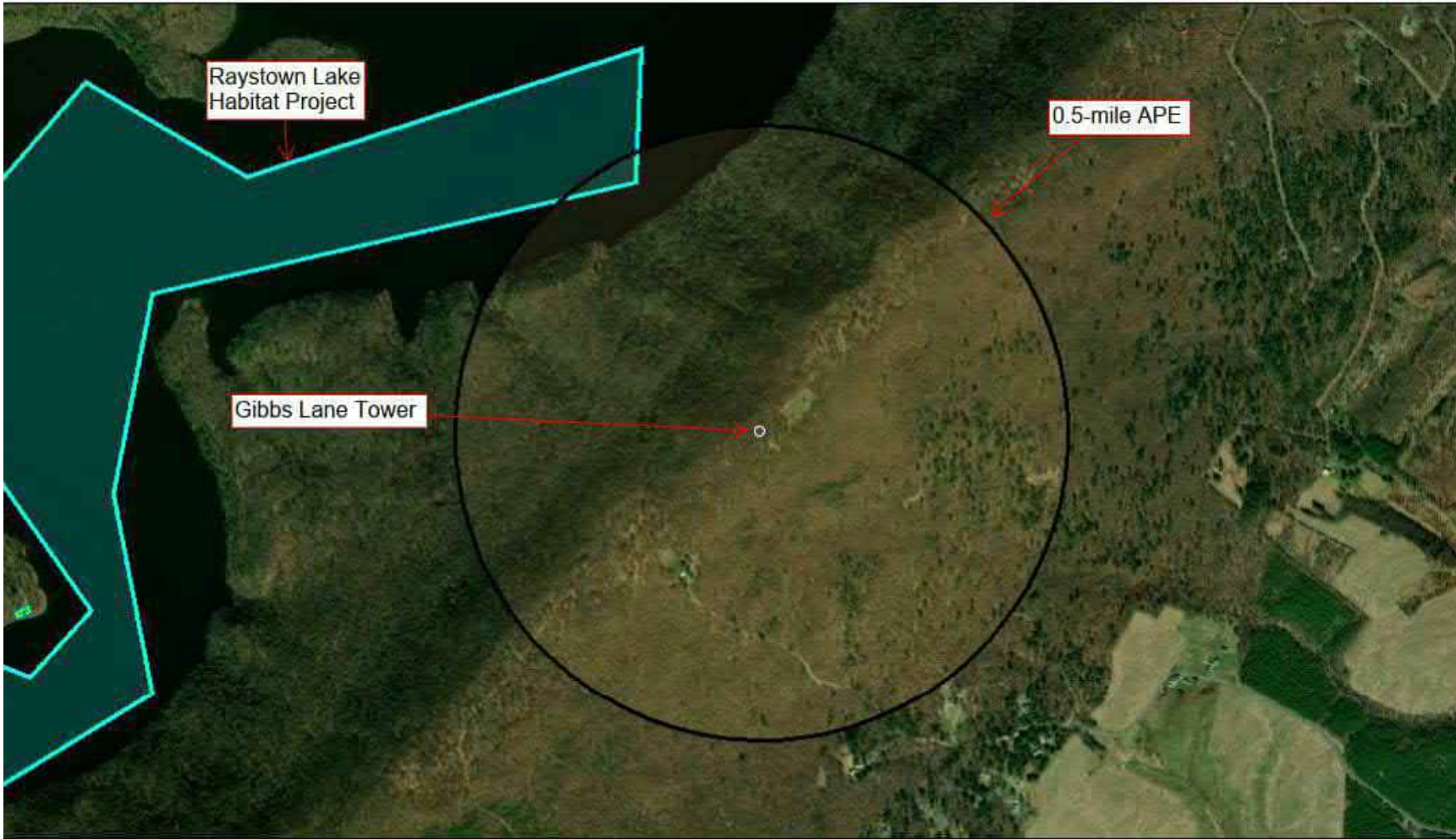
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

Geologic Map  
Gibbs Lane Tower  
Union Township, Huntingdon County, PA  
Coordinates: 40.38927, -78.02398

Exhibit  
**7a**







8/10/2023

- |                                  |                              |              |              |            |
|----------------------------------|------------------------------|--------------|--------------|------------|
| Project Area of Potential Effect | <b>Above Ground Resource</b> | Eligible     | Not Eligible | Demolished |
| Project Limits of Disturbance    | NHL                          | Eligible     | Undetermined |            |
|                                  | Listed                       | Not Eligible | Undetermined |            |

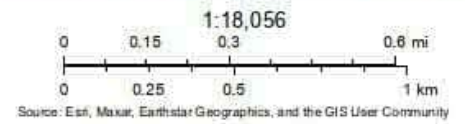


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: <b>KAE</b>	Project No. <b>AS887078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>



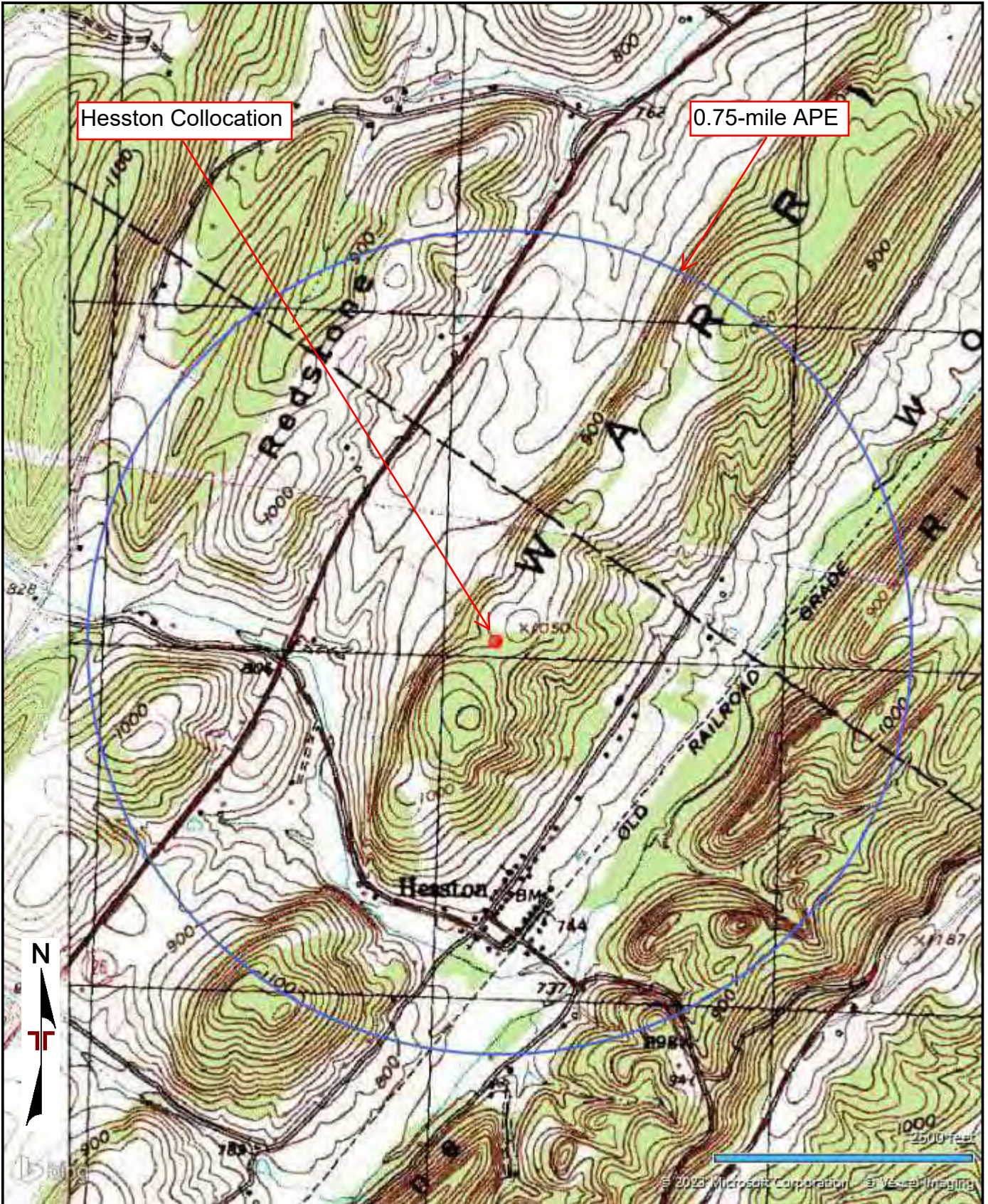
**844 N Lenola Rd, Ste 1**  
**Moorestown, NJ 08057-1052**

<b>Historic Sites Map</b>
<b>Gibbs Lane Tower</b> <b>Union Township, Huntingdon County, PA</b> <b>Coordinates: 40.38927, -78.02398</b>

Exhibit <b>9a</b>
----------------------

*Hesston Collocation  
Figures*





TOPOGRAPHIC MAP IMAGE COURTESY OF THE U.S. GEOLOGICAL SURVEY  
 QUADRANGLES INCLUDE: WILLIAMSBURG, PA (1/1/1984) and HUNTINGDON, PA (1/1/1994).

Project Manager:	KAE	Project No.	J8237078
Drawn by:	JPD	Scale:	AS SHOWN
Checked by:	KAE	File Name:	J8237078
Approved by:	KAE	Date:	August 2023



844 N Lenola Rd, Ste 1  
 Moorestown, NJ 08057-1052

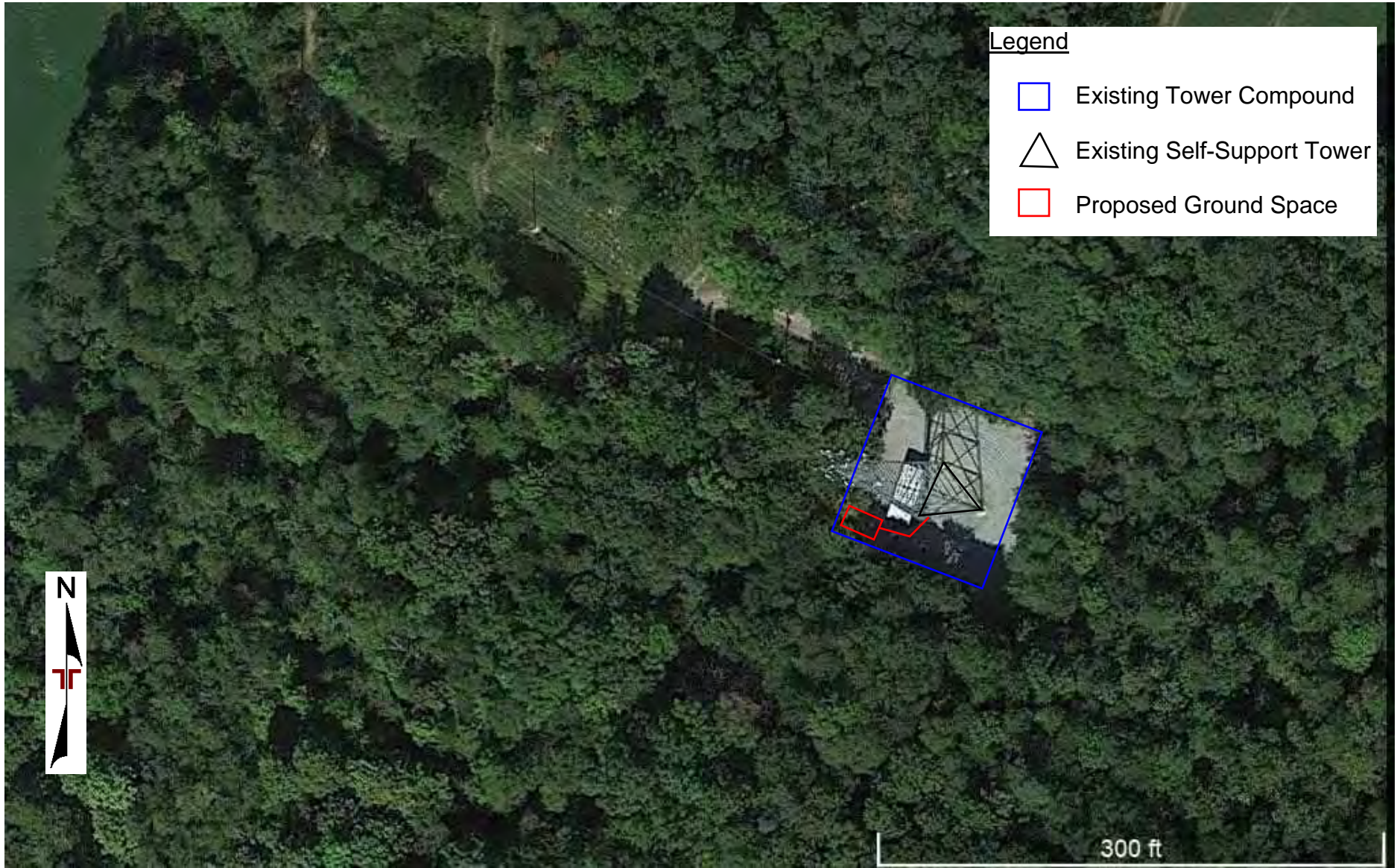
**Topographic Map**

**Hesston Collocation**  
 Penn Township, Huntingdon County, PA  
 Coordinates: 40.4278819, -78.1097989

Exhibit

2b





**Legend**

- Existing Tower Compound
- Existing Self-Support Tower
- Proposed Ground Space

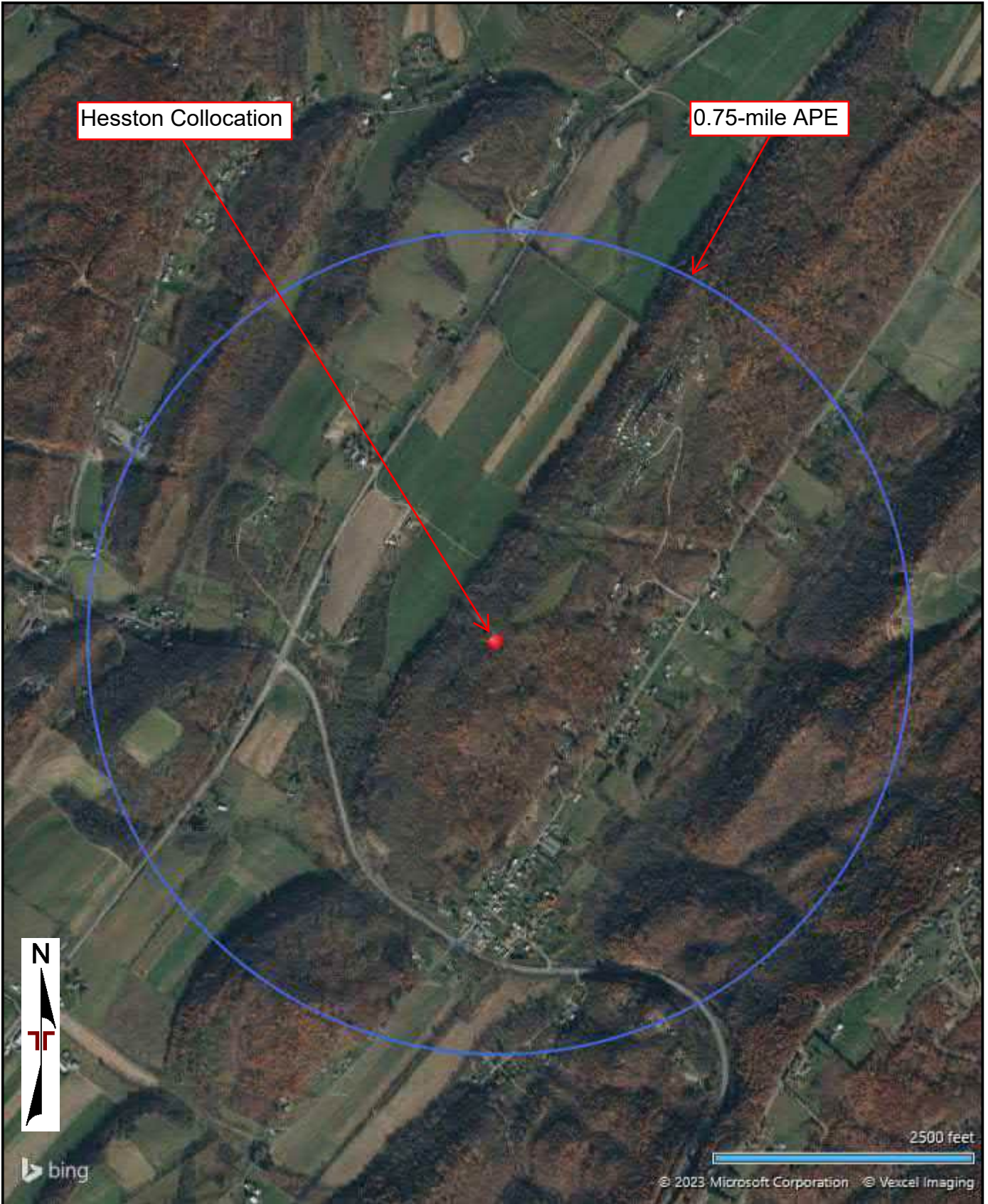


300 ft

DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: <b>KAE</b>	Project No. <b>J8237078</b>	 <b>844 N Lenola Rd, Ste 1</b> <b>Moorestown, NJ 08057-1052</b>	<b>Proposed Site Plans</b> <b>Hesston Collocation</b> <b>Penn Township, Huntingdon County, PA</b> <b>Coordinates: 40.4278819, -78.10979899</b>	Exhibit
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>			
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>			
Approved by: <b>KAE</b>	Date: <b>May 2023</b>			<b>3b</b>





AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

Project Manager:	KAE
Drawn by:	JPD
Checked by:	KAE
Approved by:	KAE

Project No.	J8237078
Scale:	AS SHOWN
File Name:	J8237078
Date:	August 2023



**844 N Lenola Rd, Ste 1**  
**Moorestown, NJ 08057-1052**

**Aerial Location Map**

---

**Hesston Collocation**  
**Penn Township, Huntingdon County, PA**  
**Coordinates: 40.4278819, -78.10979899**

Exhibit

---

**4b**



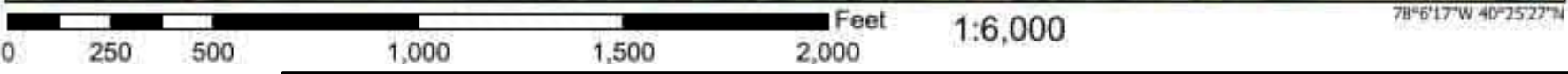


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: <b>KAE</b>	Project No: <b>J8237078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>



**844 N Lenola Rd, Ste 1**  
**Moorestown, NJ 08057-1052**

<b>FEMA Flood Plain Map</b>
<b>Hesston Collocation</b> <b>Penn Township, Huntingdon County, PA</b> <b>Coordinates: 40.4278819, -78.10979899</b>

<b>Exhibit</b>
<b>5b</b>





Project Manager: KAE	Project No. J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

**Terracon**  
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

National Wetlands Inventory Map

Hesston Collocation  
Penn Township, Huntingdon County, PA  
Coordinates: 40.4278819, -78.10979899

Exhibit  
6b

DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES



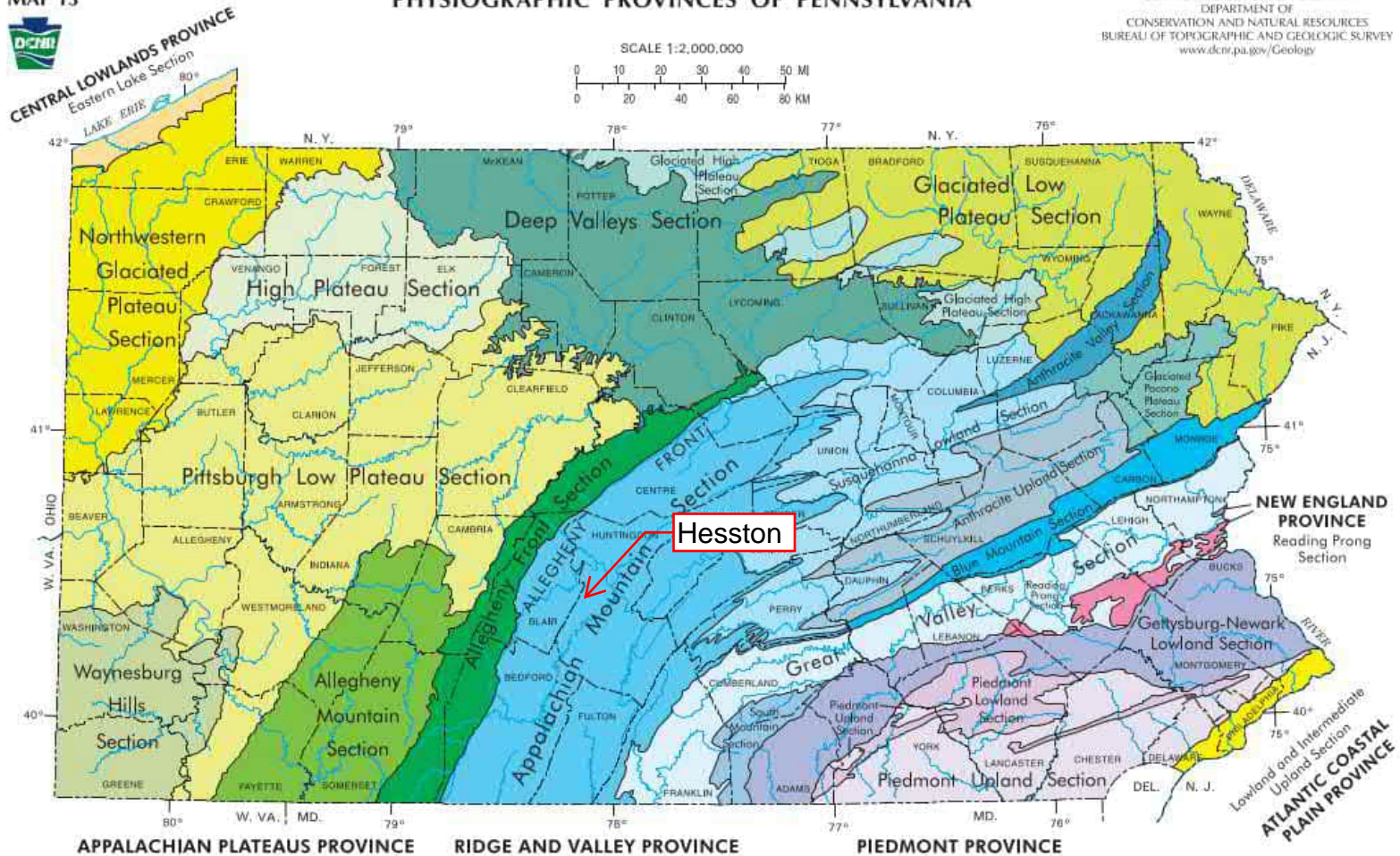
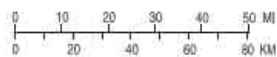
MAP 13



# PHYSIOGRAPHIC PROVINCES OF PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF  
CONSERVATION AND NATURAL RESOURCES  
BUREAU OF TOPOGRAPHIC AND GEOLOGIC SURVEY  
www.dcnr.pa.gov/Geology

SCALE 1:2,000,000



**CENTRAL LOWLANDS PROVINCE**

- Eastern Lake Section
- Northwestern Glaciated Plateau Section

**APPALACHIAN PLATEAUS PROVINCE**

- High Plateau Section
- Pittsburgh Low Plateau Section
- Waynesburg Hills Section
- Allegheny Mountain Section
- Allegheny Front Section
- Deep Valleys Section
- Glaciated High Plateau Section
- Glaciated Low Plateau Section
- Glaciated Pocono Plateau Section

**EXPLANATION**

**RIDGE AND VALLEY PROVINCE**

- Appalachian Mountain Section
- Gettysburg Lowland Section
- Anthracite Valley Section
- Anthracite Upland Section
- Blue Mountain Section
- Great Valley Section
- South Mountain Section

**NEW ENGLAND PROVINCE**

- Reading Prong Section

**PIEDMONT PROVINCE**

- Gettysburg-Newark Lowland Section
- Piedmont Lowland Section
- Piedmont Upland Section

**ATLANTIC COASTAL PLAIN PROVINCE**

- Lowland and Intermediate Upland Section

**SYMBOLS**

- Approximate boundary between physiographic provinces
- Approximate boundary between physiographic sections

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager: KAE	Project No. J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

444 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

Geologic Map

Hesston Collocation

Penn Township, Huntingdon County, PA

Coordinates: 40.4278819, -78.10979899

Exhibit

7b



(Soil Map may not be valid at this scale.)

28° 6' 38" N  
78° 6' 38" W

Map Scale: 1:729 if printed on A landscape (11" x 8.5") sheet.

0 10 20 40 60 Meters

0 35 70 140 210 Feet

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

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
HcD3	Hagerstown sity clay loam, 15 to 25 percent slopes	0.7	69.0%
HxC	Hubersburg cherty silt loam, 8 to 15 percent slopes	0.3	31.0%
Totals for Area of Interest		1.0	100.0%



DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: KAE	Project No: J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

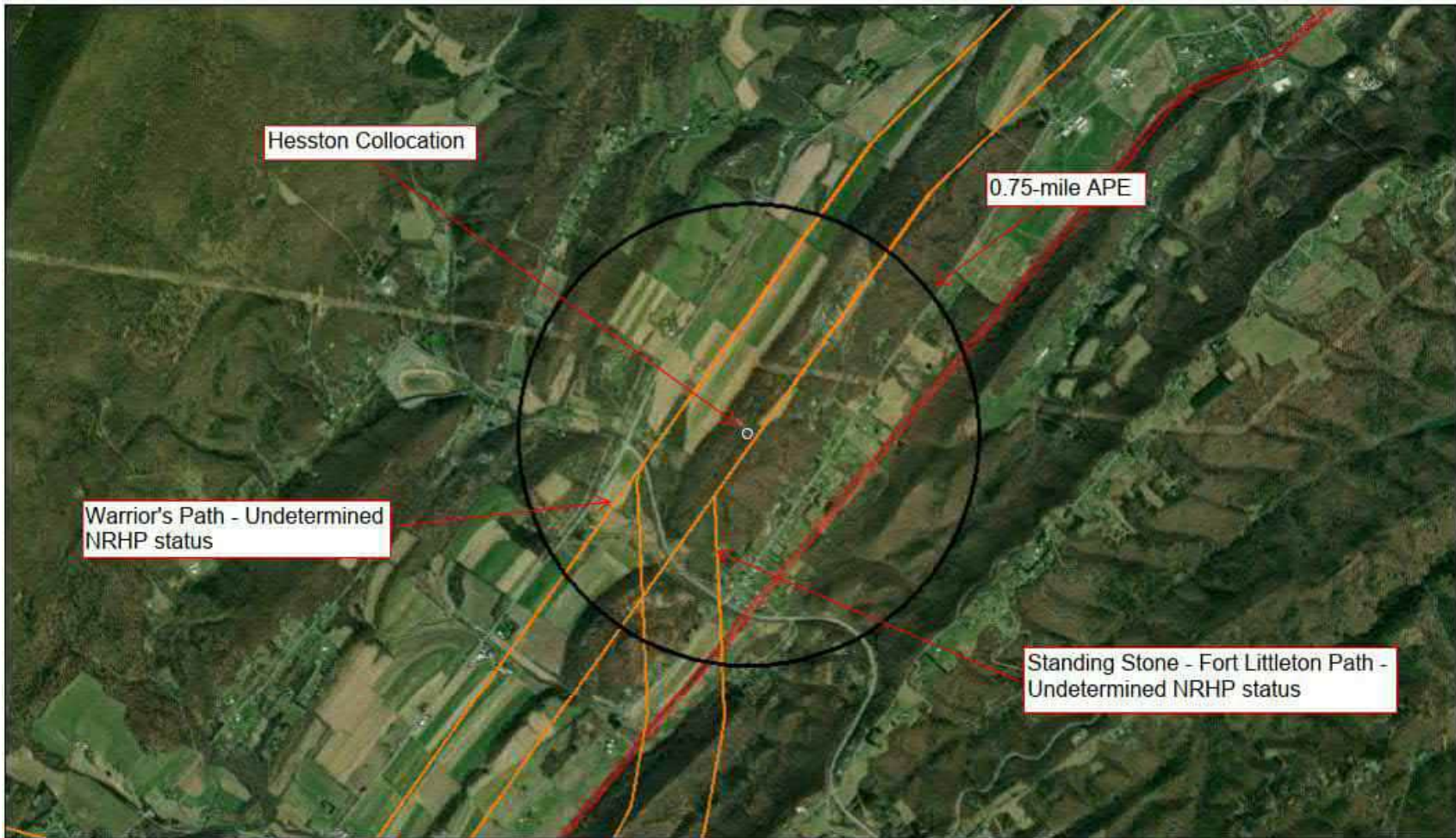


844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

Soils Map
Hesston Collocation Penn Township, Huntingdon County, PA Coordinates: 40.4278819, -78.10979899

Exhibit  8b
-------------------





8/15/2023

**Above Ground Resource**

- NHL
- Listed

- |   |   |  |
|---|---|--|
| <span style="border: 1px solid green; display: inline-block; width: 15px; height: 15px; background-color: white;"></span> Eligible    | <span style="border: 1px solid red; display: inline-block; width: 15px; height: 15px; background-color: white;"></span> Not Eligible    | <span style="border: 1px solid black; display: inline-block; width: 15px; height: 15px; background-color: white;"></span> Demolished |
| <span style="border: 1px solid green; display: inline-block; width: 15px; height: 15px; background-color: yellow;"></span> Eligible   | <span style="border: 1px solid yellow; display: inline-block; width: 15px; height: 15px; background-color: white;"></span> Undetermined |  |
| <span style="border: 1px solid red; display: inline-block; width: 15px; height: 15px; background-color: yellow;"></span> Not Eligible | <span style="border: 1px solid orange; display: inline-block; width: 15px; height: 15px; background-color: white;"></span> Undetermined |  |

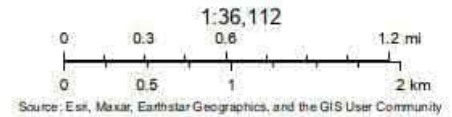


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: <b>KAE</b>	Project No: <b>J8237078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>

**Terracon**

844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

**Historic Sites Map**

---

**Hesston Collocation**  
Penn Township, Huntingdon County, PA  
Coordinates: 40.4278819, -78.10979899

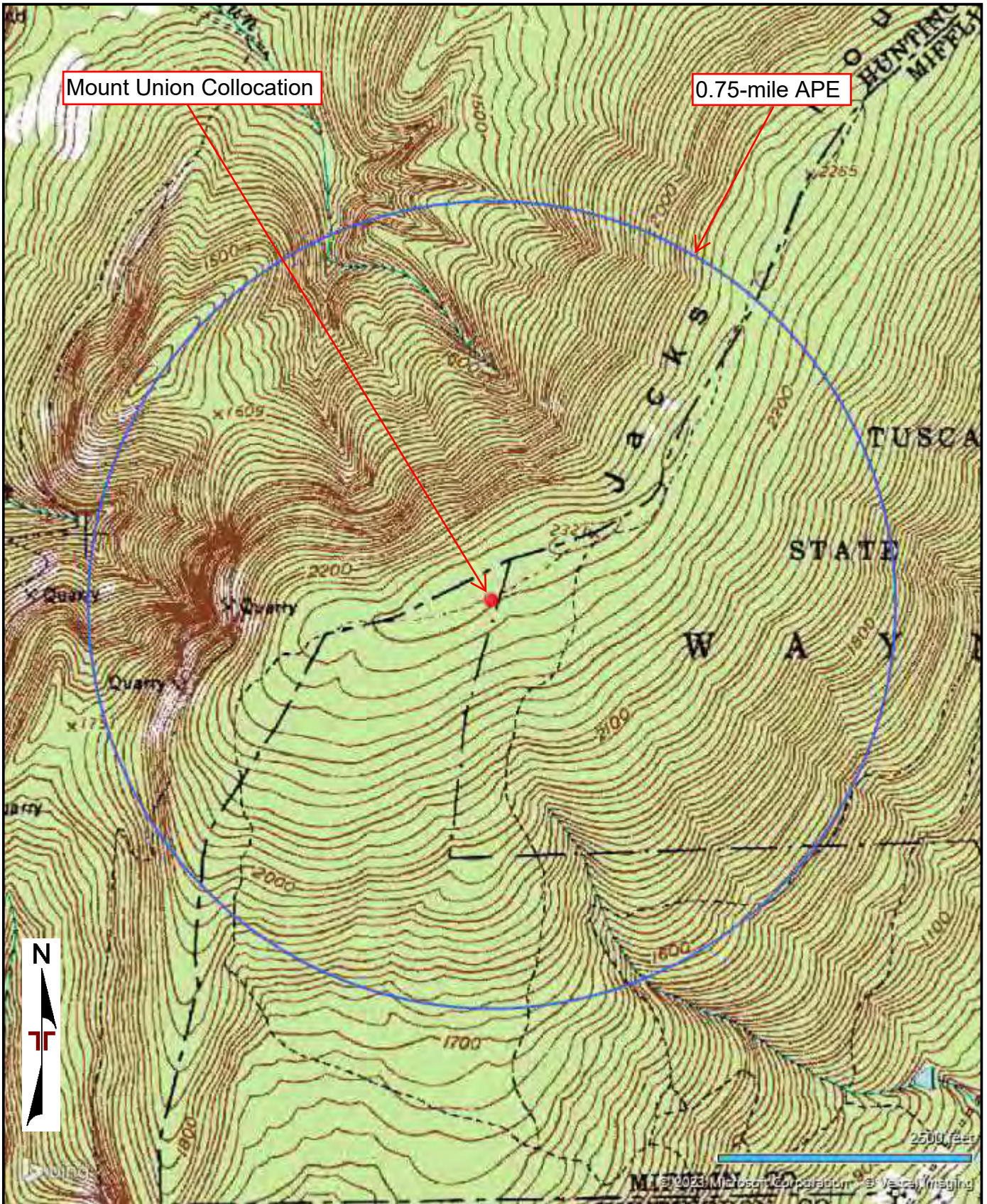
Exhibit

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**9b**

*Mt. Union Collocation  
Figures*





TOPOGRAPHIC MAP IMAGE COURTESY OF THE U.S. GEOLOGICAL SURVEY  
 QUADRANGLES INCLUDE: MOUNT UNION, PA (1/1/1971).

Project Manager:	KAE	Project No.	J8237078
Drawn by:	JPD	Scale:	AS SHOWN
Checked by:	KAE	File Name:	J8237078
Approved by:	KAE	Date:	August 2023

**Terracon**  
 844 N Lenola Rd, Ste 1  
 Moorestown, NJ 08057-1052

Topographic Map
<b>Mount Union Collocation</b> <b>Wayne Township, Mifflin County</b> <b>Coordinates: 40.414844, -77.902035</b>

Exhibit
2c



Legend

- Existing Tower Compound
- Existing Self-Support Tower
- Proposed Ground Space



Project Manager:  
KAE

Drawn by:  
JPD

Checked by:  
KAE

Approved by:  
KAE

Project No.  
J8237078

Scale:  
AS SHOWN

File Name:  
J8237078

Date:  
August 2023



844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

Proposed Site Plans

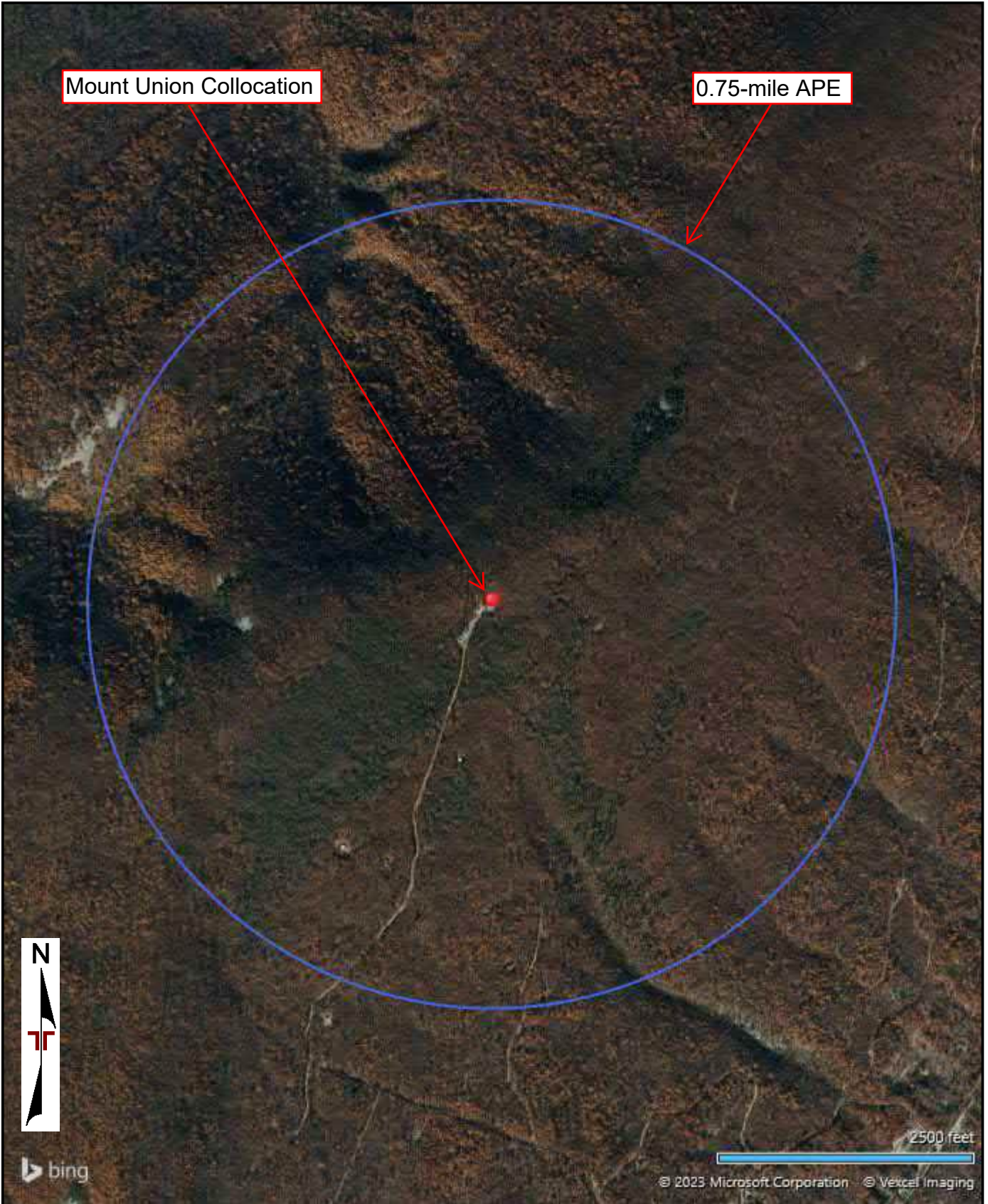
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Mount Union Collocation  
Wayne Township, Mifflin County  
Coordinates: 40.414844, -77.902035

Exhibit

3c





AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

Project Manager:	KAE	Project No.	J8237078
Drawn by:	JPD	Scale:	AS SHOWN
Checked by:	KAE	File Name:	J8237078
Approved by:	KAE	Date:	August 2023

**terracon**

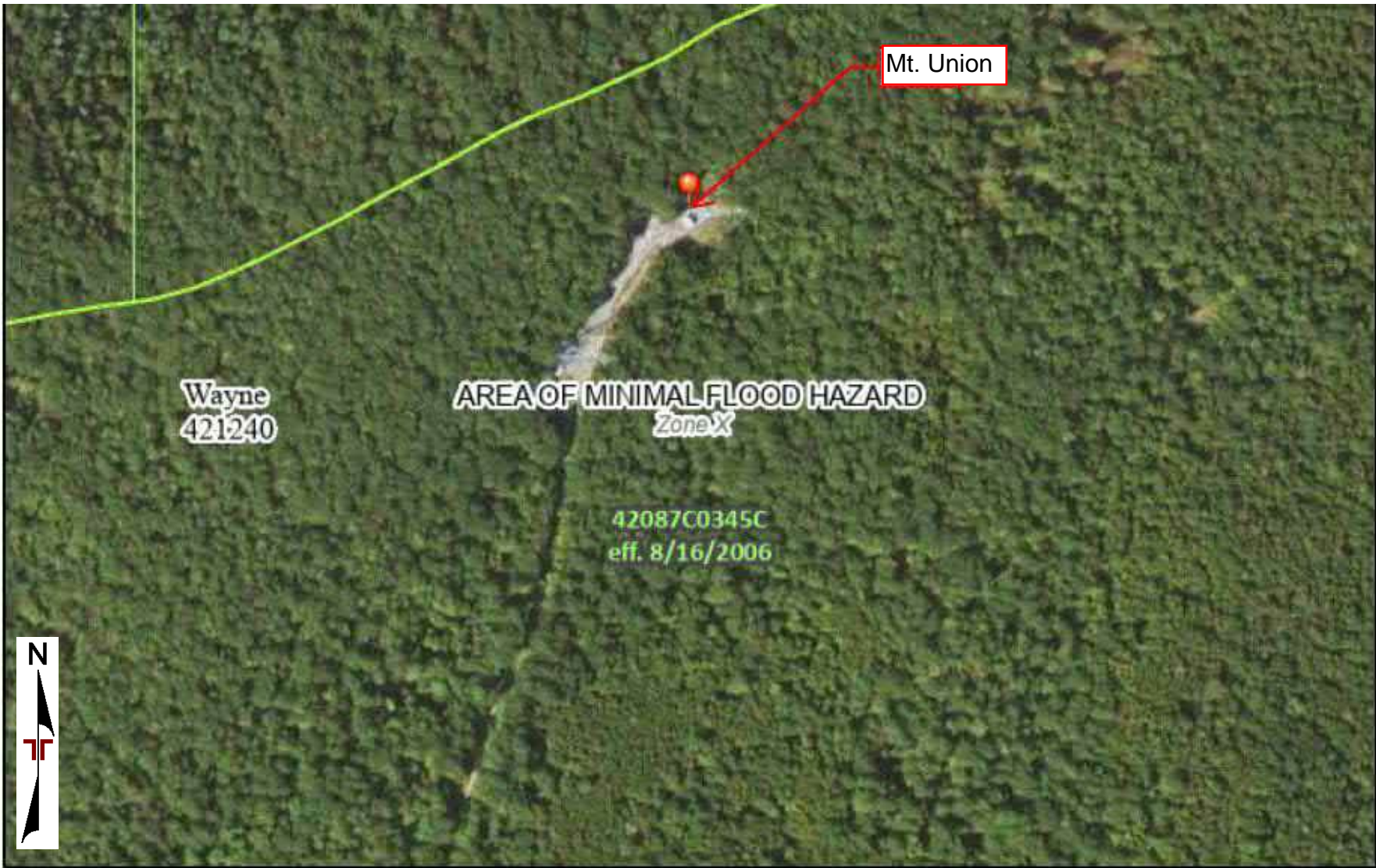
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

**Aerial Location Map**

**Mount Union Collocation**  
Wayne Township, Mifflin County  
Coordinates: 40.414844, -77.902035

Exhibit
<b>4c</b>





77°53'49"W 40°24'40"N

DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: KAE	Project No. J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023



844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

FEMA Flood Plain Map

Mount Union Collocation  
Wayne Township, Mifflin County  
Coordinates: 40.414844, -77.902035

Exhibit

5c





DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: KAE	Project No: J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

**Terracon**  
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

National Wetlands Inventory Map
Mount Union Collocation Wayne Township, Mifflin County Coordinates: 40.414844, -77.902035

Exhibit
6c



# PHYSIOGRAPHIC PROVINCES OF PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF  
CONSERVATION AND NATURAL RESOURCES  
BUREAU OF TOPOGRAPHIC AND GEOLOGIC SURVEY  
www.dcnr.pa.gov/Geology

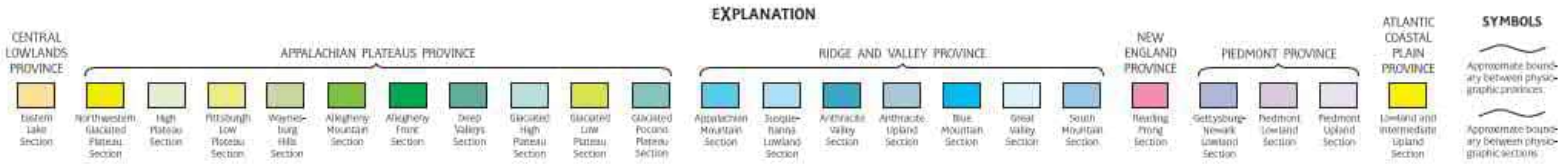
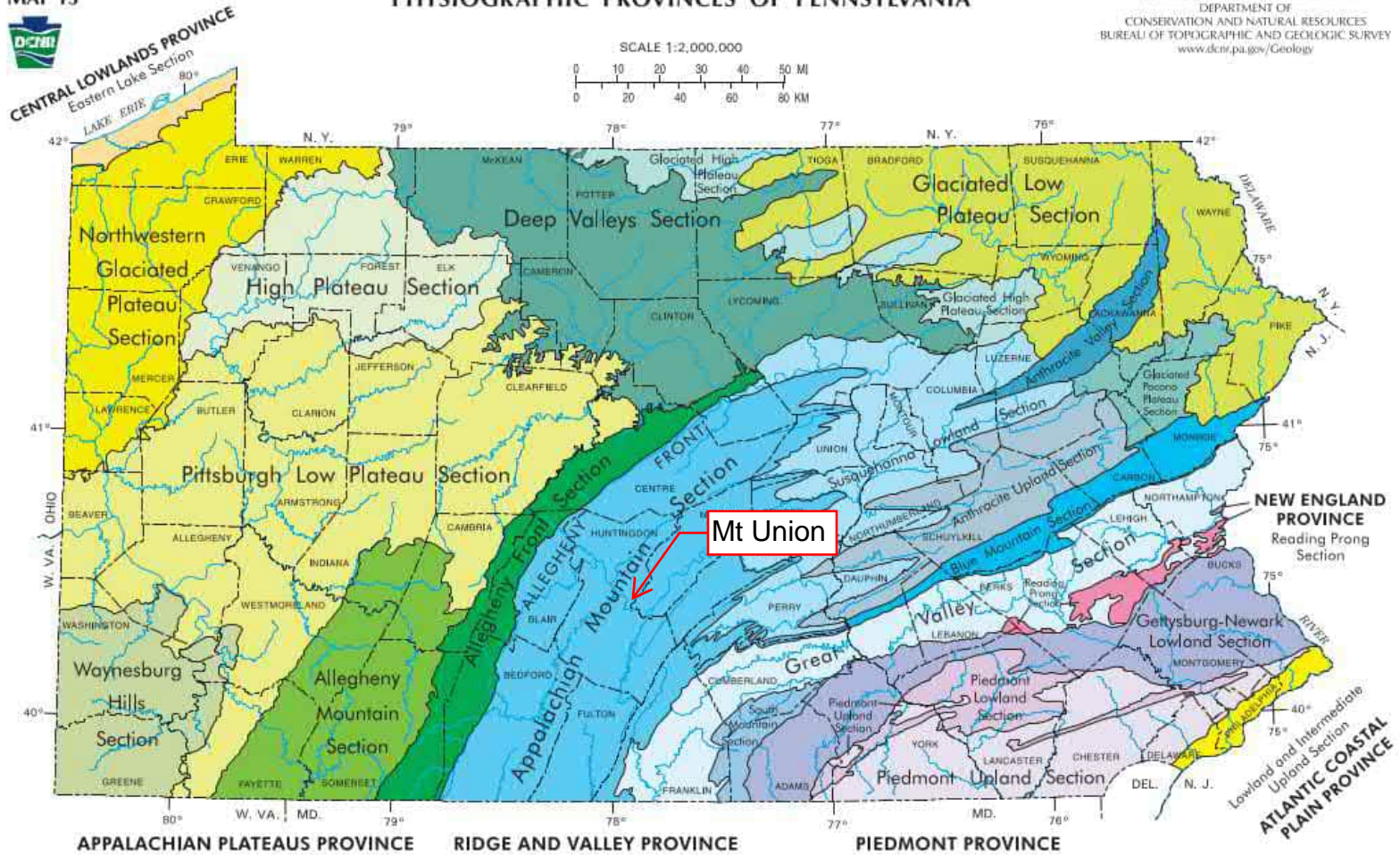
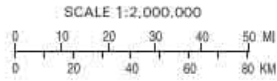


DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

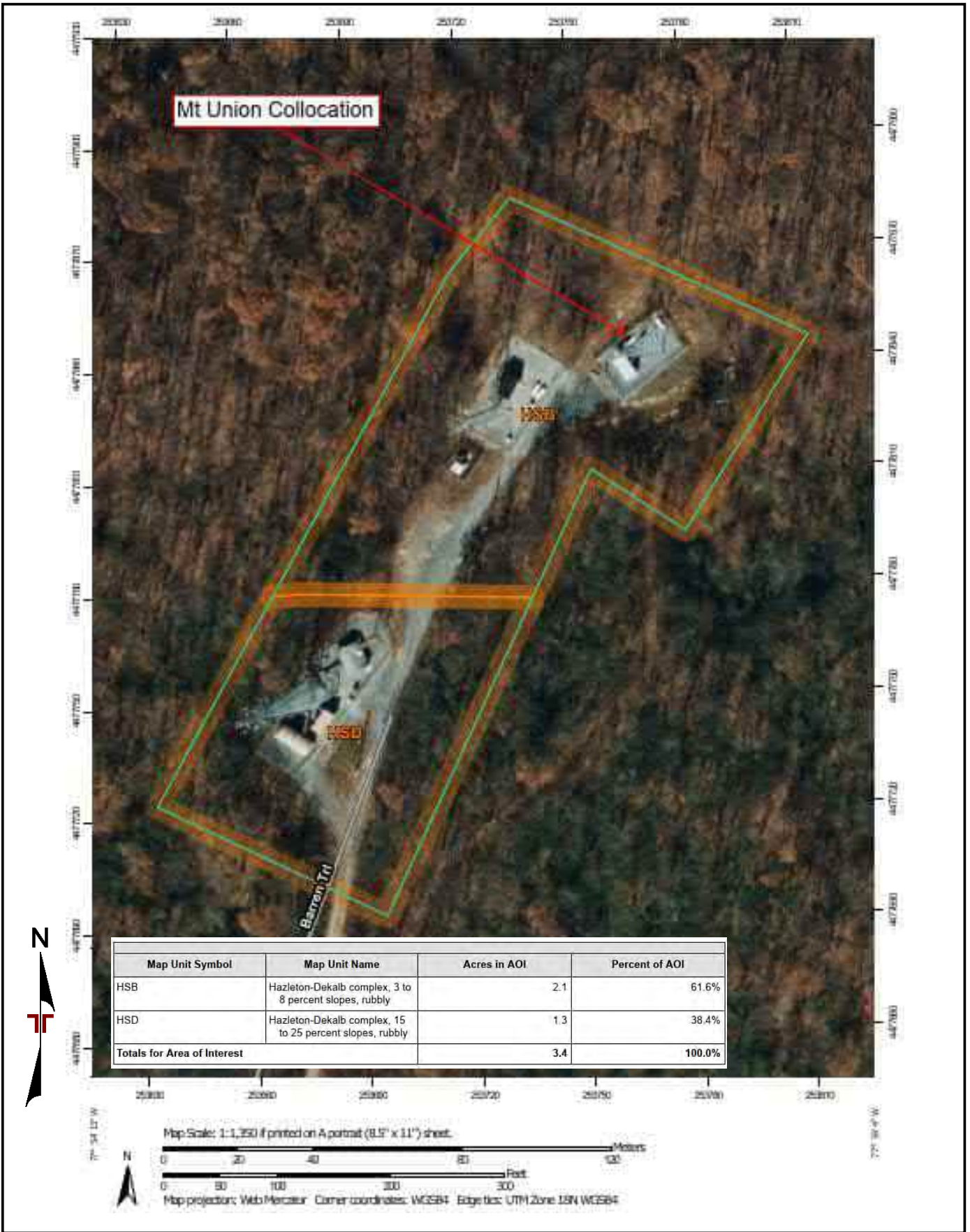
Project Manager: <b>KAE</b>	Project No: <b>J8237078</b>
Drawn by: <b>JKW</b>	Scale: <b>AS SHOWN</b>
Checked by: <b>KAE</b>	File Name: <b>J8237078</b>
Approved by: <b>KAE</b>	Date: <b>May 2023</b>

**Terracon**  
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

**Geologic Map**  
**Mount Union Collocation**  
**Wayne Township, Mifflin County**  
**Coordinates: 40.414844, -77.902035**

Exhibit  
**7c**





Project Manager: KAE  
 Drawn by: JPD  
 Checked by: KAE  
 Approved by: KAE

Project No. J8237078  
 Scale: AS SHOWN  
 File Name: J8237078  
 Date: August 2023

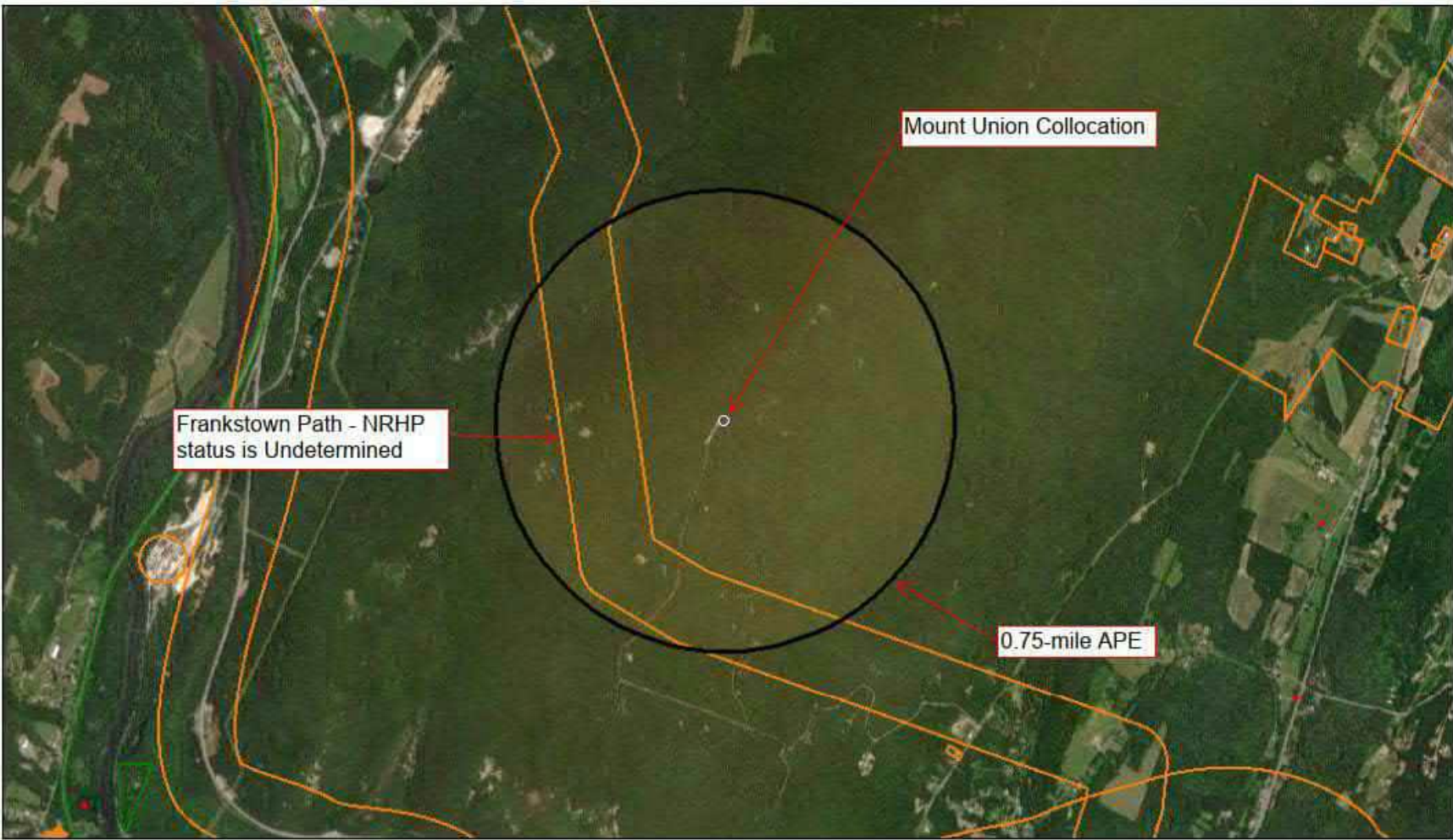


844 N Lenola Rd, Ste 1  
 Moorestown, NJ 08057-1052

**Soils Map**

**Mount Union Collocation**  
 Wayne Township, Mifflin County  
 Coordinates: 40.414844, -77.902035

Exhibit  
**8c**



8/15/2023

**Above Ground Resource**

- |          |              |              |
|----------|--------------|--------------|
| Eligible | Not Eligible | Demolished   |
| NHL      | Undetermined |              |
| Listed   | Not Eligible | Undetermined |

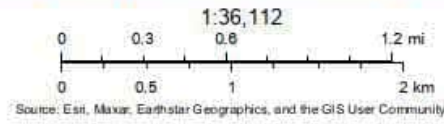


DIAGRAM IS FOR GENERAL LOCATION ONLY,  
AND IS NOT INTENDED FOR CONSTRUCTION  
PURPOSES

Project Manager: KAE	Project No. J8237078
Drawn by: JKW	Scale: AS SHOWN
Checked by: KAE	File Name: J8237078
Approved by: KAE	Date: May 2023

**Terracon**  
844 N Lenola Rd, Ste 1  
Moorestown, NJ 08057-1052

Historic Sites Map
Mount Union Collocation Wayne Township, Mifflin County Coordinates: 40.414844, -77.902035

Exhibit
9c

# **APPENDIX C**





**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED  
BROADBAND PROJECT NOTIFICATION INFORMATION**

Date: 08/18/2023

UPWARD BROADBAND  
KATHY EISELE  
1401 CONSTITUTION AVE.  
WASHINGTON, DC 20230

Dear Applicant:

The National Telecommunications and Information Administration (NTIA) is using a modified version of the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) as a means of expediting its Broadband grant programs. This notice is to inform you that the following authorized parties were sent information about the application that you submitted to NTIA through TCNS. The information was forwarded to authorized TCNS users by electronic mail and/or regular mail (letter).

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) who have set their geographic preferences on TCNS. 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. Consistent with the FCC's rules as set forth in the NPA, NTIA requires that all Tribal Nations and NHOs listed below are afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below.

We note that the review period for all parties begins upon receipt of a full project submittal and notifications that do not provide this serve as information only. 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. 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 NTIA. NTIA will follow procedures consistent with those set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO - Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) - Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 434) - electronic mail

Details: Please note we have updated procedures. Please email us at Omahatribefcctns@outlook.com

2. TCNS Coordinator - Tiffany Martinez - Delaware Nation - 31064 State Highway 281 (PO Box: 825) - Anadarko, OK - tmartinez@delawarenation-nsn.gov; epaden@delawarenation-nsn.gov - 405-247-2448 (ext: 1403) - electronic mail  
Details: The Delaware Nation of Oklahoma Historic Preservation Office has developed the following consultation procedures for all TCNS projects identified as undertakings by the Federal Communications Commission. In the email subject line, please specify whether the project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. Cultural Preservation Director - Carol Butler - Absentee-Shawnee Tribe of Indians of Oklahoma - 2025 S. Gordon Cooper Drive - Shawnee, OK - fccasttens@gmail.com - 405-275-4030 (ext: 6312) - electronic mail

4. TCNS Rep - Bryan Printup - Tuscarora Nation - 5226 Walmore Rd - Via: Lewiston, NY - bprintup@hetf.org - 716-264-6011 (ext: 103) - electronic mail

If the applicant/tower builder receives no response from the Tuscarora Nation within 30 days after notification through TCNS, the Tuscarora Nation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. THPO - Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) - Odanah, WI - thpo@badriver-nsn.gov; deputyTHPO@badriver-nsn.gov - 715-682-7123 - electronic mail

If the applicant/tower builder receives no response from the Bad River Band of Lake Superior Tribe of Chippewa Indians within 30 days after notification through TCNS, the Bad River Band of Lake Superior Tribe of Chippewa Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Bad River Band of Lake Superior Tribe of Chippewa 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.

6. THPO - Marvin DeFoe - Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin - 88455 Pike Road, HWY 13 - Bayfield, WI - Marvin.DeFoe@redcliff-nsn.gov; Edwina.Buffalo-Reyes@redcliff-nsn.gov - 715-779-3700 (ext: 4242) - electronic mail

Details: Boozhoo, we do not have the Red Cliff Portal site online anymore and apologize for the inconvenience.

If you have a project that has already been paid for or would like to voluntarily pay for, please email documents for project review to THPO@redcliff-nsn.gov. This address is only to be used by Consultants who are voluntarily paying for projects.

If you have any questions, please contact Marvin Defoe, THPO Manager at (715) 779-3700 Ext. 4244 or Edwina Buffalo-Reyes, THPO Assistant at (715) 779-3700Ext. 4243.

7. THPO - William Tarrant - Seneca-Cayuga Nation - 23701 S 655 Road (PO Box: 453220) - Grove, OK - wtarrant@sctribe.com - 918-787-5452 (ext: 344) - regular mail

Details: Please refrain from sending review information via email. We request all information to be sent via mail to PO Box 453220, Grove, OK 74345.

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

Details: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened.

Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe  
Attn: CellTower 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](mailto:celltower@estoo.net) requesting our most current copy.

9. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org) - 918-678-6344 - electronic mail

Details: Please refrain from sending information via mail. We ONLY accept information via email to: [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org). We will advise if we require additional information.

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

Details: 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](mailto:TCNS@shawnee-tribe.com)

Thank you for the opportunity to comment.

11. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - [Taivonjoi17@gmail.com](mailto:Taivonjoi17@gmail.com); [precisionarchaeology@gmail.com](mailto:precisionarchaeology@gmail.com) - 406-395-5215 - electronic mail and regular mail

Details: The Chippewa Cree Tribe of the Rocky Boy's Reservation no longer uses IResponse. Please email all review material to [taivonjoi17@gmail.com](mailto:taivonjoi17@gmail.com) and [rep32jwb@gmail.com](mailto:rep32jwb@gmail.com) and mail the packet to 96 Clinic Rd. North, Box Elder Montana 59521. If the qualified and professional reviewers determine that additional information is required, or that field work is required, they will contact you through email and through TCNS. If the Tribe determines that the proposed project will have an effect on historic properties and/or Tribal religious and cultural sites or properties, we will provide notice to the project proponent and to the FCC.

12. THPO - Sarah Thompson - Lac du Flambeau Band of Lake Superior Chippewa Indians - Tribal Historic Preservation Office (PO Box: 67) - Lac du Flambeau, WI - [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com) - 715-588-2139 - electronic mail  
Details: Effective Immediately:

Please send all submissions through email until further notice. Effective 3/23/2020

Please email all submissions to [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com)

Thank you

13. Deputy THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - East Stroudsburg, PA - sbachor@delawaretribe.org; lheady@delawaretribe.org - 610-761-7452 - electronic mail  
Details: The Delaware Tribe of Indians areas of interest include our aboriginal territories (circa 1600), known locations of historic Delaware settlements, routes of removal and forced migration, and all lands of Delaware aboriginal title ceded by treaty to the United States. If you are receiving this notification, then your project falls within these areas of interest and we ask that you provide us with a cover letter describing the project and its location (including the project coordinates) as well as a topographic map showing the project location. If an archaeological survey has already been performed in preparation for the project, please send a copy of that as well. Additionally, we may request a biological assessment of culturally significant treaty resources which may be affected by the proposed undertaking.

We are only interested in consulting on projects that involve ground disturbance that is planned to take place in both undisturbed and previously disturbed contexts. We are not interested in consulting on collocations or projects that involve no ground disturbance. If your project does involve ground disturbance or you do not receive a response from us within 30 days of submitting the above project information, then we have no comments on the project. However, if any archaeological resources or human remains are disturbed at any point in the project planning or construction, we ask that the project be halted until we can be notified of the inadvertent discovery and can determine the most appropriate course of action. If your company would like a formal written response from the Delaware Tribe concerning the potential impact of your project to culturally and religiously significant sites, please contact Susan Bachor at sbachor@delawaretribe.org to request such a response.

In order to better facilitate consultation throughout our areas of interest we have three regional tribal historic preservation offices. While our Tribal Headquarters remains in Oklahoma, our Eastern Office in Pennsylvania is the point of contact for all consultation within our Eastern Region which includes the states of Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland and Virginia. If your project exists in any of these states, please contact Susan Bachor with the above project information at the following e-mail address. All offices prefer digital submissions and the project information can be submitted by e-mail.

Susan Bachor, Acting Director of Historic Preservation  
Eastern Office  
126 University Circle  
Stroud Hall, Rm. 437  
East Stroudsburg PA 18301  
(610) 761-7452  
sbachor@delawaretribe.org

Our Midwestern office is the point of contact for all consultation within our Midwestern region which includes the states of West Virginia, Ohio, Indiana, Michigan and Illinois. If your project exists in any of these states, please contact Larry Heady with the above project information at the following e-mail address. Our Midwestern office prefers to receive digital submissions and the project information can be submitted by e-mail.

Larry Heady, THPO  
Midwestern Office  
125 Dorry Lane, Grants Pass, OR 97527  
lheady@delawaretribe.org  
(262) 825-7586

We, at the Delaware Tribe Historic Preservation Office, along with our Chief and Tribal Council remain committed to protecting the cultural and physical integrity of our historic sites, traditional cultural properties, sacred sites, objects of cultural patrimony, and most importantly, the remains of our Ancestors. We look forward to working with you on our shared interests in preserving and protecting Delaware heritage within our areas of interest.

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States.

The information you provided was also forwarded to the following SHPOs in the state in which you propose to construct and neighboring states. The information was provided to these SHPOs as a courtesy for their information and planning.

14. - Amanda Terrell - Ohio History Connection - 800 E. 17th Avenue - Columbus, OH - aterrell@ohiohistory.org - 614-298-2000 - electronic mail

15. Historic Preservation Supervisor - Barbara Frederick - Pennsylvania State Historic Preservation Office - Pennsylvania Historical & Museum Commission 400 North St, 2nd Floor - Harrisburg, PA - bafrederic@pa.gov - 717-772-4519 - electronic mail

16. Deputy SHPO - Susan Pierce - West Virginia Division of Culture & History, Historic Preservation Office - 1901 Kanawha Boulevard East - Charleston, WV - susan.pierce@wvculture.org - - electronic mail

17. SHPO - Barbara Franco - Pennsylvania Historical and Museum Commission - 300 North Street - Harrisburg, PA - bcutler@state.pa.us - 717-787-2891 - 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. 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 NTIA cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed project was forwarded to the person(s) listed above.

Notification Received: 08/15/2023

Notification ID: 270639

Project Number: 55

Applicant: Upward Broadband

Applicant Contact: Kathy Eisele

Project Type(s): Multiple Project Components

Region(s) affected (State, County): PENNSYLVANIA, HUNTINGDON PENNSYLVANIA, MIFFLIN

Address or Geographical Location Description: New Tower Construction (1 site) and Existing Tower Collocation (2 site)

Project Name: NTIA / Upward Broadband Section 7

Huntingdon and Mifflin Counties, Pennsylvania

(See Project Descriptions and Maps for specific details)

If you have any questions or comments regarding the content of this notice, please contact NTIA at: [TCNS@ntia.gov](mailto:TCNS@ntia.gov).

# **APPENDIX D**

*Gibbs Lane New Tower*  
*Section 7 Documentation*



844 N. Lenola Road, Suite 1  
Moorestown, NJ 08057

**P** (856) 813-3281  
**F** (856) 813-3279

**Terracon.com**

October 27, 2023

Ambassador Towers LLC  
3105 Lincoln Highway East  
Paradise, PA 17562

**Re: Natural Resources Site Evaluation for a Telecommunications Site**

To Whom It May Concern:

Terracon has completed a review of potential impacts to listed and proposed threatened/endangered species and critical habitats resulting from the proposed construction of a telecommunications site. The lead federal agency for this project is the National Telecommunications and Information Administration (NTIA). In addition to NTIA National Environmental Policy Act (NEPA) considerations, Federal Communications Commission's (FCC) regulations, as identified in 47CFR § 1.1307 (a) 3, are also included, which require that the effects of the proposed tower construction to protected species and critical habitats are considered. Findings in this report are based upon the site's current utilization, the most recent reconnaissance information and from other activities described herein; such information is subject to change. Basic site information is presented in the table below.

<b>Site Name:</b>	Gibbs Lane
<b>Terracon Project Number:</b>	J8237078
<b>Address:</b>	7387 Gibbs Lane
<b>City, County, State:</b>	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
<b>Latitude / Longitude:</b>	40° 23' 21.37" N / 78° 1' 26.32" W
<b>Proposed Lease Area:</b>	10,000 square feet
<b>Proposed Tower Height:</b>	199 feet (overall height), including attachments
<b>Tower Type:</b>	Self-support
<b>Description of the site</b>	Undeveloped, wooded land
<b>Proposed Access Road:</b>	A winding access/utility easement extends generally south from the proposed tower compound towards Gibbs Lane.
<b>Description of the surrounding properties</b>	Undeveloped, wooded land
<b>Description of wetlands or water bodies near the site</b>	Based on a review of the National Wetlands Inventory (NWI) map and topographic maps, there are no mapped wetlands or surface waters within 1,000 feet of the proposed tower compound or easement.
<b>Elevation and topography</b>	1,747 feet above mean sea level. The topography in the immediate site area slopes steeply to the west/southwest.

The Terracon team performed a site visit on August 10, 2023. At the time of the site reconnaissance, the proposed tower compound and access road/utility easement consisted of undeveloped wooded land. The surrounding properties are also undeveloped wooded land.



## Natural Resources Site Evaluation

Gibbs Lane Tower ■ Union Township (Huntingdon), PA  
October 27, 2023 ■ Terracon Project No. J8237078



According to the Natural Resource Conservation Service (NRCS) Web Soil Survey for Huntingdon County, Pennsylvania, the dominant soil type at the site is Clymer very stony loam (CvC). This soil type has no frequency of ponding, is well drained, and is not considered hydric soil by the NRCS.

Terracon conducted a preliminary review using the U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation System (IPaC) Endangered Species Act species list to identify listed and proposed threatened and endangered species, as well as critical habitats that may be located on or near the project site.

According to the IPaC report, the following species have the potential to be present in the vicinity of the project area:

Taxon	Name	Species Habitat	Status
Mammal	Indiana Bat ( <i>Myotis sodalists</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees. (USFWS)	Endangered
Mammal	Northern Long-eared Bat ( <i>Myotis septentrionalis</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines, called hibernacula. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees (USFWS).	Endangered
Mammal	Tricolored Bat ( <i>Perimyotis subfalvus</i> )	Found in forested landscapes, where they forage near trees (including forest perimeters) and along waterways. Maternity colonies also may utilize human-made structures (buildings, bridges, etc.) or tree cavities.	Proposed Endangered
Insect	Monarch Butterfly ( <i>Danaus plexippus</i> )	Found in open prairies, meadows, and grasslands. Sometimes along roadsides and disturbed areas but almost always in the vicinity of milkweed populations. Breeding areas are virtually all patches of milkweed in North America and some other regions (NatureServe).	Candidate
Flowering Plant	Northeastern Bulrush ( <i>Scirpus ancistrochaetus</i> )	Grows in wet areas – small wetlands, sinkhole ponds or wet depressions with seasonally fluctuating water levels (USFWS).	Endangered

There are no critical habitats documented at the site. There are no mapped critical habitats, wildlife refuges, or fish hatcheries mapped at the pole location. The IPaC species list is attached at the end of this document.

Terracon also utilized the Pennsylvania Natural Diversity Inventory (PNDI) online database environmental review tool to further refine the environmental review process for both federally and Pennsylvania-state protected species. The PNDI system is managed by the Pennsylvania Department of Conservation and Natural Resources (DCNR) in order to build, maintain, and provide accurate and accessible ecological information needed for conservation, development planning, natural resources management, and for the protection of threatened and endangered species, special concern species,

## Natural Resources Site Evaluation

Gibbs Lane Tower ■ Union Township (Huntingdon), PA  
October 27, 2023 ■ Terracon Project No. J8237078



and rare and significant ecological features. The PNDI environmental review tool analyzes proposed project footprints against known species locations and recommends conservation measures and other actions that may be needed to maintain compliance with the Federal Endangered Species Act, as well as, allied Pennsylvania state species protection laws.

Within Pennsylvania, the PNDI environmental review tool takes primacy in the project environmental review process over IPaC. The environmental review tool is utilized to coordinate concurrent project reviews with the DCNR, the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the USFWS.

The PNDI environmental review tool project response indicates the DCNR, PFBC, and USFWS concluded: *No Impact is anticipated to threatened and endangered species and/or special concern species and resources.* Therefore, no further coordination is required with these state and federal jurisdictional agencies. The PGC requested further review for Allegheny Woodrat (*Neotoma magister*), a state-listed species of special concern.

On October 13, 2023, the PGC provided the following response after receipt of the requested project maps, photographs, and supporting information:

PNDI records indicate species or resources of concern are located within the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, the PGC has determined that no impact is likely. Therefore, no further PNDI coordination with the PGC will be necessary for this project at this time.

Based on a review of the habitat for the above-listed species, compared to an analysis of the habitat present on the site location, it is not anticipated that the construction of the proposed telecommunications tower will affect listed or proposed protected species or critical habitats.

The Migratory Bird Treaty Act of 1918 (MBTA) decrees that migratory birds and their parts (including eggs, nests, and feathers) are federally protected. The MBTA is the domestic law that affirms, or implements, the United States' commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource. Each of the conventions protect selected species of birds that are common to these countries (i.e., they occur in these countries at some point during their annual life cycle). The following migratory birds of concern were identified within the vicinity of the site on the IPaC:

Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	No	January through December
Black-billed Cuckoo ( <i>Coccyzus erythrophthalmus</i> )	Yes	May through October
Black-capped Chickadee ( <i>Poecile atricapillus</i> )	Yes	April through July
Bobolink ( <i>Dolichonyx orzivorus</i> )	Yes	May through July
Cerulean Warbler ( <i>Dendroica cerulea</i> )	Yes	April through July
Chimney Swift ( <i>Chaetura pelagica</i> )	Yes	March through August
Golden-winged Warbler ( <i>Vermivora</i> )	Yes	Breeds May through July

**Natural Resources Site Evaluation**

Gibbs Lane Tower ■ Union Township (Huntingdon), PA  
October 27, 2023 ■ Terracon Project No. J8237078



Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
<i>chrysoptera</i> )		
Henslow’s Sparrow ( <i>Ammodramus henslowii</i> )	Yes	May through August
Prairie Warbler ( <i>Setophaga discolor</i> )	Yes	May through July
Rusty Blackbird ( <i>Euphagus carolinus</i> )	Yes	Breeds elsewhere
Wood Thrush ( <i>Hylocichla mustelina</i> )	Yes	May through August

If construction is to occur during breeding season, a preconstruction nesting survey is recommended as a mitigation measure.

USFWS recommendations published in Revised Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning (2021) state the preferred tower height to decrease potential effects on migratory birds is less than 200 feet tall. Siting and design process for this project could not conform to all the USFWS recommendations; however, mitigating factors proposed for implementation at the site include the following: limiting the tower height to 199 feet, location in minimally sensitive areas, and eliminating the need for guy wires.

Based on Terracon’s analysis and reconnaissance, the proposed site activities are not anticipated to effect listed or proposed protected species or critical habitats. No further coordination is required with jurisdictional agencies.

Please feel free to contact our office at 856-813-3267 if you need additional information.

Sincerely,

**Terracon Consultants, Inc.**

Trevor Underwood  
Field Scientist

Paul DeAngelo  
Senior Principal / Department Manager  
Environmental

- Attachments:** Tower Site Evaluation Form  
 Topographic Site Location Map  
 National Wetlands Inventory Map  
 Site Plans  
 Photographs  
 IPaC Report  
 PDNI Receipt  
 PGC Response





**TOWER SITE USFWS EVALUATION FORM**

**1. Location (attach map)** State: Pennsylvania County: Huntingdon  
Latitude/Longitude: 40° 23' 21.37" N / 78° 1' 26.32" W Elevation: 1,747 feet  
City and Highway Direction: Union Twp (Huntingdon), West of Highway 829

**2. Will the equipment be co-located on an existing FCC Licensed tower or other existing structure (building, billboard, etc.)?** No If yes, type of structure: n/a

***IF YES, NO FURTHER INFORMATION IS REQUIRED***

**If No, provide proposed specifications for new tower:**

Height: 199 feet Construction type: Self-support tower

Guy-wired? No Number of bands: n/a Total Number of wires: n/a

Lighting (Security & Aviation): None

***IF TOWER WILL BE LIGHTED OR GUY-WIRED, COMPLETE ITEMS 3-18.  
IF NOT, COMPLETE ONLY ITEMS 17 AND 18.***

**3. Area of tower footprint in acres or square feet:** \_\_\_\_\_

**4. Length and width of access road in feet:** \_\_\_\_\_

**5. General description of terrain, mountainous, rolling hills, etc. (attach photographs):**  
\_\_\_\_\_  
\_\_\_\_\_

**6. Meteorological conditions (incidence of fog, low ceilings, etc.):** \_\_\_\_\_  
\_\_\_\_\_

**7. Soil type(s):** \_\_\_\_\_  
\_\_\_\_\_

**8. Habitat types and land use on and adjacent to the site:**

Type: \_\_\_\_\_ Percent/acreage: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. Dominant vegetative species in each habitat type: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Average diameter breast height of dominant tree species in forested areas: \_\_\_\_\_  
\_\_\_\_\_

11. Will construction cause fragmentation of a larger habitat into two or more smaller blocks? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

12. Evidence of bird roosts or rookeries present? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

13. Distance to nearest wetland area (swamp, marsh, riparian, marine, etc.), and coastline: \_\_\_\_\_  
\_\_\_\_\_

14. Distance to nearest telecommunications tower: \_\_\_\_\_

15. Potential to collocate antennas on existing towers or structures: \_\_\_\_\_  
\_\_\_\_\_

16. Have measures been incorporated to minimize impacts on migratory birds? \_\_\_\_\_  
If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

17. Has an evaluation been made to determine if the proposed facility may affect listed or proposed endangered or threatened species or their habitats as required by FCC regulation at 47 CFR 1.1307(a)(3)? Yes If yes, present findings: \_\_\_\_\_  
No endangered or threatened species or critical habitats will be affected by the proposed project.  
\_\_\_\_\_

18. Additional information required: None \_\_\_\_\_

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*





## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Ecological Services Field Office  
110 Radnor Road Suite 101  
State College, PA 16801-7987  
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:  
Project Code: 2023-0115420  
Project Name: Ambassador Towers Site Name: Gibbs Lane

August 10, 2023

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

### To Whom It May Concern:

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

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

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Migratory Birds
- Wetlands

## **OFFICIAL SPECIES LIST**

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

This species list is provided by:

**Pennsylvania Ecological Services Field Office**

110 Radnor Road Suite 101

State College, PA 16801-7987

(814) 234-4090

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## PROJECT SUMMARY

Project Code: 2023-0115420  
Project Name: Ambassador Towers Site Name: Gibbs Lane  
Project Type: Communication Tower New Construction  
Project Description: Proposed 199-foot self support telecommunications tower  
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.38613175000004,-78.02603446987175,14z>



Counties: Huntingdon County, Pennsylvania

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

## MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

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## FLOWERING PLANTS

NAME	STATUS
Northeastern Bulrush <i>Scirpus ancistrochaetus</i>	Endangered
Population:	
No critical habitat has been designated for this species.	
Species profile: <a href="https://ecos.fws.gov/ecp/species/6715">https://ecos.fws.gov/ecp/species/6715</a>	

## CRITICAL HABITATS

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

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

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

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1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

**The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\)](#) list or warrant special attention in your project location.** To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing

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the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Aug 31
<b>Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9399">https://ecos.fws.gov/ecp/species/9399</a>	Breeds May 15 to Oct 10
<b>Black-capped Chickadee <i>Poecile atricapillus praticus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 10 to Jul 31
<b>Bobolink <i>Dolichonyx oryzivorus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Jul 31
<b>Cerulean Warbler <i>Dendroica cerulea</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/2974">https://ecos.fws.gov/ecp/species/2974</a>	Breeds Apr 27 to Jul 20
<b>Chimney Swift <i>Chaetura pelagica</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
<b>Golden-winged Warbler <i>Vermivora chrysoptera</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/8745">https://ecos.fws.gov/ecp/species/8745</a>	Breeds May 1 to Jul 20
<b>Henslow's Sparrow <i>Ammodramus henslowii</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/3941">https://ecos.fws.gov/ecp/species/3941</a>	Breeds May 1 to Aug 31
<b>Prairie Warbler <i>Dendroica discolor</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31

NAME	BREEDING SEASON
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

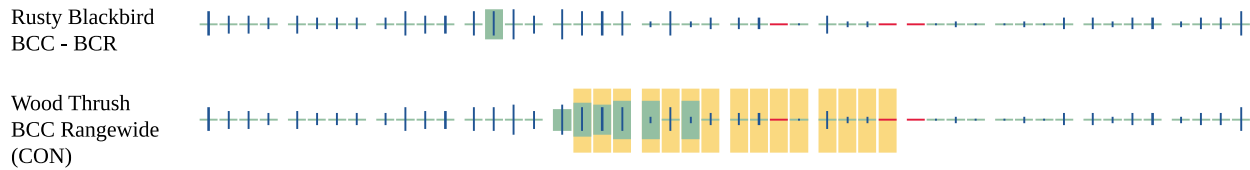
1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.







Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

## MIGRATORY BIRDS FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

### **What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### **How do I know if a bird is breeding, wintering or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

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Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## **WETLANDS**

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

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## **IPAC USER CONTACT INFORMATION**

Agency: Private Entity  
Name: Kathryn Eisele  
Address: 844 N. Lenola Road  
Address Line 2: Suite 1  
City: Moorestown  
State: NJ  
Zip: 08057  
Email: kathy.eisele@terracon.com  
Phone: 8568133267

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Federal Communications Commission

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## 1. PROJECT INFORMATION

Project Name: **Ambassador Towers: Tuscarora Mountain**

Date of Review: **8/21/2023 12:56:04 PM**

Project Category: **Communication, Cell or communication tower (include access roads in project area), new tower**

Project Area: **29.84 acres**

County(s): **Juniata; Perry**

Township/Municipality(s): **LACK TOWNSHIP; TOBOYNE TOWNSHIP**

ZIP Code:

Quadrangle Name(s): **BLAIRS MILLS**

Watersheds HUC 8: **Lower Juniata**

Watersheds HUC 12: **Horse Valley Run**

Decimal Degrees: **40.295192, -77.661128**

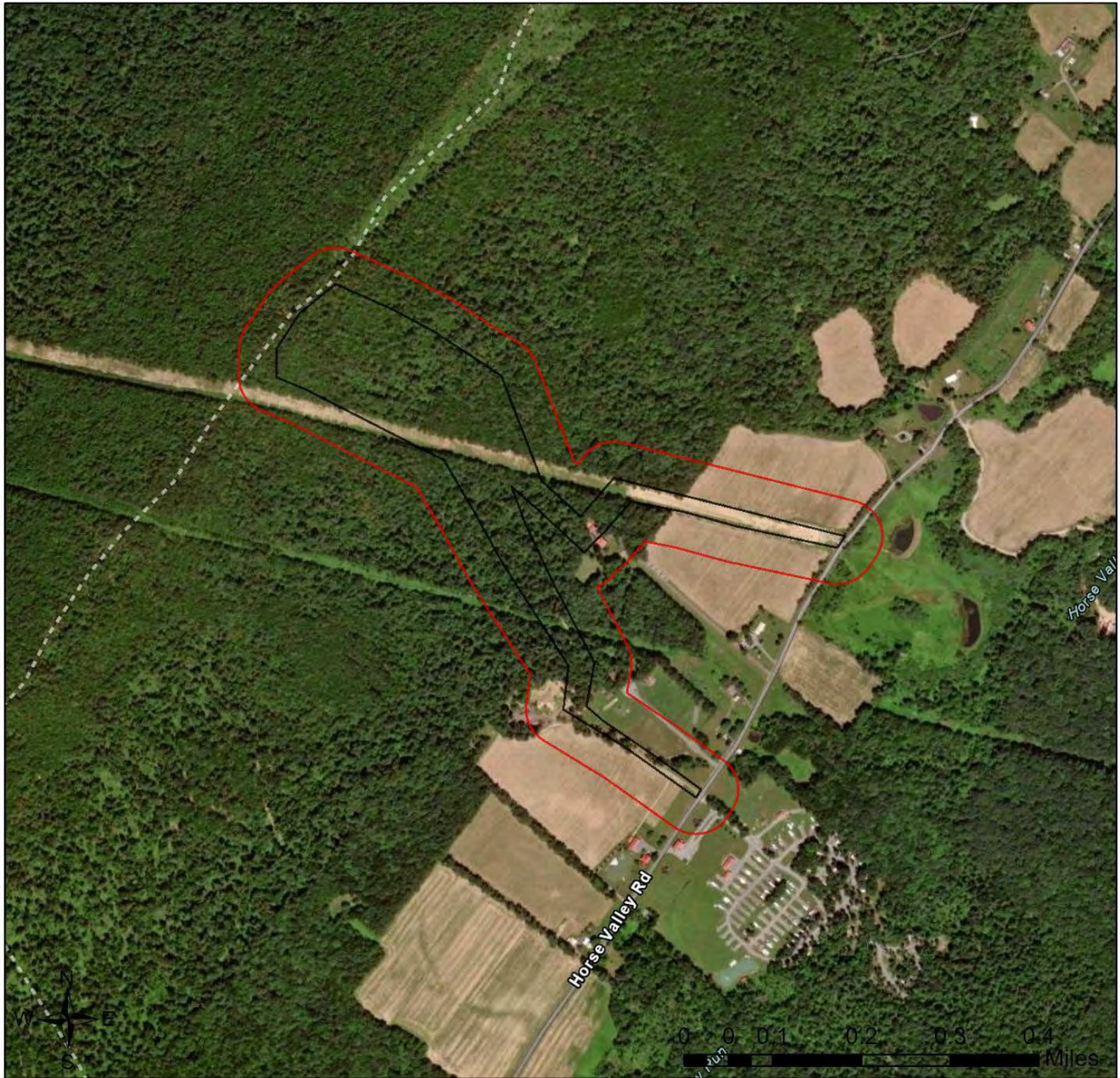
Degrees Minutes Seconds: **40° 17' 42.6922" N, 77° 39' 40.607" W**



## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	<b>Potential Impact</b>	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

### Ambassador Towers: Tuscarora Mountain



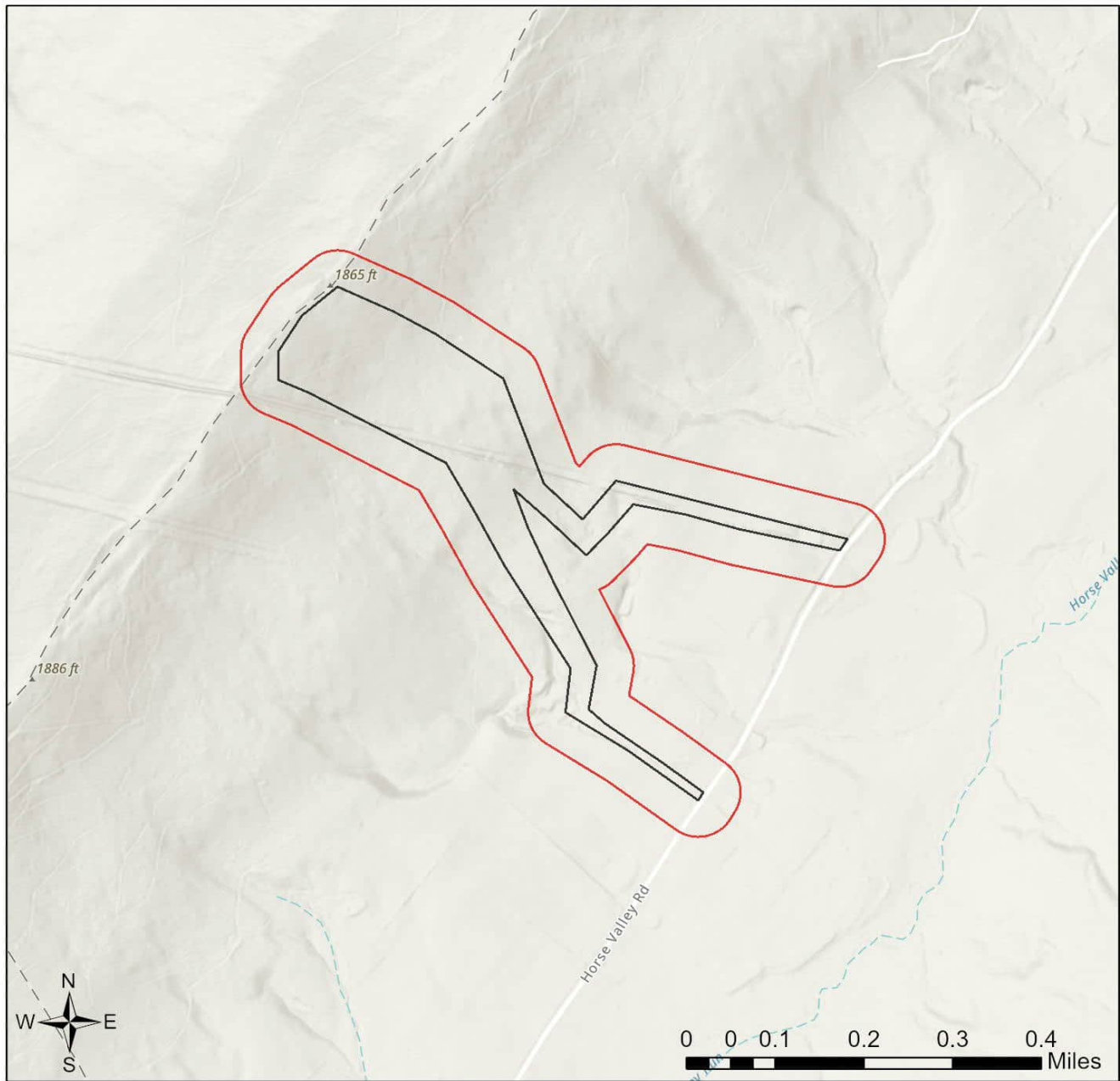
-  Buffered Project Boundary
-  Project Boundary





Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



### Ambassador Towers: Tuscarora Mountain



-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



## RESPONSE TO QUESTION(S) ASKED

**Q1:** Which of the following accurately describes the habitats on and within 650 feet of the project area? "Project area" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected -- either directly or indirectly -- by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.).

**Your answer is:** The project area has not been field investigated to identify and delineate large rocks or boulders, talus or scree, rock outcrops, boulder fields, quarries, caves and associated passages, cliffs, abandoned highwalls from previous surface mining, and abandoned deep mines - OR - it is currently unknown if the project will affect any of these habitats.

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

**PGC Species:** (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Neotoma magister	Allegheny Woodrat	Threatened

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

##### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

## WHAT TO SEND TO JURISDICTIONAL AGENCIES

**If project information was requested by one or more of the agencies above**, upload\* or email the following information to the agency(s) (see AGENCY CONTACT INFORMATION). Instructions for uploading project materials can be found [here](#). This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies (but not USFWS).

\*If information was requested by USFWS, applicants must email, or mail, project information to [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov) to initiate a review. USFWS will not accept uploaded project materials.

### Check-list of Minimum Materials to be submitted:

\_\_\_ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

\_\_\_ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

**In addition to the materials listed above, USFWS REQUIRES the following**

\_\_\_ **SIGNED** copy of a Final Project Environmental Review Receipt

### The inclusion of the following information may expedite the review process.

\_\_\_ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

\_\_\_ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.

## 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.

## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission


Bureau of Wildlife Management  
Division of Environmental Review  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: Kathy A. Eisele  
Company/Business Name: Terracon  
Address: 844 N Lenola Rd, Ste 1  
City, State, Zip: Moorestown NJ 08057-1052  
Phone: ( 856 ) 813-3267 Fax: (            )             
Email: kathy.eisele@terracon.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

  
\_\_\_\_\_  
applicant/project proponent signature  
(for) Kathy A. Eisele

8/24/23  
\_\_\_\_\_  
date



# PENNSYLVANIA GAME COMMISSION

## BUREAU OF WILDLIFE MANAGEMENT

2001 ELMERTON AVENUE HARRISBURG, PA 17110-9797 | (717) 787-5529

October 13, 2023

Kathy Eisele  
Terracon  
844 N. Lenola Road  
Suite 1  
Moorestown, New Jersey 08057  
[kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com)

Re: Ambassador Towers Site Name; Gibbs Lane  
PNDI Receipt File: *project\_receipt\_ambassador\_towers\_site\_na\_793419\_FINAL\_1.pdf*  
Juniata and Union Townships, Huntingdon County, PA

Dear Kathy Eisele,

Thank you for submitting the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt File *project\_receipt\_ambassador\_towers\_site\_na\_793419\_FINAL\_1.pdf* for review. The Pennsylvania Game Commission (PGC) screened this project for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only.

### **No Impact Anticipated – PNDI Species**

PNDI records indicate species or resources of concern are located within the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, the PGC has determined that no impact is likely. Therefore, no further PNDI coordination with the PGC will be necessary for this project at this time.

This response represents the most up-to-date summary of the PNDI data files and is valid for two (2) years from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

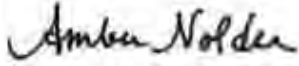
Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an “Update” (including an updated PNDI receipt, project narrative and accurate map). If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements under this agency for two additional years.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat



Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us).

Sincerely,



Amber Nolder  
Wildlife Biologist  
Bureau of Wildlife Management  
Phone: 717-787-4250, Extension 73410  
Fax: 717-787-6957  
E-mail: [anolder@pa.gov](mailto:anolder@pa.gov)

A PNHP Partner



ADN/adn

*Hesston Collocation*  
*Section 7 Documentation*



844 N. Lenola Road, Suite 1  
Moorestown, NJ 08057

**P** (856) 813-3281

**F** (856) 813-3279

**Terracon.com**

August 25, 2023

Ambassador Towers LLC  
3105 Lincoln Highway East  
Paradise, PA 17562

**Re: Natural Resources Site Evaluation for a Telecommunications Site**

To Whom It May Concern:

Terracon has completed a review of potential impacts to listed and proposed threatened/endangered species and critical habitats resulting from the proposed construction of a telecommunications site. The lead federal agency for this project is the National Telecommunications and Information Administration (NTIA). In addition to NTIA National Environmental Policy Act (NEPA) considerations, Federal Communications Commission's (FCC) regulations, as identified in 47CFR § 1.1307 (a) 3, are also included, which require that the effects of the proposed tower construction to protected species and critical habitats are considered. Findings in this report are based upon the site's current utilization, the most recent reconnaissance information and from other activities described herein; such information is subject to change. Basic site information is presented in the table below.

<b>Site Name:</b>	Hesston
<b>Terracon Project Number:</b>	J8237078
<b>Address:</b>	9290 Waterfall Road
<b>City, County, State:</b>	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
<b>Latitude / Longitude:</b>	40° 25' 40.37" N / 78° 6' 35.27" W
<b>Tower Height:</b>	305 feet, including attachments
<b>Tower Type:</b>	Existing Guyed tower
<b>Description of the site</b>	An existing telecommunications installation which contains a guyed tower, support equipment, and buried and overhead connection to utilities.
<b>Access Road:</b>	A gravel drive extends generally northwest from the site.
<b>Description of the surrounding properties</b>	Primarily forested land followed by farmland with scattered residences.
<b>Description of wetlands or water bodies near the site</b>	Based on a review of the National Wetlands Inventory (NWI) map and topographic maps, there are no mapped wetlands or surface waters within 500 feet of the proposed tower compound or easement.
<b>Elevation and topography</b>	1,021 feet above mean sea level. The topography in the immediate site area slopes steeply to the northwest.

The site consists of an existing telecommunications installation containing an existing guyed tower, support equipment, and buried and overhead connection to utilities. The surrounding properties consist of farmland and scattered residences.

According to the Natural Resource Conservation Service (NRCS) Web Soil Survey for Huntingdon County, Pennsylvania, the dominant soil type at the site is Hagerstown silty clay loam (HcD3). This soil type has no frequency of ponding, is well drained, and is not considered hydric soil by the NRCS.

Terracon conducted a preliminary review using the U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation System (IPaC) Endangered Species Act species list to identify listed and proposed threatened and endangered species, as well as critical habitats that may be located on or near the project site.

According to the IPaC report, the following species have the potential to be present in the vicinity of the project area:

<b>Taxon</b>	<b>Name</b>	<b>Species Habitat</b>	<b>Status</b>
Mammal	Indiana Bat ( <i>Myotis sodalists</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees. (USFWS)	Endangered
	Northern Long-eared Bat ( <i>Myotis septentrionalis</i> )	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines, called hibernacula. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees (USFWS).	Endangered
	Tricolored Bat ( <i>Perimyotis subflavus</i> )	Found in forested landscapes, where they forage near trees (including forest perimeters) and along waterways. Maternity colonies also may utilize human-made structures (buildings, bridges, etc.) or tree cavities.	Proposed Endangered
Insect	Monarch Butterfly ( <i>Danaus plexippus</i> )	Found in open prairies, meadows, and grasslands. Sometimes along roadsides and disturbed areas but almost always in the vicinity of milkweed populations. Breeding areas are virtually all patches of milkweed in North America and some other regions (NatureServe).	Candidate
Flowering Plant	Northeastern Bulrush ( <i>Scirpus ancistrochaetus</i> )	Grows in wet areas – small wetlands, sinkhole ponds or wet depressions with seasonally fluctuating water levels (USFWS).	Endangered

There are no critical habitats documented at the site. There are no mapped critical habitats, wildlife refuges, or fish hatcheries mapped at the proposed tower location. The IPaC species list is attached at the end of this document.

Terracon also utilized the Pennsylvania Natural Diversity Inventory (PNDI) online database environmental review tool to further refine the environmental review process for both federally and Pennsylvania-state protected species. The PNDI system is managed by the Pennsylvania Department of Conservation and Natural Resources (DCNR) in order to build, maintain, and provide accurate and accessible ecological information needed for conservation, development planning, natural resources management, and for the protection of threatened and endangered species, special concern species,





and rare and significant ecological features. The PNDI environmental review tool analyzes proposed project footprints against known species locations and recommends conservation measures and other actions that may be needed to maintain compliance with the Federal Endangered Species Act, as well as, allied Pennsylvania state species protection laws.

Within Pennsylvania, the PNDI environmental review tool takes primacy in the project environmental review process over IPaC. The environmental review tool is utilized to coordinate concurrent project reviews with the DCNR, the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the USFWS.

The PNDI environmental review tool project response indicates the DCNR, PFBC, PGC, and USFWS concluded: *No Impact is anticipated to threatened and endangered species and/or special concern species and resources.* Therefore, no further coordination is required with these state and federal jurisdictional agencies.

Based on a review of the habitat for the above-listed species, compared to an analysis of the habitat present on the site location, it is not anticipated that the construction of the proposed telecommunications tower will affect listed or proposed protected species or critical habitats.

The Migratory Bird Treaty Act of 1918 (MBTA) decrees that migratory birds and their parts (including eggs, nests, and feathers) are federally protected. The MBTA is the domestic law that affirms, or implements, the United States' commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource. Each of the conventions protect selected species of birds that are common to these countries (i.e., they occur in these countries at some point during their annual life cycle). The following migratory birds of concern were identified within the vicinity of the site on the IPaC:

<b>Species Name</b>	<b>Bird of Conservation Concern (BCC)</b>	<b>Seasonal Occurrence in Project Area</b>
Bald Eagle <i>(Haliaeetus leucocephalus)</i>	No	January through December
Black-billed Cuckoo <i>(Coccyzus erythrophthalmus)</i>	Yes	May through October
Black-capped Chickadee <i>(Poecile atricapillus)</i>	Yes	April through July
Canada Warbler <i>(Cardellina canadensis)</i>	Yes	May through August
Cerulean Warbler <i>(Dendroica cerulea)</i>	Yes	April through July
Chimney Swift <i>(Chaetura pelagica)</i>	Yes	March through August
Eastern Whip-poor-will <i>(Antrostomus vociferus)</i>	Yes	May through August
Golden Eagle <i>(Aquila chrysaeto)</i>	No	Breeds elsewhere
Golden-winged Warbler <i>(Vermivora chrysoptera)</i>	Yes	May through July
Northern Saw-whet Owl <i>(Aegolius acadicus acadicus)</i>	Yes	March through July



Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
Prairie Warbler ( <i>Setophaga discolor</i> )	Yes	May through July
Rusty Blackbird ( <i>Euphagus carolinus</i> )	Yes	Breeds elsewhere
Wood Thrush ( <i>Hylocichla mustelina</i> )	Yes	May through August

If construction is to occur during breeding season, a preconstruction nesting survey is recommended as a mitigation measure.

USFWS recommendations published in Revised Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning (2021) state the preferred tower height to decrease potential effects on migratory birds is less than 200 feet tall. Siting and design process for this project could not conform to all the USFWS recommendations; however, mitigating factors proposed for implementation at the site include the following: location in minimally sensitive areas.

Based on Terracon’s analysis and reconnaissance, the proposed site activities are not anticipated to effect listed or proposed protected species or critical habitats. No further coordination is required with jurisdictional agencies.

Please feel free to contact our office at 856-813-3267 if you need additional information.

Sincerely,  
**Terracon Consultants, Inc.**

Trevor Underwood  
 Field Scientist

Paul DeAngelo  
 Senior Principal / Department Manager  
 Environmental

- Attachments:** Tower Site Evaluation Form  
 Topographic Site Location Map  
 National Wetlands Inventory Map  
 Site Plans  
 IPaC Report  
 PNDI Receipt



**TOWER SITE USFWS EVALUATION FORM**

**1. Location (attach map)** State: Pennsylvania County: Huntingdon  
Latitude/Longitude: 40° 25' 40.37" N / 78° 6' 35.27" W Elevation: 1,021 feet  
City and Highway Direction: Hustontown, North of Highway 76

**2. Will the equipment be co-located on an existing FCC Licensed tower or other existing structure (building, billboard, etc.)?** Yes  If yes, type of structure: Guyed Wire Tower

***IF YES, NO FURTHER INFORMATION IS REQUIRED***

**If No, provide proposed specifications for new tower:**

Height: \_\_\_\_\_ Construction type: \_\_\_\_\_

Guy-wired? \_\_\_\_\_ Number of bands: \_\_\_\_\_ Total Number of wires: \_\_\_\_\_

Lighting (Security & Aviation): \_\_\_\_\_

***IF TOWER WILL BE LIGHTED OR GUY-WIRED, COMPLETE ITEMS 3-18.  
IF NOT, COMPLETE ONLY ITEMS 17 AND 18.***

**3. Area of tower footprint in acres or square feet:** \_\_\_\_\_

**4. Length and width of access road in feet:** \_\_\_\_\_

**5. General description of terrain, mountainous, rolling hills, etc. (attach photographs):**  
\_\_\_\_\_  
\_\_\_\_\_

**6. Meteorological conditions (incidence of fog, low ceilings, etc.):** \_\_\_\_\_  
\_\_\_\_\_

**7. Soil type(s):** \_\_\_\_\_  
\_\_\_\_\_

**8. Habitat types and land use on and adjacent to the site:**

Type: \_\_\_\_\_ Percent/acreage: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

9. Dominant vegetative species in each habitat type: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Average diameter breast height of dominant tree species in forested areas: \_\_\_\_\_  
\_\_\_\_\_

11. Will construction cause fragmentation of a larger habitat into two or more smaller blocks? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

12. Evidence of bird roosts or rookeries present? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

13. Distance to nearest wetland area (swamp, marsh, riparian, marine, etc.), and coastline: \_\_\_\_\_  
\_\_\_\_\_

14. Distance to nearest telecommunications tower: \_\_\_\_\_

15. Potential to collocate antennas on existing towers or structures: \_\_\_\_\_  
\_\_\_\_\_

16. Have measures been incorporated to minimize impacts on migratory birds? \_\_\_\_\_  
If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

17. Has an evaluation been made to determine if the proposed facility may affect listed or proposed endangered or threatened species or their habitats as required by FCC regulation at 47 CFR 1.1307(a)(3)? Yes If yes, present findings: \_\_\_\_\_  
No endangered or threatened species or critical habitats will be affected by the proposed project.  
\_\_\_\_\_

18. Additional information required: None \_\_\_\_\_



*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Ecological Services Field Office  
110 Radnor Road Suite 101  
State College, PA 16801-7987  
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:  
Project Code: 2023-0117221  
Project Name: Ambassador Towers Site Name: Hesston

August 15, 2023

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

### To Whom It May Concern:

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

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

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

---



Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Migratory Birds
- Wetlands

## **OFFICIAL SPECIES LIST**

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

This species list is provided by:

**Pennsylvania Ecological Services Field Office**

110 Radnor Road Suite 101

State College, PA 16801-7987

(814) 234-4090

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## PROJECT SUMMARY

Project Code: 2023-0117221

Project Name: Ambassador Towers Site Name: Hesston

Project Type: Maintenance/Modification of Communication Tower

Project Description: Proposed collocation on existing 305-foot guyed tower

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.427924649999994,-78.10979306554276,14z>



Counties: Huntingdon County, Pennsylvania

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

## MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

---

## FLOWERING PLANTS

NAME	STATUS
Northeastern Bulrush <i>Scirpus ancistrochaetus</i> Population: No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6715">https://ecos.fws.gov/ecp/species/6715</a>	Endangered

## CRITICAL HABITATS

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

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

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

**The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location.** To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing

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the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Aug 31
<b>Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9399">https://ecos.fws.gov/ecp/species/9399</a>	Breeds May 15 to Oct 10
<b>Black-capped Chickadee <i>Poecile atricapillus praticus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 10 to Jul 31
<b>Canada Warbler <i>Cardellina canadensis</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Aug 10
<b>Cerulean Warbler <i>Dendroica cerulea</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/2974">https://ecos.fws.gov/ecp/species/2974</a>	Breeds Apr 27 to Jul 20
<b>Chimney Swift <i>Chaetura pelagica</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
<b>Eastern Whip-poor-will <i>Antrostomus vociferus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
<b>Golden Eagle <i>Aquila chrysaetos</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1680">https://ecos.fws.gov/ecp/species/1680</a>	Breeds elsewhere

NAME	BREEDING SEASON
Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/8745">https://ecos.fws.gov/ecp/species/8745</a>	Breeds May 1 to Jul 20
Northern Saw-whet Owl <i>Aegolius acadicus acadicus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 31
Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

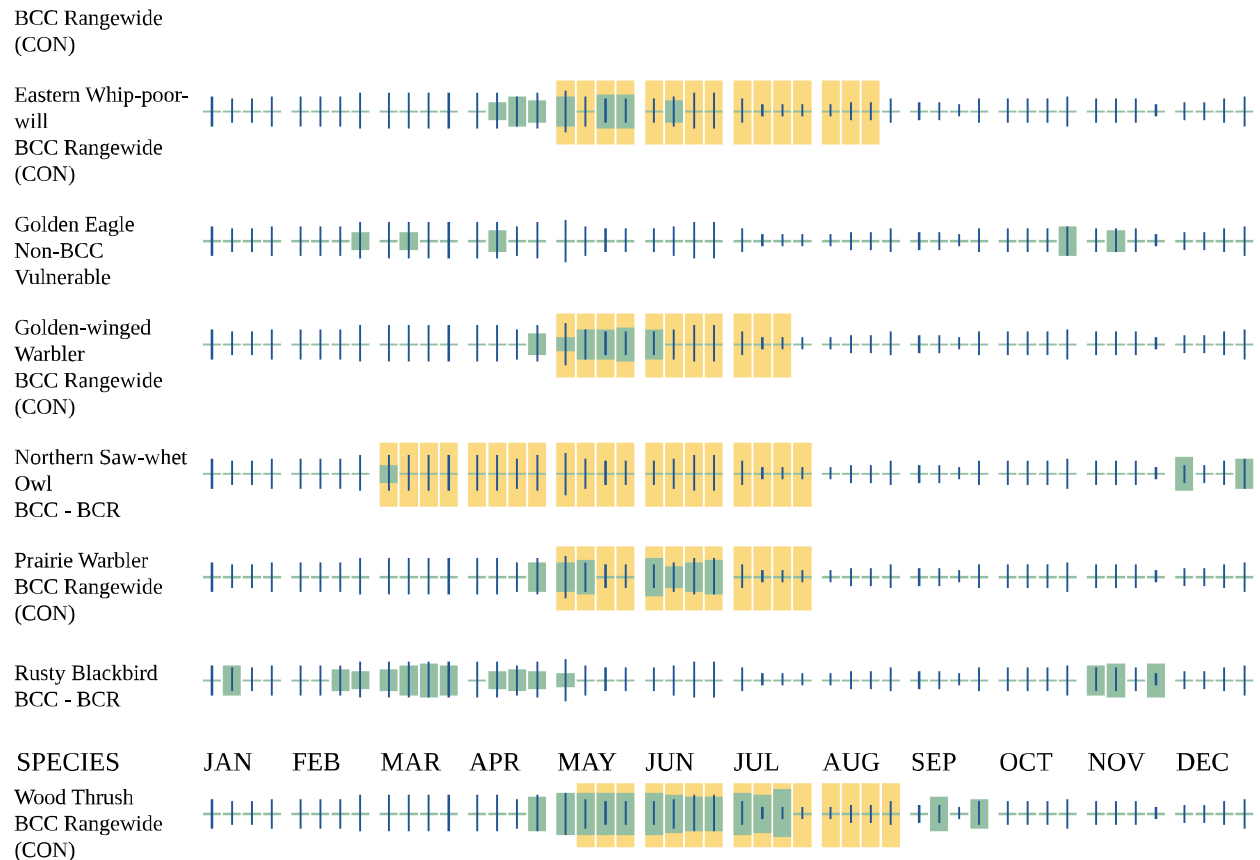
### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12





Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

## MIGRATORY BIRDS FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.



**What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

**What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
  2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
-

3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell

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me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## **WETLANDS**

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

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## **IPAC USER CONTACT INFORMATION**

Agency: Private Entity  
Name: Kathryn Eisele  
Address: 844 N. Lenola Road  
Address Line 2: Suite 1  
City: Moorestown  
State: NJ  
Zip: 08057  
Email: kathy.eisele@terracon.com  
Phone: 8568133267

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Federal Communications Commission

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## 1. PROJECT INFORMATION

Project Name: **Ambassador Towers Site Name: Hesston**

Date of Review: **8/15/2023 04:14:01 PM**

Project Category: **Communication, Cell or communication tower (include access roads in project area), modification of existing tower**

Project Area: **0.96 acres**

County(s): **Huntingdon**

Township/Municipality(s): **PENN TOWNSHIP**

ZIP Code:

Quadrangle Name(s): **HUNTINGDON**

Watersheds HUC 8: **Upper Juniata**

Watersheds HUC 12: **Snyders Run-Juniata River**

Decimal Degrees: **40.427924, -78.109778**

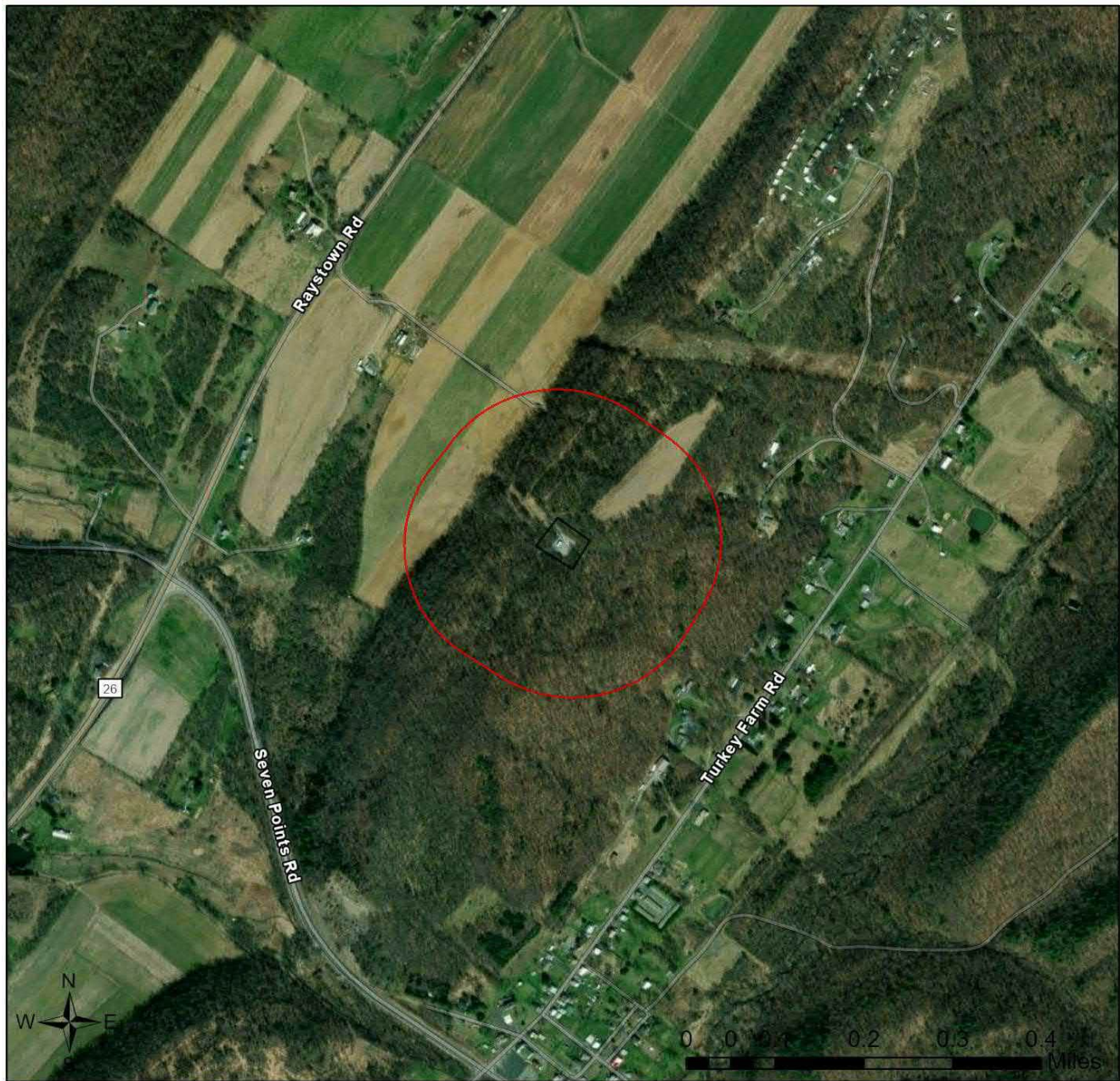
Degrees Minutes Seconds: **40° 25' 40.5278" N, 78° 6' 35.2015" W**



## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

### Ambassador Towers Site Name: Hesston



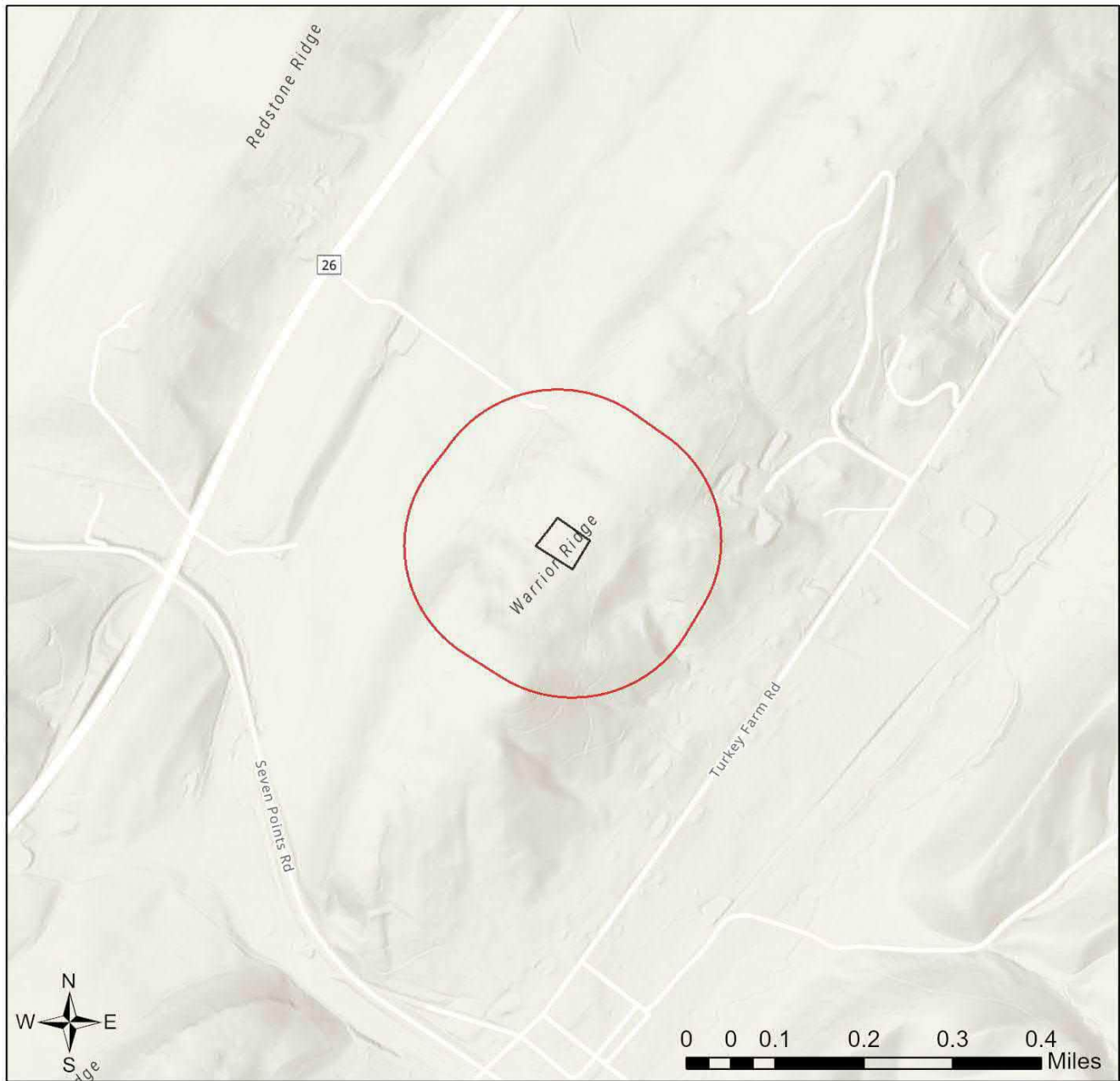
-  Buffered Project Boundary
-  Project Boundary





Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



### Ambassador Towers Site Name: Hesston



-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

##### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

### 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.

## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Management  
Division of Environmental Review  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: Kathy A. Eisele  
Company/Business Name: Terracon  
Address: 844 N Lenola Rd, Ste 1  
City, State, Zip: Moorestown NJ 08057-1052  
Phone: ( 856 ) 813-3267 Fax: (      )       
Email: kathy.eisele@terracon.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.



applicant/project proponent signature  
(for) Kathy A. Eisele

8/24/23

date



*Mt. Union Collocation*  
*Section 7 Documentation*

December 5, 2023

Ambassador Towers LLC  
3105 Lincoln Highway East  
Paradise, PA 17562**Re: Natural Resources Site Evaluation for a Telecommunications Site**

To Whom It May Concern:

Terracon has completed a review of potential impacts to listed and proposed threatened/endangered species and critical habitats resulting from the proposed construction of a telecommunications site. The lead federal agency for this project is the National Telecommunications and Information Administration (NTIA). In addition to NTIA National Environmental Policy Act (NEPA) considerations, Federal Communications Commission's (FCC) regulations, as identified in 47CFR § 1.1307 (a) 3, are also included, which require that the effects of the proposed tower construction to protected species and critical habitats are considered. Findings in this report are based upon the site's current utilization, the most recent reconnaissance information and from other activities described herein; such information is subject to change. Basic site information is presented in the table below.

<b>Site Name:</b>	Mount Union
<b>Terracon Project Number:</b>	J8237078
<b>Address:</b>	North terminus of Barren Trail Road
<b>City, County, State:</b>	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
<b>Latitude / Longitude:</b>	40° 24' 53.43" N / 77° 54' 7.32" W
<b>Tower Height:</b>	245 feet (overall height), including attachments
<b>Tower Type:</b>	Self-support
<b>Description of the site</b>	An existing self-support cell tower and associated tower compound
<b>Description of the surrounding properties</b>	Undeveloped, wooded land
<b>Description of wetlands or water bodies near the site</b>	Based on a review of the National Wetlands Inventory (NWI) map and topographic maps, there are no mapped wetlands or surface waters within 500 feet of the proposed tower compound or easement.
<b>Elevation and topography</b>	2,307 feet above mean sea level. The topography in the immediate site area slopes steeply to the south

Suzanne Reece and Josh Duncan performed a site visit on August 9, 2023. At the time of the site reconnaissance, the site consisted of an existing tower compound with associated equipment and a gravel access drive.

The Natural Resource Conservation Service's (NRCS) Web Soil Survey (2023) records the following soils within the project area:

**Natural Resources Site Evaluation**

Mount Union Collocation ■ Wayne Township (Mount Union), PA  
 December 2023 ■ Terracon Project No. J8237078



Soil Name	Approx. Percentage of Project Area	Associated Landscape	Hydric Soil Rating
Hazleton-Dekalb complex, 3 to 8 percent slopes, rubbly (HSB)	61.6	Ridges	No
Hazleton-Dekalb complex, 15 to 25 percent slopes, rubbly (HSD)	38.4	Ridges	No

Terracon conducted a preliminary review using the U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation System (IPaC) Endangered Species Act species list to identify listed and proposed threatened and endangered species, as well as critical habitats that may be located on or near the project site.

According to the IPaC report, the following species have the potential to be present in the vicinity of the project area:

Taxon	Name	Species Habitat	Status
Mammal	Indiana Bat <i>(Myotis sodalists)</i>	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees. (USFWS)	Endangered
	Northern Long-eared Bat <i>(Myotis septentrionalis)</i>	Found in caves and in wooded land. During the winter, this species utilizes caves or abandoned mines, called hibernacula. During summer, this species utilizes wooded areas where trees contain exfoliating bark of live trees or decaying bark of snag trees (USFWS).	Endangered
	Tricolored Bat <i>(Perimyotis subflavus)</i>	Found in forested landscapes, where they forage near trees (including forest perimeters) and along waterways. Maternity colonies also may utilize human-made structures (buildings, bridges, etc.) or tree cavities.	Proposed Endangered
Insect	Monarch Butterfly <i>(Danaus plexippus)</i>	Found in open prairies, meadows, and grasslands. Sometimes along roadsides and disturbed areas but almost always in the vicinity of milkweed populations. Breeding areas are virtually all patches of milkweed in North America and some other regions (NatureServe).	Candidate
Flowering Plant	Northeastern Bulrush <i>(Scirpus ancistrochaetus)</i>	Grows in wet areas – small wetlands, sinkhole ponds or wet depressions with seasonally fluctuating water levels (USFWS).	Endangered

There are no critical habitats documented at the site. There are no mapped critical habitats, wildlife refuges, or fish hatcheries mapped at the pole location. The IPaC species list is attached at the end of this document.

## Natural Resources Site Evaluation

Mount Union Collocation ■ Wayne Township (Mount Union), PA  
December 2023 ■ Terracon Project No. J8237078



Terracon also utilized the Pennsylvania Natural Diversity Inventory (PNDI) online database environmental review tool to further refine the environmental review process for both federally and Pennsylvania-state protected species. The PNDI system is managed by the Pennsylvania Department of Conservation and Natural Resources (DCNR) in order to build, maintain, and provide accurate and accessible ecological information needed for conservation, development planning, natural resources management, and for the protection of threatened and endangered species, special concern species, and rare and significant ecological features. The PNDI environmental review tool analyzes proposed project footprints against known species locations and recommends conservation measures and other actions that may be needed to maintain compliance with the Federal Endangered Species Act, as well as allied Pennsylvania state species protection laws.

Within Pennsylvania, the PNDI environmental review tool takes primacy in the project environmental review process over IPaC. The environmental review tool is utilized to coordinate concurrent project reviews with the DCNR, the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the USFWS.

The PNDI environmental review tool project response indicates the PGC, DCNR, and USFWS concluded: *No Impact is anticipated to threatened and endangered species and/or special concern species and resources.* No further coordination is required with these state and federal jurisdictional agencies.

Within the PNDI response, the PFBC provided recommended conservation measures with regard to the timber rattlesnake (*Crotalus horridus*), a state-listed species of special concern. The PFBC recommended conservation measures were primarily with regard to ground-disturbing construction activities. On August 29, 2023, Terracon provided additional documentation regarding the proposed project to the PFBC summarizing that the project site consists of an existing telecommunications compound and no ground disturbance is planned. As such, it is not anticipated that the collocation activities associated with the site will affect the timber rattlesnake.

On November 16, 2023, the PFBC replied with the following recommendations:

There have been observations of Timber Rattlesnakes in the vicinity of the project area, but based on our review of the information you sent as well as mapping overlays, **we do not anticipate any direct adverse impacts to the Timber Rattlesnake from the proposed project.** However, the project areas could be used as foraging habitat for Timber Rattlesnakes and this warrants some concern about rattlesnake-human conflicts. Although the nature of the Timber Rattlesnake is rather docile, it can be dangerous if cornered or handled. Therefore, the workers should be mindful of the presence of the snakes in the area. Rattlesnakes are attracted to open, rocky, log-strewn areas for basking and forested areas with thick deciduous leaf litter that tend to support high populations of rodents. We recommend that the workers responsible for implementing this project be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. These workers should also be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes without a proper permit is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6. If any Timber Rattlesnakes are observed on-site, please notify this office.

Based on a review of the habitat for the above-listed species, compared to an analysis of the habitat present on the site location, it is not anticipated that the proposed telecommunications tower will affect the timber rattlesnake.

## Natural Resources Site Evaluation

Mount Union Collocation ■ Wayne Township (Mount Union), PA  
December 2023 ■ Terracon Project No. J8237078



The Migratory Bird Treaty Act of 1918 (MBTA) decrees that migratory birds and their parts (including eggs, nests, and feathers) are federally protected. The MBTA is the domestic law that affirms, or implements, the United States' commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource. Each of the conventions protect selected species of birds that are common to these countries (i.e., they occur in these countries at some point during their annual life cycle). The following migratory birds of concern were identified within the vicinity of the site on the IPaC:

Species Name	Bird of Conservation Concern (BCC)	Seasonal Occurrence in Project Area
Bald Eagle ( <i>Haliaeetus leucocephalus</i> )	No	January through December
Black-capped Chickadee ( <i>Poecile atricapillus</i> )	Yes	April through July
Cerulean Warbler ( <i>Dendroice cerulea</i> )	Yes	April through July
Chimney Swift ( <i>Chaetura pelagica</i> )	Yes	March through August
Golden-winged Warbler ( <i>Vermivora chrysoptera</i> )	Yes	May through July
Kentucky Warbler ( <i>Oporornis formosus</i> )	Yes	April through August
Prairie Warbler ( <i>Setophaga discolor</i> )	Yes	May through July
Wood Thrush ( <i>Hylocichla mustelina</i> )	Yes	May through August

If construction is to occur during breeding season, a preconstruction nesting survey is recommended as a mitigation measure.

USFWS recommendations published in Revised Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning (2021) state the preferred tower height to decrease potential effects on migratory birds is less than 200 feet tall. Siting and design process for this project could not conform to all the USFWS recommendations; however, mitigating factors proposed for implementation at the site include the following: limiting the tower height to 199 feet, location in minimally sensitive areas, and eliminating the need for guy wires.

Based on Terracon's analysis and reconnaissance, the proposed site activities are not anticipated to effect other listed or proposed protected species or critical habitats. **Except for notifying the PFBC if any Timber Rattlesnakes are observed on site, no further coordination is required with jurisdictional agencies at this time.**



**Natural Resources Site Evaluation**

Mount Union Collocation ■ Wayne Township (Mount Union), PA  
December 2023 ■ Terracon Project No. J8237078



Please feel free to contact our office at 856-813-3267 if you need additional information.

Sincerely,

**Terracon Consultants, Inc.**

A handwritten signature in black ink that reads 'Kathryn A. Eisele'.

Kathryn A. Eisele  
Senior Project Manager

A handwritten signature in black ink that reads 'Marv Klinger'.

Marv Klinger  
Senior Project Manager

**Attachments:** Tower Site Evaluation Form  
Topographic Site Location Map  
National Wetlands Inventory Map  
Site Plans  
Photographs  
IPaC Report  
PDNI Receipt  
PFBC Letter, August 29, 2023  
PFBC Reply, November 16, 2023



9. Dominant vegetative species in each habitat type: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Average diameter breast height of dominant tree species in forested areas: \_\_\_\_\_  
\_\_\_\_\_

11. Will construction cause fragmentation of a larger habitat into two or more smaller blocks? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

12. Evidence of bird roosts or rookeries present? \_\_\_\_\_ If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

13. Distance to nearest wetland area (swamp, marsh, riparian, marine, etc.), and coastline: \_\_\_\_\_  
\_\_\_\_\_

14. Distance to nearest telecommunications tower: \_\_\_\_\_

15. Potential to collocate antennas on existing towers or structures: \_\_\_\_\_  
\_\_\_\_\_

16. Have measures been incorporated to minimize impacts on migratory birds? \_\_\_\_\_  
If yes, describe: \_\_\_\_\_  
\_\_\_\_\_

17. Has an evaluation been made to determine if the proposed facility may affect listed or proposed endangered or threatened species or their habitats as required by FCC regulation at 47 CFR 1.1307(a)(3)? Yes If yes, present findings: \_\_\_\_\_  
No endangered or threatened species or critical habitats will be affected by the proposed project.  
\_\_\_\_\_

18. Additional information required: None \_\_\_\_\_

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*





## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Ecological Services Field Office  
110 Radnor Road Suite 101  
State College, PA 16801-7987  
Phone: (814) 234-4090 Fax: (814) 234-0748

In Reply Refer To:

December 05, 2023

Project Code: 2023-0117225

Project Name: Ambassador Towers Site Name: Mount Union

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

To Whom It May Concern:

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

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

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

## **OFFICIAL SPECIES LIST**

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

This species list is provided by:

**Pennsylvania Ecological Services Field Office**

110 Radnor Road Suite 101  
State College, PA 16801-7987  
(814) 234-4090

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## PROJECT SUMMARY

Project Code: 2023-0117225  
Project Name: Ambassador Towers Site Name: Mount Union  
Project Type: Maintenance/Modification of Communication Tower  
Project Description: Proposed collocation on existing 245-foot self support telecommunications tower

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.414027000000004,-77.90293963204539,14z>



Counties: Mifflin County, Pennsylvania

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

## MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

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## FLOWERING PLANTS

NAME	STATUS
Northeastern Bulrush <i>Scirpus ancistrochaetus</i> Population: No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6715">https://ecos.fws.gov/ecp/species/6715</a>	Endangered

## CRITICAL HABITATS

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

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

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

## BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act<sup>1</sup> and the Migratory Bird Treaty Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats<sup>3</sup>, should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

- 
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
  2. The [Migratory Birds Treaty Act](#) of 1918.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

### **There are bald and/or golden eagles in your project area.**

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

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NAME	BREEDING SEASON
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Sep 1 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

### Breeding Season (■)

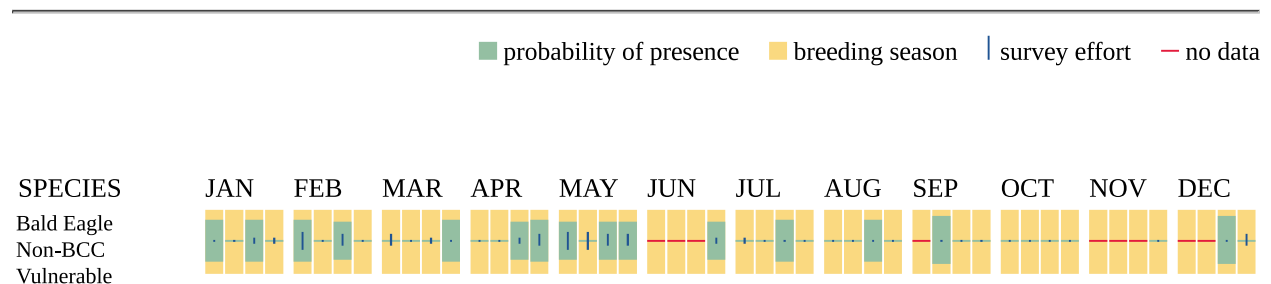
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

### Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats<sup>3</sup> should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Sep 1 to Aug 31
Black-capped Chickadee <i>Poecile atricapillus praticus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/10645">https://ecos.fws.gov/ecp/species/10645</a>	Breeds Apr 10 to Jul 31
Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/2974">https://ecos.fws.gov/ecp/species/2974</a>	Breeds Apr 27 to Jul 20
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9406">https://ecos.fws.gov/ecp/species/9406</a>	Breeds Mar 15 to Aug 25

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NAME	BREEDING SEASON
<b>Golden-winged Warbler</b> <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/8745">https://ecos.fws.gov/ecp/species/8745</a>	Breeds May 1 to Jul 20
<b>Kentucky Warbler</b> <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9443">https://ecos.fws.gov/ecp/species/9443</a>	Breeds Apr 20 to Aug 20
<b>Prairie Warbler</b> <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9513">https://ecos.fws.gov/ecp/species/9513</a>	Breeds May 1 to Jul 31
<b>Wood Thrush</b> <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9431">https://ecos.fws.gov/ecp/species/9431</a>	Breeds May 10 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

### Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

### Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

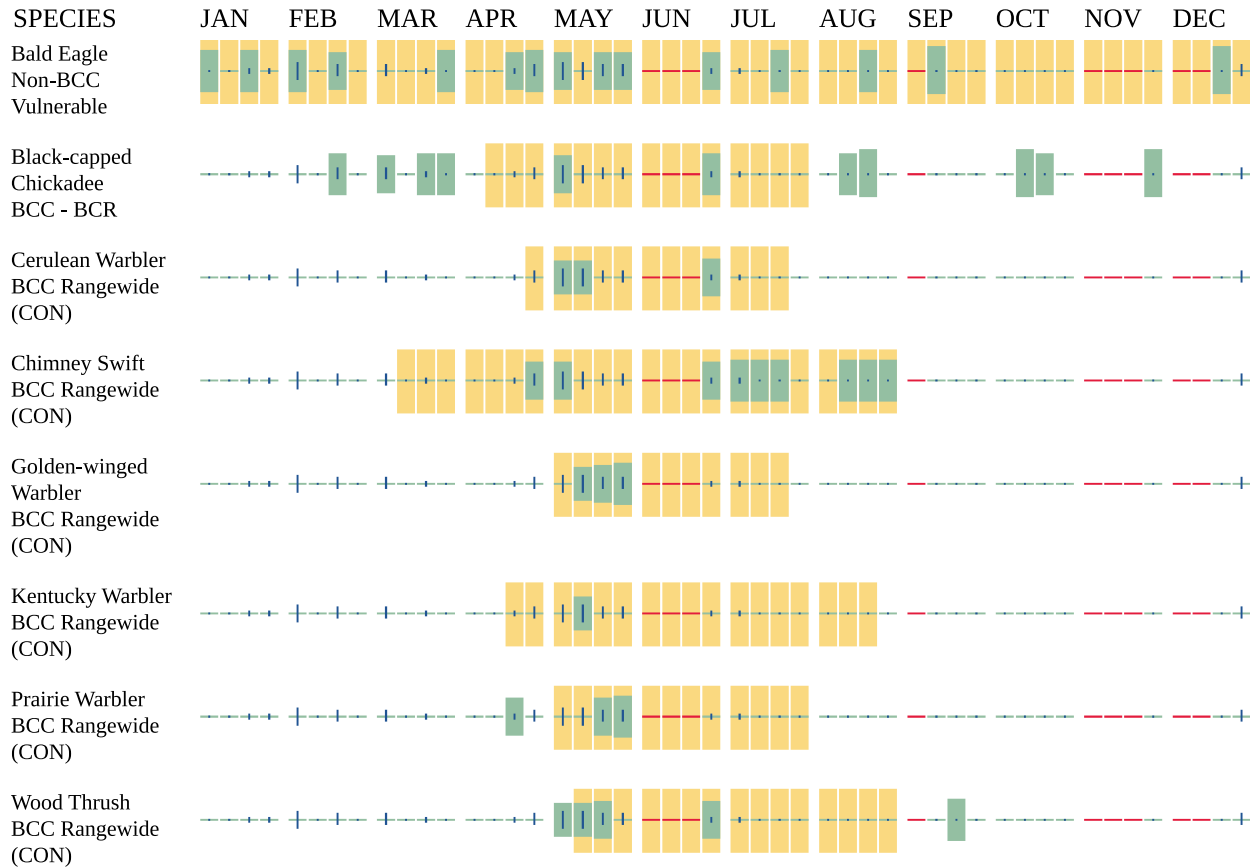
### No Data (—)

A week is marked as having no data if there were no survey events for that week.

---

■ probability of presence   ■ breeding season   | survey effort   — no data

---



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).



Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

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## **IPAC USER CONTACT INFORMATION**

Agency: Private Entity  
Name: Kathryn Eisele  
Address: 844 N. Lenola Road  
Address Line 2: Suite 1  
City: Moorestown  
State: NJ  
Zip: 08057  
Email: kathy.eisele@terracon.com  
Phone: 8568133267

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: National Telecommunications and Information Administration

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## 1. PROJECT INFORMATION

Project Name: **Ambassador Towers** Site Name: **Mount Union**

Date of Review: **8/30/2023 11:03:32 AM**

Project Category: **Communication, Cell or communication tower (include access roads in project area), modification of existing tower**

Project Area: **3.35 acres**

County(s): **Mifflin**

Township/Municipality(s): **WAYNE TOWNSHIP**

ZIP Code:

Quadrangle Name(s): **MOUNT UNION**

Watersheds HUC 8: **Lower Juniata**

Watersheds HUC 12: **Hares Valley Creek-Juniata River**

Decimal Degrees: **40.414346, -77.902632**

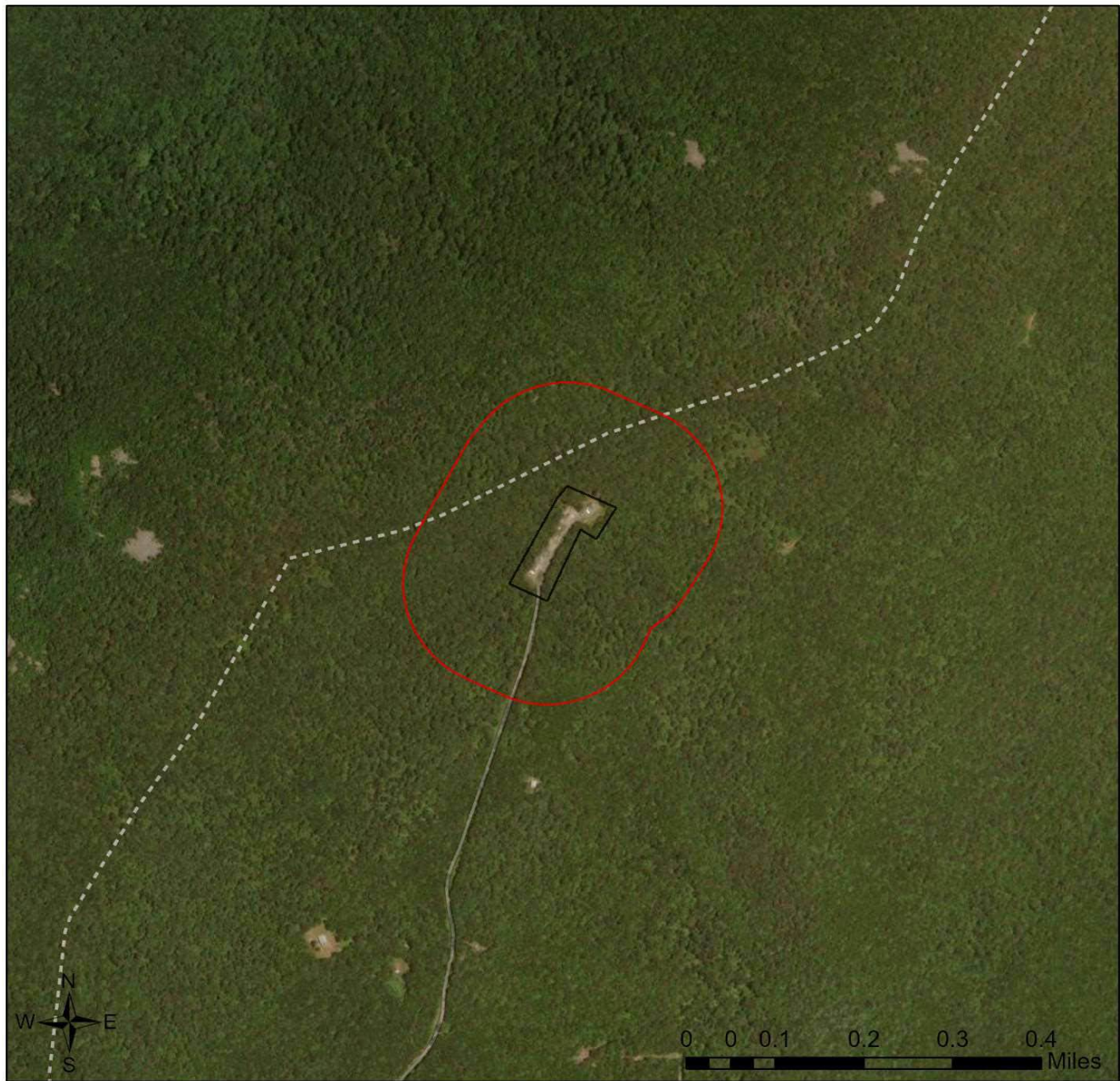
Degrees Minutes Seconds: **40° 24' 51.6458" N, 77° 54' 9.4751" W**

## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	<b>Conservation Measure</b>	<b>No Further Review Required, See Agency Comments</b>
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

Pennsylvania Natural Diversity Inventory (PNDI) records indicate that while threatened and endangered and/or special concern species and resources are in the project vicinity and that recommended Conservation Measures should be implemented in their entirety to avoid and minimize impacts to these species, no further coordination is required with the jurisdictional agencies. If a DEP permit is required for this project, DEP has the discretion to incorporate one or more Conservation Measures into its permit. This response does not reflect potential agency concerns regarding potential impacts to other ecological resources, such as wetlands.

### Ambassador Towers Site Name: Mount Union

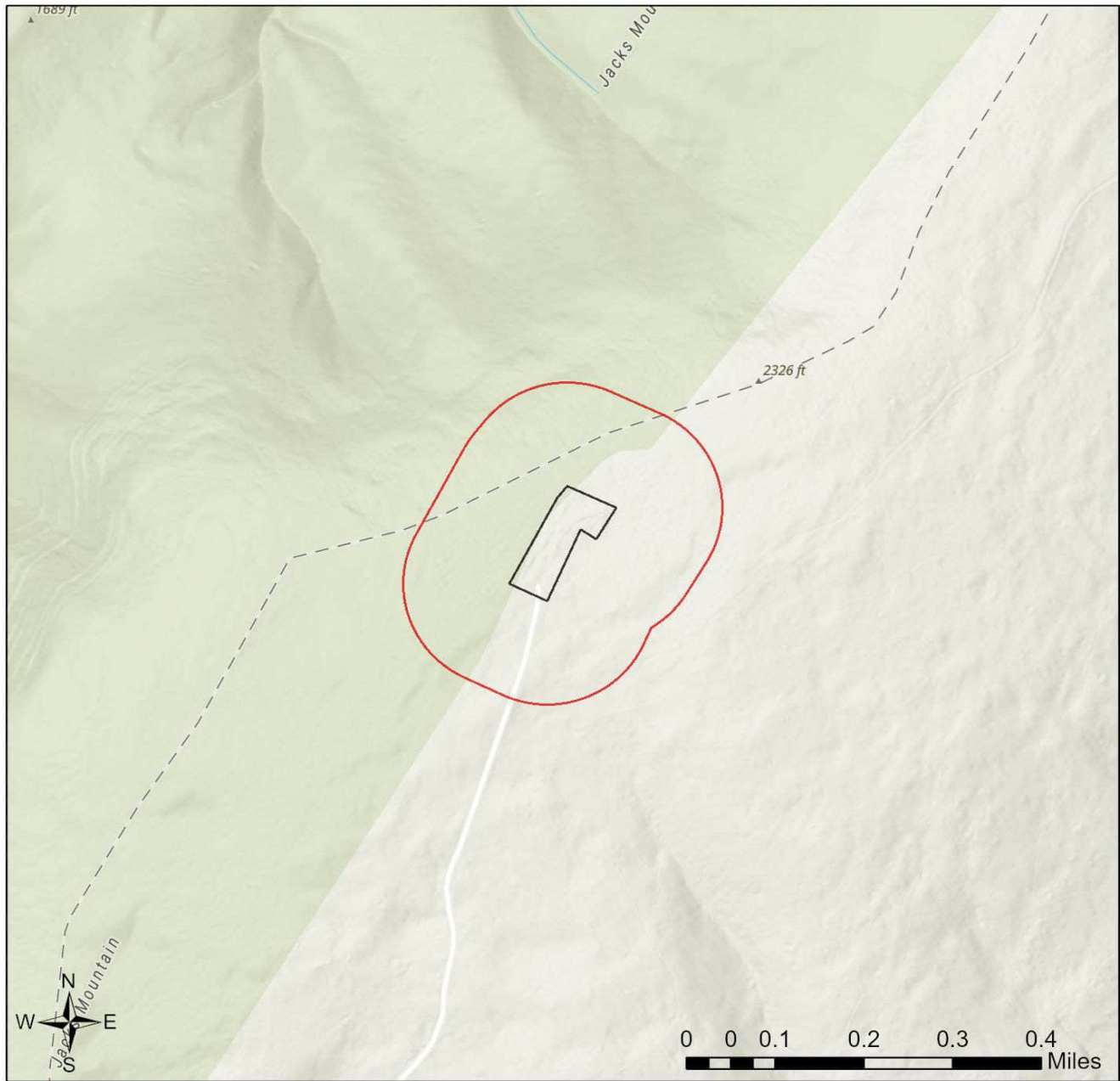




-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

### Ambassador Towers Site Name: Mount Union



-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:

Conservation Measure: Projects conducted in the occupied range of the timber rattlesnake (*Crotalus horridus*) have a high risk of encountering this species during construction.

- 1) Workers responsible for implementing this project should be advised that timber rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. It is suggested that safety protocols be implemented for timber rattlesnake encounters and workers should be advised that the timber rattlesnake is a state protected species and is not to be harmed. Killing of timber rattlesnakes is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6.
- 2) We recommend that a timber rattlesnake habitat assessment be conducted in the project area by a qualified timber rattlesnake surveyor in order to assist project planners in avoiding disturbance of critical habitat. A list of qualified surveyors and habitat assessment protocol can be found here.
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for a list of Qualified Timber Rattlesnake Surveyors
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the Timber Rattlesnake Habitat Protocol
- 3) If potential den (over-wintering) habitat is located during the habitat assessment, we recommend that the project be modified to avoid direct impacts to this irreplaceable habitat, or a Timber Rattlesnake Presence-Absence Survey of potential den (over-wintering) habitat be conducted in the habitats that are currently slated for direct disturbance to determine the presence or absence of rattlesnake hibernacula in the project area. Survey reports should be sent to PFBC for review and consultation. This information is necessary to allow PFBC to formulate recommendations to avoid adverse impacts to this species of special concern.
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the Timber Rattlesnake Presence-Absence Survey Protocol
- 4) If potential or occupied gestation habitat is located during the habitat assessment and cannot be avoided by the proposed development, we recommend that this habitat be replaced using our habitat creation guidelines.
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the PFBC Gestation Habitat Creation Guidelines
- 5) Tree clearing and timbering within potential timber rattlesnake critical habitats (135°-275° aspect, >10% slope) should be conducted from October 16 to April 14 in order to avoid encounters with timber rattlesnakes.
- 6) For the safety of workers and snakes, the Commission recommends that a PFBC permitted timber rattlesnake biologist who has the proper skills to handle this venomous species be on-site prior to and during construction, between April 15 and October 15, to inspect and clear the area (including staging areas and access roads) of timber rattlesnakes and to capture and remove any rattlesnakes that may interfere with work activities. See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the Monitoring Guidelines
- 7) If concerns arise during construction over high numbers of snake encounters or habitat alteration, please contact the PFBC at 814-359-5237 for consultation with our biologists.

**PFBC Species:** (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Special Concern Species*

## U.S. Fish and Wildlife Service

### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

## 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.



## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Management  
Division of Environmental Review  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: Kathryn Eisele  
Company/Business Name: Terracon  
Address: 844 N. Lenola Road, Suite 1  
City, State, Zip: Moorestown, NJ 08057  
Phone: ( 856 ) 813-3267 Fax: (      )       
Email: Kathy.Eisele@terracon.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

*Kathy A. Eisele*

12/5/2023

applicant/project proponent signature

date



844 N. Lenola Road, Suite 1  
Moorestown, NJ 08057

**P** (856) 813-3281

**F** (856) 813-3279

**Terracon.com**

August 29, 2023

Pennsylvania Fish and Boat Commission  
1601 Elmerton Ave  
Harrisburg, PA 17110

Re: **Natural Resources Site Evaluation for a Telecommunications Site**

To Whom it May Concern:

Ambassador Towers LLC proposes to construct a new communications tower and support facility in Wayne Township, Pennsylvania. The project includes the collocation of antennas on existing tower and installation of associated equipment within existing tower compound. After collocation, the tower will be operated under Upward Broadband LLC., who has contracted Terracon Consultants, Inc. to assist with the National Environmental Policy Act (NEPA) permitting process associated with the project. The lead federal agency for the proposed project is the National Telecommunications and Information Administration (NTIA), who is providing grant funding to assist with the construction of the communications tower. Basic site information is presented in the table below.

<b>Site Name:</b>	Mount Union
<b>Terracon Project Number:</b>	J8237078
<b>Address:</b>	North terminus of Barren Trail Road
<b>City, County, State:</b>	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
<b>Latitude / Longitude:</b>	40° 24' 53.43" N / 77° 54' 7.32" W
<b>Tower Height:</b>	245 feet (overall height), including attachments
<b>Tower Type:</b>	Self-support
<b>Description of the site</b>	An existing tower compound contained by a chain link fence that is accessible via a gravel access drive
<b>Description of the surrounding properties</b>	Undeveloped, wooded land and existing telecommunications compounds
<b>Description of wetlands or water bodies near the site</b>	Based on a review of the National Wetlands Inventory (NWI) map and topographic maps, there are no mapped wetlands or surface waters within the proposed tower compound or proposed access/utility easement
<b>Elevation and topography</b>	2,307 feet above mean sea level. The topography in the immediate site area slopes steeply to the south



Suzanna Reece and Josh Duncan performed a site visit on August 9, 2023. At the time of the site reconnaissance, the site consisted of an existing tower compound with associated equipment and a gravel access drive.

The Natural Resource Conservation Service’s (NRCS) Web Soil Survey (2023) records seven soils within the project area. These soils are summarized below.

**Soils Within the Project Area.**

Soil Name	Approx. Percentage of Project Area	Associated Landscape	Hydric Soil Rating
Hazleton-Dekalb complex, 3 to 8 percent slopes, rubbly (HSB)	61.6	Ridges	No
Hazleton-Dekalb complex, 15 to 25 percent slopes, rubbly (HSD)	38.4	Ridges	No

Terracon also utilized the Pennsylvania Natural Diversity Inventory (PNDI) online database environmental review tool to coordinate concurrent project reviews with the Pennsylvania Department of Conservation and Natural Resources (DCNR), the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the United States Fish and Wildlife Service (USFWS).

The PNDI environmental review tool project response indicates the PGC, DCNR, and USFWS concluded: *No Impact is anticipated to threatened and endangered species and/or special concern species and resources.* No further coordination is required with these state and federal jurisdictional agencies.

The PFBC requested further review for timber rattlesnake (*Crotalus horridus*), a state-listed species of special concern. It should be noted that the proposed project will take place within an existing telecommunications installation which contains a self-support lattice tower, support equipment, and buried and overhead connection to utilities and involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. As the project site consists of an existing telecommunications compound and no ground disturbance is planned, it is not anticipated that the collocation activities associated with the site will affect listed or proposed protected species or critical habitats. Please find attached for your review project maps, photographs, and supporting information. We look forward to your input.


If you have any questions or require additional information for your review, please do not hesitate to call (856) 813-3267 or email [trevor.underwood@terracon.com](mailto:trevor.underwood@terracon.com). Thank you for your assistance.

Sincerely,

**Terracon Consultants, Inc.**



Trevor Underwood  
Field Scientist



Marv Klinger  
Senior Project Manager

**Attachments:**

Topographic Site Location Map  
National Wetlands Inventory Map  
Site Plans  
Photographs  
PNDI Receipt

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*

## 1. PROJECT INFORMATION

Project Name: **Ambassador Towers** Site Name: **Mount Union**

Date of Review: **8/30/2023 11:03:32 AM**

Project Category: **Communication, Cell or communication tower (include access roads in project area), modification of existing tower**

Project Area: **3.35 acres**

County(s): **Mifflin**

Township/Municipality(s): **WAYNE TOWNSHIP**

ZIP Code:

Quadrangle Name(s): **MOUNT UNION**

Watersheds HUC 8: **Lower Juniata**

Watersheds HUC 12: **Hares Valley Creek-Juniata River**

Decimal Degrees: **40.414346, -77.902632**

Degrees Minutes Seconds: **40° 24' 51.6458" N, 77° 54' 9.4751" W**

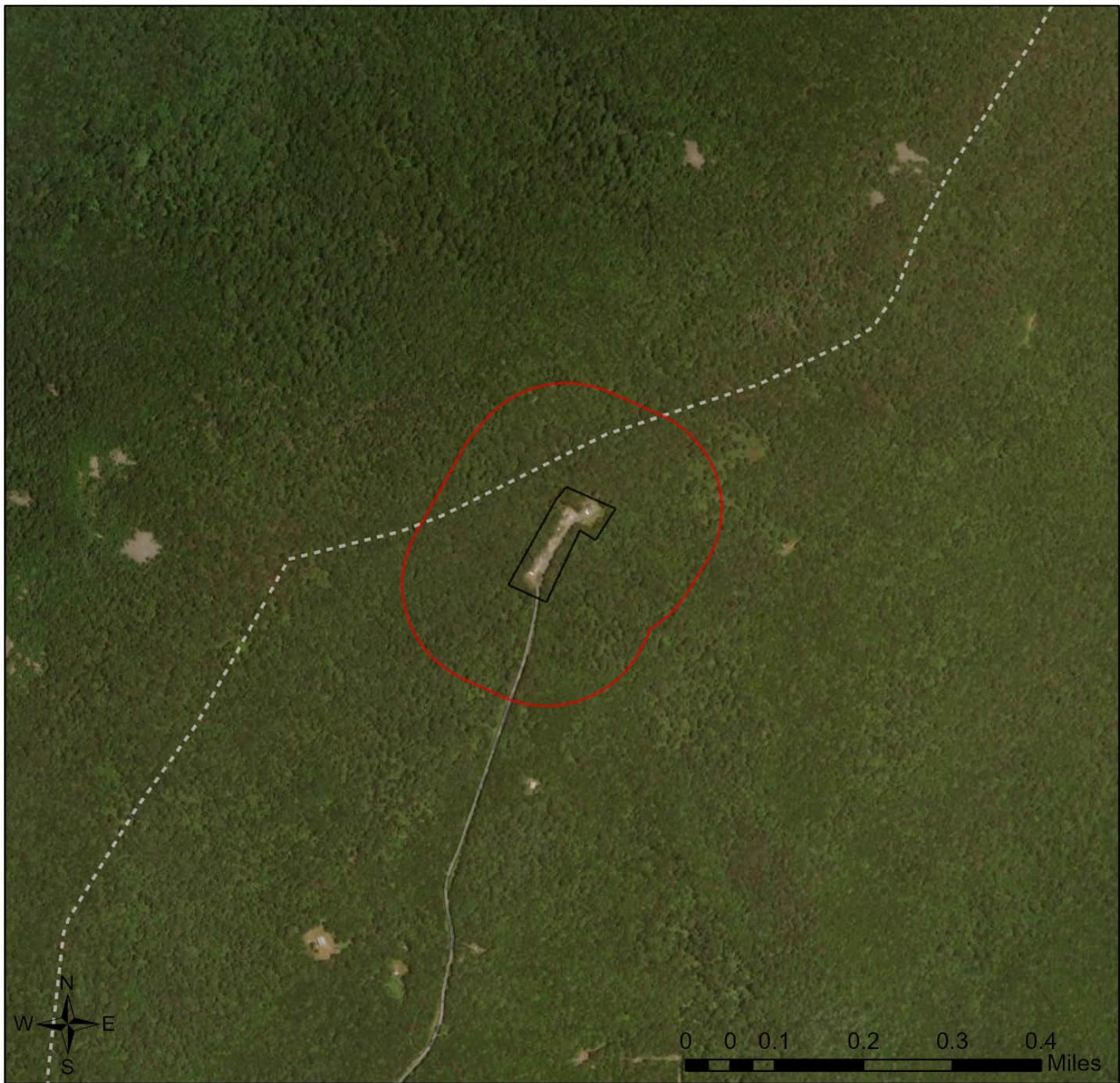
## 2. SEARCH RESULTS



Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	<b>Conservation Measure</b>	<b>No Further Review Required, See Agency Comments</b>
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

Pennsylvania Natural Diversity Inventory (PNDI) records indicate that while threatened and endangered and/or special concern species and resources are in the project vicinity and that recommended Conservation Measures should be implemented in their entirety to avoid and minimize impacts to these species, no further coordination is required with the jurisdictional agencies. If a DEP permit is required for this project, DEP has the discretion to incorporate one or more Conservation Measures into its permit. This response does not reflect potential agency concerns regarding potential impacts to other ecological resources, such as wetlands.



### Ambassador Towers Site Name: Mount Union

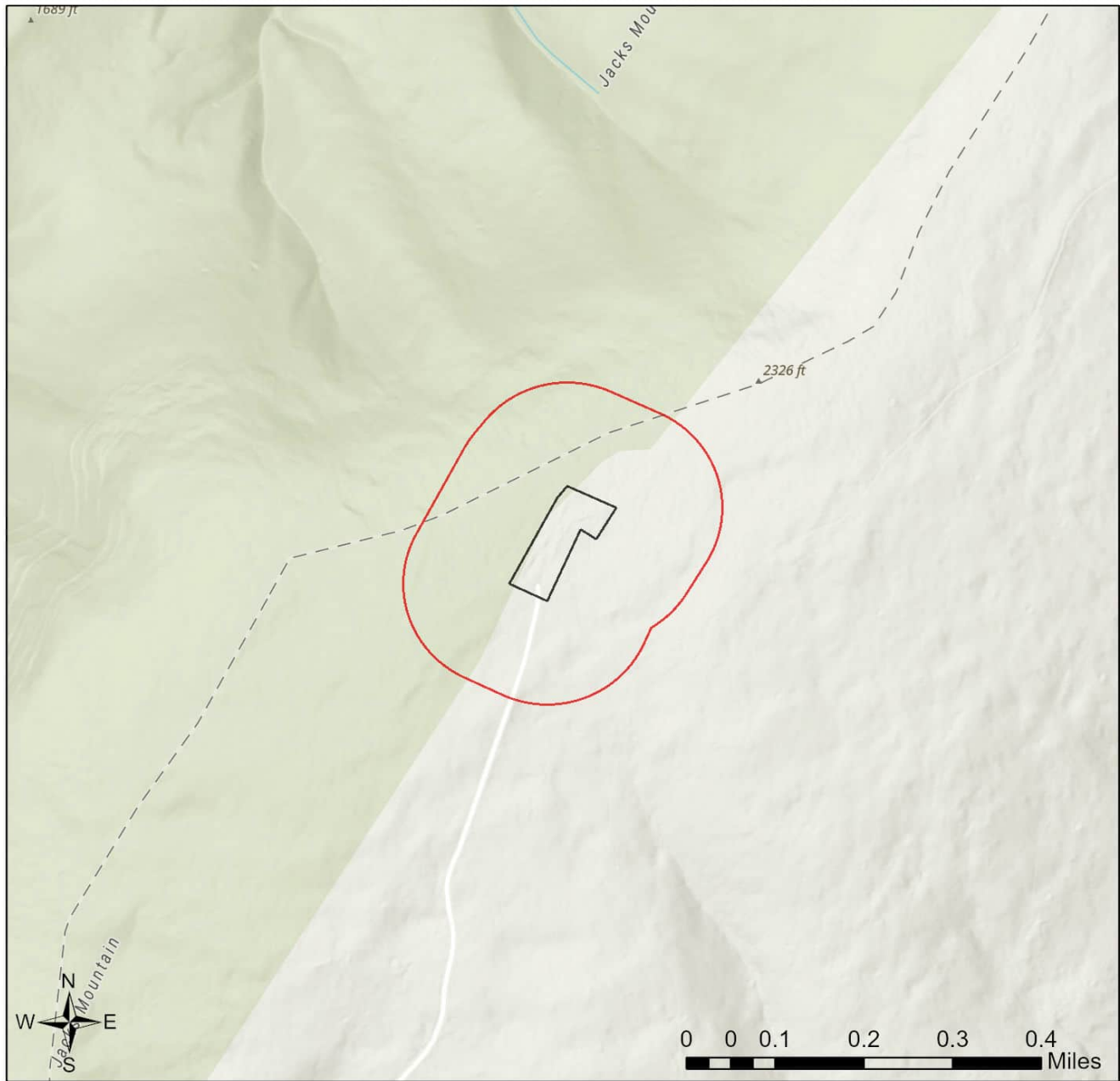




-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

### Ambassador Towers Site Name: Mount Union



-  Buffered Project Boundary
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Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:



Conservation Measure: Projects conducted in the occupied range of the timber rattlesnake (*Crotalus horridus*) have a high risk of encountering this species during construction.

- 1) Workers responsible for implementing this project should be advised that timber rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. It is suggested that safety protocols be implemented for timber rattlesnake encounters and workers should be advised that the timber rattlesnake is a state protected species and is not to be harmed. Killing of timber rattlesnakes is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6.
- 2) We recommend that a timber rattlesnake habitat assessment be conducted in the project area by a qualified timber rattlesnake surveyor in order to assist project planners in avoiding disturbance of critical habitat. A list of qualified surveyors and habitat assessment protocol can be found here.
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for a list of Qualified Timber Rattlesnake Surveyors
  - See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the Timber Rattlesnake Habitat Protocol
- 3) If potential den (over-wintering) habitat is located during the habitat assessment, we recommend that the project be modified to avoid direct impacts to this irreplaceable habitat, or a Timber Rattlesnake Presence-Absence Survey of potential den (over-wintering) habitat be conducted in the habitats that are currently slated for direct disturbance to determine the presence or absence of rattlesnake hibernacula in the project area. Survey reports should be sent to PFBC for review and consultation. This information is necessary to allow PFBC to formulate recommendations to avoid adverse impacts to this species of special concern.
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- 4) If potential or occupied gestation habitat is located during the habitat assessment and cannot be avoided by the proposed development, we recommend that this habitat be replaced using our habitat creation guidelines.
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- 5) Tree clearing and timbering within potential timber rattlesnake critical habitats (135°-275° aspect, >10% slope) should be conducted from October 16 to April 14 in order to avoid encounters with timber rattlesnakes.
- 6) For the safety of workers and snakes, the Commission recommends that a PFBC permitted timber rattlesnake biologist who has the proper skills to handle this venomous species be on-site prior to and during construction, between April 15 and October 15, to inspect and clear the area (including staging areas and access roads) of timber rattlesnakes and to capture and remove any rattlesnakes that may interfere with work activities.  
See <http://www.fishandboat.com/Resource/AmphibiansandReptiles/Pages/TimberRattlesnakeConservation.aspx> for the Monitoring Guidelines
- 7) If concerns arise during construction over high numbers of snake encounters or habitat alteration, please contact the PFBC at 814-359-5237 for consultation with our biologists.

**PFBC Species:** (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Special Concern Species*

## U.S. Fish and Wildlife Service

### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

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## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Management  
Division of Environmental Review  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: \_\_\_\_\_  
Company/Business Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Phone:(\_\_\_\_\_) \_\_\_\_\_ Fax:(\_\_\_\_\_) \_\_\_\_\_  
Email: \_\_\_\_\_

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

\_\_\_\_\_  
applicant/project proponent signature

\_\_\_\_\_  
date



November 16, 2023

**IN REPLY REFER TO**

SIR# 58796

Terracon  
Kathy Eisele  
844 N. Lenola Road  
Moorestown, New Jersey 08057

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species  
PNDI Search No. 793736\_1  
Ambassador Towers Site Name: Mount Union  
Wayne Township: MIFFLIN County**

Dear Kathy Eisele:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish and Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish and Boat Code (Chapter 75), or the Wildlife Code.

**Timber Rattlesnake (*Crotalus horridus*, Species of Special Concern)**

Timber Rattlesnakes occur in relatively high elevation forested, mountainous regions of the Commonwealth. They prefer forested areas to forage for small mammals (e.g., mice and chipmunks) and southerly-facing slopes for hibernating and other thermoregulatory activities. The Timber Rattlesnake is threatened by habitat loss/alteration, wanton killing, and poaching. In Pennsylvania, Timber Rattlesnakes are a protected species. Special (venomous snake) permits are needed to hunt individual rattlesnakes, and only legal sized males (>42 inches) can be taken during a restricted hunting season. However, communal overwintering and gestation sites are considered critical habitats for the species and are therefore protected through the environmental review process. Also, due to the species being venomous, projects that come in close proximity to these critical habitats will likely encounter the species and potentially pose health and human safety concerns to project workers. Therefore, in these consultations, the PFBC aims to avoid and minimize impacts to the species and address health and human safety issues.

There have been observations of Timber Rattlesnakes in the vicinity of the project area, but based on our review of the information you sent as well as mapping overlays, **we do not anticipate any direct adverse impacts to the Timber Rattlesnake from the proposed project.** However, the project areas could be used as foraging habitat for Timber Rattlesnakes and this warrants some concern about rattlesnake-human conflicts. Although the nature of the Timber Rattlesnake is rather docile, it can be dangerous if cornered or handled. Therefore, the workers should be mindful of the presence of the

snakes in the area. Rattlesnakes are attracted to open, rocky, log-strewn areas for basking and forested areas with thick deciduous leaf litter that tend to support high populations of rodents. We recommend that the workers responsible for implementing this project be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. These workers should also be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes without a proper permit is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6. If any Timber Rattlesnakes are observed on-site, please notify this office.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

**If you have any questions regarding this review, please contact Josh Brown at 814-359-5129 or [joshbrown@pa.gov](mailto:joshbrown@pa.gov) and refer to the SIR # 58796.** Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Urban". The signature is written in a cursive style with a large, prominent initial "C".

Christopher A. Urban, Chief  
Natural Diversity Section

CAU/JRB/dn

Mt Union PFBC  
Pending Response

# **APPENDIX E**



*Mt Union Collocation  
Section 106 Compliance  
Documentation*

Notification Date:

File Number:

**General Information**

1) (Select only one) ( <b>NE</b> ) <b>NE</b> – New <b>UA</b> – Update of Application <b>WD</b> – 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): <b>0033898511</b>
4) Name: <b>Ambassador Towers LLC</b>

**Contact Name**

5) First Name: <b>Ben</b>	6) MI:	7) Last Name: <b>Momose</b>	8) Suffix:
9) Title: <b>NEPA Regulatory Compliance</b>			

**Contact Information**

10) P.O. Box:	<b>And /Or</b>	11) Street Address: <b>3105 Lincoln Highway East</b>	
12) City: <b>Paradise</b>		13) State: <b>PA</b>	14) Zip Code: <b>17562</b>
15) Telephone Number: <b>(210)448-2623</b>		16) Fax Number:	
17) E-mail Address: <b>bmomose@upwardbroadband.com</b>			

**Consultant Information**

18) FCC Registration Number (FRN): <b>0028057495</b>
19) Name: <b>Terracon Consultants</b>

**Principal Investigator**

20) First Name: <b>Suzanne</b>	21) MI:	22) Last Name: <b>Reece</b>	23) Suffix:
24) Title:			

**Principal Investigator Contact Information**

25) P.O. Box:	<b>And /Or</b>	26) Street Address: <b>844 N. Lenola Road</b>	
27) City: <b>Moorestown</b>		28) State: <b>NJ</b>	29) Zip Code: <b>08057</b>
30) Telephone Number: <b>(856)813-3267</b>		31) Fax Number:	
32) E-mail Address: <b>Kathy.Eisele@Terracon.com</b>			

**Professional Qualification**

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

**Additional Staff**

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

If "YES," complete the following:

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

### Site Information

#### Tower Construction Notification System

1) TCNS Notification Number: \_\_\_\_\_

#### Site Information

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

3) Site Name: **Mount Union**

4) Site Address: **North terminus of Barren Trail Road**

5) Detailed Description of Project:

**Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.**

6) City: **Wayne Township**

7) State: **PA**

8) Zip Code: **17066**

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

10) Nearest Crossroads: **North Dark Hollow and Barren Trail Road**

11) **NAD 83** Latitude (DD-MM-SS.S): **40-24-53.4** ( **X** ) N or ( ) S

12) **NAD 83** Longitude (DD-MM-SS.S): **077-54-07.3** ( ) E or ( **X** ) W

#### Collocation Information

13) Antennas will be located on (Select One):

( **X** ) Communications Tower (Select One): ( ) Guyed Lattice Tower ( **X** ) Self-supporting Lattice ( ) Monopole

( ) Other (Describe): \_\_\_\_\_

( ) Non-Tower Structure (Describe Structure): \_\_\_\_\_

14) Tower height above ground level (including top-mounted attachments such as lightning rods): **245.0** ( **X** ) Feet ( ) Meters

15) Description of Antennas to be collocated (e.g. number, type, shape, dimensions, color):

**Antenna arrays are to be determined**

16) Will the Antennas be placed at multiple levels on the structure?

( ) Yes ( **X** ) No

If "Yes", describe placement:

\_\_\_\_\_

If "No", specify the height of collocation above ground: **245.0** ( **X** ) Feet ( ) Meters

17) Structure Completion Year: **2022** (YYYY)

( **X** ) Check here if your year provided is approximate.

<p>18) Has the Communications Tower or Non-Tower Structure been the subject of SHPO/THPO review?</p> <p>If "Yes", specify the following:</p> <p>Company that made the submission: _____</p> <p>Date submitted: _____ SHPO/THPO Reference Number: _____</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>
<p>19) Is the Communications Tower or Non-Tower Structure eligible for listing on the National Register?</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>

**Collocation Status**

20) Current Collocation Status (Select One):

( **X** ) Construction and/or installation has not yet commenced

( ) Construction and/or installation has commenced, but is not completed

Construction and/or installation commenced on: \_\_\_\_\_

( ) Construction has been completed

Construction and/or installation commenced on: \_\_\_\_\_ Construction and/or installation completed on: \_\_\_\_\_

**Determination of Effect**

21) Direct Effects (Select One):

( **X** ) 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

---

22) Visual Effects (Select One):

( ) No Historic Properties in Area of Potential Effects (APE)

( ) No Effect on Historic Properties in APE

( **X** ) No Adverse Effect on Historic Properties in APE

( ) Adverse Effect on one or more Historic Properties in APE



### Tribal/NHO Involvement

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

#### Contact Name

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

#### Dates & Response

10) Date Contacted _____	11) Date Replied _____
<input type="checkbox"/> No Reply	
<input type="checkbox"/> Replied/No Interest	
<input type="checkbox"/> Replied/Have Interest	
<input type="checkbox"/> 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:	<b>And /Or</b>	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:  <input type="checkbox"/> E-mail  <input type="checkbox"/> Letter  <input type="checkbox"/> Both				

### Dates & Response

17) Date Contacted _____	18) Date Replied _____
<input type="checkbox"/> No Reply  <input type="checkbox"/> Replied/No Interest  <input type="checkbox"/> Replied/Have Interest  <input type="checkbox"/> Replied/Other	

## Historic Properties

### Properties Identified

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

### Historic Property

4) Property Name:
5) SHPO Site Number:

### Property Address

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

### Status & Eligibility

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

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

## Local Government Involvement

### Local Government Agency

1) FCC Registration Number (FRN):

2) Name: **Wayne Township**

### Contact Name

3) First Name: **n/a**

4) MI:

5) Last Name: **n/a**

6) Suffix:

7) Title:

### Contact Information

8) P.O. Box:

And  
/Or

9) Street Address: **3055 Ferguson Valley Road**

10) City: **McVeytown**

11) State: **PA**

12) Zip Code: **17051**

13) Telephone Number: **(717)899-7430**

14) Fax Number:

15) E-mail Address: **waynetwp1@gmail.com**

16) Preferred means of communication:

(  ) E-mail

(  ) Letter

(  ) Both

### Dates & Response

17) Date Contacted **08/23/2023**

18) Date Replied \_\_\_\_\_

(  ) 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?	( <input checked="" type="checkbox"/> ) Yes ( <input type="checkbox"/> ) No
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#### Consulting Party

2) FCC Registration Number (FRN):
3) Name: <b>Mifflin County Historical Society</b>

#### Contact Name

4) First Name: <b>N/A</b>	5) MI:	6) Last Name: <b>N/A</b>	7) Suffix:
8) Title:			

#### Contact Information

9) P.O. Box:	And /Or	10) Street Address: <b>1 Market Street</b>		
11) City: <b>Lewistown</b>		12) State: <b>PA</b>	13) Zip Code: <b>17044</b>	
14) Telephone Number: <b>(717)242-1022</b>		15) Fax Number:		
16) E-mail Address: <b>office@mifflincountyhistory.org</b>				
17) Preferred means of communication: ( <input checked="" type="checkbox"/> ) E-mail ( <input type="checkbox"/> ) Letter ( <input type="checkbox"/> ) Both				

#### Dates & Response

18) Date Contacted <b>08/23/2023</b>	19) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply ( <input type="checkbox"/> ) Replied/No Interest ( <input type="checkbox"/> ) Replied/Have Interest ( <input type="checkbox"/> ) Replied/Other	

#### Additional Information

20) Information on other consulting parties' role or interest (optional):
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## 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/collocation.

### SHPO/THPO

Name: Pennsylvania State Historic Preservation Office

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 621 Submission Packet and the accompanying attachments are true, correct, and complete.

#### Party Authorized to Sign

First Name:	MI:	Last Name:	Suffix:
Signature: _____			Date: _____

**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

# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

### PROFESSIONAL EXPERIENCE

Ms. Reece is an Archaeologist and Principal Investigator in our Minnesota office. Ms. Reece has worked as an archaeological Principal Investigator throughout the upper Midwest. She has planned, managed, and conducted numerous cultural resources surveys for both public and private clients ranging from individual landowners to federal agencies. Ms. Reece has expertise in the areas of historical research, pedestrian and subsurface archaeological investigations, human and animal skeletal analysis, artifact identification and curation, as well as mitigation of disturbances to archaeological sites. She also has extensive experience in evaluation of historic structures and archaeological sites for National Register of Historic Places (NRHP) eligibility.

### PROPERTY DEVELOPMENT

Ms. Reece has done extensive work with both private and public sector clients assessing proposed site locations for cultural resources. Her work has helped clients avoid costly delays by identifying archaeological sites and historic properties prior to land purchases and the start of construction. She has conducted literature searches (desktop reviews), intensive Phase I and Phase II surveys, and archaeological monitoring of construction activities in support of site selection and property development projects. Some of the property development and site selection projects Ms. Reece has worked on include: residential developments, municipal and state land purchases, industrial park development, and wetland mitigation banks.

### INFRASTRUCTURE DEVELOPMENT

Ms. Reece has planned and conducted numerous cultural resources surveys related to the repair, replacement, and creation of modern infrastructure. She has conducted literature searches (desktop reviews) for utility installations within road rights-of-way, as well as intensive Phase II surveys and Phase III treatment plans for waterline, sewer line, telecommunication, and flood mitigation projects. While conducting these surveys, Ms. Reece has also gained experience in identifying and documenting historic structures and historic districts.

### MUNICIPAL, STATE, AND FEDERAL PROPERTY

Ms. Reece has conducted many cultural resources studies on public lands owned by a government entity. In conducting these projects, she has played a role in obtaining the necessary state and federal archaeological permits, overseen compliance with permit stipulations, and conducted and documented the resulting fieldwork. She has conducted archival research,



### EDUCATION

Master of Science,  
Osteoarchaeology, University of  
Edinburgh, 2013.

Bachelor of Arts, Anthropology,  
University of Minnesota, 2011.

### AFFILIATIONS

American Association of Biological  
Anthropologists (AABA)

International Council for  
Archaeozoology (ICAZ)

Register of Professional  
Archaeologists (RPA)

### WORK HISTORY

Terracon Consultants, Inc., St. Paul,  
Minnesota. Principal Investigator,  
2018-Present.

Kogel Archaeological Consulting  
Services, Sioux Falls, South Dakota.  
Principal Investigator, 2013-2018.

University of Edinburgh, Edinburgh,  
Scotland. Osteoarchaeologist, 2013.

University of Minnesota,  
Minneapolis, Minnesota. Laboratory  
Intern, 2010; Excavator, 2008.

# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

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Phase I reconnaissance surveys and intensive Phase II surveys, mortuary feature relocation surveys, Phase III treatment plans and investigations, and archaeological monitoring for projects on public land.

### TRANSPORTATION IMPROVEMENTS

Ms. Reece has led cultural resources planning efforts and fieldwork for numerous transportation improvement projects which require compliance with state or federal historic preservation laws. These projects have included improvements to railways, road construction and expansion, highway erosion and floodwater mitigation studies, as well as cultural resources oversight of soil borrow project areas. She has conducted research and prepared reports on the historic significance of structures such as bridges and culverts and how to mitigate their loss of historic integrity during repairs or replacements.

### OSTEOARCHAEOLOGICAL PROJECT EXPERIENCE

#### COMPLEX AND COMMINGLED CONTEXTS

From the start of her archaeological training, Ms. Reece has worked with comingled human and animal skeletal remains from complex archaeological contexts. She has undertaken projects that involve sorting and identification of comingled skeletal remains from archaeological sites from the United States and around the world, including work with assemblages from Algeria, the Caucasus Mountains, Ireland, Spain, Turkey, and the United Kingdom. Her experience with human and non-human skeletal materials has proven invaluable in the analysis and proper identification of osseous material in both field and laboratory settings, particularly when fragmentary remains are involved.

### MORTUARY FEATURE IDENTIFICATION

As a Principal Investigator, Ms. Reece has been responsible for the identification and investigation of potential burial features encountered during cultural resources surveys. Her experience includes identification and non-intrusive investigation of burial mound sites, determining likely burial mound locations based on historical and ethnographic documentation, and minimally invasive excavation of unconfirmed mortuary features. Ms. Reece has also conducted historic research and pedestrian surveys to identify the boundaries of historic cemeteries to ensure that proposed projects do not encroach on any unmarked burials that may be present.

### SKELETAL ANALYSIS

In her work, Ms. Reece has used modern techniques to identify important biological information from human skeletal remains, including age, sex, height, and ancestry indicators. Her work has also included documentation and identification of both pathological conditions and traumatic injuries. Ms. Reece has conducted skeletal analysis with complete, partial, and fragmentary osseous material, as well as cremated remains ("cremains"). Her experience with analysis of animal remains includes identification of species, sex, age, body size estimations, pathological conditions, and traumatic injuries. Ms. Reece is also experienced in the identification of taphonomic changes in bone caused by human and animal activity as well as natural weathering processes

*Please refer to Appendix B for Site Figures*



## ADDITIONAL SITE INFORMATION

Terracon understands that Ambassador Towers LLC is proposing to collocate antennas on an existing telecommunications tower under the following specifications:

Site Name:	Mount Union
Terracon Project Number:	J8237078
Address:	North terminus of Barren Trail Road
City, County, State:	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
Latitude / Longitude:	40° 24' 53.43" N / 77° 54' 7.32" W
Tower Height:	245 feet, including attachments
Tower Type:	Self-support
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

The proposed project will take place within an existing telecommunications installation which contains a self-support lattice tower, support equipment, and buried and overhead connection to utilities. The existing compound is contained within a chain link fence and is accessible via a gravel driveway. The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The surrounding properties are primarily farmland with scattered residences.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED  
BROADBAND PROJECT NOTIFICATION INFORMATION**

Date: 08/18/2023

UPWARD BROADBAND  
KATHY EISELE  
1401 CONSTITUTION AVE.  
WASHINGTON, DC 20230

Dear Applicant:

The National Telecommunications and Information Administration (NTIA) is using a modified version of the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) as a means of expediting its Broadband grant programs. This notice is to inform you that the following authorized parties were sent information about the application that you submitted to NTIA through TCNS. The information was forwarded to authorized TCNS users by electronic mail and/or regular mail (letter).

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) who have set their geographic preferences on TCNS. 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. Consistent with the FCC's rules as set forth in the NPA, NTIA requires that all Tribal Nations and NHOs listed below are afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below.

We note that the review period for all parties begins upon receipt of a full project submittal and notifications that do not provide this serve as information only. 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. 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 NTIA. NTIA will follow procedures consistent with those set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO - Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) - Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 434) - electronic mail

Details: Please note we have updated procedures. Please email us at Omahatribefcctns@outlook.com

2. TCNS Coordinator - Tiffany Martinez - Delaware Nation - 31064 State Highway 281 (PO Box: 825) - Anadarko, OK - tmartinez@delawarenation-nsn.gov; epaden@delawarenation-nsn.gov - 405-247-2448 (ext: 1403) - electronic mail  
Details: The Delaware Nation of Oklahoma Historic Preservation Office has developed the following consultation procedures for all TCNS projects identified as undertakings by the Federal Communications Commission. In the email subject line, please specify whether the project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. Cultural Preservation Director - Carol Butler - Absentee-Shawnee Tribe of Indians of Oklahoma - 2025 S. Gordon Cooper Drive - Shawnee, OK - fccasttens@gmail.com - 405-275-4030 (ext: 6312) - electronic mail

4. TCNS Rep - Bryan Printup - Tuscarora Nation - 5226 Walmore Rd - Via: Lewiston, NY - bprintup@hetf.org - 716-264-6011 (ext: 103) - electronic mail

If the applicant/tower builder receives no response from the Tuscarora Nation within 30 days after notification through TCNS, the Tuscarora Nation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. THPO - Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) - Odanah, WI - thpo@badriver-nsn.gov; deputyTHPO@badriver-nsn.gov - 715-682-7123 - electronic mail

If the applicant/tower builder receives no response from the Bad River Band of Lake Superior Tribe of Chippewa Indians within 30 days after notification through TCNS, the Bad River Band of Lake Superior Tribe of Chippewa Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Bad River Band of Lake Superior Tribe of Chippewa 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.

6. THPO - Marvin DeFoe - Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin - 88455 Pike Road, HWY 13 - Bayfield, WI - Marvin.DeFoe@redcliff-nsn.gov; Edwina.Buffalo-Reyes@redcliff-nsn.gov - 715-779-3700 (ext: 4242) - electronic mail

Details: Boozhoo, we do not have the Red Cliff Portal site online anymore and apologize for the inconvenience.

If you have a project that has already been paid for or would like to voluntarily pay for, please email documents for project review to THPO@redcliff-nsn.gov. This address is only to be used by Consultants who are voluntarily paying for projects.

If you have any questions, please contact Marvin Defoe, THPO Manager at (715) 779-3700 Ext. 4244 or Edwina Buffalo-Reyes, THPO Assistant at (715) 779-3700Ext. 4243.

7. THPO - William Tarrant - Seneca-Cayuga Nation - 23701 S 655 Road (PO Box: 453220) - Grove, OK - wtarrant@sctribe.com - 918-787-5452 (ext: 344) - regular mail

Details: Please refrain from sending review information via email. We request all information to be sent via mail to PO Box 453220, Grove, OK 74345.

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

Details: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened.

Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe  
Attn: CellTower 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](mailto:celltower@estoo.net) requesting our most current copy.

9. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org) - 918-678-6344 - electronic mail  
Details: Please refrain from sending information via mail. We ONLY accept information via email to: [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org). We will advise if we require additional information.

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

Thank you for the opportunity to comment.

11. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - [Taivonjoi17@gmail.com](mailto:Taivonjoi17@gmail.com); [precisionarchaeology@gmail.com](mailto:precisionarchaeology@gmail.com) - 406-395-5215 - electronic mail and regular mail  
Details: The Chippewa Cree Tribe of the Rocky Boy's Reservation no longer uses IResponse. Please email all review material to [taivonjoi17@gmail.com](mailto:taivonjoi17@gmail.com) and [rep32jwb@gmail.com](mailto:rep32jwb@gmail.com) and mail the packet to 96 Clinic Rd. North, Box Elder Montana 59521. If the qualified and professional reviewers determine that additional information is required, or that field work is required, they will contact you through email and through TCNS. If the Tribe determines that the proposed project will have an effect on historic properties and/or Tribal religious and cultural sites or properties, we will provide notice to the project proponent and to the FCC.

12. THPO - Sarah Thompson - Lac du Flambeau Band of Lake Superior Chippewa Indians - Tribal Historic Preservation Office (PO Box: 67) - Lac du Flambeau, WI - [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com) - 715-588-2139 - electronic mail  
Details: Effective Immediately:

Please send all submissions through email until further notice. Effective 3/23/2020

Please email all submissions to [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com)

Thank you

13. Deputy THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - East Stroudsburg, PA - sbachor@delawaretribe.org; lheady@delawaretribe.org - 610-761-7452 - electronic mail  
Details: The Delaware Tribe of Indians areas of interest include our aboriginal territories (circa 1600), known locations of historic Delaware settlements, routes of removal and forced migration, and all lands of Delaware aboriginal title ceded by treaty to the United States. If you are receiving this notification, then your project falls within these areas of interest and we ask that you provide us with a cover letter describing the project and its location (including the project coordinates) as well as a topographic map showing the project location. If an archaeological survey has already been performed in preparation for the project, please send a copy of that as well. Additionally, we may request a biological assessment of culturally significant treaty resources which may be affected by the proposed undertaking.

We are only interested in consulting on projects that involve ground disturbance that is planned to take place in both undisturbed and previously disturbed contexts. We are not interested in consulting on collocations or projects that involve no ground disturbance. If your project does involve ground disturbance or you do not receive a response from us within 30 days of submitting the above project information, then we have no comments on the project. However, if any archaeological resources or human remains are disturbed at any point in the project planning or construction, we ask that the project be halted until we can be notified of the inadvertent discovery and can determine the most appropriate course of action. If your company would like a formal written response from the Delaware Tribe concerning the potential impact of your project to culturally and religiously significant sites, please contact Susan Bachor at sbachor@delawaretribe.org to request such a response.

In order to better facilitate consultation throughout our areas of interest we have three regional tribal historic preservation offices. While our Tribal Headquarters remains in Oklahoma, our Eastern Office in Pennsylvania is the point of contact for all consultation within our Eastern Region which includes the states of Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland and Virginia. If your project exists in any of these states, please contact Susan Bachor with the above project information at the following e-mail address. All offices prefer digital submissions and the project information can be submitted by e-mail.

Susan Bachor, Acting Director of Historic Preservation  
Eastern Office  
126 University Circle  
Stroud Hall, Rm. 437  
East Stroudsburg PA 18301  
(610) 761-7452  
sbachor@delawaretribe.org

Our Midwestern office is the point of contact for all consultation within our Midwestern region which includes the states of West Virginia, Ohio, Indiana, Michigan and Illinois. If your project exists in any of these states, please contact Larry Heady with the above project information at the following e-mail address. Our Midwestern office prefers to receive digital submissions and the project information can be submitted by e-mail.

Larry Heady, THPO  
Midwestern Office  
125 Dorry Lane, Grants Pass, OR 97527  
lheady@delawaretribe.org  
(262) 825-7586

We, at the Delaware Tribe Historic Preservation Office, along with our Chief and Tribal Council remain committed to protecting the cultural and physical integrity of our historic sites, traditional cultural properties, sacred sites, objects of cultural patrimony, and most importantly, the remains of our Ancestors. We look forward to working with you on our shared interests in preserving and protecting Delaware heritage within our areas of interest.

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States.



The information you provided was also forwarded to the following SHPOs in the state in which you propose to construct and neighboring states. The information was provided to these SHPOs as a courtesy for their information and planning.

14. - Amanda Terrell - Ohio History Connection - 800 E. 17th Avenue - Columbus, OH - aterrell@ohiohistory.org - 614-298-2000 - electronic mail

15. Historic Preservation Supervisor - Barbara Frederick - Pennsylvania State Historic Preservation Office - Pennsylvania Historical & Museum Commission 400 North St, 2nd Floor - Harrisburg, PA - bafrederic@pa.gov - 717-772-4519 - electronic mail

16. Deputy SHPO - Susan Pierce - West Virginia Division of Culture & History, Historic Preservation Office - 1901 Kanawha Boulevard East - Charleston, WV - susan.pierce@wvculture.org - - electronic mail

17. SHPO - Barbara Franco - Pennsylvania Historical and Museum Commission - 300 North Street - Harrisburg, PA - bcutler@state.pa.us - 717-787-2891 - 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. 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 NTIA cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed project was forwarded to the person(s) listed above.

Notification Received: 08/15/2023

Notification ID: 270639

Project Number: 55

Applicant: Upward Broadband

Applicant Contact: Kathy Eisele

Project Type(s): Multiple Project Components

Region(s) affected (State, County): PENNSYLVANIA, HUNTINGDON PENNSYLVANIA, MIFFLIN

Address or Geographical Location Description: New Tower Construction (1 site) and Existing Tower Collocation (2 site)

Project Name: NTIA / Upward Broadband Section 7

Huntingdon and Mifflin Counties, Pennsylvania

(See Project Descriptions and Maps for specific details)

If you have any questions or comments regarding the content of this notice, please contact NTIA at: TCNS@ntia.gov.



844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Wayne Township  
 3055 Ferguson Valley Road  
 McVeytown, Pennsylvania 17051  
 Phone: 717-899-7430 / Email: [waynetwp1@gmail.com](mailto:waynetwp1@gmail.com)

RE: Invitation to Comment as a Consulting Party on a Telecommunications Collocation Project

Site Name:	Mount Union
Terracon Project Number:	J8237078
Address:	North terminus of Barren Trail Road
City, County, State:	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
Latitude / Longitude:	40° 24' 53.43" N / 77° 54' 7.32" W
Tower Height:	245 feet, including attachments
Tower Type:	Self-support
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

To Whom it May Concern:

In accordance with Section 106 of the National Historic Preservation Act (Section 106), the above-referenced proposed broadband deployment project is being evaluated for its potential effects to tribal resources, archaeological sites, or historic resources. If approved, funding for the above-referenced broadband deployment projects will be, in part, provided through a grant from the U.S. Department of Commerce, National Telecommunications & Information Administration (NTIA). As such, the proposed project is a federal undertaking subject to consultation under Section 106.

Terracon is writing to invite your comment on the effect of the above-referenced project on historic resources within the project's Area of Potential Effects (APE).

Field assessment for both historic properties and archaeological sites will be conducted, and a determination will be made of the project's direct and indirect effects on eligible properties. Consulting parties are invited to provide information concerning historic or archaeological properties already listed in the National Register or that could be eligible for listing in the National Register. We welcome your comments regarding the effect of the tower on historic resources that may be listed in or eligible for the National Register of Historic Places.

If you would like to comment, please respond to this letter within 30 days of its receipt. Thank you for your response on this matter. If you have any questions, please do not hesitate to call. If you wish to respond by email, I may be reached at [kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com) and (856) 813-3267.

Sincerely,  
 Terracon Consultants, Inc.

Kathryn A. Eisele  
 Sr. Project Manager

Attachment: Project Location Map with APE

Explore with us



844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Mifflin County Historical Society  
 1 Market Street  
 Lewistown, Pennsylvania 17044  
 Phone 717-242-1022 / Email: [office@mifflincountyhistory.org](mailto:office@mifflincountyhistory.org)

RE: Invitation to Comment as a Consulting Party on a Telecommunications Collocation Project

Site Name:	Mount Union
Terracon Project Number:	J8237078
Address:	North terminus of Barren Trail Road
City, County, State:	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
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Terracon is writing to invite your comment on the effect of the above-referenced project on historic resources within the project's Area of Potential Effects (APE).

Field assessment for both historic properties and archaeological sites will be conducted, and a determination will be made of the project's direct and indirect effects on eligible properties. Consulting parties are invited to provide information concerning historic or archaeological properties already listed in the National Register or that could be eligible for listing in the National Register. We welcome your comments regarding the effect of the tower on historic resources that may be listed in or eligible for the National Register of Historic Places.

If you would like to comment, please respond to this letter within 30 days of its receipt. Thank you for your response on this matter. If you have any questions, please do not hesitate to call. If you wish to respond by email, I may be reached at [kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com) and (856) 813-3267.

Sincerely,  
 Terracon Consultants, Inc.

Kathryn A. Eisele  
 Sr. Project Manager

*Attachment: Project Location Map with APE*

**Sentinel (Lewistown), The**  
**352 Sixth Street, PO Box 588**  
**(717) 248-6741**

I, Matthew Bolich, of lawful age, being duly sworn upon oath, deposes and says that I am the Advertising Director of Sentinel (Lewistown), The, a publication that is a "legal newspaper" as that phrase is defined for the city of Lewistown, for the County of Mifflin, in the state of Pennsylvania, that this affidavit is Page 1 of 1 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

**PUBLICATION DATES:**

25 Aug 2023

**Notice ID:** m1c5sknLtjP13f0BUqlv

**Publisher ID:** C09999

**Notice Name:** NTIA Mount Union

**PUBLICATION FEE:** \$83.34



Advertising Director

**VERIFICATION**

STATE OF PENNSYLVANIA  
COUNTY OF MIFFLIN

Signed or attested before me on this

25 day of August, A.D. 2023.



Notary Public

**PUBLIC NOTICE:**  
Ambassador Towers LLC is proposing to collocate antennas on an existing 245-ft Self-Support Telecommunication Tower located north terminus of Barren Trail Rd, Wayne Twp (Mount Union), Mifflin Co., PA 17068 (40° 24' 53.43" N / 77° 54' 7.32" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8287, or Kathy.eisele@terracon.com.

Commonwealth of Pennsylvania - Notary Seal  
SUE KLINE - Notary Public  
Mifflin County  
My Commission Expires February 18, 2026  
Commission Number 1328015

## AREAS OF POTENTIAL EFFECTS

Site Name:	Mount Union
Terracon Project Number:	J8237078
Address:	North terminus of Barren Trail Road
City, County, State:	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
Latitude / Longitude:	40° 24' 53.43" N / 77° 54' 7.32" W
Tower Height:	245 feet, including attachments
Tower Type:	Self-support
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

### A. Direct Effects

The direct APE was determined to be the existing telecommunication tower and tower compound.

### B. Visual Effects

The proposed tower will be approximately 245 feet in overall height. The APE for visual effects is therefore considered to be a 0.75-mile radius, per the 2004 Programmatic Agreement (Section VI.4.a), which defines the visual APE as a 0.75-mile radius for towers between 200 and 399 feet in height (unless otherwise determined through consultation between the applicant and the local SHPO office).



# Prior Disturbance Assessment

**Mount Union  
Barren Trail Road  
Mount Union, Wayne Township  
Mifflin County  
Pennsylvania 17066**  
Terracon Project No. J8237078  
September 2023



**Prepared for:**  
Ambassador Towers LLC

**Prepared by:**  
Terracon Consultants, Inc.  
844 N. Lenola Road, Suite 1  
Moorestown, NJ 08057



September 23, 2023

PA State Historic Preservation Office  
400 North Street, Second Floor  
Harrisburg PA 17120  
ATTN: Justin McKeel, Environmental Review Archaeologist  
P: (717) 783-9900 / E: jusmckeel@pa.gov

Re: Prior Disturbance Assessment  
Site Name: Mount Union  
Terracon Project No. J8237078

Dear Mr. McKeel,

Terracon Consultants, Inc. (Terracon) completed a prior disturbance assessment for a proposed collocation on an existing communications tower. The proposed project involves the placement of antennas on an existing tower and installations of associated support equipment within the existing tower compound. The proposed project is being done by Upward Broadband LLC., with funding partially provided by a grant from the National Telecommunications and Information Administration (NTIA). The proposed project is being conducted with the following specifications:

Site Name:	Mount Union
Terracon Project Number:	J8237078
Address:	North terminus of Barren Trail Road
City, County, State:	Wayne Twp (Mount Union), Mifflin County, Pennsylvania 17066
Latitude / Longitude:	40° 24' 53.43" N / 77° 54' 7.32" W
Tower Height:	245 feet (overall height), including attachments
Tower Type:	Self-support
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

The lead federal agency for this project is the NTIA. The NTIA defers to the Federal Communications Commission's (FCC) 2004 Nationwide Programmatic Agreement (NPA) (FCC 2004) for guidance and compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. According to the NPA, the Applicant need not undertake a Field Survey for archaeological resources where the depth of previous disturbance exceeds the proposed construction depth or geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area. Based on the nature of the proposed undertaking (an antenna collocation on a previously constructed tower) this letter provides an evaluation from a Secretary of Interior (SOI)-qualified archaeologist regarding the applicability of a field survey for the proposed tower collocation.

## **Project Description**

The project is located at the terminus of Barren Trail Road, a minimally maintained road near Mount Union, Wayne Township, Mifflin County, Pennsylvania. The proposed project will take place within an existing communications compound, which contains a lattice tower, associated support equipment, and utilities. The existing compound is contained within a chain link fence, and is accessible via a gravel driveway. The existing compound is located in an area containing multiple communication tower installations. The area surrounding the existing tower is primarily woodland. The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The project area is depicted on the attached aerial photograph and 7.5-minute United States Geological Survey (USGS) topographic quadrangle.

## **Records Review**

Terracon conducted a search of the Pennsylvania State Historic and Archaeological Resource Exchange (PA-SHARE) online database, maintained by the Pennsylvania State Historic Preservation Office (SHPO) for information on previously recorded historic properties within the project area and within 0.75-mile of the project area. This search radius was determined by the overall height of the existing tower and the guidance on determining the visual area of effects (APE) within the NPA. This search resulted in no historic properties have previously been recorded within the existing tower compound, or within 0.75-mile of the compound.

Background research included an examination of historic photographs of the project area, ranging in date from 1957 to the present. This examination found the area around the project area was undeveloped woodland up until 1983, when one of the other tower compounds and road is depicted to the southwest of the project area. Additional towers continue to be constructed on the property from 1983 on, with the existing tower compound in the project area being constructed sometime between 2017 and 2019. Historic topographic maps dating from 1922 to 2023 were also examined. No structures or other development are depicted within the project area until 1961, when a trail is depicted passing through the project area. Barren Trail Road is first depicted approaching the project area on the 2010 topographic map. No additional features or structures are depicted in or near the project area on subsequent maps.

## **Recommendations**

Due to prior ground disturbing activities within the project site, and the small footprint of the proposed collocation, there is a low probability that archaeological materials would be encountered or be found in an undisturbed context. Therefore, no further archaeological investigations are recommended for the proposed project at this time.

Should buried artifacts, human remains, or cultural deposits be encountered during ground disturbing activities, it is Terracon's recommendation that construction immediately halt,

and the resources should be examined by a professional archaeologist. Appropriate authorities, including the appropriate tribal entities and SHPO, should be notified.

## **Closing**

We appreciate the opportunity to provide you with this report. If you have any questions or comments, please contact Kathy Eisele at (856) 813-3276 or at [Kathy.Eisele@terracon.com](mailto:Kathy.Eisele@terracon.com).

Sincerely,  
Terracon Consultants, Inc.

Suzanne Reece, MSc, RPA  
Principal Investigator Archaeologist

Marilyn Zenko  
Senior Archaeologist

*Attachments:*  
Project Maps

## References

Federal Communications Commission (FCC)

2004 Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission. Available online: <http://wireless.fcc.gov/siting/npa/FCC-04-222A3.pdf>.

Historic Aerials

2023 *Historic Aerial Photograph Database*. Website at <http://www.historicaerials.com/>.

Pennsylvania State Historic Preservation Office (PA SHPO), publisher

2023 *PA-SHARE database*. Website at [share.phmc.pa.gov/pashare](http://share.phmc.pa.gov/pashare).

United States Geological Survey (USGS)

2023 *Mount Union, Pennsylvania [map]. 1:24,000 7.5-minute series topographic quadrangle. U.S. Department of the Interior, U.S. Geological Survey, Washington, D.C. Electronic map available from <https://store.usgs.gov/map-locator>.*



*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*



September 29, 2023

*Sent Via PA-SHARE*

RE: ER Project # 2023PR04752.001, Mount Union Collocation on existing tower, National Telecommunications and Information Admini, Brady Township, Huntingdon County

Dear Submitter,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

**Above Ground Resources**

*No Above Ground Concerns - Environmental Review - No Effect - Above Ground*

Based on the information received and available within our files, it is our opinion that the proposed project will have No Effect on above ground historic properties, including historic buildings, districts, structures, and/or objects, should they exist. Should the scope of the project change and/or should you be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning above ground resources, please contact John Gardosik at [jgardosik@pa.gov](mailto:jgardosik@pa.gov).

**Archaeological Resources**

*No Archaeological Concerns - Environmental Review - No Effect - Archaeological - No Ground Disturbance*

Based on the information received and available within our files, the proposed project will have No Effect on archaeological resources. If project plans should change to include ground-disturbing activities and/or you should be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning archaeological resources, please contact John Gardosik at [jgardosik@pa.gov](mailto:jgardosik@pa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Emma Diehl". The signature is written in a cursive style with a prominent loop at the end.

Emma Diehl

Environmental Review Division Manager

*Hesston Collocation*  
*Section 106 Compliance*  
*Documentation*

Notification Date:

File Number:

**General Information**

1) (Select only one) ( <b>NE</b> ) <b>NE</b> – New <b>UA</b> – Update of Application <b>WD</b> – 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): <b>0033898511</b>
4) Name: <b>Ambassador Towers LLC</b>

**Contact Name**

5) First Name: <b>Ben</b>	6) MI:	7) Last Name: <b>Momose</b>	8) Suffix:
9) Title:			

**Contact Information**

10) P.O. Box:	<b>And /Or</b>	11) Street Address: <b>3105 Lincoln Highway East</b>	
12) City: <b>Paradise</b>		13) State: <b>PA</b>	14) Zip Code: <b>17562</b>
15) Telephone Number: <b>(210)448-2623</b>		16) Fax Number:	
17) E-mail Address: <b>bmomose@upwardbroadband.com</b>			

**Consultant Information**

18) FCC Registration Number (FRN): <b>0028057495</b>
19) Name: <b>Terracon Consultants</b>

**Principal Investigator**

20) First Name: <b>Suzanne</b>	21) MI:	22) Last Name: <b>Reece</b>	23) Suffix:
24) Title:			

**Principal Investigator Contact Information**

25) P.O. Box:	<b>And /Or</b>	26) Street Address: <b>844 N. Lenola Road</b>	
27) City: <b>Moorestown</b>		28) State: <b>NJ</b>	29) Zip Code: <b>08057</b>
30) Telephone Number: <b>(856)813-3267</b>		31) Fax Number:	
32) E-mail Address: <b>Kathy.Eisele@Terracon.com</b>			



**Professional Qualification**

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

**Additional Staff**

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

If "YES," complete the following:

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

### Site Information

#### Tower Construction Notification System

1) TCNS Notification Number: \_\_\_\_\_

#### Site Information

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

3) Site Name: **Hesston**

4) Site Address: **1,900 ft SE of 12951 Raystown Road**

5) Detailed Description of Project:  
**Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.**

6) City: <b>Penn Township</b>	7) State: <b>PA</b>	8) Zip Code: <b>16652</b>
-------------------------------	---------------------	---------------------------

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

10) Nearest Crossroads: **East of Raystown Road and 4661 Thorn HI Drive**

11) NAD 83 Latitude (DD-MM-SS.S): **40-25-40.3** ( **X** ) N or ( ) S

12) NAD 83 Longitude (DD-MM-SS.S): **078-06-35.2** ( ) E or ( **X** ) W

#### Collocation Information

13) Antennas will be located on (Select One):  
 ( **X** ) Communications Tower (Select One): ( ) Guyed Lattice Tower ( **X** ) Self-supporting Lattice ( ) Monopole  
 ( ) Other (Describe): \_\_\_\_\_  
 ( ) Non-Tower Structure (Describe Structure): \_\_\_\_\_

14) Tower height above ground level (including top-mounted attachments such as lightning rods): **305.0** ( **X** ) Feet ( ) Meters

15) Description of Antennas to be collocated (e.g. number, type, shape, dimensions, color):  
**The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The project site and surrounding properties are also undeveloped, wooded land.**

16) Will the Antennas be placed at multiple levels on the structure? If "Yes", describe placement: _____ If "No", specify the height of collocation above ground: <b>305.0</b> ( <b>X</b> ) Feet ( ) Meters	( ) <u>Yes</u> ( <b>X</b> ) <u>No</u>
--	---------------------------------------

17) Structure Completion Year: **2019** (YYYY)  
 ( **X** ) Check here if your year provided is approximate.

<p>18) Has the Communications Tower or Non-Tower Structure been the subject of SHPO/THPO review?</p> <p>If "Yes", specify the following:</p> <p>Company that made the submission: _____</p> <p>Date submitted: _____ SHPO/THPO Reference Number: _____</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>
<p>19) Is the Communications Tower or Non-Tower Structure eligible for listing on the National Register?</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>

**Collocation Status**

<p>20) Current Collocation Status (Select One):</p> <p>( <b>X</b> ) Construction and/or installation has not yet commenced</p> <p>( ) Construction and/or installation has commenced, but is not completed</p> <p>Construction and/or installation commenced on: _____</p> <p>( ) Construction has been completed</p> <p>Construction and/or installation commenced on: _____ Construction and/or installation completed on: _____</p>
--

**Determination of Effect**

<p>21) Direct Effects (Select One):</p> <p>( <b>X</b> ) No Historic Properties in Area of Potential Effects (APE)</p> <p>( ) No Effect on Historic Properties in APE</p> <p>( ) No Adverse Effect on Historic Properties in APE</p> <p>( ) Adverse Effect on one or more Historic Properties in APE</p>
<p>22) Visual Effects (Select One):</p> <p>( <b>X</b> ) No Historic Properties in Area of Potential Effects (APE)</p> <p>( ) No Effect on Historic Properties in APE</p> <p>( ) No Adverse Effect on Historic Properties in APE</p> <p>( ) Adverse Effect on one or more Historic Properties in APE</p>

### Tribal/NHO Involvement

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

#### Contact Name

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

#### Dates & Response

10) Date Contacted _____	11) Date Replied _____
<input type="checkbox"/> No Reply	
<input type="checkbox"/> Replied/No Interest	
<input type="checkbox"/> Replied/Have Interest	
<input type="checkbox"/> 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:	<b>And /Or</b>	9) Street Address:		
10) City:		11) State:	12) Zip Code:	
13) Telephone Number:		14) Fax Number:		
15) E-mail Address:				
16) Preferred means of communication:  (    ) E-mail  (    ) Letter  (    ) Both				

### Dates & Response

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

## Historic Properties

### Properties Identified

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

### Historic Property

4) Property Name:
5) SHPO Site Number:

### Property Address

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

### Status & Eligibility

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

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



## Local Government Involvement

### Local Government Agency

1) FCC Registration Number (FRN):

2) Name: **Penn Township**

### Contact Name

3) First Name: **Jim**

4) MI:

5) Last Name: **Weikert**

6) Suffix:

7) Title:

### Contact Information

8) P.O. Box:

And  
/Or

9) Street Address: **12281 Red Stone Ridge Road**

10) City: **Hesston**

11) State: **PA**

12) Zip Code: **16647**

13) Telephone Number: **(814)386-2880**

14) Fax Number:

15) E-mail Address: **kathy.eisele@terracon.com**

16) Preferred means of communication:

(  ) E-mail

(  ) Letter

(  ) Both

### Dates & Response

17) Date Contacted **08/23/2023**

18) Date Replied \_\_\_\_\_

(  ) 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?	( <input checked="" type="checkbox"/> ) Yes ( <input type="checkbox"/> ) No
--	---

#### Consulting Party

2) FCC Registration Number (FRN):
3) Name: <b>Huntingdon County Historical Society</b>

#### Contact Name

4) First Name: <b>Margaret</b>	5) MI:	6) Last Name: <b>Skrivseth</b>	7) Suffix:
8) Title:			

#### Contact Information

9) P.O. Box:	And /Or	10) Street Address: <b>106 Fourth Stret</b>
11) City: <b>Hungtingdon</b>	12) State: <b>PA</b>	13) Zip Code: <b>17264</b>
14) Telephone Number: <b>(814)643-5449</b>	15) Fax Number:	
16) E-mail Address: <b>hchsmail@gmail.com</b>		
17) Preferred means of communication: ( <input checked="" type="checkbox"/> ) E-mail ( <input type="checkbox"/> ) Letter ( <input type="checkbox"/> ) Both		

#### Dates & Response

18) Date Contacted <b>08/23/2023</b>	19) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply ( <input type="checkbox"/> ) Replied/No Interest ( <input type="checkbox"/> ) Replied/Have Interest ( <input type="checkbox"/> ) Replied/Other	

#### Additional Information

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

## Designation of SHPO/THPO

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

### SHPO/THPO

Name: Pennsylvania State Historic Preservation Office

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 621 Submission Packet and the accompanying attachments are true, correct, and complete.

#### Party Authorized to Sign

First Name:	MI:	Last Name:	Suffix:
Signature: _____			Date: _____

**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).**

Notification Date:

File Number:

**General Information**

1) (Select only one) ( <b>NE</b> ) <b>NE</b> – New <b>UA</b> – Update of Application <b>WD</b> – 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): <b>0033898511</b>
4) Name: <b>Ambassador Towers LLC</b>

**Contact Name**

5) First Name: <b>Ben</b>	6) MI:	7) Last Name: <b>Momose</b>	8) Suffix:
9) Title:			

**Contact Information**

10) P.O. Box:	<b>And /Or</b>	11) Street Address: <b>3105 Lincoln Highway East</b>	
12) City: <b>Paradise</b>		13) State: <b>PA</b>	14) Zip Code: <b>17562</b>
15) Telephone Number: <b>(210)448-2623</b>		16) Fax Number:	
17) E-mail Address: <b>bmomose@upwardbroadband.com</b>			

**Consultant Information**

18) FCC Registration Number (FRN): <b>0028057495</b>
19) Name: <b>Terracon Consultants</b>

**Principal Investigator**

20) First Name: <b>Suzanne</b>	21) MI:	22) Last Name: <b>Reece</b>	23) Suffix:
24) Title:			

**Principal Investigator Contact Information**

25) P.O. Box:	<b>And /Or</b>	26) Street Address: <b>844 N. Lenola Road</b>	
27) City: <b>Moorestown</b>		28) State: <b>NJ</b>	29) Zip Code: <b>08057</b>
30) Telephone Number: <b>(856)813-3267</b>		31) Fax Number:	
32) E-mail Address: <b>Kathy.Eisele@Terracon.com</b>			

**Professional Qualification**

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

**Additional Staff**

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

If "YES," complete the following:

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

**Site Information**

**Tower Construction Notification System**

1) TCNS Notification Number: **NTIA TCNS No. 270639**

**Site Information**

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

3) Site Name: **Hesston**

4) Site Address: **1,900 ft SE of 12951 Raystown Road**

5) Detailed Description of Project:  
**Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.**

6) City: <b>Penn Township</b>	7) State: <b>PA</b>	8) Zip Code: <b>16652</b>
-------------------------------	---------------------	---------------------------

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

10) Nearest Crossroads: **East of Raystown Road and 4661 Thorn HI Drive**

11) NAD 83 Latitude (DD-MM-SS.S): **40-25-40.3** ( **X** ) N or ( ) S

12) NAD 83 Longitude (DD-MM-SS.S): **078-06-35.2** ( ) E or ( **X** ) W

**Collocation Information**

13) Antennas will be located on (Select One):  
 ( **X** ) Communications Tower (Select One): ( ) Guyed Lattice Tower ( **X** ) Self-supporting Lattice ( ) Monopole  
 ( ) Other (Describe): \_\_\_\_\_  
 ( ) Non-Tower Structure (Describe Structure): \_\_\_\_\_

14) Tower height above ground level (including top-mounted attachments such as lightning rods): **305.0** ( **X** ) Feet ( ) Meters

15) Description of Antennas to be collocated (e.g. number, type, shape, dimensions, color):  
**The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The project site and surrounding properties are also undeveloped, wooded land.**

16) Will the Antennas be placed at multiple levels on the structure? If "Yes", describe placement: _____ If "No", specify the height of collocation above ground: <b>305.0</b> ( <b>X</b> ) Feet ( ) Meters	( ) <u>Y</u> es ( <b>X</b> ) <u>N</u> o
--	---

17) Structure Completion Year: **2019** (YYYY)  
 ( **X** ) Check here if your year provided is approximate.



<p>18) Has the Communications Tower or Non-Tower Structure been the subject of SHPO/THPO review?</p> <p>If "Yes", specify the following:</p> <p>Company that made the submission: _____</p> <p>Date submitted: _____ SHPO/THPO Reference Number: _____</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>
<p>19) Is the Communications Tower or Non-Tower Structure eligible for listing on the National Register?</p>	<p>( ) <u>Y</u>es ( <b>X</b> ) <u>N</u>o</p>

**Collocation Status**

<p>20) Current Collocation Status (Select One):</p> <p>( <b>X</b> ) Construction and/or installation has not yet commenced</p> <p>( ) Construction and/or installation has commenced, but is not completed</p> <p>Construction and/or installation commenced on: _____</p> <p>( ) Construction has been completed</p> <p>Construction and/or installation commenced on: _____ Construction and/or installation completed on: _____</p>
--

**Determination of Effect**

<p>21) Direct Effects (Select One):</p> <p>( <b>X</b> ) No Historic Properties in Area of Potential Effects (APE)</p> <p>( ) No Effect on Historic Properties in APE</p> <p>( ) No Adverse Effect on Historic Properties in APE</p> <p>( ) Adverse Effect on one or more Historic Properties in APE</p>
<p>22) Visual Effects (Select One):</p> <p>( <b>X</b> ) No Historic Properties in Area of Potential Effects (APE)</p> <p>( ) No Effect on Historic Properties in APE</p> <p>( ) No Adverse Effect on Historic Properties in APE</p> <p>( ) Adverse Effect on one or more Historic Properties in APE</p>

### Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	( <input checked="" type="checkbox"/> ) <u>Y</u> es (    ) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: _____ Number of Tribes/NHOs: <u>0</u>	
2b) Tribes/NHOs contacted through an alternate system: NTIA TCNS No. 270639      Number of Tribes/NHOs: <u>13</u>	

#### Tribe/NHO Contacted Through TCNS

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

#### Contact Name

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

#### Dates & Response

10) Date Contacted _____	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:	<b>And /Or</b>	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:  <input type="checkbox"/> E-mail  <input type="checkbox"/> Letter  <input type="checkbox"/> Both				

### Dates & Response

17) Date Contacted _____	18) Date Replied _____
<input type="checkbox"/> No Reply	
<input type="checkbox"/> Replied/No Interest	
<input type="checkbox"/> Replied/Have Interest	
<input type="checkbox"/> Replied/Other	

## Historic Properties

### Properties Identified

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

### Historic Property

4) Property Name:
5) SHPO Site Number:

### Property Address

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

### Status & Eligibility

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

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

## Local Government Involvement

### Local Government Agency

1) FCC Registration Number (FRN):

2) Name: **Penn Township**

### Contact Name

3) First Name: **Jim**

4) MI:

5) Last Name: **Weikert**

6) Suffix:

7) Title:

### Contact Information

8) P.O. Box:

And  
/Or

9) Street Address: **12281 Red Stone Ridge Road**

10) City: **Hesston**

11) State: **PA**

12) Zip Code: **16647**

13) Telephone Number: **(814)386-2880**

14) Fax Number:

15) E-mail Address: **kathy.eisele@terracon.com**

16) Preferred means of communication:

( ) E-mail

( **X** ) Letter

( ) Both

### Dates & Response

17) Date Contacted **08/23/2023**

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?	( <input checked="" type="checkbox"/> ) Yes ( <input type="checkbox"/> ) No
--	---

#### Consulting Party

2) FCC Registration Number (FRN):
3) Name: <b>Huntingdon County Historical Society</b>

#### Contact Name

4) First Name: <b>Margaret</b>	5) MI:	6) Last Name: <b>Skrivseth</b>	7) Suffix:
8) Title:			

#### Contact Information

9) P.O. Box:	And /Or	10) Street Address: <b>106 Fourth Stret</b>
11) City: <b>Hungtingdon</b>	12) State: <b>PA</b>	13) Zip Code: <b>17264</b>
14) Telephone Number: <b>(814)643-5449</b>	15) Fax Number:	
16) E-mail Address: <b>hchsmail@gmail.com</b>		
17) Preferred means of communication: ( <input checked="" type="checkbox"/> ) E-mail ( <input type="checkbox"/> ) Letter ( <input type="checkbox"/> ) Both		

#### Dates & Response

18) Date Contacted <b>08/23/2023</b>	19) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply ( <input type="checkbox"/> ) Replied/No Interest ( <input type="checkbox"/> ) Replied/Have Interest ( <input type="checkbox"/> ) Replied/Other	

#### Additional Information

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



## Designation of SHPO/THPO

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

### SHPO/THPO

Name: Pennsylvania State Historic Preservation Office

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 621 Submission Packet and the accompanying attachments are true, correct, and complete.

#### Party Authorized to Sign

First Name:

MI:

Last Name:

Suffix:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**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).**

# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

### PROFESSIONAL EXPERIENCE

Ms. Reece is an Archaeologist and Principal Investigator in our Minnesota office. Ms. Reece has worked as an archaeological Principal Investigator throughout the upper Midwest. She has planned, managed, and conducted numerous cultural resources surveys for both public and private clients ranging from individual landowners to federal agencies. Ms. Reece has expertise in the areas of historical research, pedestrian and subsurface archaeological investigations, human and animal skeletal analysis, artifact identification and curation, as well as mitigation of disturbances to archaeological sites. She also has extensive experience in evaluation of historic structures and archaeological sites for National Register of Historic Places (NRHP) eligibility.

### PROPERTY DEVELOPMENT

Ms. Reece has done extensive work with both private and public sector clients assessing proposed site locations for cultural resources. Her work has helped clients avoid costly delays by identifying archaeological sites and historic properties prior to land purchases and the start of construction. She has conducted literature searches (desktop reviews), intensive Phase I and Phase II surveys, and archaeological monitoring of construction activities in support of site selection and property development projects. Some of the property development and site selection projects Ms. Reece has worked on include: residential developments, municipal and state land purchases, industrial park development, and wetland mitigation banks.

### INFRASTRUCTURE DEVELOPMENT

Ms. Reece has planned and conducted numerous cultural resources surveys related to the repair, replacement, and creation of modern infrastructure. She has conducted literature searches (desktop reviews) for utility installations within road rights-of-way, as well as intensive Phase II surveys and Phase III treatment plans for waterline, sewer line, telecommunication, and flood mitigation projects. While conducting these surveys, Ms. Reece has also gained experience in identifying and documenting historic structures and historic districts.

### MUNICIPAL, STATE, AND FEDERAL PROPERTY

Ms. Reece has conducted many cultural resources studies on public lands owned by a government entity. In conducting these projects, she has played a role in obtaining the necessary state and federal archaeological permits, overseen compliance with permit stipulations, and conducted and documented the resulting fieldwork. She has conducted archival research,



### EDUCATION

Master of Science,  
Osteoarchaeology, University of  
Edinburgh, 2013.

Bachelor of Arts, Anthropology,  
University of Minnesota, 2011.

### AFFILIATIONS

American Association of Biological  
Anthropologists (AABA)

International Council for  
Archaeozoology (ICAZ)

Register of Professional  
Archaeologists (RPA)

### WORK HISTORY

Terracon Consultants, Inc., St. Paul,  
Minnesota. Principal Investigator,  
2018-Present.

Kogel Archaeological Consulting  
Services, Sioux Falls, South Dakota.  
Principal Investigator, 2013-2018.

University of Edinburgh, Edinburgh,  
Scotland. Osteoarchaeologist, 2013.

University of Minnesota,  
Minneapolis, Minnesota. Laboratory  
Intern, 2010; Excavator, 2008.

# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

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Phase I reconnaissance surveys and intensive Phase II surveys, mortuary feature relocation surveys, Phase III treatment plans and investigations, and archaeological monitoring for projects on public land.

### TRANSPORTATION IMPROVEMENTS

Ms. Reece has led cultural resources planning efforts and fieldwork for numerous transportation improvement projects which require compliance with state or federal historic preservation laws. These projects have included improvements to railways, road construction and expansion, highway erosion and floodwater mitigation studies, as well as cultural resources oversight of soil borrow project areas. She has conducted research and prepared reports on the historic significance of structures such as bridges and culverts and how to mitigate their loss of historic integrity during repairs or replacements.

### OSTEOARCHAEOLOGICAL PROJECT EXPERIENCE

#### COMPLEX AND COMMINGLED CONTEXTS

From the start of her archaeological training, Ms. Reece has worked with comingled human and animal skeletal remains from complex archaeological contexts. She has undertaken projects that involve sorting and identification of comingled skeletal remains from archaeological sites from the United States and around the world, including work with assemblages from Algeria, the Caucasus Mountains, Ireland, Spain, Turkey, and the United Kingdom. Her experience with human and non-human skeletal materials has proven invaluable in the analysis and proper identification of osseous material in both field and laboratory settings, particularly when fragmentary remains are involved.

### MORTUARY FEATURE IDENTIFICATION

As a Principal Investigator, Ms. Reece has been responsible for the identification and investigation of potential burial features encountered during cultural resources surveys. Her experience includes identification and non-intrusive investigation of burial mound sites, determining likely burial mound locations based on historical and ethnographic documentation, and minimally invasive excavation of unconfirmed mortuary features. Ms. Reece has also conducted historic research and pedestrian surveys to identify the boundaries of historic cemeteries to ensure that proposed projects do not encroach on any unmarked burials that may be present.

### SKELETAL ANALYSIS

In her work, Ms. Reece has used modern techniques to identify important biological information from human skeletal remains, including age, sex, height, and ancestry indicators. Her work has also included documentation and identification of both pathological conditions and traumatic injuries. Ms. Reece has conducted skeletal analysis with complete, partial, and fragmentary osseous material, as well as cremated remains (“cremains”). Her experience with analysis of animal remains includes identification of species, sex, age, body size estimations, pathological conditions, and traumatic injuries. Ms. Reece is also experienced in the identification of taphonomic changes in bone caused by human and animal activity as well as natural weathering processes

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*

## ADDITIONAL SITE INFORMATION

Terracon understands that Ambassador Towers LLC is proposing to collocate antennas on an existing telecommunications tower under the following specifications:

Site Name:	Hesston
Terracon Project Number:	J8237078
Address:	1,900 ft SE of 12951 Raystown Road
City, County, State:	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 25' 40.37" N / 78° 6' 35.27" W
Tower Height:	305 feet, including attachments
Tower Type:	Existing Guyed tower
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

The proposed project will take place within an existing telecommunications installation which contains a guyed tower, support equipment, and buried and overhead connection to utilities. The existing compound is contained within a chain link fence and is accessible via a gravel driveway. The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The surrounding properties are primarily farmland with scattered residences.





**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED  
BROADBAND PROJECT NOTIFICATION INFORMATION**

Date: 08/18/2023

UPWARD BROADBAND  
KATHY EISELE  
1401 CONSTITUTION AVE.  
WASHINGTON, DC 20230

Dear Applicant:

The National Telecommunications and Information Administration (NTIA) is using a modified version of the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) as a means of expediting its Broadband grant programs. This notice is to inform you that the following authorized parties were sent information about the application that you submitted to NTIA through TCNS. The information was forwarded to authorized TCNS users by electronic mail and/or regular mail (letter).

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) who have set their geographic preferences on TCNS. 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. Consistent with the FCC's rules as set forth in the NPA, NTIA requires that all Tribal Nations and NHOs listed below are afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below.

We note that the review period for all parties begins upon receipt of a full project submittal and notifications that do not provide this serve as information only. 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. 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 NTIA. NTIA will follow procedures consistent with those set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO - Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) - Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 434) - electronic mail

Details: Please note we have updated procedures. Please email us at Omahatribefcctns@outlook.com

2. TCNS Coordinator - Tiffany Martinez - Delaware Nation - 31064 State Highway 281 (PO Box: 825) - Anadarko, OK - tmartinez@delawarenation-nsn.gov; epaden@delawarenation-nsn.gov - 405-247-2448 (ext: 1403) - electronic mail  
Details: The Delaware Nation of Oklahoma Historic Preservation Office has developed the following consultation procedures for all TCNS projects identified as undertakings by the Federal Communications Commission. In the email subject line, please specify whether the project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. Cultural Preservation Director - Carol Butler - Absentee-Shawnee Tribe of Indians of Oklahoma - 2025 S. Gordon Cooper Drive - Shawnee, OK - fccasttens@gmail.com - 405-275-4030 (ext: 6312) - electronic mail

4. TCNS Rep - Bryan Printup - Tuscarora Nation - 5226 Walmore Rd - Via: Lewiston, NY - bprintup@hetf.org - 716-264-6011 (ext: 103) - electronic mail

If the applicant/tower builder receives no response from the Tuscarora Nation within 30 days after notification through TCNS, the Tuscarora Nation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. THPO - Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) - Odanah, WI - thpo@badriver-nsn.gov; deputyTHPO@badriver-nsn.gov - 715-682-7123 - electronic mail

If the applicant/tower builder receives no response from the Bad River Band of Lake Superior Tribe of Chippewa Indians within 30 days after notification through TCNS, the Bad River Band of Lake Superior Tribe of Chippewa Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Bad River Band of Lake Superior Tribe of Chippewa 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.

6. THPO - Marvin DeFoe - Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin - 88455 Pike Road, HWY 13 - Bayfield, WI - Marvin.DeFoe@redcliff-nsn.gov; Edwina.Buffalo-Reyes@redcliff-nsn.gov - 715-779-3700 (ext: 4242) - electronic mail

Details: Boozhoo, we do not have the Red Cliff Portal site online anymore and apologize for the inconvenience.

If you have a project that has already been paid for or would like to voluntarily pay for, please email documents for project review to THPO@redcliff-nsn.gov. This address is only to be used by Consultants who are voluntarily paying for projects.

If you have any questions, please contact Marvin Defoe, THPO Manager at (715) 779-3700 Ext. 4244 or Edwina Buffalo-Reyes, THPO Assistant at (715) 779-3700Ext. 4243.

7. THPO - William Tarrant - Seneca-Cayuga Nation - 23701 S 655 Road (PO Box: 453220) - Grove, OK - wtarrant@sctribe.com - 918-787-5452 (ext: 344) - regular mail

Details: Please refrain from sending review information via email. We request all information to be sent via mail to PO Box 453220, Grove, OK 74345.

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

Details: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened.

Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe  
Attn: CellTower 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](mailto:celltower@estoo.net) requesting our most current copy.

9. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org) - 918-678-6344 - electronic mail  
Details: Please refrain from sending information via mail. We ONLY accept information via email to: [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org). We will advise if we require additional information.

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

Thank you for the opportunity to comment.

11. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - [Taivonjoi17@gmail.com](mailto:Taivonjoi17@gmail.com); [precisionarchaeology@gmail.com](mailto:precisionarchaeology@gmail.com) - 406-395-5215 - electronic mail and regular mail  
Details: The Chippewa Cree Tribe of the Rocky Boy's Reservation no longer uses IResponse. Please email all review material to [taivonjoi17@gmail.com](mailto:taivonjoi17@gmail.com) and [rep32jwb@gmail.com](mailto:rep32jwb@gmail.com) and mail the packet to 96 Clinic Rd. North, Box Elder Montana 59521. If the qualified and professional reviewers determine that additional information is required, or that field work is required, they will contact you through email and through TCNS. If the Tribe determines that the proposed project will have an effect on historic properties and/or Tribal religious and cultural sites or properties, we will provide notice to the project proponent and to the FCC.

12. THPO - Sarah Thompson - Lac du Flambeau Band of Lake Superior Chippewa Indians - Tribal Historic Preservation Office (PO Box: 67) - Lac du Flambeau, WI - [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com) - 715-588-2139 - electronic mail  
Details: Effective Immediately:

Please send all submissions through email until further notice. Effective 3/23/2020

Please email all submissions to [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com)

Thank you

13. Deputy THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - East Stroudsburg, PA - sbachor@delawaretribe.org; lheady@delawaretribe.org - 610-761-7452 - electronic mail  
Details: The Delaware Tribe of Indians areas of interest include our aboriginal territories (circa 1600), known locations of historic Delaware settlements, routes of removal and forced migration, and all lands of Delaware aboriginal title ceded by treaty to the United States. If you are receiving this notification, then your project falls within these areas of interest and we ask that you provide us with a cover letter describing the project and its location (including the project coordinates) as well as a topographic map showing the project location. If an archaeological survey has already been performed in preparation for the project, please send a copy of that as well. Additionally, we may request a biological assessment of culturally significant treaty resources which may be affected by the proposed undertaking.

We are only interested in consulting on projects that involve ground disturbance that is planned to take place in both undisturbed and previously disturbed contexts. We are not interested in consulting on collocations or projects that involve no ground disturbance. If your project does involve ground disturbance or you do not receive a response from us within 30 days of submitting the above project information, then we have no comments on the project. However, if any archaeological resources or human remains are disturbed at any point in the project planning or construction, we ask that the project be halted until we can be notified of the inadvertent discovery and can determine the most appropriate course of action. If your company would like a formal written response from the Delaware Tribe concerning the potential impact of your project to culturally and religiously significant sites, please contact Susan Bachor at sbachor@delawaretribe.org to request such a response.

In order to better facilitate consultation throughout our areas of interest we have three regional tribal historic preservation offices. While our Tribal Headquarters remains in Oklahoma, our Eastern Office in Pennsylvania is the point of contact for all consultation within our Eastern Region which includes the states of Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland and Virginia. If your project exists in any of these states, please contact Susan Bachor with the above project information at the following e-mail address. All offices prefer digital submissions and the project information can be submitted by e-mail.

Susan Bachor, Acting Director of Historic Preservation  
Eastern Office  
126 University Circle  
Stroud Hall, Rm. 437  
East Stroudsburg PA 18301  
(610) 761-7452  
sbachor@delawaretribe.org

Our Midwestern office is the point of contact for all consultation within our Midwestern region which includes the states of West Virginia, Ohio, Indiana, Michigan and Illinois. If your project exists in any of these states, please contact Larry Heady with the above project information at the following e-mail address. Our Midwestern office prefers to receive digital submissions and the project information can be submitted by e-mail.

Larry Heady, THPO  
Midwestern Office  
125 Dorry Lane, Grants Pass, OR 97527  
lheady@delawaretribe.org  
(262) 825-7586

We, at the Delaware Tribe Historic Preservation Office, along with our Chief and Tribal Council remain committed to protecting the cultural and physical integrity of our historic sites, traditional cultural properties, sacred sites, objects of cultural patrimony, and most importantly, the remains of our Ancestors. We look forward to working with you on our shared interests in preserving and protecting Delaware heritage within our areas of interest.

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States.

The information you provided was also forwarded to the following SHPOs in the state in which you propose to construct and neighboring states. The information was provided to these SHPOs as a courtesy for their information and planning.

14. - Amanda Terrell - Ohio History Connection - 800 E. 17th Avenue - Columbus, OH - aterrell@ohiohistory.org - 614-298-2000 - electronic mail

15. Historic Preservation Supervisor - Barbara Frederick - Pennsylvania State Historic Preservation Office - Pennsylvania Historical & Museum Commission 400 North St, 2nd Floor - Harrisburg, PA - bafrederic@pa.gov - 717-772-4519 - electronic mail

16. Deputy SHPO - Susan Pierce - West Virginia Division of Culture & History, Historic Preservation Office - 1901 Kanawha Boulevard East - Charleston, WV - susan.pierce@wvculture.org - - electronic mail

17. SHPO - Barbara Franco - Pennsylvania Historical and Museum Commission - 300 North Street - Harrisburg, PA - bcutler@state.pa.us - 717-787-2891 - 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. 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 NTIA cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed project was forwarded to the person(s) listed above.

Notification Received: 08/15/2023

Notification ID: 270639

Project Number: 55

Applicant: Upward Broadband

Applicant Contact: Kathy Eisele

Project Type(s): Multiple Project Components

Region(s) affected (State, County): PENNSYLVANIA, HUNTINGDON PENNSYLVANIA, MIFFLIN

Address or Geographical Location Description: New Tower Construction (1 site) and Existing Tower Collocation (2 site)

Project Name: NTIA / Upward Broadband Section 7

Huntingdon and Mifflin Counties, Pennsylvania

(See Project Descriptions and Maps for specific details)

If you have any questions or comments regarding the content of this notice, please contact NTIA at: [TCNS@ntia.gov](mailto:TCNS@ntia.gov).



844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Penn Township  
 12281 Red Stone Ridge Road  
 Hesston, Pennsylvania 16647  
 ATTN: Jim Weikert  
 Phone: 814-386-2880

RE: Invitation to Comment as a Consulting Party on a Proposed Collocation

Site Name:	Hesston
Terracon Project Number:	J8237078
Address:	1,900 ft SE of 12951 Raystown Road
City, County, State:	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 25' 40.37" N / 78° 6' 35.27" W
Tower Height:	305 feet, including attachments
Tower Type:	Existing Guyed tower
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

To Whom it May Concern:

In accordance with Section 106 of the National Historic Preservation Act (Section 106), the above-referenced proposed broadband deployment project is being evaluated for its potential effects to tribal resources, archaeological sites, or historic resources. If approved, funding for the above-referenced broadband deployment projects will be, in part, provided through a grant from the U.S. Department of Commerce, National Telecommunications & Information Administration (NTIA). As such, the proposed project is a federal undertaking subject to consultation under Section 106.

Terracon is writing to invite your comment on the effect of the above-referenced project on historic resources within the project's Area of Potential Effects (APE).

Field assessment for both historic properties and archaeological sites will be conducted, and a determination will be made of the project's direct and indirect effects on eligible properties. Consulting parties are invited to provide information concerning historic or archaeological properties already listed in the National Register or that could be eligible for listing in the National Register. We welcome your comments regarding the effect of the tower on historic resources that may be listed in or eligible for the National Register of Historic Places.

If you would like to comment, please respond to this letter within 30 days of its receipt. Thank you for your response on this matter. If you have any questions, please do not hesitate to call. If you wish to respond by email, I may be reached at [kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com) and (856) 813-3267.

Sincerely,  
 Terracon Consultants, Inc.

Kathryn A. Eisele  
 Sr. Project Manager

*Attachment: Project Location Map with APE*

**Explore with us**





844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Huntingdon County Historical Society  
 106 Fourth Street  
 PO Box 305  
 Huntingdon, PA  
 ATTN: Margaret Skrivseth, Executive Director  
 Phone 814-643-5449 / Email: [hchsmail@gmail.com](mailto:hchsmail@gmail.com)

RE: Invitation to Comment as a Consulting Party on a Proposed Collocation

Site Name:	Hesston
Terracon Project Number:	J8237078
Address:	1,900 ft SE of 12951 Raystown Road
City, County, State:	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 25' 40.37" N / 78° 6' 35.27" W
Tower Height:	305 feet, including attachments
Tower Type:	Existing Guyed tower
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

To Whom it May Concern:

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If you would like to comment, please respond to this letter within 30 days of its receipt. Thank you for your response on this matter. If you have any questions, please do not hesitate to call. If you wish to respond by email, I may be reached at [kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com) and (856) 813-3267.

Sincerely,  
 Terracon Consultants, Inc.  
 Kathryn A. Eisele  
 Sr. Project Manager

Attachment: *Project Location Map with APE*

**Explore with us**

# Proof of Publication of Legal Notice

In Accordance with the Provisions of "Newspaper Advertising Act" approved May 16, 1929, P.L. 1784, as amended

## Proof of Publication

.....  
vs.  
.....

State of Pennsylvania  
County of Huntingdon

SS:

Copy of Notice or Advertisement

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located 21204 Laurel Mountain Rd, Cromwell Twp (Three Springs), Huntingdon Co., PA 17264 (40° 14' 7.08"N / 77° 58' 20.20" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located near 7876 Chilcote Hollow Rd, Logan Twp (Petersburg), Huntingdon Co., PA 16669 (40° 35' 10.89" N / 78° 00' 43.88" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to collocate antennas on an existing 255-ft Self-Support Telecommunications Tower located at 5299 Saulsburg Loop Rd, Barree Twp (Huntingdon), Huntingdon Co., PA 16652 (40° 37' 47.69" N / 77° 54' 24.08" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located near 7387 Gibbs Lane, Union Twp (Huntingdon), Huntingdon County, PA 16652 (40° 23' 21.37" N, 78° 1' 26.32" W ). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to collocate antennas on an existing 325-ft Guyed Telecommunications Tower located 1,900 ft SE of 12951 Raystown Rd, Penn Twp (Huntingdon), Huntingdon County, PA 16652(40° 25' 40.37" N / 78° 6' 35.27" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

BETSY CLINGER HIKES, being duly sworn according to law, deposes that she is ADMINISTRATIVE ASSISTANT of The Daily News, a newspaper of general circulation in Huntingdon County, Published at Huntingdon, Pennsylvania, daily established in 1922 and that the legal notice attached hereto and made part hereof was published in said Newspaper August 26, 2023 ;

that the affiant is not interested in any manner in the subject matter of said notice or advertisement, and that all of the allegations contained herein as to

*Betsy Clinger Hikes*

the time, place and character of the said publication are true and correct.

Sworn to and subscribed before me this 31st

day of August A.D. 2023

My Commission expires

*Sarah Share*  
Prothonotary

Huntingdon County, Pennsylvania

My Commission Expires First Monday 2026

*Sarah Share*

## Statement of Advertising Costs

to Terracon - 5 Public Notices for Ambassador Towers, LLC.

OR August 26 2023 \$142.60

publishing Notice or Advertisement attached hereto on above dates \$ 5.25

Probating same PROOF OF PUBLICATION Total \$147.85

## Publisher's Receipt for Advertising Costs

The Daily News, by the publisher or authorized representative whose signature follows, hereby acknowledges receipt of the aforesaid advertising and probation costs and certifies that the same have been fully paid.

THE DAILY NEWS

By .....

## AREAS OF POTENTIAL EFFECTS

Site Name:	Hesston
Terracon Project Number:	J8237078
Address:	1,900 ft SE of 12951 Raystown Road
City, County, State:	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 25' 40.37" N / 78° 6' 35.27" W
Tower Height:	305 feet, including attachments
Tower Type:	Existing Guyed tower
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

### A. Direct Effects

The direct APE was determined to be the existing approximate 10,000 square-foot tower compound.

### B. Visual Effects

The proposed tower will be approximately 305 feet in overall height. The APE for visual effects is therefore considered to be a 0.75-mile radius, per the 2004 Programmatic Agreement (Section VI.4.a), which defines the visual APE as a 0.75-mile radius for towers between 200 and 399 feet in height (unless otherwise determined through consultation between the applicant and the local SHPO office).

# Prior Disturbance Assessment

**Hesston  
Near 12951 Raystown Road  
Huntingdon, Penn Township  
Huntingdon County  
Pennsylvania 16652**

Terracon Project No. J8237078  
September 2023



**Prepared for:**

Ambassador Towers LLC

**Prepared by:**

Terracon Consultants, Inc.  
844 N. Lenola Road, Suite 1  
Moorestown, NJ 08057



September 23, 2023

PA State Historic Preservation Office  
400 North Street, Second Floor  
Harrisburg PA 17120  
ATTN: Justin McKeel, Environmental Review Archaeologist  
P: (717) 783-9900 / E: jusmckeel@pa.gov

Re: Prior Disturbance Assessment  
Site Name: Hesston  
Terracon Project No. J8237078

Dear Mr. McKeel,

Terracon Consultants, Inc. (Terracon) completed a prior disturbance assessment for a proposed collocation on an existing communications tower. The proposed project involves the placement of antennas on an existing tower and installations of associated support equipment within the existing tower compound. The proposed project is being done by Upward Broadband LLC., with funding partially provided by a grant from the National Telecommunications and Information Administration (NTIA). The proposed project is being conducted with the following specifications:

Site Name:	Hesston
Terracon Project Number:	J8237078
Address:	1,900 ft SE of 12951 Raystown Road
City, County, State:	Penn Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 25' 40.37" N / 78° 6' 35.27" W
Tower Height:	305 feet (overall height), including attachments
Tower Type:	Existing Guyed tower
Project Description:	Collocation of antennas on existing tower and installation of associated equipment within existing tower compound.

The lead federal agency for this project is the NTIA. The NTIA defers to the Federal Communications Commission's (FCC) 2004 Nationwide Programmatic Agreement (NPA) (FCC 2004) for guidance and compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. According to the NPA, the Applicant need not undertake a Field Survey for archaeological resources where the depth of previous disturbance exceeds the proposed construction depth or geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area. Based on the nature of the proposed undertaking (an antenna collocation on a previously constructed tower) this letter provides an evaluation from a Secretary of Interior (SOI)-qualified archaeologist regarding the applicability of a field survey for the proposed tower collocation.

## **Project Description**

The project is located to the east of Raystown Road, near Huntingdon, Penn Township, Huntingdon County, Pennsylvania. The proposed project will take place within an existing communications compound, which contains a lattice tower, associated support equipment, and utilities. The existing compound is contained within a chain link fence, and is accessible via a gravel driveway and two-track road. The area surrounding the existing tower is primarily woodland. The proposed project involves the installation of antennas on the existing tower and placement of associated equipment within the tower compound. The project area is depicted on the attached aerial photograph and 7.5-minute United States Geological Survey (USGS) topographic quadrangle.

## **Records Review**

Terracon conducted a search of the Pennsylvania State Historic and Archaeological Resource Exchange (PA-SHARE) online database, maintained by the Pennsylvania State Historic Preservation Office (SHPO) for information on previously recorded historic properties within the project area and within 0.75-mile of the project area. This search radius was determined by the overall height of the existing tower and the guidance on determining the visual area of effects (APE) within the NPA. This search resulted in no historic properties have previously been recorded within the existing tower compound, or within 0.75-mile of the compound.

Background research included an examination of historic photographs of the project area, ranging in date from 1962 to the present. This examination found the area around the project area was undeveloped woodland up until 1981. In the 1981 photograph, the two-track access road can be seen. By the 2003 aerial photograph, the existing tower compound has been constructed, and no additional development activities are depicted in subsequent photographs. Historic topographic maps dating from 1901 to 2023 were also examined. No structures or other development are depicted within the project area on the reviewed topographic maps.

## **Recommendations**

Due to prior ground disturbing activities within the project site, and the small footprint of the proposed collocation, there is a low probability that archaeological materials would be encountered or be found in an undisturbed context. Therefore, no further archaeological investigations are recommended for the proposed project at this time.

Should buried artifacts, human remains, or cultural deposits be encountered during ground disturbing activities, it is Terracon's recommendation that construction immediately halt, and the resources should be examined by a professional archaeologist. Appropriate authorities, including the appropriate tribal entities and SHPO, should be notified.



## **Closing**

We appreciate the opportunity to provide you with this report. If you have any questions or comments, please contact Kathy Eisele at (856) 813-3276 or at [Kathy.Eisele@terracon.com](mailto:Kathy.Eisele@terracon.com).

Sincerely,  
Terracon Consultants, Inc.

Suzanne Reece, MSc, RPA  
Principal Investigator Archaeologist

Marilyn Zenko  
Senior Archaeologist

*Attachments:*  
Project Maps

## Prior Disturbance Assessment

Hesston ■ Huntingdon, PA

September 2023 ■ Terracon Project No. J8237078



## References

Federal Communications Commission (FCC)

2004 Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission. Available online: <http://wireless.fcc.gov/siting/npa/FCC-04-222A3.pdf>.

Historic Aerials

2023 *Historic Aerial Photograph Database*. Website at <http://www.historicaerials.com/>.

Pennsylvania State Historic Preservation Office (PA SHPO), publisher

2023 *PA-SHARE database*. Website at [share.phmc.pa.gov/pashare](http://share.phmc.pa.gov/pashare).

United States Geological Survey (USGS)

2023 *Huntingdon, Pennsylvania [map]. 1:24,000 7.5-minute series topographic quadrangle*. U.S. Department of the Interior, U.S. Geological Survey, Washington, D.C. Electronic map available from <https://store.usgs.gov/map-locator>.

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*



September 29, 2023

*Sent Via PA-SHARE*

RE: ER Project # 1999PR15811.002, HESSTON PROPERTY, Federal Communications Commission, Penn Township, Huntingdon County

Dear Submitter,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

**Above Ground Resources**

*No Above Ground Concerns - Environmental Review - FCC - No Effect - Modification of Existing Telecommunications Collocation*

Based on the information received and available within our files, in our opinion, the proposed project, which includes modification of an existing telecommunications collocation, will have No Effect on above ground historic properties. If project plans should change and/or you should be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning above ground resources, please contact John Gardosik at [jgardosik@pa.gov](mailto:jgardosik@pa.gov).

**Archaeological Resources**

*No Archaeological Concerns - Environmental Review - No Effect - Archaeological - No Ground Disturbance*

Based on the information received and available within our files, the proposed project will have No Effect on archaeological resources. If project plans should change to include ground-disturbing activities and/or you should be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning archaeological resources, please contact John Gardosik at [jgardosik@pa.gov](mailto:jgardosik@pa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Emma Diehl". The signature is fluid and cursive, with a long horizontal stroke at the end.

Emma Diehl

Environmental Review Division Manager



*Gibbs Lane New Tower  
Section 106 Compliance  
Documentation*

New Tower ("NT") Submission Packet

Notification Date:

See instructions for

File Number:

public burden estimates

General Information

1) (Select only one) ( <b>NE</b> ) <b>NE</b> – New <b>UA</b> – Update of Application <b>WD</b> – 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): <b>0033898511</b>
4) Name: <b>Ambassador Towers LLC</b>

Contact Name

5) First Name: <b>Ben</b>	6) MI:	7) Last Name: <b>Momose</b>	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: <b>3105 Lincoln Highway East</b>	
12) City: <b>Paradise</b>		13) State: <b>PA</b>	14) Zip Code: <b>17562</b>
15) Telephone Number: <b>(210)448-2623</b>		16) Fax Number:	
17) E-mail Address: <b>bmomose@upwardbroadband.com</b>			

Consultant Information

18) FCC Registration Number (FRN): <b>0028057495</b>
19) Name: <b>Terracon Consultants</b>

Principal Investigator

20) First Name: <b>Suzanne</b>	21) MI:	22) Last Name: <b>Reece</b>	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: <b>844 N. Lenola Road</b>	
27) City: <b>Moorestown</b>		28) State: <b>NJ</b>	29) Zip Code: <b>08057</b>
30) Telephone Number: <b>(856)813-3267</b>		31) Fax Number:	
32) E-mail Address: <b>Kathy.Eisele@Terracon.com</b>			

**Professional Qualification**

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

**Additional Staff**

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

If "YES," complete the following:

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

**Site Information**

**Tower Construction Notification System**

1) TCNS Notification Number: **NTIA TCNS No. 270639**

**Site Information**

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

3) Site Name: **Gibbs Lane**

4) Site Address: **7387 Gibbs Lane**

5) Detailed Description of Project:  
**Construction of self-support telecommunications tower**

6) City: **Union Township**

7) State: **PA**

8) Zip Code: **16652**

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

10) Nearest Crossroads: **NW of Gibbs Lane and Longhorn Road**

11) **NAD 83** Latitude (DD-MM-SS.S): **40-23-21.3** ( **X** ) N or ( ) S

12) **NAD 83** Longitude (DD-MM-SS.S): **078-01-26.3** ( ) E or ( **X** ) W

**Tower Information**

13) Tower height above ground level (include top-mounted attachments such as lightning rods): 199.0 ( **X** ) Feet ( ) Meters

14) Tower Type (Select One):

- ( ) Guyed lattice tower
- ( **X** ) Self-supporting lattice
- ( ) Monopole
- ( ) Other (Describe):

**Project Status**

15) Current Project Status (Select One):

- ( **X** ) Construction has not yet commenced
  - ( ) Construction has commenced, but is not completed      Construction commenced on: \_\_\_\_\_
  - ( ) Construction has been completed      Construction commenced on: \_\_\_\_\_
- Construction completed on: \_\_\_\_\_

**Determination of Effect**

14) Direct Effects (Select One):

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

15) Visual Effects (Select One):

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

### Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	( <input checked="" type="checkbox"/> ) <u>Y</u> es (    ) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: _____ Number of Tribes/NHOs: <u>0</u>	
2b) Tribes/NHOs contacted through an alternate system: <b>NTIA TCNS No. 270639</b> Number of Tribes/NHOs: <u>13</u>	

#### Tribe/NHO Contacted Through TCNS

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

#### Contact Name

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

#### Dates & Response

10) Date Contacted _____	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:	<b>And /Or</b>	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:  <input type="checkbox"/> E-mail  <input type="checkbox"/> Letter  <input type="checkbox"/> Both				

### Dates & Response

17) Date Contacted _____	18) Date Replied _____
<input type="checkbox"/> No Reply  <input type="checkbox"/> Replied/No Interest  <input type="checkbox"/> Replied/Have Interest  <input type="checkbox"/> Replied/Other	

## Historic Properties

### Properties Identified

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

### Historic Property

4) Property Name:
5) SHPO Site Number:

### Property Address

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

### Status & Eligibility

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

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

## Local Government Involvement

### Local Government Agency

1) FCC Registration Number (FRN):

2) Name: **Union Township**

### Contact Name

3) First Name: **N/A**

4) MI:

5) Last Name: **N/A**

6) Suffix:

7) Title:

### Contact Information

8) P.O. Box:

And  
/Or

9) Street Address: **14129 Trough Creek Valley Pike**

10) City: **Huntingdon**

11) State: **PA**

12) Zip Code: **16652**

13) Telephone Number: **(814)641-7447**

14) Fax Number:

15) E-mail Address: **uniontownship16652@gmail.com**

16) Preferred means of communication:

(  ) E-mail

(  ) Letter

(  ) Both

### Dates & Response

17) Date Contacted **08/23/2023**

18) Date Replied \_\_\_\_\_

(  ) 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?	( <input checked="" type="checkbox"/> ) Yes ( <input type="checkbox"/> ) No
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#### Consulting Party

2) FCC Registration Number (FRN):
3) Name: <b>Huntingdon County Historical Society</b>

#### Contact Name

4) First Name: <b>Margaret</b>	5) MI:	6) Last Name: <b>Skrivseth</b>	7) Suffix:
8) Title:			

#### Contact Information

9) P.O. Box: <b>PO Box 305</b>	And /Or	10) Street Address: <b>106 Fourth Street</b>
11) City: <b>Huntingdon</b>	12) State: <b>PA</b>	13) Zip Code: <b>16652</b>
14) Telephone Number: <b>(814)643-5449</b>	15) Fax Number:	
16) E-mail Address: <b>hchsmail@gmail.com</b>		
17) Preferred means of communication: ( <input checked="" type="checkbox"/> ) E-mail ( <input type="checkbox"/> ) Letter ( <input type="checkbox"/> ) Both		

#### Dates & Response

18) Date Contacted <b>08/23/2023</b>	19) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply	
( <input type="checkbox"/> ) Replied/No Interest	
( <input type="checkbox"/> ) Replied/Have Interest	
( <input type="checkbox"/> ) Replied/Other	

#### Additional Information

20) Information on other consulting parties' role or interest (optional):
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## 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: Pennsylvania State Historic Preservation Office

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:	MI:	Last Name:	Suffix:
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Signature: _____	Date: _____
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**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



# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

### PROFESSIONAL EXPERIENCE

Ms. Reece is an Archaeologist and Principal Investigator in our Minnesota office. Ms. Reece has worked as an archaeological Principal Investigator throughout the upper Midwest. She has planned, managed, and conducted numerous cultural resources surveys for both public and private clients ranging from individual landowners to federal agencies. Ms. Reece has expertise in the areas of historical research, pedestrian and subsurface archaeological investigations, human and animal skeletal analysis, artifact identification and curation, as well as mitigation of disturbances to archaeological sites. She also has extensive experience in evaluation of historic structures and archaeological sites for National Register of Historic Places (NRHP) eligibility.

### PROPERTY DEVELOPMENT

Ms. Reece has done extensive work with both private and public sector clients assessing proposed site locations for cultural resources. Her work has helped clients avoid costly delays by identifying archaeological sites and historic properties prior to land purchases and the start of construction. She has conducted literature searches (desktop reviews), intensive Phase I and Phase II surveys, and archaeological monitoring of construction activities in support of site selection and property development projects. Some of the property development and site selection projects Ms. Reece has worked on include: residential developments, municipal and state land purchases, industrial park development, and wetland mitigation banks.

### INFRASTRUCTURE DEVELOPMENT

Ms. Reece has planned and conducted numerous cultural resources surveys related to the repair, replacement, and creation of modern infrastructure. She has conducted literature searches (desktop reviews) for utility installations within road rights-of-way, as well as intensive Phase II surveys and Phase III treatment plans for waterline, sewer line, telecommunication, and flood mitigation projects. While conducting these surveys, Ms. Reece has also gained experience in identifying and documenting historic structures and historic districts.

### MUNICIPAL, STATE, AND FEDERAL PROPERTY

Ms. Reece has conducted many cultural resources studies on public lands owned by a government entity. In conducting these projects, she has played a role in obtaining the necessary state and federal archaeological permits, overseen compliance with permit stipulations, and conducted and documented the resulting fieldwork. She has conducted archival research,



### EDUCATION

Master of Science,  
Osteoarchaeology, University of  
Edinburgh, 2013.

Bachelor of Arts, Anthropology,  
University of Minnesota, 2011.

### AFFILIATIONS

American Association of Biological  
Anthropologists (AABA)

International Council for  
Archaeozoology (ICAZ)

Register of Professional  
Archaeologists (RPA)

### WORK HISTORY

Terracon Consultants, Inc., St. Paul,  
Minnesota. Principal Investigator,  
2018-Present.

Kogel Archaeological Consulting  
Services, Sioux Falls, South Dakota.  
Principal Investigator, 2013-2018.

University of Edinburgh, Edinburgh,  
Scotland. Osteoarchaeologist, 2013.

University of Minnesota,  
Minneapolis, Minnesota. Laboratory  
Intern, 2010; Excavator, 2008.

# Suzanne Reece, MSC, RPA

## PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

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Phase I reconnaissance surveys and intensive Phase II surveys, mortuary feature relocation surveys, Phase III treatment plans and investigations, and archaeological monitoring for projects on public land.

### TRANSPORTATION IMPROVEMENTS

Ms. Reece has led cultural resources planning efforts and fieldwork for numerous transportation improvement projects which require compliance with state or federal historic preservation laws. These projects have included improvements to railways, road construction and expansion, highway erosion and floodwater mitigation studies, as well as cultural resources oversight of soil borrow project areas. She has conducted research and prepared reports on the historic significance of structures such as bridges and culverts and how to mitigate their loss of historic integrity during repairs or replacements.

### OSTEOARCHAEOLOGICAL PROJECT EXPERIENCE

#### COMPLEX AND COMMINGLED CONTEXTS

From the start of her archaeological training, Ms. Reece has worked with comingled human and animal skeletal remains from complex archaeological contexts. She has undertaken projects that involve sorting and identification of comingled skeletal remains from archaeological sites from the United States and around the world, including work with assemblages from Algeria, the Caucasus Mountains, Ireland, Spain, Turkey, and the United Kingdom. Her experience with human and non-human skeletal materials has proven invaluable in the analysis and proper identification of osseous material in both field and laboratory settings, particularly when fragmentary remains are involved.

### MORTUARY FEATURE IDENTIFICATION

As a Principal Investigator, Ms. Reece has been responsible for the identification and investigation of potential burial features encountered during cultural resources surveys. Her experience includes identification and non-intrusive investigation of burial mound sites, determining likely burial mound locations based on historical and ethnographic documentation, and minimally invasive excavation of unconfirmed mortuary features. Ms. Reece has also conducted historic research and pedestrian surveys to identify the boundaries of historic cemeteries to ensure that proposed projects do not encroach on any unmarked burials that may be present.

### SKELETAL ANALYSIS

In her work, Ms. Reece has used modern techniques to identify important biological information from human skeletal remains, including age, sex, height, and ancestry indicators. Her work has also included documentation and identification of both pathological conditions and traumatic injuries. Ms. Reece has conducted skeletal analysis with complete, partial, and fragmentary osseous material, as well as cremated remains (“cremains”). Her experience with analysis of animal remains includes identification of species, sex, age, body size estimations, pathological conditions, and traumatic injuries. Ms. Reece is also experienced in the identification of taphonomic changes in bone caused by human and animal activity as well as natural weathering processes

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*

## ADDITIONAL SITE INFORMATION

Terracon understands that Ambassador Towers LLC is proposing to build a telecommunications tower with associated antennas and equipment enclosures under the following specifications:

Site Name:	Gibbs Lane
Terracon Project Number:	J8237078
Address:	7387 Gibbs Lane
City, County, State:	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 23' 21.37" N / 78° 1' 26.32" W
Proposed Lease Area:	10,000 square feet
Proposed Tower Height:	199 feet, including attachments
Tower Type:	Self-support

The project consists of an approximate 10,000 square-foot tower compound and associated access/utility easement. The proposed self-support tower will be 199 feet in overall height. The project site and surrounding properties are undeveloped, wooded land.



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED  
BROADBAND PROJECT NOTIFICATION INFORMATION**

Date: 08/18/2023

UPWARD BROADBAND  
KATHY EISELE  
1401 CONSTITUTION AVE.  
WASHINGTON, DC 20230

Dear Applicant:

The National Telecommunications and Information Administration (NTIA) is using a modified version of the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) as a means of expediting its Broadband grant programs. This notice is to inform you that the following authorized parties were sent information about the application that you submitted to NTIA through TCNS. The information was forwarded to authorized TCNS users by electronic mail and/or regular mail (letter).

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) who have set their geographic preferences on TCNS. 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. Consistent with the FCC's rules as set forth in the NPA, NTIA requires that all Tribal Nations and NHOs listed below are afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below.

We note that the review period for all parties begins upon receipt of a full project submittal and notifications that do not provide this serve as information only. 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. 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 NTIA. NTIA will follow procedures consistent with those set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. THPO - Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) - Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 434) - electronic mail

Details: Please note we have updated procedures. Please email us at Omahatribefcctns@outlook.com

2. TCNS Coordinator - Tiffany Martinez - Delaware Nation - 31064 State Highway 281 (PO Box: 825) - Anadarko, OK - tmartinez@delawarenation-nsn.gov; epaden@delawarenation-nsn.gov - 405-247-2448 (ext: 1403) - electronic mail  
Details: The Delaware Nation of Oklahoma Historic Preservation Office has developed the following consultation procedures for all TCNS projects identified as undertakings by the Federal Communications Commission. In the email subject line, please specify whether the project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. Cultural Preservation Director - Carol Butler - Absentee-Shawnee Tribe of Indians of Oklahoma - 2025 S. Gordon Cooper Drive - Shawnee, OK - fccasttens@gmail.com - 405-275-4030 (ext: 6312) - electronic mail

4. TCNS Rep - Bryan Printup - Tuscarora Nation - 5226 Walmore Rd - Via: Lewiston, NY - bprintup@hetf.org - 716-264-6011 (ext: 103) - electronic mail

If the applicant/tower builder receives no response from the Tuscarora Nation within 30 days after notification through TCNS, the Tuscarora Nation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tuscarora Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. THPO - Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) - Odanah, WI - thpo@badriver-nsn.gov; deputyTHPO@badriver-nsn.gov - 715-682-7123 - electronic mail

If the applicant/tower builder receives no response from the Bad River Band of Lake Superior Tribe of Chippewa Indians within 30 days after notification through TCNS, the Bad River Band of Lake Superior Tribe of Chippewa Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Bad River Band of Lake Superior Tribe of Chippewa 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.

6. THPO - Marvin DeFoe - Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin - 88455 Pike Road, HWY 13 - Bayfield, WI - Marvin.DeFoe@redcliff-nsn.gov; Edwina.Buffalo-Reyes@redcliff-nsn.gov - 715-779-3700 (ext: 4242) - electronic mail

Details: Boozhoo, we do not have the Red Cliff Portal site online anymore and apologize for the inconvenience.

If you have a project that has already been paid for or would like to voluntarily pay for, please email documents for project review to THPO@redcliff-nsn.gov. This address is only to be used by Consultants who are voluntarily paying for projects.

If you have any questions, please contact Marvin Defoe, THPO Manager at (715) 779-3700 Ext. 4244 or Edwina Buffalo-Reyes, THPO Assistant at (715) 779-3700Ext. 4243.

7. THPO - William Tarrant - Seneca-Cayuga Nation - 23701 S 655 Road (PO Box: 453220) - Grove, OK - wtarrant@sctribe.com - 918-787-5452 (ext: 344) - regular mail

Details: Please refrain from sending review information via email. We request all information to be sent via mail to PO Box 453220, Grove, OK 74345.

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

Details: DO NOT EMAIL DOCUMENTATION; it will be deleted without being opened.

Submit one printed color copy by US postal mail or other parcel carrier of all documentation to:

Eastern Shawnee Tribe  
Attn: CellTower 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](mailto:celltower@estoo.net) requesting our most current copy.

9. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org) - 918-678-6344 - electronic mail  
Details: Please refrain from sending information via mail. We ONLY accept information via email to: [sclemons@wyandotte-nation.org](mailto:sclemons@wyandotte-nation.org). We will advise if we require additional information.

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

Thank you for the opportunity to comment.

11. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - [Taivonjoi17@gmail.com](mailto:Taivonjoi17@gmail.com); [precisionarchaeology@gmail.com](mailto:precisionarchaeology@gmail.com) - 406-395-5215 - electronic mail and regular mail  
Details: The Chippewa Cree Tribe of the Rocky Boy's Reservation no longer uses IResponse. Please email all review material to [taivonjoi17@gmail.com](mailto:taivonjoi17@gmail.com) and [rep32jwb@gmail.com](mailto:rep32jwb@gmail.com) and mail the packet to 96 Clinic Rd. North, Box Elder Montana 59521. If the qualified and professional reviewers determine that additional information is required, or that field work is required, they will contact you through email and through TCNS. If the Tribe determines that the proposed project will have an effect on historic properties and/or Tribal religious and cultural sites or properties, we will provide notice to the project proponent and to the FCC.

12. THPO - Sarah Thompson - Lac du Flambeau Band of Lake Superior Chippewa Indians - Tribal Historic Preservation Office (PO Box: 67) - Lac du Flambeau, WI - [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com) - 715-588-2139 - electronic mail  
Details: Effective Immediately:

Please send all submissions through email until further notice. Effective 3/23/2020

Please email all submissions to [ldfthpo@ldftribe.com](mailto:ldfthpo@ldftribe.com)

Thank you

13. Deputy THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - East Stroudsburg, PA - sbachor@delawaretribe.org; lheady@delawaretribe.org - 610-761-7452 - electronic mail  
Details: The Delaware Tribe of Indians areas of interest include our aboriginal territories (circa 1600), known locations of historic Delaware settlements, routes of removal and forced migration, and all lands of Delaware aboriginal title ceded by treaty to the United States. If you are receiving this notification, then your project falls within these areas of interest and we ask that you provide us with a cover letter describing the project and its location (including the project coordinates) as well as a topographic map showing the project location. If an archaeological survey has already been performed in preparation for the project, please send a copy of that as well. Additionally, we may request a biological assessment of culturally significant treaty resources which may be affected by the proposed undertaking.

We are only interested in consulting on projects that involve ground disturbance that is planned to take place in both undisturbed and previously disturbed contexts. We are not interested in consulting on collocations or projects that involve no ground disturbance. If your project does involve ground disturbance or you do not receive a response from us within 30 days of submitting the above project information, then we have no comments on the project. However, if any archaeological resources or human remains are disturbed at any point in the project planning or construction, we ask that the project be halted until we can be notified of the inadvertent discovery and can determine the most appropriate course of action. If your company would like a formal written response from the Delaware Tribe concerning the potential impact of your project to culturally and religiously significant sites, please contact Susan Bachor at sbachor@delawaretribe.org to request such a response.

In order to better facilitate consultation throughout our areas of interest we have three regional tribal historic preservation offices. While our Tribal Headquarters remains in Oklahoma, our Eastern Office in Pennsylvania is the point of contact for all consultation within our Eastern Region which includes the states of Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland and Virginia. If your project exists in any of these states, please contact Susan Bachor with the above project information at the following e-mail address. All offices prefer digital submissions and the project information can be submitted by e-mail.

Susan Bachor, Acting Director of Historic Preservation  
Eastern Office  
126 University Circle  
Stroud Hall, Rm. 437  
East Stroudsburg PA 18301  
(610) 761-7452  
sbachor@delawaretribe.org

Our Midwestern office is the point of contact for all consultation within our Midwestern region which includes the states of West Virginia, Ohio, Indiana, Michigan and Illinois. If your project exists in any of these states, please contact Larry Heady with the above project information at the following e-mail address. Our Midwestern office prefers to receive digital submissions and the project information can be submitted by e-mail.

Larry Heady, THPO  
Midwestern Office  
125 Dorry Lane, Grants Pass, OR 97527  
lheady@delawaretribe.org  
(262) 825-7586

We, at the Delaware Tribe Historic Preservation Office, along with our Chief and Tribal Council remain committed to protecting the cultural and physical integrity of our historic sites, traditional cultural properties, sacred sites, objects of cultural patrimony, and most importantly, the remains of our Ancestors. We look forward to working with you on our shared interests in preserving and protecting Delaware heritage within our areas of interest.

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States.

The information you provided was also forwarded to the following SHPOs in the state in which you propose to construct and neighboring states. The information was provided to these SHPOs as a courtesy for their information and planning.

14. - Amanda Terrell - Ohio History Connection - 800 E. 17th Avenue - Columbus, OH - aterrell@ohiohistory.org - 614-298-2000 - electronic mail

15. Historic Preservation Supervisor - Barbara Frederick - Pennsylvania State Historic Preservation Office - Pennsylvania Historical & Museum Commission 400 North St, 2nd Floor - Harrisburg, PA - bafrederic@pa.gov - 717-772-4519 - electronic mail

16. Deputy SHPO - Susan Pierce - West Virginia Division of Culture & History, Historic Preservation Office - 1901 Kanawha Boulevard East - Charleston, WV - susan.pierce@wvculture.org - - electronic mail

17. SHPO - Barbara Franco - Pennsylvania Historical and Museum Commission - 300 North Street - Harrisburg, PA - bcutler@state.pa.us - 717-787-2891 - 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. 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 NTIA cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed project was forwarded to the person(s) listed above.

Notification Received: 08/15/2023

Notification ID: 270639

Project Number: 55

Applicant: Upward Broadband

Applicant Contact: Kathy Eisele

Project Type(s): Multiple Project Components

Region(s) affected (State, County): PENNSYLVANIA, HUNTINGDON PENNSYLVANIA, MIFFLIN

Address or Geographical Location Description: New Tower Construction (1 site) and Existing Tower Collocation (2 site)

Project Name: NTIA / Upward Broadband Section 7

Huntingdon and Mifflin Counties, Pennsylvania

(See Project Descriptions and Maps for specific details)

If you have any questions or comments regarding the content of this notice, please contact NTIA at: [TCNS@ntia.gov](mailto:TCNS@ntia.gov).



844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Union Township  
 14129 Trough Creek Valley Pike  
 Huntingdon, Pennsylvania 16652  
 Phone: 814-641-7447 / Email: [uniontownship16652@gmail.com](mailto:uniontownship16652@gmail.com)

RE: Invitation to Comment as a Consulting Party on a Proposed Telecommunications Tower

Site Name:	Gibbs Lane
Terracon Project Number:	J8237078
Address:	7387 Gibbs Lane
City, County, State:	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 23' 21.37" N / 78° 1' 26.32" W
Proposed Lease Area:	10,000 square feet
Proposed Tower Height:	199 feet, including attachments
Tower Type:	Self-support

To Whom it May Concern:

In accordance with Section 106 of the National Historic Preservation Act (Section 106), the above-referenced proposed broadband deployment project is being evaluated for its potential effects to tribal resources, archaeological sites, or historic resources. If approved, funding for the above-referenced broadband deployment projects will be, in part, provided through a grant from the U.S. Department of Commerce, National Telecommunications & Information Administration (NTIA). As such, the proposed project is a federal undertaking subject to consultation under Section 106.

Terracon is writing to invite your comment on the effect of the above-referenced project on historic resources within the project's Area of Potential Effects (APE).

Field assessment for both historic properties and archaeological sites will be conducted, and a determination will be made of the project's direct and indirect effects on eligible properties. Consulting parties are invited to provide information concerning historic or archaeological properties already listed in the National Register or that could be eligible for listing in the National Register. We welcome your comments regarding the effect of the tower on historic resources that may be listed in or eligible for the National Register of Historic Places.

If you would like to comment, please respond to this letter within 30 days of its receipt. Thank you for your response on this matter. If you have any questions, please do not hesitate to call. If you wish to respond by email, I may be reached at [kathy.eisele@terracon.com](mailto:kathy.eisele@terracon.com) and (856) 813-3267.

Sincerely,  
 Terracon Consultants, Inc.

Kathryn A. Eisele  
 Sr. Project Manager

*Attachment: Project Location Map with APE*



844 N. Lenola Road, Suite 1  
 Moorestown, NJ 08057  
 P (856) 813-3267  
 F (856) 813-3279  
[Terracon.com](http://Terracon.com)

August 23, 2023

Huntingdon County Historical Society  
 PO Box 305  
 106 Fourth Street  
 Huntingdon, Pennsylvania 16652  
 ATTN: Margaret Skrivseth, Executive Director  
 Phone 814-643-5449 / Email: [hchsmail@gmail.com](mailto:hchsmail@gmail.com)

RE: Invitation to Comment as a Consulting Party on a Proposed Telecommunications Tower

Site Name:	Gibbs Lane
Terracon Project Number:	J8237078
Address:	7387 Gibbs Lane
City, County, State:	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
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Sincerely,  
 Terracon Consultants, Inc.

Kathryn A. Eisele  
 Sr. Project Manager

*Attachment: Project Location Map with APE*

**Explore with us**

# Proof of Publication of Legal Notice

In Accordance with the Provisions of "Newspaper Advertising Act" approved May 16, 1929, P.L. 1784, as amended

## Proof of Publication

.....  
vs.  
.....

State of Pennsylvania  
County of Huntingdon

SS:

Copy of Notice or Advertisement

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located 21204 Laurel Mountain Rd, Cromwell Twp (Three Springs), Huntingdon Co., PA 17264 (40° 14' 7.08"N / 77° 58' 20.20" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located near 7876 Chilcote Hollow Rd, Logan Twp (Petersburg), Huntingdon Co., PA 16669 (40° 35' 10.89" N / 78° 00' 43.88" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to collocate antennas on an existing 255-ft Self-Support Telecommunications Tower located at 5299 Saulsburg Loop Rd, Barree Twp (Huntingdon), Huntingdon Co., PA 16652 (40° 37' 47.69" N / 77° 54' 24.08" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower located near 7387 Gibbs Lane, Union Twp (Huntingdon), Huntingdon County, PA 16652 (40° 23' 21.37" N, 78° 1' 26.32" W ). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

**PUBLIC NOTICE:** Ambassador Towers LLC is proposing to collocate antennas on an existing 325-ft Guyed Telecommunications Tower located 1,900 ft SE of 12951 Raystown Rd, Penn Twp (Huntingdon), Huntingdon County, PA 16652(40° 25' 40.37" N / 78° 6' 35.27" W). Public comments regarding potential effects from this site on historic properties may be submitted within 30-days from the date of this publication to: K. Eisele, Terracon, 844 N. Lenola Rd, Ste 1, Moorestown, NJ 08057, 856-813-8267, or [Kathy.eisele@terracon.com](mailto:Kathy.eisele@terracon.com).

BETSY CLINGER HIKES, being duly sworn according to law, deposes that she is ADMINISTRATIVE ASSISTANT of The Daily News, a newspaper of general circulation in Huntingdon County, Published at Huntingdon, Pennsylvania, daily established in 1922 and that the legal notice attached hereto and made part hereof was published in said Newspaper August 26, 2023 ;

that the affiant is not interested in any manner in the subject matter of said notice or advertisement, and that all of the allegations contained herein as to

*Betsy Clinger Hikes*

the time, place and character of the said publication are true and correct.

Sworn to and subscribed before me this 31st

day of August A.D. 2023

My Commission expires

*Sarah Share*  
Prothonotary

Huntingdon County, Pennsylvania

My Commission Expires First Monday 2026

*Sarah Share*

## Statement of Advertising Costs

to Terracon - 5 Public Notices for Ambassador Towers, LLC.

OR August 26 2023 \$142.60

publishing Notice or Advertisement attached hereto on above dates \$ 5.25

Probating same PROOF OF PUBLICATION Total \$147.85

## Publisher's Receipt for Advertising Costs

The Daily News, by the publisher or authorized representative whose signature follows, hereby acknowledges receipt of the aforesaid advertising and probation costs and certifies that the same have been fully paid.

THE DAILY NEWS

By .....

## AREAS OF POTENTIAL EFFECTS

Site Name:	Gibbs Lane
Terracon Project Number:	J8237078
Address:	7387 Gibbs Lane
City, County, State:	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 23' 21.37" N / 78° 1' 26.32" W
Proposed Lease Area:	10,000 square feet
Proposed Tower Height:	199 feet, including attachments
Tower Type:	Self-support

### A. Direct Effects

The direct APE was determined to be the approximate 10,000 square-foot tower compound and a proposed utility/access easement.

### B. Visual Effects

The proposed tower will be approximately 199 feet in overall height. The APE for visual effects is therefore considered to be a 0.5-mile radius, per the 2004 Programmatic Agreement (Section VI.4.a), which defines the visual APE as a 0.5-mile radius for towers 200 feet or less in height (unless otherwise determined through consultation between the applicant and the local SHPO office).



# Phase I Cultural Resources Survey

Site Name: Gibbs Lane  
Huntingdon, Union Township  
Huntingdon County, Pennsylvania 16652

October 5, 2023 | Project Number: J8237078

Prepared for:

Ambassador Towers LLC.  
Paradise, Pennsylvania

Prepared by:

Suzanne Reece, MSc, RPA  
Josh Duncan, BA  
Terracon Consultants, Inc.  
Blue Bell, Pennsylvania

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## Executive Summary

Ambassador Towers LLC. proposes to construct a new communications tower and support facility near Huntingdon, Union Township, Huntingdon County, Pennsylvania. The project includes the construction of a self-supported tower, an equipment compound, and installation of utility lines to connect to existing services. An existing two-track road will be improved as part of the project. After completion of construction, the tower will be operated under Upward Broadband LLC., who has hired Terracon to assist with the permitting process associated with the project. This tower and associated support equipment are proposed with the following specifications:

Site Name:	Gibbs Lane
Terracon Project Number:	J8237078
Address:	7387 Gibbs Lane
City, County, State:	Union Twp (Huntingdon), Huntingdon County, Pennsylvania 16652
Latitude / Longitude:	40° 23' 21.37" N / 78° 1' 26.32" W
Proposed Lease Area:	10,000 square feet
Proposed Tower Height:	199 feet (overall height), including attachments
Tower Type:	Self-support

The lead federal agency for the proposed project is the National Telecommunications and Information Administration (NTIA), who is providing grant funding to assist with the construction of the communications tower. The NTIA defers to the Federal Communications Commission’s (FCC) 2004 Nationwide Programmatic Agreement (NPA) for guidance and compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. As such, the project proponent must consider the effects of the proposed undertaking on historic properties in compliance with the standards of the NPA. Secretary of Interior qualified Archaeologist Suzanne Reece, MSc, RPA, (Principal Investigator) inventoried historic properties within the area of potential effect (APE) with Staff Archaeologist Josh Duncan. The aim of this investigation was to determine if historic properties are located within the APE for direct or visual effects, and to determine if the proposed communications tower installation would have an adverse effect on cultural resources listed in, or eligible for listing in, the National Register of Historic Places (NRHP). The records search and field investigation were conducted in accordance with federal standards and the Pennsylvania State Historic Preservation Office’s Guidelines for Archaeological Investigations in Pennsylvania (PA SHPO 2021). Based on the records search and field investigation, Terracon recommends a finding of *no historic properties* for the direct APE. No recorded historic properties are currently mapped within the 0.5-mile search radius. As such, Terracon recommends a finding of *no historic properties* for the APE of visual effects.

## 1.0 Introduction

Ambassador Towers LLC. is proposing to install a self-supporting communications tower with attached antenna array and lighting rod near Huntingdon, Union Township, Huntingdon County, Pennsylvania. The proposed overall height will be 199-feet, with appurtenances. The proposed project area is located within undeveloped land that has previously been logged. Neighboring parcels contain woodland and residential properties. The APE for direct effects consists of the proposed project area including the location of the tower and equipment compound, a temporary construction staging area, as well as the utility and access corridor. The APE for visual effects consists of one-half-mile radius of the APE, as directed by the FCC Nationwide Programmatic Agreement (2004).

## 2.0 Project Information

### 2.1 Project Area Description

The project area consists of a proposed tower compound and an easement for the access drive and utility corridor extending south from the proposed tower compound. The project area can be seen on an aerial photograph and a United States Geological Survey (USGS) topographic map in Appendix A, Exhibits 1 and 2. Overview photographs of the proposed project area can be seen in Appendix B, Figures 1 through 8.

The Natural Resource Conservation Service’s (NRCS) Web Soil Survey (2023) records three soils within the project area. These soils are summarized below in Table 1.

Table 1. Soils Within the Project Area.

Soil Name	Approx. Percentage of Project Area	Associated Landscape	Hydric Soil Rating
Hazleton-Dekalb complex, 0 to 8 percent slopes, rubbly (HsB)	75	Hillslopes	No
Hazleton-Dekalb association, steep (HTF)	5	Mountains	No
Clymer very stony loam, 8 to 15 percent slopes (CVC)	20	Mountains	No

The project area is located within the Appalachian Mountain Section of the Ridge and Valley physiographic province (PADCNR 2023). This region is bordered on the southeast by the

base of the southeast slope of Blue Mountain. To the west and northwest, it is bordered by the center of the valley bottom west of the westernmost linear ridge. The rest of this section has arbitrary borders based on slope change of eastern ridges (PADCNr 2023). The Appalachian Mountain Section of the Ridge and Valley physiographic province is characterized by long narrow ridges and broad to narrow valleys, with some karst (PADCNr 2023). Local relief is considered moderate to very high, and drainage patterns consist of trellis, angulate, and some karst drainage (PADCNr 2023). The geologic structure of this section of the province consists of open and closed plunging folds having narrow hinges and planar limbs, including a variety of faults (PADCNr 2023). Underlying rock types are sandstone, siltstone, shale, conglomerate, limestone, and dolomite. The origins of this section arose from fluvial erosion, solution of carbonate rocks, and periglacial mass wasting (PADCNr 2023).

At the time of the Phase I survey, ground surface visibility ranged from 0 to 40 percent, with an average visibility of 20 percent. The location of the proposed tower compound has been previously logged, with comments from a land surveyor and the property owner suggesting it had been logged at some point within the previous year. At the time of the Phase I survey, ferns, decaying leaves, and other vegetation covered much of the proposed project area. Vegetation within the project area primarily consisted of ferns, and other woodland undergrowth. The closest, named body of water to the project area is Raystown Lake, which is located approximately 0.4-miles to the south of the proposed project area.

## 2.2 Objectives and Research Design

There were two main objectives of the Phase I Survey: determine if archaeological sites or historic-age structures are present within the proposed project area and determine if historic properties within the APE for visual effects would be adversely impacted by the proposed project. The background research for the project first involved investigating land use history, examination of historical maps and aerial photographs, and consultation of the PA-SHARE database for information on previously archaeological sites and historic-age resources. Next, a pedestrian survey was conducted to examine the project area, and a series of shovel tests were excavated. The collected information was reviewed, and a recommendation of effects is presented in this document.

## 3.0 Cultural Chronology and Ethnohistoric Context

### Pre-Contact Period

This discussion employs a traditional cultural historical chronological sequence, though period distinctions and boundaries are often difficult to draw across broad geographical areas, given the incomplete and imprecise nature of the archaeological data. The summary

information presented is provided as context for the interpretation of any identified pre-contact cultural resources within the archaeological APE and is not meant to be a complete and detailed history.

### Paleoindian Period (13,950 to 9,950 Years B.P.)

The Paleoindian period encompassed the terminal Pleistocene, a cold, windy, and dry period of the declining Late Wisconsinan glaciation (Watts 1979). The southernmost advance of this glaciation did not reach Lehigh County (Sevon et al. 1999: 14). Fluted lanceolate projectile points are the primary early Paleoindian diagnostic artifacts. Available blood residue analysis suggests that these projectile points were used on a wide variety of large and small species that were available during the last stages of the Pleistocene, including mammoth, bison, sheep, caribou, musk ox, and even rabbits (Brush and Smith 1994; Loy and Dixon 1998). At Dutchess Quarry Cave No. 1 in Orange County, New York, caribou bones, teeth, and antler fragments were recovered. Broken caribou limb bones, possibly indicative of marrow extraction, occurred within the same stratum as a fluted Cumberland-like point (Funk and Steadman 1994; Funk et al. 1969).

Some of the primary evidence for Paleoindian occupation of Pennsylvania comes from the Meadowcroft Rockshelter (36WH297), the Shoop site (36DA20), and the Shawnee Minisink site (36MR43). Meadowcroft Rock Shelter, located in Washington County in southwestern Pennsylvania, saw repeated but sporadic and ephemeral utilization, possibly as early as 17,650 B.C., but more securely by 14,225 B.C. to 10,850 B.C. (Adovasio and Carlisle 1986). A small unfluted lanceolate blade (Miller Lanceolate) is attributed to a Paleoindian occupation dating between 10,850±870 B.C. and 9,350±700 B.C. at Meadowcroft Rock Shelter (Adovasio et al. 1988).

The Shoop site (36DA20), located in Dauphin County in central Pennsylvania, consists of a series of lithic concentrations situated on a plateau bordered by an upper branch and tributaries of Armstrong Creek (Witthoft 1952). This site produced numerous fluted projectile points and fragments together with an extensive associated collection of cores, flaked stone implements, and debitage. Reassessments of the data from the Shoop site (36DA20) have been offered by Carr (1989) and Cox (1986). Stone tools from the Shoop site (36DA20) retained blood residue attributed to the Family Cervidae, which includes deer, elk, moose, and caribou (Hyland et al. 1990).

The Shawnee Minisink site (36MR43) is located along the Delaware River just above the Delaware Water Gap in Monroe County, Pennsylvania. The Paleoindian component at the Shawnee Minisink site (36MR43) has been dated to 8,700 B.C. (or approximately 10,650 B.P.), and produced a single fluted projectile point, along with numerous other flaked stone tools and hammerstones (McNett 1985). Features associated with the Paleoindian component include hearths and concentrations of flaking debris (McNett 1985). Resource procurement and processing strategies associated with this component are fishing; the hunting of small animals, deer, and caribou; and the collection of floral resources, including

copperleaf, pigweed, blackberry, buckbean, goosefoot, hackberry, hawthorn plum, and wintercress (Dent and Kauffman 1985). More recent excavations at Shawnee-Minisink have produced a date of approximately 11,000 B.P. for the Paleoindian components (Gingerich 2007).

#### Archaic Period (9,950 to 3,800 Years B.P.)

Gradual climatic warming that occurred after the close of the Pleistocene gave rise to dense deciduous forests, which supported more numerous and varied species of flora and fauna. The Archaic period has traditionally been divided into Early, Middle, Late, and Terminal (or Transitional) periods, largely based upon hypothesized projectile point sequences, which have not been supported on well-dated, stratified sites.

Archaic peoples probably lived in small, highly mobile bands. Evidence gathered from various locations suggests the existence of broad-based economies centered on large and small game, birds, and fish, with the seasonal collection of nuts, berries, seeds, and greens (Asch and Asch 1985; Chapman 1975; Chapman and Watson 1993; Hughes et al. 1992; Meltzer and Smith 1986; Michels and Smith 1967). Although local and regional subsistence data remain sparse, evidence from the Susquehanna watershed supports the emergence of squash cultivation toward the end of the Archaic period (Hart and Asch-Sidell 1997).

While the Early Archaic period is associated with a technological and stylistic shift to projectiles and knives fitted with a variety of notched and stemmed blade forms, the remainder of the flaked stone tool assemblage had changed little. The Middle Archaic period in Pennsylvania is mainly defined by the presence of particular projectile point types including MacCorkle, St. Albans, LeCroy, Neville, Kanawha, Stanly, or Otter Creek types (Carr 1998: 80). While bifurcate point forms seem to be clearly associated with a limited temporal span, other forms have been shown to persist into later periods. Custer (1996: Table 7) dates the Middle Archaic period, which corresponds to his "Hunter-Gatherer II Cultural Period," from 6,500 to 3,000 B.C. Raber (1985: 33-36) also uses the 6,500 to 3,000 B.C. interval for the Middle Archaic in A Comprehensive State Plan for the Conservation of Archaeological Resources. While Cowin (1982, 1991) and George (1971, 1985), like Chapman (1975, 1985), assign most bifurcate point styles to the Early Archaic period, Carr (1998), Custer (1996), Gardner (1989), and Stewart and Cavallo (1991) include the bifurcates within the early Middle Archaic period. The CRGIS database also assigns bifurcate-producing sites to the Middle Archaic period (PHMC 2014).

Few Middle Archaic component archaeological sites have been excavated in Pennsylvania (Carr 1998: 80). Three sites with Middle Archaic components, including the Meadowcroft Rock Shelter, Sheep Rock Shelter, and Shawnee-Minisink, have been the most informative, with others, such as the State Road Ripple Site (Cowin 1991), Conrail site (Griffiths-Connelly 1995), Central Builders site (Baker 1993), Sandts Eddy Site (Bergman et al. 1994), and West Water Street Site (Custer et al. 1993), being less so. Evidence, including the environmental reconstruction of the Early Holocene and site densities, suggests that



population growth in Pennsylvania was slow throughout the Early Archaic, but increased significantly during the Middle Archaic (Carr 1998:87). In addition to the growth in population, there appears to be a greater variety of lithic raw material types being used by Middle Archaic populations. These materials are often found in cobble form indicating use of local sources. The use of upland landforms for basecamp settlements also increased (Carr 1998:88).

The early Laurentian or “Proto-Laurentian” Tradition represents the oldest Late Archaic period assemblage defined in the Upper Susquehanna Valley in New York State (Funk 1993; Funk and RippetEAU 1977), where surface finds of Otter Creek and similar large side-notched projectile points are moderately common. Turnbaugh (1977) reports surface finds of Otter Creek projectile points in the West Branch Susquehanna River and Lycoming Creek valleys. At the East Bank site (36NB16), located on the West Branch Susquehanna River at the Interstate 80 crossing, Otter Creek-like projectile points occurred in four strata dating between ca. 6,900±40 and 3,620±60 years B.P. (East et al. 2002a). The various Brewerton projectile point forms (Ritchie 1961) are generally attributed to the Middle or Late Archaic periods in Pennsylvania, although similar forms may date to as late as the Middle Woodland period (East et al. 2002b). Surveys of upland areas in the Ridge and Valley physiographic province have revealed that Late Archaic sites are located in a variety of settings, including areas near springs, on benches, and on hillsides (Graetzer 1986; Hatch 1979; Miller 1993). Both base camps and special purpose sites are represented in the Late Archaic settlement pattern (Raber et al. 1998:126).

#### Woodland and Late Pre-Contact Periods (3,800 to 350 Years B.P.)

The emerging temporal overlap of broadspears, fishtails, Meadowood projectile points, ceramics, and steatite vessels suggests that the separate Terminal Archaic (or Transitional) period should be eliminated and merged with the Early Woodland period. Although the Woodland period is thought to have been marked by progressively greater reliance on native seed crops (chenopod, maygrass, sumpweed), little barley, and sunflower, as well as cultivated tropical plants, the evidence for this progression in Pennsylvania has not been forthcoming. All indications are that the hunting and gathering lifeways of the Archaic period largely continued well into the Woodland period. Maize was not in widespread use until ca. AD 850, while beans did not arrive until ca. AD 1250-1300. Large, nucleated and fortified settlements were probably not prominent fixtures on the landscape until ca. AD 1250 or later.

The hallmark of the Early and Middle Woodland periods would be the intensive trade in semi-finished and finished items made of exotic stone, particularly steatite (bowls); rhyolite (broadspears and bifaces); jasper (broadspears, Jack’s Reef projectile points, and bifaces); argillite (broadspears, Fox Creek projectile points, and bifaces); and Onondaga chert (Meadowood projectile points/bifaces and Jack’s Reef projectile points). These particular projectile point types can be firmly identified as diagnostic of the period through consistent and corroborating radiocarbon dates. Although triangular projectile points are evidenced in

earlier period occupations, after AD 1000, they are the only style seen in pre-contact period tool kits (Kinsey 1972:441-443; Ritchie 1961:31-33). The exclusive use of small triangular projectile points is linked to the introduction of the bow and arrow. There have been attempts to link certain styles of triangular projectile points with certain ethnic groups; however, the evidence is not conclusive (Custer 1996:265). According to the CRGIS, the Early Woodland period within the project region has been predominantly distinguished by the presence of Meadowood, broadspear, Perkiomen, and Susquehanna projectile points (PHMC 2014).

The earliest eastern Pennsylvania Early Woodland complex, the Bushkill phase, was defined by Kinsey (1972) from components found within the Upper Delaware River Valley. Associated artifacts include Rossville and Lagoon projectile points, along with Broadhead Net-Marked and Vinette I ceramics. The Middle Woodland period in eastern Pennsylvania is associated with Jacks Reef and Fox Creek projectile points and plain and cord-marked ceramics. The people associated with these artifacts probably followed the typical Archaic pattern of seasonal hunting and gathering (Ritchie and Funk 1973:121). Evidence of plant cultivation from the Early Woodland is inferred, although there is no direct evidence for domesticated plants in the region at this time (Stewart 2003:7). Examples of eastern Pennsylvania sites with Early to Middle Woodland components are scarce, but include the Zimmerman (Werner 1972), Faucett (Kinsey 1975), and Three Mile Island (Custer 1996; Smith 1977). Evidence from these sites implies that these communities were semi-sedentary with cyclical use of some resources and a riverine-based hunting and fishing economy (Kinsey 1975; Stewart 2003:7).

The Late Woodland Clemsons Island/Owasco period apparently featured a dispersed settlement pattern, with small hamlets on low terraces adjacent to major streams surrounded by smaller, temporary procurement and processing stations, some of which may have been situated in upland areas. Components that have not been thoroughly disrupted by plowing are often associated with buried A (Ab) horizons that may indicate a period of relative environmental and hydrologic stability (East et al. 1988; Vento 1988; Vento and Fitzgibbons 1987; Vento et al. 1990). The Clemson Island culture was primarily located within the Susquehanna River drainage. Clemson Island ceramics are characterized by crushed rock temper with cord-marked or fabric-impressed surface treatments and often a row of punctuates and/or raised nodes/bosses below the lip or on the upper rim (Maryland Archaeological Conservation Lab 2002). Evidence of Clemson Island populations from sites located on the islands and floodplains of the Middle Susquehanna and Juniata rivers indicates that these people built "small parallel-sided houses with rounded ends" (Kent 1980:33).

The later Late Woodland division (ca. AD 1250 to AD 1600) encompasses the Minguannan, Overpeck, Pahaquarra, and Delaware/Lenape (Unami and Munsee/Minisink complexes). Evidence for the presence of the Minguannan complex in southeastern Pennsylvania comes primarily from the Minguannan Site (Wilkins 1978) and the Webb Site (Custer 1985; Custer and Griffith 1985), both of which are located in Chester County. The settlement pattern of

this complex involves large, macro-band base camps in productive floodplain and stream settings (Custer 1989).

#### Contact Period (AD 1600–ca. 1750)

The Contact period dates from the first arrival of Europeans in eastern Pennsylvania until the removal of most of the Native Americans from the area ca. 1750 (Custer 1996). During the seventeenth and eighteenth centuries, Native American groups along the western frontier underwent rapid and dramatic changes in response to disease, the fur trade, and political strategizing of the French and English. From ca. AD 1550 to AD 1675, the Susquehannock were the dominant group in both the Susquehanna and Delaware River valleys (Custer 1996). The Susquehannock controlled the fur trade with the Europeans at this time.

The Iroquois League was a confederacy of Iroquoian-speaking tribes that occupied the area between the Mohawk and Genesee rivers in what is now southern New York State (Graymont 1988:13). The Iroquois expanded their hunting territory through negotiation or warfare with neighboring tribes. In 1675, the Iroquois defeated the Susquehannock (Waldman 1988; Wallace 1986) and claimed ownership of the entire Susquehanna Valley (Weslager 1996). By 1675, the Susquehannock had left eastern Pennsylvania (Custer 1996).

During the Contact period, the Lenni Lenape (or Delaware) inhabited agricultural villages in the Delaware River Valley and along tributaries to the Delaware River (Weslager 1996). They adopted a subsistence strategy based on planting, hunting, and fishing (Weslager 1996). According to the CRGIS database, no Contact period sites have been recorded in Lehigh County. The Maxatawny Path, which connected Lechauwekink (modern day Easton) with Manangy's Town (present day Reading), passed through the present location of Allentown.

#### Historic Period (ca. 1750+)

Huntingdon County is located in South Central Pennsylvania, in the Ridge and Valley Appalachian Mountains of Pennsylvania, which run southwest to northeast across the county. It was officially formed as a legal entity in 1787 and was incorporated as a borough in 1796. The county's name comes from Dr. William Smith, the Provost of the University of Pennsylvania, and owner of the land in the 1760s, who is said to have named the county after the Countess of Huntingdon, England (PHMC 2023). The land that became Huntingdon County was originally part of Cumberland County, the territory from which Bedford County was cut in 1771, and it was from Bedford County that Huntingdon County was cut in 1787 (Africa 1876). Over the next century the County's borders shrank somewhat, as land was taken for the creation of other new counties in central and south-central Pennsylvania (Africa 1876).

It is known from historical, oral, and archaeological data that, prior to settlement of the area that would become Huntingdon County, the land was inhabited by Indigenous Native Americans. The earliest named Native American inhabitants in the area are known as the Juniata Tribe of the Standing Stone, named for a stone obelisk that stood in the center of their village (SAH 2023). By the time Euro-American settlers arrived in the area, Shawnee and Tuscarora Native groups, allied with the Iroquoian Confederacy, had removed the Juniata Tribe from the area, though the name of "Standing Stone" was still used for the location that would become the Borough of Huntingdon (SAH 2023). It was the Iroquoian Confederacy that sold the land that would include Huntingdon County to the Colony of Pennsylvania during the Albany Purchase of 1754 (Native Americans 2022). Other tribes, including the Delaware, Susquehannock, and various Ohio Valley tribes certainly interacted in the region as well (Native Americans 2022).

Written records from Euro-American Settlers in the area go back to at least 1754, with John Harris' account and description of the Native village that stood at the junction of the Juniata River and standing Stone Creek (Borough of Huntingdon 2022). At that time, central Pennsylvania was the frontier that marked the ever-expanding boundary between Indian territory and colonial English territory, and a series of forts were built in the region to provide protection for the colonial settlers, who were largely German and Scots-Irish (SAH 2023). Fort Shirley was constructed circa 1755, near present-day Shirleysburg, which served as a staging area for military incursions into Native territory (SAH 2023). In 1767/1768, Dr. William Smith purchased a portion of land in what was then part of Cumberland County and began to lay out plans for the future borough of Huntingdon and selling lots along the Juniata River (Borough of Huntingdon 2022). Settlement of the area was slow at first, but the area saw a large influx of settlers in the 1780s, leading to formation of Huntingdon County, with the town of Huntingdon serving as the county seat, which it remains to this day (Borough of Huntingdon 2022). By the 1790s, Iron production began in the county, and the vast sources of brown hematite and fossil ores, as well as trees for charcoal and streams to power waterwheels, led the inhabitants to open multiple furnaces and forges, making iron production a major part of the Huntingdon County economy for the next century (SAH 2023). The completion of railroads in the area aided the iron-based economy of the area in the mid-19<sup>th</sup> century, and in 1852 the Pennsylvania Railroad tied Huntingdon to Pittsburgh, allowing some of the larger furnaces to remain open well into the 20<sup>th</sup> century (SAH 2023). However, the clear cutting of the forests for fuel for the furnaces, and ore shortages in the 1870s, led to the decline of the iron industry in Huntingdon County, and the economy in the region shifted to an agricultural and tourism-based economy in the 20<sup>th</sup> century (SAH 2023).

Union Township, in Huntingdon County, Pennsylvania, is a small rural township located just south of the approximate center of the county. It is comprised of mostly mountainous land, but also is home to a few unincorporated communities, the Town on Mapleton, and three small valleys that each contain agricultural land with farms of various size. Union Township was formed as a legal entity in 1791, when it was cut apart from Hopewell Township (Africa 1883). An account from 1754 indicates that the Logstown Road, "an old Indian war-path,"

passed through the future township, and that Conrad Weiser passed through the area in 1748 (Lytle 1876). Other 18<sup>th</sup> century records indicate that settlements existed here during the American Revolution, and that some local action may have occurred there, related to the presence of both Pro-English and Pro-American settlers, though there were no official battles that took place within the future township lines (Lytle 1876). These same records indicate the existence of some mills in the area, as well as a steam tannery. The introduction of a section of the Pennsylvania Canal in the early part of the 19<sup>th</sup> century brought increased settlement and industry to the area, though the area experienced a period of decline after a disastrous flood in 1847 (Lytle 1876). A portion of the Pennsylvania Railroad ran through the area in 1850, but in 1866, a depot was built at Mapleton, the same year the town was founded, and brought increased industry and settlement back to the valleys Union Township (Mapleton Centennial Committee 1966). While many of the smaller rural settlements in the township then disappeared slowly throughout the 20<sup>th</sup> century, the town of Mapleton continued to grow (Mapleton Centennial Committee 1966). Little data is currently available concerning the 20<sup>th</sup> history of Union Township; however, it can be seen from modern aerial photographs that agriculture is a large part of the economy and culture of the area (Google Images 2020). The presence of Raystown Lake immediately west of the township's western border, as well as state game lands, wildlife parks, and campgrounds also support the local economy with tourism related to outdoor activities such as hunting, camping, and boating.

## 4.0 Records Search and Background Research Results

A records search was conducted of the PA-SHARE GIS database maintained by SHPO for information regarding previously recorded historic properties within the project area and the 0.5-mile APE for visual effects. According to the results of the records search, no historic properties have been previously recorded within the project area, or within the 0.5-mile search radius. A copy of the mapped search results from the GIS database can be found in Appendix A, Exhibit 3.

Two historical atlases and plat maps were consulted at the Historic Map Works (2023) website to identify potential historical-period resources within or near the project area, including: Hopkins and Co. 1874 and Walling and Gray 1872. Neither of the reviewed atlases and plat maps depicted man-made features within the proposed project area.

A series of historical USGS topographic maps were reviewed which ranged in date from 1901 to 2023. No development is depicted within the project area on any of the reviewed topographic maps.

Aerial photographs dating from 1962 to 2019 were reviewed for information on land use history. No structures or other development is depicted within the proposed project area

until 1994, when a series of trail or two track roads can be seen cutting through the woodland present in the earlier photographs. By 2003, evidence of logging can be seen within and near the project area. There is a notable reduction in the number of trees within the project area within this photograph, and an area to the northeast of the project area has been clear cut. In subsequent photographs, trees do regrow within the project area, but the clear-cut area remains open.

## 5.0 Fieldwork

Suzanne Reece, MSc, RPA conducted the fieldwork for the Phase I survey with Staff Archaeologist Josh Duncan on August 10, 2023. The project area was examined with a pedestrian survey. No prehistoric or historic-age artifacts or structural remains were encountered during the pedestrian survey. The proposed project area is currently undeveloped land, and had been logged at some point within the year prior to the survey. Overview photographs of the project area can be found in Appendix B, Figures 1 through 8.

Five shovel tests were excavated within the proposed tower compound. No shovel tests were excavated within the access or utility easements. The shovel tests were documented with Munsell soil color charts, field notes, photographs, and Global Positioning System (GPS) coordinates. Table 2 summarizes the information collected during the shovel testing. The soils excavated from the shovel tests were passed through 1/4-inch wire mesh to screen for artifacts. No artifacts or cultural deposits were encountered during shovel testing. There was evidence of prior ground disturbing activities within some of the shovel tests, likely due to the various incidents of logging within the proposed tower compound. On each of the shovel tests, efforts were made to excavate at least 10 cm into sterile subsoil. A representative photograph of a shovel test can be found in Appendix B, Figure 9. The locations of the shovel tests can be seen on a recent aerial photograph in Appendix B, Figure 10.

Table 2. Shovel Test Profiles and Artifact Data.

Shovel Test	Depth Below Ground Surface	Soil Description	Notes
1	0-20 cm	Mottled 10YR 2/2 and 10YR 3/4 silt loam	Large rocks throughout, soils clearly disturbed from logging. Rock impasse at base.
2	0-15 cm	10YR 3/2 silty loam	
	15-30 cm	10YR 5/4 silty loam	
3	0-11 cm	10YR 2/1 silty loam	Rock impasse.



Shovel Test	Depth Below Ground Surface	Soil Description	Notes
4	0-17 cm	10YR 3/2 silty loam	Rock impasse.
	17-23 cm	10YR 5/4 silty loam	
5	0-20 cm	10YR 3/2 silty loam	Rock impasse.
	20-25 cm	10YR 5/4 silty loam	


## 6.0 Summary and Recommendations

A Phase I survey was conducted near Huntingdon, Union, Logan Township, Huntingdon County, Pennsylvania ahead of the proposed construction of a communications tower. A pedestrian survey was conducted of the project area, and did not encounter artifacts, historic structural remains, or surface level evidence of cultural deposits. Five shovel tests were excavated within the proposed tower compound and did not encounter subsurface artifacts or cultural deposits. Based on the results of the pedestrian survey and shovel testing, it is unlikely that unknown, NRHP eligible cultural resources are present within the direct APE. Therefore, Terracon recommends a finding of *no historic properties* for the direct APE. No historic properties have been previously recorded within 0.5-mile of the project area; therefore, Terracon recommends a finding of *no historic properties* for the APE of visual effects.

Should buried artifacts, human remains, or cultural deposits be encountered during ground disturbing activities, it is Terracon’s recommendation that construction immediately halt, and the resources should be examined by a professional archaeologist. Appropriate authorities, including the State Historic Preservation Office (SHPO), should be notified.

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## Appendix A Site Plan and Maps

*Please refer to Appendix B for Site Figures*

*Please refer to Appendix F for Site Photographs*





October 16, 2023

*Sent Via PA-SHARE*

RE: ER Project # 2023PR04941.001, Gibbs Lane Tower (Ambassador Towers), National Telecommunications and Information Admini, Juniata Township, Huntingdon County

Dear Submitter,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

**Above Ground Resources**

*No Above Ground Concerns - Environmental Review - No Historic Properties - Above Ground*

Based on the information received and available in our files, it is our opinion that there are no above ground historic properties (resources listed in or eligible for listing in the National Register) present in the project area of potential effect. Therefore, no above ground historic properties will be affected by the proposed project. Should the scope of the project change and/or new information be brought to your attention regarding historic properties located within the project area of potential effect, please reinitiate consultation with our office using PA-SHARE.

For questions concerning above ground resources, please contact Tyra Guyton at tyguyton@pa.gov.

**Archaeological Resources**

*No Archaeological Concerns - Environmental Review - No Historic Properties - Archaeological*

Based on the information received and available within our files, it is our opinion that there are no archaeological historic properties (resources listed in or eligible for listing in the National Register) present within the area of potential effect. Should the scope of the project change and/or should you be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning archaeological resources, please contact Justin McKeel at jusbmckeel@pa.gov.

Sincerely,

A handwritten signature in black ink that reads "Emma Diehl". The signature is written in a cursive, flowing style.

Emma Diehl  
Environmental Review Division Manager

# **APPENDIX F**



Site Name: Gibbs Lane  
Project No. J8237078  
Photographs Taken On: August 10, 2023



1. View of the proposed access easement and utility corridor, view to the northwest.

2. View of the proposed access easement and utility corridor, view to the northeast.



3. View of the proposed compound, view to the north.

4. View of the proposed compound, view to the south.



5. View to the south from the proposed tower location.

6. View to the west from the proposed tower location.



Site Name: Gibbs Lane  
Project No. J8237078  
Photographs Taken On: August 10, 2023



7. View to the north from the proposed tower location.

8. View to the east from the proposed tower location.



9. View of Shovel Test 2, a typical excavated shovel test.





1. View of the existing access and utility corridor, view to the northeast.



2. View of the existing compound, view to the southeast.



3. View to the northwest from the existing compound.



4. View of the existing compound, view to the southwest.



5. View to the northeast from the existing compound.



6. View of the existing compound, view to the northwest.



Site Name: Hesston  
Project No. J8237078  
Photographs Taken On: August 22, 2023



7. View to the southeast from the existing compound.

8. View of the existing compound, view to the northeast.



9. View to the southwest from the existing compound.





1. View of the existing access and utility corridor, view to the northeast.

2. View of the existing access and utility corridor, view to the south.



3. View of the existing compound, view to the northeast.

4. View to the southwest from the existing compound.



5. View of the existing compound, view to the northwest.

6. View to the southeast from the existing compound.



Site Name: Mt. Union  
Project No. J8237078  
Photographs Taken On: August 9, 2023



7. View of the existing compound, view to the southwest.

8. View to the northeast from the existing compound.



9. View of the existing compound, view to the southeast.

10. View to the northwest from the existing compound.



**Site Name:** Mt. Union  
**Project No.** J8237078  
**Photographs Taken On:** August 9, 2023



11. Overview of the existing tower compound, view to the northeast.