Environmental Assessment

RURAL BROADBAND INFRASTRUCTURE EXPANSION IN THE ALLEGHENIES: SPRING RUN TOWER

FRANKLIN COUNTY, PENNSYLVANIA

Department of Commerce

National Telecommunications and Information Administration

July 7, 2025

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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). 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 25 communications towers, which are divided into nine separate and independent projects.

This EA's proposed action addresses the eighth component of the total grant located in Franklin County: the Spring Run Tower. 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").

The Spring Run Tower is the proposed construction of a new 195-foot self-supporting lattice communication tower (199-foot with appearance) and compound including access and utilities easements. The proposed tower will be located at 40° 09' 03.6" N / 77° 44' 13.4" W.

The proposed action is based on the lack of broadband access in Franklin County 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 construction of Spring Run 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 construction of Spring Run Tower; broadband coverage in certain areas of Franklin County 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
- 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. Sensitive receptors were not identified in the location of the tower site. 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 to reduce fugitive dust emissions during construction. The 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 than significant Impacts to air quality are anticipated.	No impacts.
Geology and Soils	Minimal impact to soils will occur during construction of the tower. Dust suppression techniques via water trucks or other methods can be used to reduce fugitive dust emissions. No significant impacts to geology or soils are anticipated.	No impacts.
Water Resources	There are no water features in the vicinity of the site location. No Impacts to water resources are anticipated.	No impacts.

Resource Area	Proposed Action Alternative	No Action Alternative
Biological Resources	A Pennsylvania Natural Diversity Inventory (PNDI) environmental review was completed for the project. 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). To avoid impacts to the Northern-Long Eared Bat (NLEB), there should be no tree clearing, drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30). As a mitigation measure, 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. Less than significant impacts with BMPs and/or mitigation incorporated are expected for all of the identified species	No impacts.
Historic and Cultural Resources	No historic or archeological resources were identified at the collocation and proposed tower 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. 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)).	No impacts.
Aesthetic and Visual Resources	No impacts to aesthetic and visual resources are anticipated.	No impacts.
Land Use	The proposed Spring Run 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 Franklin County by providing valuable broadband coverage and services.	Less than Significant Impacts.

Resource Area	Proposed Action Alternative	No Action Alternative
Human Health and Safety	No sources of significant contamination were identified at the tower location. The Grantee 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.	No 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 NTIA and Federal Communications Commission (FCC; 47 CFR §1.1301-1 .1320) NEPA implementing procedures. 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 Franklin County, 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, and

- 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. Franklin 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 Spring Run Tower as well as improve the coverage to areas of the county that currently do not have access. By providing this coverage, Franklin County, its 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 25 communications towers providing highspeed broadband internet to the proposed service area comprised of 97 census blocks in the Pennsylvania counties of Huntingdon, Fulton, Bedford, Franklin, Perry, and Mifflin. This EA's proposed action addresses the Spring Run Tower located in Franklin County, 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 of Franklin County. 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

Spring Run Tower is the proposed new construction of a 199-foot self-supporting lattice communications tower located at 40° 09' 03.6" N / 77° 44' 13.4" W. The site parcels are owned by Robert C. Stewart which are identified as Franklin County Tax Parcel Map No. 07-0B29.-041.-000000. Development consists of an approximate 5,100 square-foot tower compound, with a temporary construction easement immediately northeast of the compound and an access drive that largely follows an existing dirt road. Utilities will be routed underground and will extend southeast from the proposed tower compound to existing utility poles located along the proposed access drive. 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. The Spring

Run will be constructed and owned by the Grantee. 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 Spring Run Tower and compound has dense vegetation and is forested with mixed deciduous trees located on a mountain crest. Anticipated site work includes the removal of trees and vegetation within the proposed compound, construction easement, and associated easements, 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 87,310 square feet (approximately 2 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 northeast of the site.

3.3 No Action Alternative

Under the no action alternative, the project would not move forward, and Franklin 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 construction of Spring Run Tower and associated compound/easements/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 construction of Spring Run Tower; broadband coverage in certain areas of Franklin 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 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 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.

Noise ordinances were not identified specific to Franklin County. The Spring Run Tower project area consists of undeveloped, wooded land. The site is abutted by wooded and grassy land along portions consisting of an existing access road, wooded land along potions of the site consisting of the proposed access drive and construction easement, and wooded land along the project area consisting of the proposed tower compound. There are no residential structures, churches, schools, or other sensitive receptors within the immediate vicinity of the proposed tower site.

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_3), particulate matter (PM 2.5 and 10), nitrogen dioxide (NO_2), carbon monoxide

(CO), sulfur dioxide (SO_2), 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, Franklin County, Pennsylvania is not located within a non-attainment area for any major pollutants (US EPA, 2022c).

4.3 Geology and Soils

According to the United States Geological Survey (USGS) Ground Water Atlas of the United States Section L, the project area falls within the Appalachian Mountain Section of the Ridge and Valley physiographic province, which is characterized by long narrow ridges and broad to narrow valleys, with some karst. The geological structure of this section of the province consists of open and closed plunged folds having narrow hinges and planar limbs, including a variety of faults. The underlying rock types are sandstone, siltstone, shale, conglomerate, limestone, and dolomite.

According to the United States Department of Agriculture (USDA) Natural Resource Conservation Service's (NRCS) Web Soil Survey, the majority of soils beneath the proposed Spring Run Tower are defined as Berks channery silt loam, 3 to 8 percent slopes, Buchanan channery loam, 3 to 8 percent slopes, Dekalb-Hazleton cobbly Sandy Loams, 25 to 75 percent slopes, Laidig gravelly loam, 8 to 25 percent slopes, Sideling gravelly loam, 8 to 15 percent slopes, Sidline and Hazleton soils, 25 to 60 percent slopes, Weikert channery silt loam, 8 to 15 percent slopes, and Weikert very channery silt loam, 25 to 65 percent slopes. Construction at the Spring Run Tower will necessitate about 87,310 square feet of ground disturbance for the new tower location compound, construction of the remaining portions of the proposed access road, and construction of the proposed underground utility easement.

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 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 Spring Run Tower site. According to the National Wetlands Inventory (NWI) map, there are no mapped wetlands within 500 feet of the proposed tower compound. A riverine wetland feature is mapped crossing the proposed access/utility easement west of New Bridge Road. Based on the site reconnaissance, there were no surface water or wetlands observed within the project footprint. The Spring Run Tower site consists of wooded land along a mountain crest.

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

According to the Susquehanna River Basin Commission (SRBC), a portion of Franklin 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. 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 Franklin County, Pennsylvania shows the water level on average at 75.8 feet below the surface. No sole source aquifers are mapped within the state of Pennsylvania. No groundwater recharge areas are known to exist on any of the project sites (USGS, 2023).

4.4.3 Coastal Zone, Estuary, and Inter-tidal Areas

Franklin County is located within an inland portion of Pennsylvania and is not mapped within a coastal zone, estuary, or inter-tidal area. As such, the project site is not 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, the project site is not mapped within a floodplain.

4.4.5 Wild and Scenic Rivers

According to the National Park Service (NPS) Wild and Scenic Rivers Map, the project site is not 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 area proposed for the Spring Run Tower and compound has dense vegetation and is forested with mixed deciduous trees. The United States Forest Service (USFS) individual tree species parameter map was consulted and identified the following species as typically within the proposed area: white ash (*Fraxinus americana*), sweet birch (*Betula lenta*), black gum (*Nyssa sylvatica*), table mountain pine (Pinus pungens), black cherry (*Prunus serotina*). Wildlife in the vicinity of Franklin County typically include those associated with forested and rural areas throughout the northeastern United States.

4.5.1 Threatened and Endangered Species

An Informal Biological Assessment was performed by Terracon Consultants, Inc. (Terracon) regarding the proposed tower. 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 Spring Run Tower sites:

Table 4.5.1 Federally-Listed Species

Taxon	Name	Species Habitat	Status
Mammals	Indiana Bat (*Myotis sodalis*)	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 *(Myotis septentrionalis)*	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)*
Insect	Monarch Butterfly *(Danaus plexippus)*	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)	Proposed Threatened
Flowering Plants	Northeastern Bulrush (*Scirpus ancistrochaetus*)	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 Spring Run Tower, the PNDI environmental review tool project response indicates the DCNR and PFBC 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 replied: *"Potential impacts to state and federally listed species which are under the jurisdiction of both the PGC and the USFWS may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the USFWS. No further coordination with the PGC is required at this time."*

The USFWS requested Terracon to enter the project information into IPaC to review the project's potential effect on federally listed species. Terracon utilized the IPaC determination keys to evaluate the effect of the proposed project on the Northern Long-eared Bat. It was determined the project May Affect, Not Likely to Adversely Affect the Northern Long-eared Bat. To avoid impacts to the NLEB, there should be no tree clearing, drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30. No consultation with the USFWS pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 et seq.) is required for these species. The USFWS Determination Letters are attached.

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 (*Haliaeetus leucocephalus*)	No	January through December
Black-capped Chickadee (*Poecile atricapillus*)	Yes	April through July
Canada Warbler (*Cardellina canadensis*)	Yes	May through August
Cerulean Warbler (*Dendroice cerulea*)	Yes	April through July
Chimney Swift (*Chaetura pelagica*)	Yes	March through August
Eastern Whip-poor-will *(Antrostomus vociferus)*	Yes	May through August
Golden Eagle (*Aquila chrysaeto)*	No	Breeds elsewhere
Prairie Warbler *(Setophaga discolor)*	Yes	May through July
Wood Thrush (*Hylocichla mustelina*)	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 for the proposed tower. According to the National Wetlands Inventory (NWI) map, there are no mapped wetlands within 500 feet of the proposed tower compound. A riverine wetland feature is mapped crossing the proposed access/utility easement west of New Bridge Road. Based on the site reconnaissance, there were no surface water or wetlands observed within the project footprint.

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

A Phase I cultural resource survey was conducted at the Spring Run 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; therefore, Terracon recommends a finding of no historic properties for the APE of visual effects.

No significant archaeological resources (determined to be listed or eligible for the NRHP) were identified within the specific project area boundaries. Additionally, the PA SHPO was consulted 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 for the proposed Spring Run Tower site will be submitted through the PA-SHARE website the Pennsylvania SHPO. 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 the proposed Spring Run Tower project area and the 0.5-mile APE for visual effects. According to the results of the records search, no significant historic properties have previously been recorded within the project area, or within 0.5-mile of the 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 Nations that attach 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 construction in their self-determined areas of interest. NTIA initiates tribal consultation using grantee prepared information/documentation. Uploading the relevant information to the TCNS system will notify Tribal Nations that the materials are ready for review in TCNS, and the information will also be forwarded to Tribal Nations by electronic mail and/or regular mail (letter), if they have specified an additional, alternative method outside TCNS. The TCNS

submittal begins the 30-day period that is ordinarily considered "reasonable time" for review. It is expected that tribal recipients will respond directly to NTIA if they have concerns about a proposed construction. After 30 days, if NTIA has not received a response from a tribe(s), NTIA will promptly contact all unresponsive tribes and/or tribes that did not have self-imposed timeout periods (usually 30 days) by email to request that the tribe inform NTIA, within 15 calendar days, of its interest in consulting on or providing comments on the proposed project. If the tribe(s) does not provide comment within 15 days (45-day period total), NTIA's tribal consultation obligations are considered discharged, and the consultation period is concluded.

For the Proposed Action, on April 24, 2025, tribes (see list below) were notified of the Project through TCNS and/or email/mail, per the procedures above. No tribes provided any comments during the initial 30-day consultation period. On May 28, 2025, following the end of the initial 30-day consultation period (May 25, 2025), NTIA reached out, via email, to all other tribes that either had not responded or did not have self-imposed timeout periods to allow for another 15 days to comment. On May 29, 2025, the Eastern Shawnee Tribe of Oklahoma responded that they have "no interest in this site." June 8, 2025 was the end of the additional period (45 total days). No other tribes provided any comments during the additional 15-day consultation period.

- Omaha Tribe O Nebraska
- Delaware Nation
- Tuscarora Nation
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- 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

No Native American Traditional, Cultural or Religious Resources have been identified in the project area. A copy of the project tribal summary table is included in Appendix C.

4.7 Aesthetic and Visual Resources

The project site is not located in a national and state park. No national scenic trails are mapped within the project site (NPS, 2023b). The NRHP-listed properties identified in Franklin County are further discussed in Section 4.6 (Cultural Resources). There are no parks or designated recreational areas located at the proposed location area of potential effects.

4.8 Land Use

The proposed Spring Run Tower has a current land use of undeveloped forest on privately owned land. The Spring Run Tower will involve converting approximately 1.5 acres of forested 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 the proposed site as located within an area considered as "farmland of statewide importance" as defined by 7 CFR §658.2. Terracon submitted a Farmland conversion impact rating form to the NRCS for consultation. NRCS concluded that "no potential for impact has been found for our {NRCS] easements and dams". Additionally, no additional action or alternatives are required with respect to the FPPA if the total site assessment score from Part VII is less than 160. The assessment score for Part VII is 57. (NRCS documentation is provided in Appendix G)

According to federal lands mapping data maintained by the USGS, USFS, and the National Park Service (NPS), the project site is not located in an officially designated wilderness area and/or wildlife preserve (i.e. refuge). The proposed site is located on privately owned land and is therein not in an officially designated wilderness area or wildlife preserve.

4.9 Infrastructure

The Spring Run Tower is a proposed new construction of a communications tower with an associated access easement. 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 Grantee 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 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 Grantee 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 regard to all construction activities.

On August 31, 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 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 the site.

In accordance with Title 14 of the Code of Federal Regulations (14 CFR) Part 77, the proposed tower will not require Federal Aviation Administration (FAA) filing to ensure it does not pose a hazard to air navigation. FAA Park 77 filing typically applies to proposed structures greater than 200' or within the glide slope of an airport.

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.

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 location in the case of power loss. The Spring Run proposed tower site will include a new generator; however, no sensitive receptors (residences, churches, schools, etc.) are located within the immediate vicinity that would not be buffered by wooded land.

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 proposed Spring Run 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

Construction of the new tower at the proposed Spring Run Tower will necessitate about 2 acres of ground disturbance for the new tower location compound and access/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 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 proposed 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 Spring Run tower project, the PNDI environmental review tool project response indicates the DCNR and PFBC 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 replied: *"Potential impacts to state and federally listed species which are under the jurisdiction of both the PGC and the USFWS may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the USFWS. No further coordination with the PGC is required at this time."*

The USFWS requested Terracon to enter the project information into IPaC to review the project's potential effect on federally listed species. Terracon utilized the IPaC determination keys to evaluate the effect of the proposed project on the Northern Long-eared Bat. It was determined the project May Affect, Not Likely to Adversely Affect the Northern Long-eared Bat. To avoid impacts to the NLEB, there should be no tree clearing, drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30). No consultation with the USFWS pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 et seq.) is required for these species.

No bald or golden eagle nests have been documented within 660 feet of either site; however, several migratory birds were identified with the potential to occur in the vicinity of the proposed 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 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 the above mitigation measures, it is anticipated that the proposed telecommunications will result in less than significant 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 archeological resources were identified at either site location. Both the 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 less than significant direct or indirect impacts to historic and cultural resources.

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

5.7 Aesthetic and Visual Resources

No significant resources were identified in the viewshed of the proposed Spring Run Tower site. The proposed action will result in less than significant direct or indirect impacts 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 site consists of wooded land in a predominantly rural area. Rural areas have historically lacked 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 permanent change equating to approximately 1.5 acres of forested area, which will be conducted consistently with local land use requirements. Areas of significant disturbance include the tower compound and construction easement which consist of, and are abutted by, wooded land. The proposed action will result in less than significant direct or indirect impacts to land use.

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

5.9 Infrastructure

The proposed action involves 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 Franklin County that currently lacks access to broadband. To ensure minimal conflict with other utilities in the area, the Grantee 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 Franklin County. 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 Human Health and Safety

No potential environmental concerns have been identified in the vicinity of the site that would potentially impact soil or groundwater. The Grantee 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 not be required for the proposed Spring Run tower. 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.

5.11 Reasonably Foreseeable Environmental Impacts

Reasonably foreseeable environmental impacts take into consideration 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) 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 within its own EA, the effects of this collective portfolio is 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 NLEB, there should be no tree clearing, drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30).
- Pre-construction nesting surveys for migratory birds should be completed at the site before ground disturbing activities that occur with migratory bird nesting seasons.

- 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)).
- Use of dust suppression techniques via water trucks or other methods may be implemented to reduce fugitive dust emissions during construction. A NPDES permit would be required for the tower site which requires greater than one acre of disturbance during construction activities.
- The Grantee 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 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 Spring Run Tower indicated no environmental concerns with any agencies, and no further ESA consultation was required for the proposed tower. To avoid impacts to the NLEB, there should be no tree clearing, drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30).
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	Pre-construction nesting surveys for migratory birds should be completed at the site before ground disturbing activities. The project as currently proposed will have no effect on migratory birds.

Regulation	Project Information / Applicability
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 migratory birds.
Waters, Wetlands, and Floodplain Protection	
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. Based on a review of the National Wetlands Inventory (NWI) map, there is a riverine wetland feature that crosses the proposed access/utility easement west of New Bridge Road. Based on the site reconnaissance and existing site conditions, there were no wetland features or surface waters observed within the project footprint. Therefore, the proposed 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.
Air Quality	
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.
Cultural and Historic Resources	
Antiquities Act of 1906 16 U.S.C. § 431-433 Historic Sites Act of 1935 16 U.S.C. § 461-467 National Historic Preservation Act (NHPA), as amended, inclusive of Section 106 54 U.S.C. § 306108 et seq. Archaeological Data Preservation Act of 1974 (16 U.S.C. § 469 – 469-1)	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)).

Regulation	Project Information / Applicability
Archaeological Resources Protection Act of 1979, as amended 16 U.S.C. § 469 a-c Native American Graves Protection and Repatriation Act 25 U.S.C. § 3001 et seq. Indian Sacred Sites Executive Order 13007 American Indian Religious Freedom Act of 1978 (42 U.S.C. § 1996)	
Noise, Public Health, and Safety	
Noise Control Act of 1972 42 U.S.C. § 4901 et seq.	The project is not subject to county specific noise regulations.
Spill Prevention Control and Countermeasures Rule 40 CFR 112 Comprehensive Environmental Response, Compensation, and Liability Act 42 U.S.C. § 9601 et seq. Resource Conservation and Recovery Act 42 U.S.C. § 6901 et seq. The Toxic Substances Control Act 15 U.S.C. 2601 et seq.	Workers should follow OSHA requirements for worker protection (i.e. wearing hearing protection, etc.). The Grantee 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.
State, County, and Local Plan Consistency	
NPDES Permit	A NPDES permit would be required for construction activities with ground disturbance greater than one acre.

7.0 Consultations

Table 7.0 Agency Consultations:

Agency and Name	Consultation	Status
PA Fish and Boat Commission Josh Brown	Environmental Review	No further review required, no known impact
Pennsylvania Game Commission	Environmental Review	No further review required, defer to USFWS
United States Fish and Wildlife Service	Environmental Review	No further review required. To avoid impacts to the NLEB, there should be no tree clearing,

Agency and Name	Consultation	Status
		drilling, or blasting restrictions during the Summer Occupancy period (April 1- September 30).
PA Department of Conservation and Natural Resources	Environmental Review	No further review required, no known impact
PA SHPO Barbara Frederick	Section 106 of the NHPA	SHPO Concurrence received
Fannett Township Georgia O'Donnell	Section 106 of the NHPA	No response received
Franklin County Historical Society Margaret Skrivseth	Section 106 of the NHPA	No response received

Tribal Nation Consultation

NTIA initiated tribal consultation using grantee prepared information/documentation to notify Tribal Nations of the project and provided The Grantee 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
- Tuscarora Nation
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- 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, one tribe (Eastern Shawnee Tribe of Oklahoma) 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.

8.0 References

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United States Geological Survey (USGS). (1980a). Pennsylvania geologic map data. https://mrdata.usgs.gov/geology/state/state.php?state=PA

APPENDIX A

Name	Title	Role
Emily Kosmalski	Environmental Planning Manager	Report Review and QA/QC
Kathy Eisele	Senior Associate	Tribal and Agency Consultation Coordination
Arielle Hess	Field Scientist	Report Author / Biological and Wetland Resources
Marilyn Zenko	Senior Associate	Biological and Wetland Resources / Cultural Resources Reviewer
Suzanne Reece	Senior Archaeologist, Principal Investigator	Cultural Resources Reviewer
Patricia Davenport – Jacobs Meghan Browning	Architectural Historian, Principal Investigator	Cultural Resources Researchers
Josh Duncan	Archaeologist	Cultural Resources Researcher

APPENDIX B

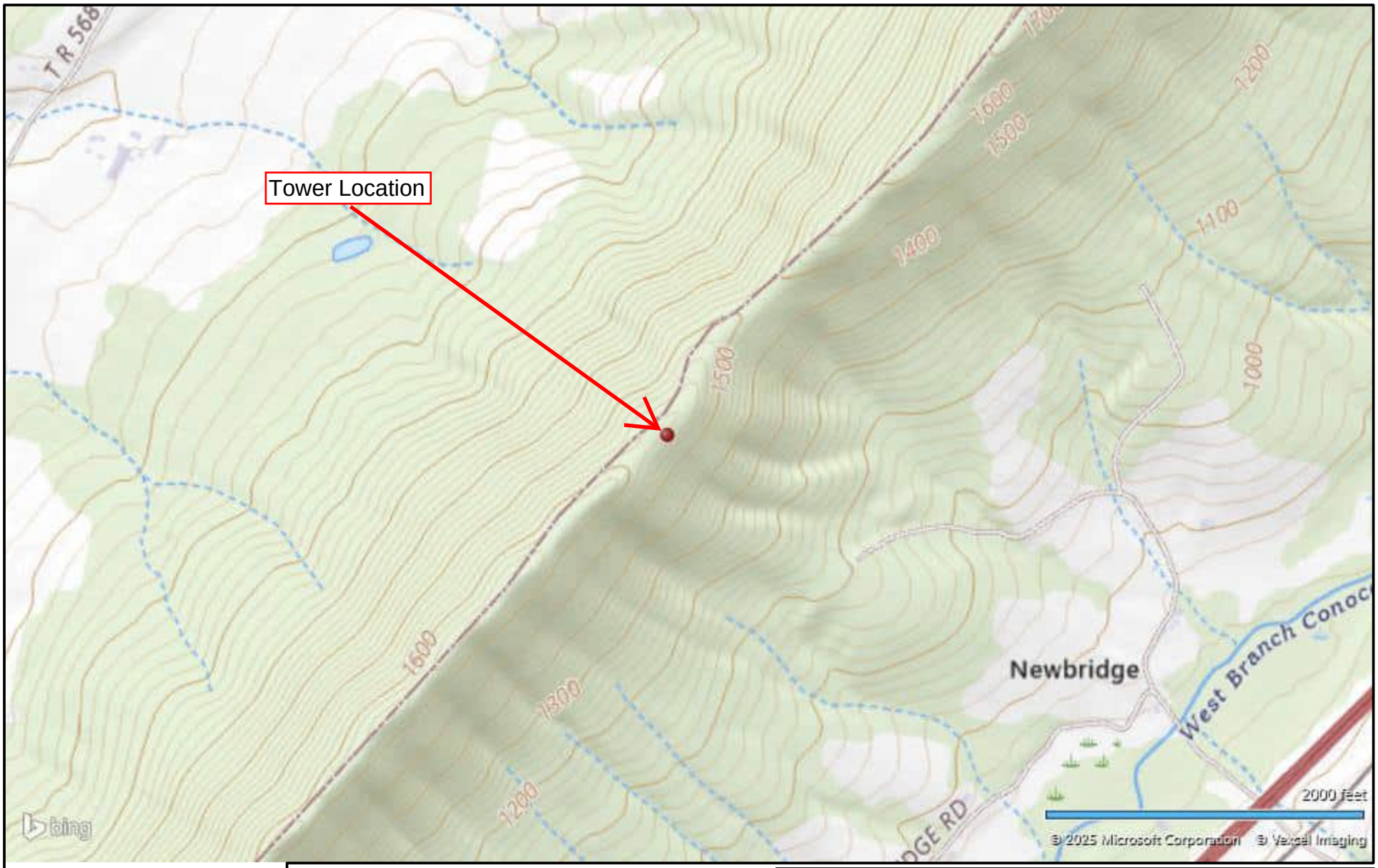

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DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

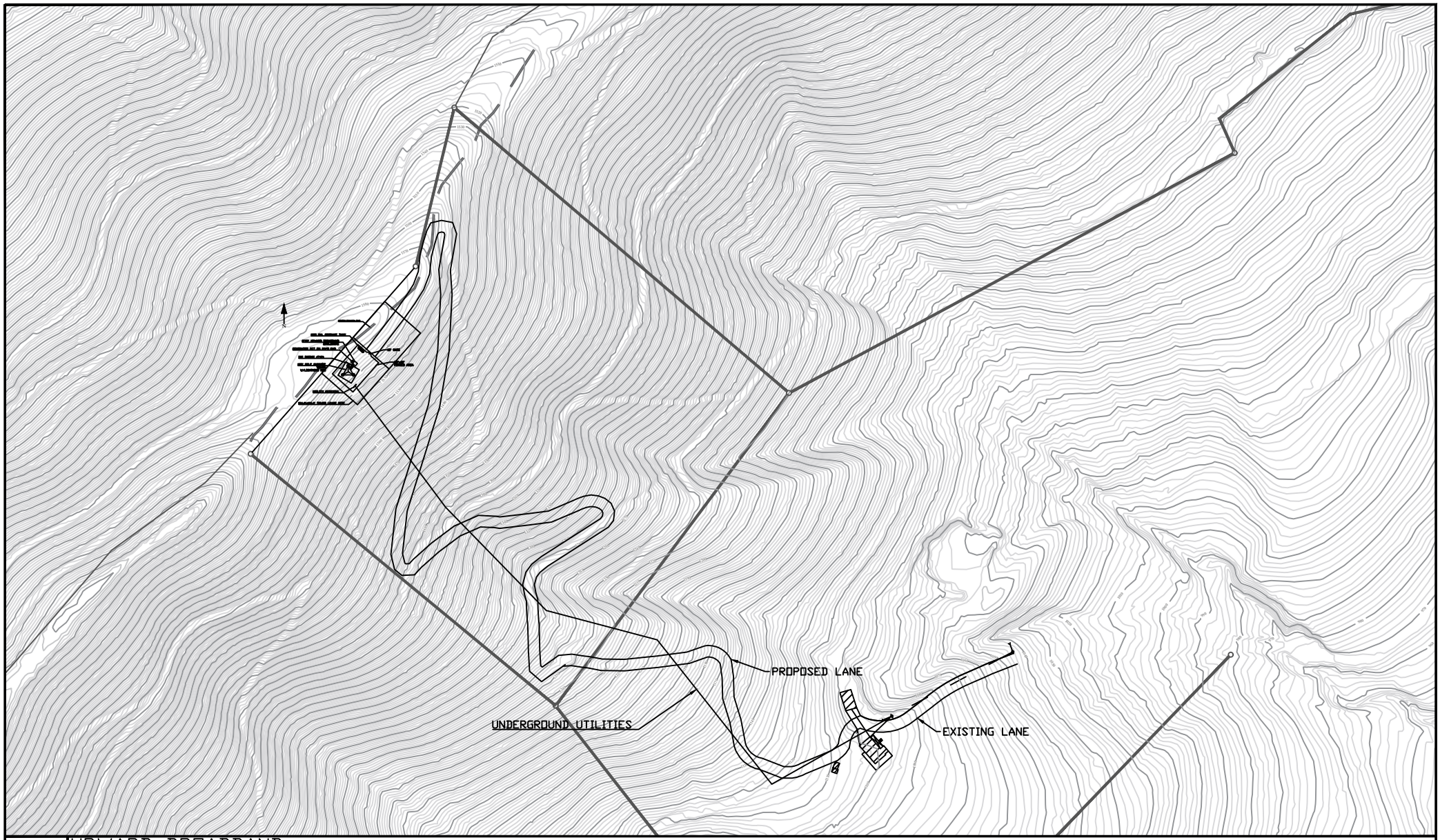
Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

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

Topographic Map

Spring Run Tower
17935 New Bridge Road
Fannett Township (Spring Run), Franklin County PA



UPWARD BROADBAND

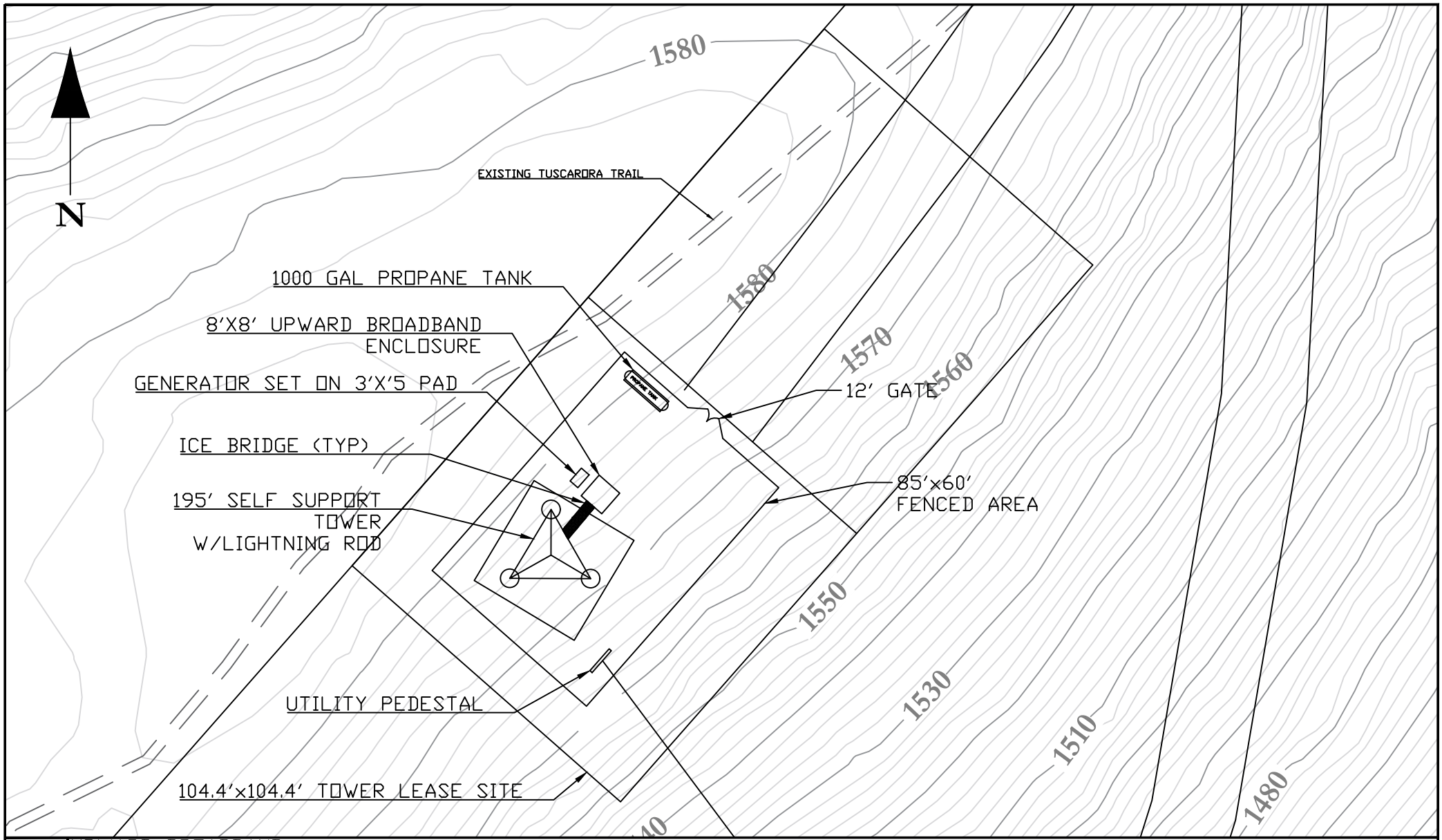
SHEET 1 OF 1

Job Name: Spring Run

Preliminary Site Plan Final

Spring Run Tower: 40.15091, -77.73687

BY:BSR | DATE:3/14/25 | Spring Run.dwg



UPWARD BROADBAND

Job Name: UB/NTIA Spring Run

Spring Run Tower: 40.15091, -77.73687

BY:BSR | DATE:3/14/25 | Spring Run.dwg

SHEET 1 OF 1

Preliminary Site Plan Final

N

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

Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

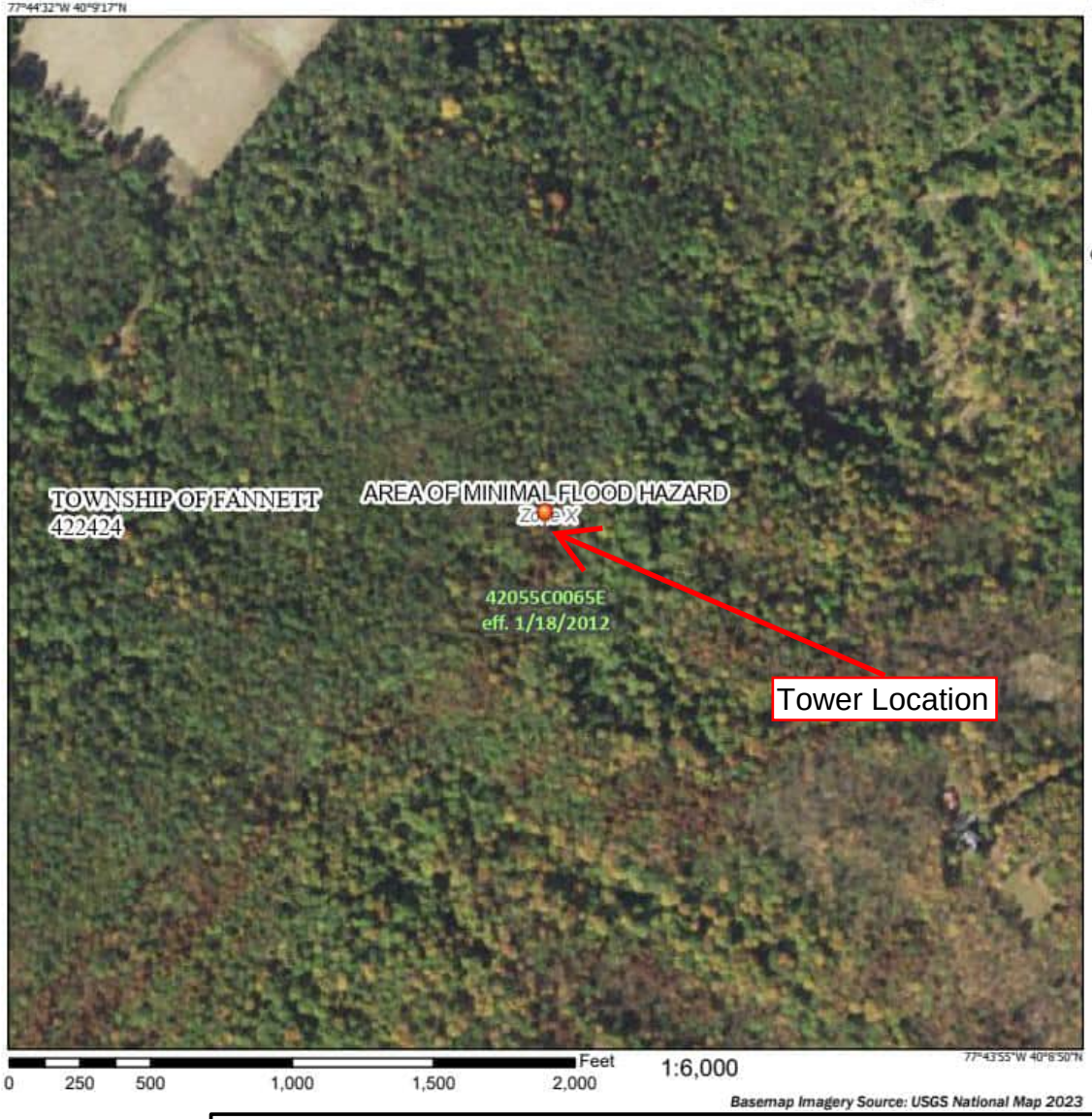
844 N Lenola Rd, Ste 1
Moorestown, NJ 08057-1052

Aerial Location Map with 0.5-mile APE

Spring Run Tower

17935 New Bridge Road
Fannett Township (Spring Run), Franklin County PA

National Flood Hazard Layer FIRMette



Basemap Imagery Source: USGS National Map 2023

Legend

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

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

N

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/15/2025 at 5:19 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

N

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

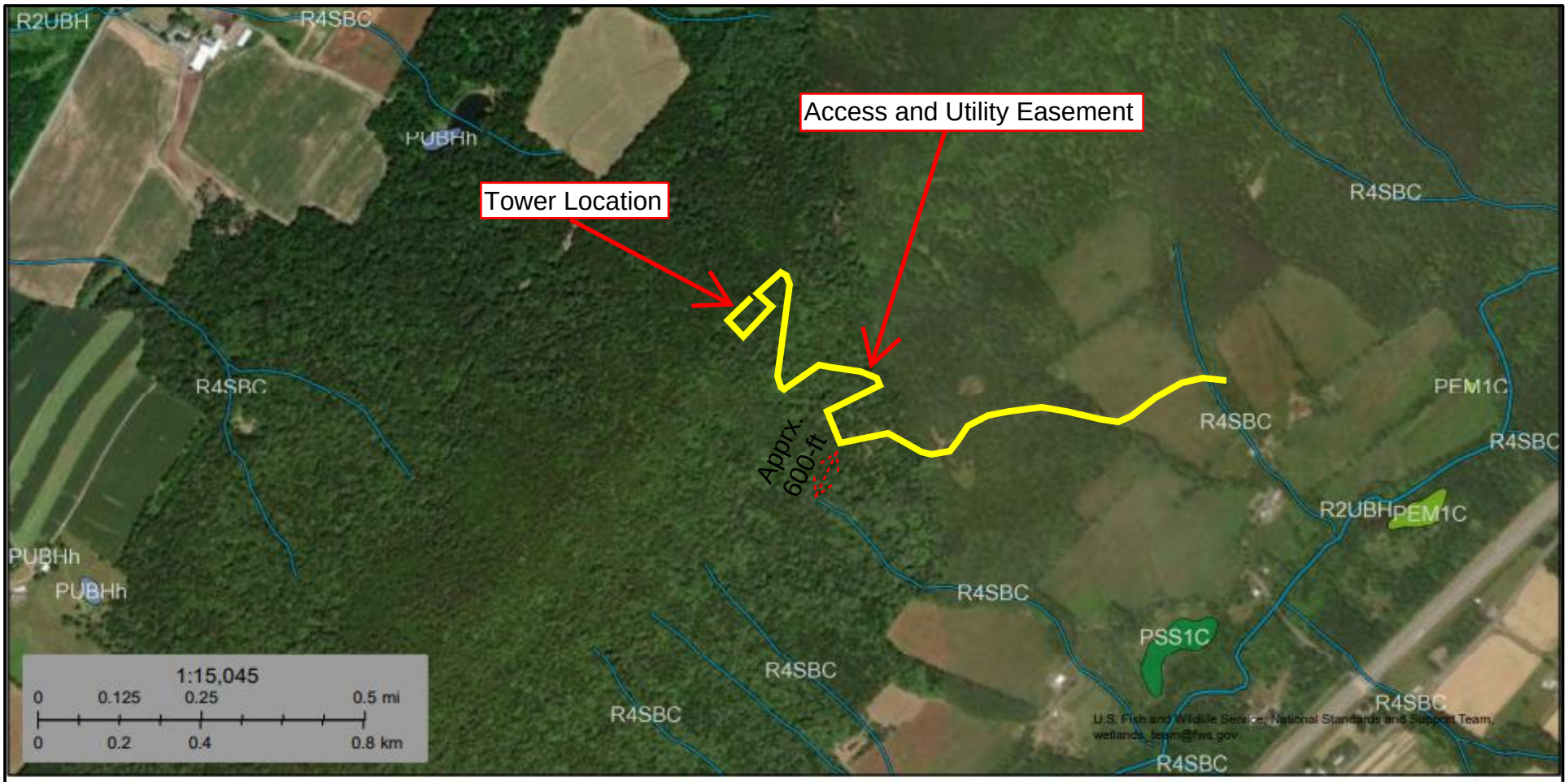
Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

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

FEMA National Flood Hazard Map

Spring Run Tower
17935 New Bridge Road
Fannett Township (Spring Run), Franklin County PA



April 15, 2025

Wetlands

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

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

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

N

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

Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

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

National Wetlands Inventory Map

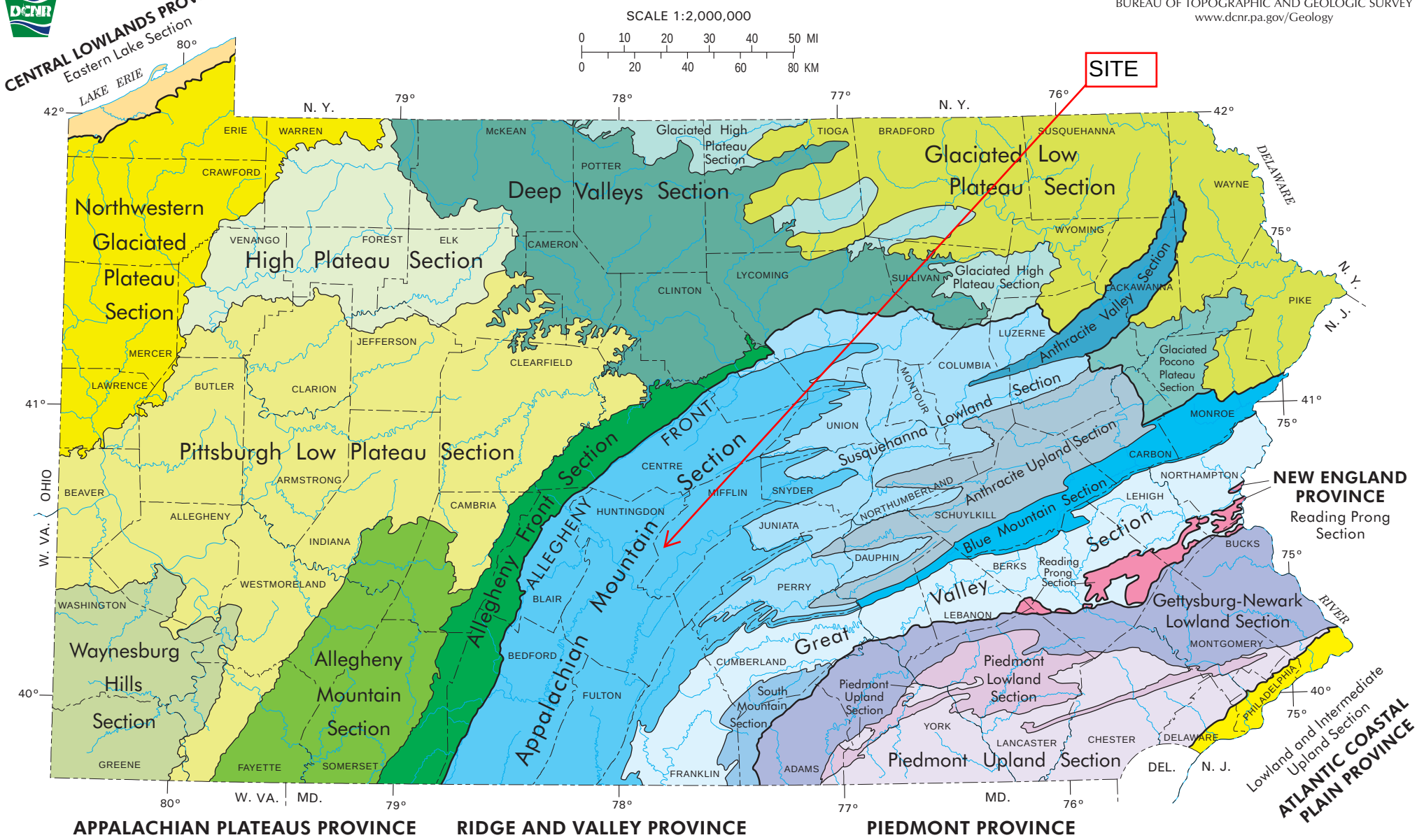
Spring Run Tower

17935 New Bridge Road
Fannett Township (Spring Run), Franklin County PA

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



EXPLANATION

CENTRAL LOWLANDS PROVINCE
- Eastern Lake Section

APPALACHIAN PLATEAUS PROVINCE
- Northwestern Glaciated Plateau Section
- 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

RIDGE AND VALLEY PROVINCE
- Appalachian Mountain Section
- Susquehanna 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

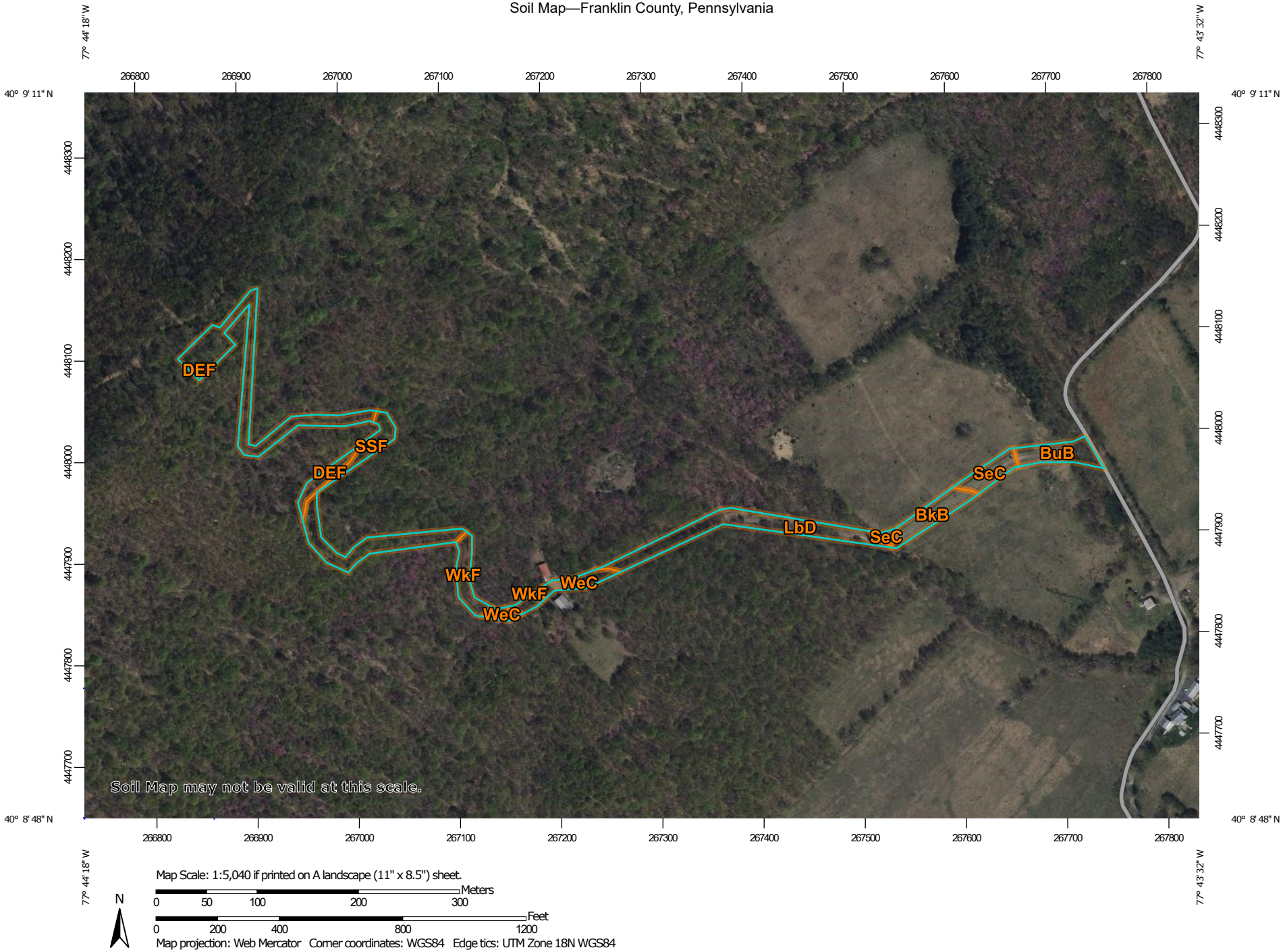
SYMBOLS
- Approximate boundary between physiographic provinces
- Approximate boundary between physiographic sections

Compiled by W. D. Sevon. Fourth Edition, 2000; Second Printing, 2018.

PHYSIOGRAPHIC PROVINCES OF PENNSYLVANIA

PHYSIOGRAPHIC PROVINCE	PHYSIOGRAPHIC SECTION	DOMINANT TOPOGRAPHIC FORM	LOCAL RELIEF[1]	UNDERLYING ROCK TYPE	GEOLOGIC STRUCTURE	APPROXIMATE ELEVATION[2] Min.	Max.	DRAINAGE PATTERN	BOUNDARIES	ORIGIN
CENTRAL LOWLANDS	Eastern Lake	Northwest-sloping, lake-parallel, low-relief ridges.	Very low to low.	Shale and siltstone.	Beds either horizontal or having low south dip.	570	1,000	Parallel.	*Northwest:* Lake Erie. *Southeast:* Base of escarpment.	Glacial, lake, and fluvial deposition and erosion.
APPALACHIAN PLATEAUS	Northwestern Glaciated Plateau	Broad, rounded upland and deep, steep-sided, linear valleys partly filled with glacial deposits.	Very low to moderate.	Shale, siltstone, and sandstone.	Subhorizontal beds.	900	2,200	Dendritic.	*Northwest:* Base of escarpment. *Southeast:* Glacial border.	Fluvial and glacial erosion; glacial deposition.
	High Plateau	Broad, rounded to flat uplands having deep, angular valleys.	Moderate to high.	Sandstone, siltstone, shale, and conglomerate; some coal.	Low-amplitude, open folds.	980	2,360	Dendritic.	*Northwest:* Glacial border. *Northeast:* Margins of deep valleys. *South:* Arbitrary along drainage divides between coal and noncoal areas.	Fluvial erosion; periglacial mass wasting.
	Pittsburgh Low Plateau	Smooth to irregular, undulating surface; narrow, relatively shallow valleys; strip mines and reclaimed land.	Low to moderate.	Shale, siltstone, sandstone, limestone, and coal.	Moderate- to low-amplitude, open folds, decreasing in occurrence northwestward.	660	2,340	Dendritic.	*Northwest:* Glacial border. *Elsewhere:* Arbitrary at topographic changes with adjacent sections.	Fluvial erosion; periglacial mass wasting; strip mining.
	Waynesburg Hills	Very hilly with narrow hilltops and steep-sloped, narrow valleys.	Moderate.	Sandstone, shale, red beds, and limestone.	Horizontal beds.	848	1,638	Dendritic.	Arbitrary at change of topography.	Fluvial erosion and landslides.
	Allegheny Mountain	Wide ridges separated by broad valleys; ridge elevations decrease to north.	Moderate to high.	Sandstone, siltstone, shale, and conglomerate; some limestone and coal.	Large-amplitude, open folds.	775	3,210	Dendritic.	*East:* Arbitrary between coal and noncoal areas. *West:* Base of west flank of Chestnut Ridge. *North:* Approximates northeast terminus of large-amplitude, open folds.	Fluvial erosion; some periglacial mass wasting.
	Allegheny Front	*East:* Rounded to linear hills rising by steps to an escarpment; hills cut by narrow valleys. *West:* Undulating hills sloping away from escarpment.	Moderate to high.	Shale, siltstone, and sandstone.	*South:* Broad fold. *Elsewhere:* Beds having low northwest dip; some faults.	540	2,980	Parallel and trellis.	*East:* Stream at base of hills below escarpment. *West:* Arbitrary between coal and noncoal areas.	Fluvial erosion; periglacial mass wasting.
	Deep Valleys	Very deep, angular valleys; some broad to narrow uplands.	Moderate to very high.	Sandstone, siltstone, shale, and conglomerate.	Moderate-amplitude, open folds that control valley orientations.	560	2,560	Angulate and rectangular.	Arbitrary at margins of deep valleys, either at top of valley slope or along drainage divide.	Fluvial erosion; periglacial mass wasting.
	Glaciated High Plateau	Broad to narrow, rounded to flat, elongate uplands and shallow valleys.	Low to high.	Sandstone, siltstone, shale, and conglomerate; some coal.	Moderate-amplitude, open folds.	620	2,560	Angulate and dendritic.	*East:* Base of escarpment. *Elsewhere:* Arbitrary with margins of deep valleys.	Fluvial and glacial erosion; glacial deposition.
	Glaciated Low Plateau	Rounded hills and valleys.	Low to moderate.	Sandstone, siltstone, and shale.	Low-amplitude folds.	440	2,690	Dendritic.	Base of escarpments of adjacent uplands; base of Pocono escarpment. *Elsewhere:* Arbitrary.	Fluvial and glacial erosion; glacial deposition.
	Glaciated Pocono Plateau	Broad, undulatory upland surface having dissected margins.	Low to moderate.	Sandstone, siltstone, and shale; some conglomerate.	Beds having low north dip; some small folds.	1,200	2.320	Deranged.	*South and east:* Base of Pocono escarpment. *North:* Crest of drainage divide. *West:* Arbitrary.	Fluvial and glacial erosion; glacial deposition.
RIDGE AND VALLEY	Appalachian Mountain	Long, narrow ridges and broad to narrow valleys; some karst.	Moderate to very high.	Sandstone, siltstone, shale, conglomerate, limestone, and dolomite.	Open and closed plunging folds having narrow hinges and planar limbs; variety of faults.	440	2,775	Trellis, angulate, and some karst.	*Southeast:* Base of slope change on southeast side of Blue Mountain. *West and northwest:* Center of valley bottom west of westernmost linear ridge. *Elsewhere:* Base of slope change of eastern ridges; arbitrary between ridges.	Fluvial erosion; solution of carbonate rocks; periglacial mass wasting.
	Susquehanna Lowland	Low to moderately high, linear ridges; linear valleys; Susquehanna River valley.	Low to moderate.	Sandstone, siltstone, shale, conglomerate, limestone, and dolomite.	Open and closed plunging folds having narrow hinges and planar limbs.	260	1,715	Trellis and angulate.	Base of slope change to higher ridges of all surrounding areas; arbitrary in valley areas.	Fluvial erosion; some glacial erosion and deposition in northeast.
	Anthracite Valley	Narrow to wide, canoe-shaped valley having irregular to linear hills; valley enclosed by steep-sloped mountain rim.	Low to moderate.	Sandstone, siltstone, conglomerate, and anthracite.	Broad, doubly-plunging syncline; faults and smaller folds.	500	2,368	Trellis and parallel.	Outer base of surrounding mountain.	Fluvial and glacial erosion; some glacial deposition.
	Anthracite Upland	Upland surface having low, linear to rounded hills, strip mines, and waste piles; upland surrounded by an escarpment, a valley, and a mountain rim.	Low to high.	Sandstone, shale, conglomerate, and anthracite.	Many narrow folds having steep limbs; many faults.	320	2,094	Trellis.	*Northeast:* Arbitrary between coal and noncoal areas. *Elsewhere:* Outer base of surrounding mountain.	Fluvial erosion; some glacial erosion and periglacial mass wasting.
	Blue Mountain	Linear ridge to south and valley to north; valley widens eastward and includes low linear ridges and shallow valleys.	Moderate to high.	Sandstone, siltstone, and shale; some limestone and conglomerate.	*Southwest:* South limb of broad fold. *Northeast:* Small folds north of Blue Mountain.	300	1,680	Trellis.	*Southeast:* Base of slope change on southeast side of Blue Mountain. *Northwest:* Base of mountain; base of Pocono escarpment. *Northeast:* Arbitrary.	Fluvial erosion; some glacial erosion and deposition in northeast.
	Great Valley	Very broad valley. *Northwest half:* Dissected upland. *Southeast half:* Low karst terrain.	Low to moderate.	*Northwest:* Shale and sandstone; slate at east end. *Southeast:* Limestone and dolomite.	Thrust sheets, nappes, overturned folds, and steep faults; many third- and fourth-order folds.	140	1,100	Dendritic and karst.	*North:* Base of slope change on southeast side of Blue Mountain. *South:* Base of slope change to adjacent uplands.	Fluvial erosion; solution of carbonate rocks; some periglacial mass wasting.
	South Mountain	Linear ridges, deep valleys, and flat uplands.	Moderate to high.	Metavolcanic rocks, quartzite, and some dolomite.	Major anticlinorium having many second- and third-order folds.	450	2,080	Dendritic.	Base of slope change to adjacent lowlands.	Fluvial erosion of highly variable rocks; some periglacial mass wasting.
NEW ENGLAND	Reading Prong	Circular to linear, rounded hills and ridges.	Moderate.	Granitic gneiss, granodiorite, and quartzite.	Multiple nappes.	140	1,364	Dendritic.	Base of slope change to adjacent lowlands.	Fluvial erosion; some periglacial mass wasting.
PIEDMONT	Gettysburg-Newark Lowland	Rolling lowlands, shallow valleys, and isolated hills.	Low to moderate.	Mainly red shale, siltstone, and sandstone; some conglomerate and diabase.	Half-graben having low, monoclinal, northwest-dipping beds.	20	1,355	Dendritic and trellis.	Base of slope changes with adjacent uplands and lowlands. *Elsewhere:* Arbitrary.	Fluvial erosion of rocks of variable resistance.
	Piedmont Lowland	Broad, moderately dissected, karst valleys separated by broad, low hills.	Low.	Dominantly limestone and dolomite; some phyllitic shale and sandstone.	Complexly folded and faulted.	60	700	Dendritic and karst.	*South:* Base of slope change to adjacent upland. *North:* Mesozoic red rocks.	Fluvial erosion; some periglacial mass wasting.
	Piedmont Upland	Broad, rounded to flat-topped hills and shallow valleys.	Low to moderate.	Mainly schist, gneiss, and quartzite; some saprolite.	Extremely complexly folded and faulted.	100	1,220	Dendritic.	*East:* Base of low to vague Fall Line escarpment. *North:* Base of slope change to adjacent lowlands.	Fluvial erosion; some periglacial mass wasting.
ATLANTIC COASTAL PLAIN	Lowland and Intermediate Upland	Flat upper terrace surface cut by shallow valleys; Delaware River floodplain.	Very low.	Unconsolidated to poorly consolidated sand and gravel; underlain by schist, gneiss, and other metamorphic rocks.	Unconsolidated deposits underlain by complexly folded and faulted rocks.	0	200	Dendritic.	*Northwest:* Base of low to vague Fall Line escarpment. *East:* Arbitrary.	Fluvial erosion and deposition.

[1]Local relief: 0 to 100 feet, very low; 101 to 300 feet, low; 301 to 600 feet, moderate; 601 to 1,000 feet, high; >1,000 feet, very high.
(Relief categories listed here for Pennsylvania do not necessarily apply to other states or countries.)
[2]Elevations are in feet.



Map Scale: 1:5,040 if printed on A landscape (11" x 8.5") sheet.

N

Meters: 0 50 100 200 300

Feet: 0 200 400 800 1200

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 18N WGS84

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

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

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

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

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

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

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

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

Soil Survey Area: Franklin County, Pennsylvania
Survey Area Data: Version 18, Sep 4, 2024

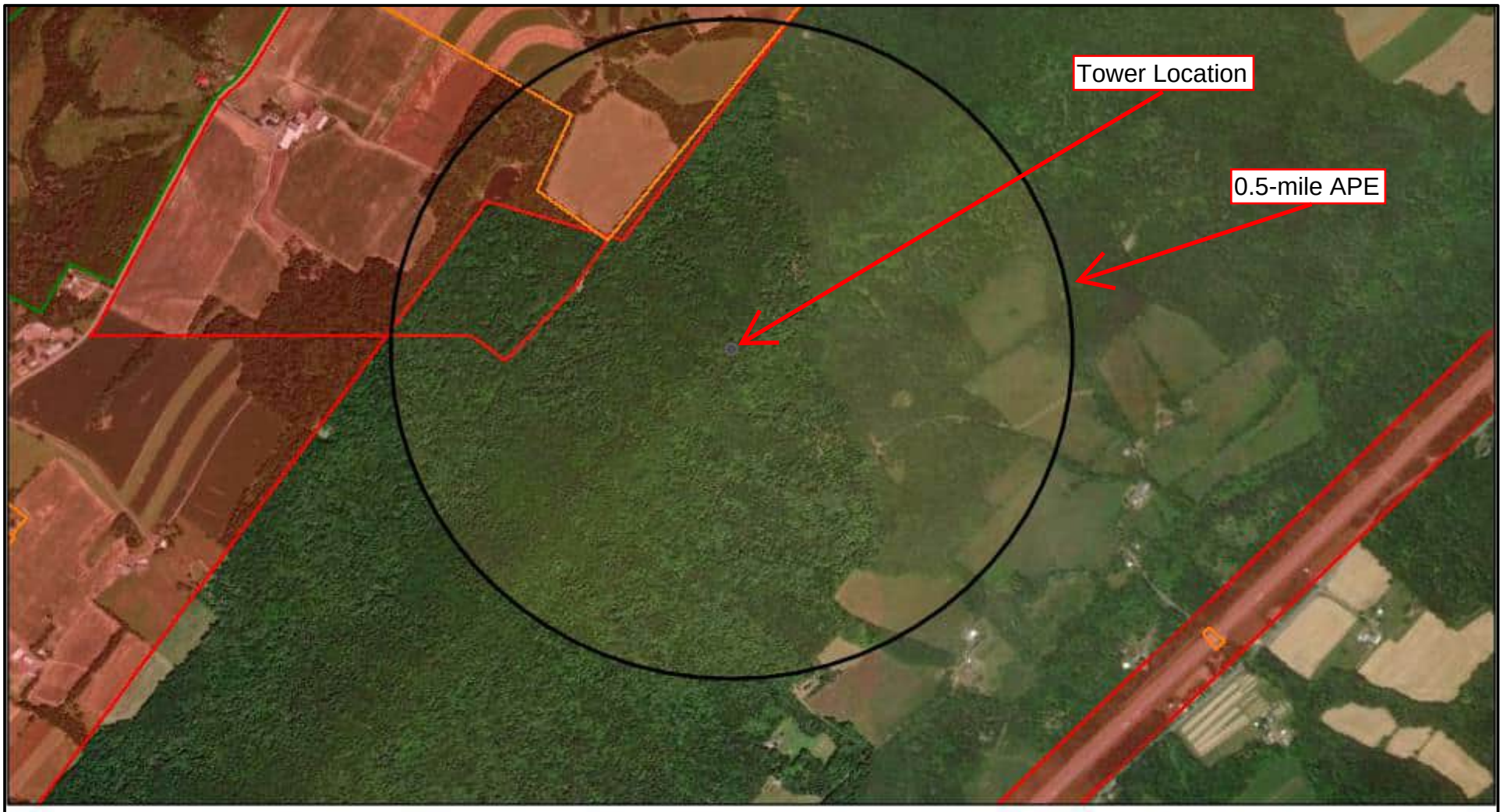
Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 13, 2023—May 17, 2023

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
BkB	Berks channery silt loam, 3 to 8 percent slopes	0.4	7.7%
BuB	Buchanan channery loam, 3 to 8 percent slopes	0.4	7.7%
DEF	Dekalb-Hazleton cobbly sandy loams, 25 to 75 percent slopes, rubbly	1.4	26.6%
LbD	Laidig gravelly loam, 8 to 25 percent slopes, extremely stony	1.0	19.2%
SeC	Sideling gravelly loam, 8 to 15 percent slopes	0.3	6.6%
SSF	Sideling and Hazleton soils 25 to 60 percent slopes, extremely stony	1.0	18.9%
WeC	Weikert channery silt loam, 8 to 15 percent slopes	0.3	5.7%
WkF	Weikert very channery silt loam, 25 to 65 percent slopes	0.4	7.6%
Totals for Area of Interest		**5.1**	**100.0%**



4/15/2025

Above Ground Resource

Eligible

Not Eligible

Undetermined

District Resource

Not Eligible

1:18,056

0 0.1 0.2 0.4 mi

0 0.17 0.35 0.7 km

Maxar

N

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

Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

844 N Lenola Rd, Ste 1

Moorestown, NJ 08057-1052

PA SHARE Cultural Resources Map with 0.5-mile APE

Spring Run Tower

17935 New Bridge Road

Fannett Township (Spring Run), Franklin County PA

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: 04/25/2025

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 Omahatribefcctcns@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 whetherthe project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. 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.

4. 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.

5. Director - Lora Nuckolls - Eastern Shawnee Tribe of Oklahoma - 70400 East HWY 60 - Wyandotte, OK - celltower@estoo.net - 918-238-5151 (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 requesting our most current copy.

6. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - 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. We will advise if we require additional information.

7. THPO - Tonya Tipton - Shawnee Tribe - 29 South 69A Highway - Miami, OK - 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 contactthe Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

8. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - rep32jwb@gmail.com; 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 and 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.

9. 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 - 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

Thank you

10. THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - Bartlesville, OK - historicpreservation@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 theproject. 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 Pennsylvaniais 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 Midwesternregion 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 officeprefers 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 DelawareTribe 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.

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

12. 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

13. 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

14. SHPO - Barbara Franco - Pennsylvania Historical and Museaum 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: 04/22/2025

Notification ID: 294977
Project Number: 73
Applicant: Upward Broadband
Applicant Contact: Kathy Eisele

Project Type(s): Towers

Region(s) affected (State, County): PENNSYLVANIA, FRANKLIN

Address or Geographical Location Description: Proposed 195-foot self-support telecommunications tower (overall height
199 feet) with associated access/utility easement and lease area, located 2,500 ft Southwest of 16832 S. Dry Run Road, Dry Run (Fannett Township), Franklin County, PA 17220

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

APPENDIX D

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

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

Terracon.com

June 18, 2025

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.

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Lease Area:	5,100 square feet
Tower Height:	199 feet, including attachments
Tower Type:	Self-support
Description of the site	Undeveloped, wooded land
Proposed Access Road:	A proposed access/utility easement extends generally south-southeast from the proposed tower compound towards New Bridge Road.
Description of the surrounding properties	Wooded and agricultural land
Description of wetlands or water bodies near the site	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. A riverine wetland feature is mapped crossing the proposed utility easement. See additional details below.
Elevation and topography	1,574 feet above mean sea level. The topography in the immediate vicinity of the site slopes to the southeast.

Suzanne Reese performed a site visit on May 15, 2025. At the time of the site reconnaissance, the site and surrounding properties were observed to consist of undeveloped, wooded land.

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. A riverine wetland feature is mapped crossing the proposed utility easement west of New Bridge Road. Based on existing site conditions, there were no surface water or wetlands observed during the site reconnaissance; therefore, it is Terracon's opinion that the proposed constructions will have no impact to the mapped riverine feature.

The Natural Resource Conservation Service's (NRCS) Web Soil Survey (2025) records five soils within the project area. These soils are summarized below.

Soil Name	Approx. Percentage of Project Area	Drainage Class / Frequency of Flooding	Hydric Soil Rating
Dekalb-Hazleton cobbly sandy loams, 25 to 75 percent slopes, rubbly	43.7%	Well drained / no flooding	No
Laidig gravelly loam, 8 to 25 percent slopes, extremely stony	0.4%	Well drained / no flooding	No
Sideling and Hazleton soils 25 to 60 percent slopes, extremely stony	36.5%	Moderately well drained / no flooding	No
Weikert channery silt loam, 8 to 15 percent slopes	0.2%	Somewhat excessively drained / no flooding	No
Weikert very channery silt loam, 25 to 65 percent slopes	0.6%	Somewhat excessively drained / no flooding	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 (*Myotis sodalist)*	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 *(Myotis septentrionalis)*	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

Insect	Monarch Butterfly *(Danaus plexippus)*	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).	Proposed Threatened
Flowering Plant	Northeastern Bulrush (*Scirpus ancistrochaetus*)	Grows in wet areas – small wetlands, sinkhole ponds or wet depressions with seasonally fluctuating water levels (USFWS).	Endangered

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.

The PGC replied: “Potential impacts to state and federally listed species which are under the jurisdiction of both the PGC and the USFWS may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the USFWS. No further coordination with the PGC is required at this time.”

The USFWS requested Terracon to enter the project information into IPaC to review the project’s potential effect on federally listed species. Terracon utilized the IPaC determination keys to evaluate the effect of the proposed project on the Northern Long-eared Bat. It was determined the project May Affect, Not Likely to Adversely Affect the Northern Long-eared Bat. Due to habitat suitability, the applicant has agreed to adhere to seasonal tree clearing, drilling, and blasting restrictions during the Summer Occupancy period (April 1- September 30). No consultation with the USFWS pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 et seq.) is required for these species. The USFWS Determination Letters are attached.

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.

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 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 267-512-7044 or arielle.hess@terracon.com if you need additional information.

Sincerely,
Terracon Consultants, Inc.

Arielle Hess
Field Scientist

Marilyn Zenko, F.SAME
Senior Associate

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

TOWER SITE USFWS EVALUATION FORM

1. Location (attach map) State: Pennsylvania County: Franklin
Latitude/Longitude: 40° 09' 03.6" N / 77° 44' 13.5" W Elevation: 1,574 feet
City and Highway Direction: Spring Run, East of Route 641

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: Total Number of wires:
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 be 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: 06/18/2025 14:40:56 UTC
Project Code: 2025-0110997
Project Name: NTIA - Spring Run Tower

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 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.

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

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

PROJECT SUMMARY

Project Code: 2025-0110997
Project Name: NTIA - Spring Run Tower
Project Type: Communication Tower New Construction
Project Description: The project consists of an approximate 5,100 square-foot tower compound and an associated access/utility easement.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@40.14997315,-77.73531161870514,14z

Counties: Franklin County, Pennsylvania

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], 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 *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered

INSECTS

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

FLOWERING PLANTS

NAME	STATUS
Northeastern Bulrush *Scirpus ancistrochaetus* Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6715	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.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Arielle Hess
Address: 930 Harvest Drive
Address Line 2: Suite 460
City: Blue Bell
State: PA
Zip: 19422
Email arielle.hess@terracon.com
Phone: 9132002415

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

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: 06/19/2025 15:11:21 UTC
Project code: 2025-0110997
Project Name: NTIA - Spring Run Tower

Federal Nexus: yes
Federal Action Agency (if applicable): National Telecommunications and Information Administration

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for 'NTIA - Spring Run Tower'

Dear Arielle Hess:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on June 19, 2025, for 'NTIA - Spring Run Tower' (here forward, Project). This project has been assigned Project Code 2025-0110997 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements may not be complete.**

Ensuring Accurate Determinations When Using IPaC

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

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

Determination for the Northern Long-Eared Bat and Tricolored Bat

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

Species	Listing Status	Determination
Northern Long-eared Bat (*Myotis septentrionalis*)	Endangered	NLAA

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

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

15-Day Review Period

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

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

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

- Indiana Bat *Myotis sodalis* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Northeastern Bulrush *Scirpus ancistrochaetus* Endangered

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

If you have any questions regarding this letter or need further assistance, please contact the Pennsylvania Ecological Services Field Office and reference Project Code 2025-0110997 associated with this Project.

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

1. Name

NTIA - Spring Run Tower

2. Description

The following description was provided for the project 'NTIA - Spring Run Tower':

> The project consists of an approximate 5,100 square-foot tower compound and an associated access/utility easement.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@40.14997315,-77.73531161870514,14z

DETERMINATION KEY RESULT

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

QUALIFICATION INTERVIEW

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

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

   No

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

   Automatically answered
   No

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

   Automatically answered
   No

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

   Note: For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

   No

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

   Yes

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

   No

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

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

   Yes

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

   Yes

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

   Automatically answered
   No

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

    No

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

    No

12. Will the action cause effects to a bridge?

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

    No

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

    No

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

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

    Yes

15. Does the action include the intentional exclusion of bats from a building or structure?

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

    No

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

    No

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

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

    No

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

    No

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

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

    No

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

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

    No

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

    No

22. Will the action include drilling or blasting?

    Yes

23. Will the drilling or blasting produce noise or vibrations above existing background levels that will affect suitable summer habitat for northern long-eared bats and/or tricolored bats?

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

    Yes

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

    No

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

    No

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

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

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

    No

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

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

    No

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

    Yes

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

    No

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

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

    No

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

    Automatically answered
    No

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

    Automatically answered
    No

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

    Automatically answered
    No

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

    Automatically answered
    Yes

35. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 100 acres in total extent?

    No

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

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

    No

37. Does the action area intersect the northern long-eared bat species list area?

    Automatically answered
    Yes

38. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

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

    Automatically answered
    No

40. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

    Automatically answered
    No

41. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.Have you contacted the appropriate agency to determine if your action is within 150 feet of any documented northern long-eared bat roosts?

    Note: A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat roosts is available here. Location information for northern long-eared bat roosts is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

    Automatically answered
    No

42. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities?
    If unsure, answer "Yes."

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

    Yes

43. Has a presence/probable absence summer bat survey targeting the northern long-eared bat following the Service's Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines been conducted within the project area?

    No

44. Will drilling or blasting occur during the **Summer Occupancy** season for northern long-eared bats in the action area?

    Note: Bat activity periods for your state can be found in Appendix L of the Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines.

    No

45. Are any of the trees proposed for cutting or other means of knocking down, bringing down, topping, or trimming suitable for northern long-eared bat roosting (i.e., live trees and/or snags ≥3 inches dbh that have exfoliating bark, cracks, crevices, and/or cavities)?

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

    Yes

46. Will any tree cutting/trimming or other knocking or bringing down of trees occur during the **Summer Occupancy season** for northern long-eared bats in the action area? **Note:** Bat activity periods for your state can be found in Appendix L of the Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines.

    No

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

    No

PROJECT QUESTIONNAIRE

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

1.5

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Arielle Hess
Address: 930 Harvest Drive
Address Line 2: Suite 460
City: Blue Bell
State: PA
Zip: 19422
Email arielle.hess@terracon.com
Phone: 9132002415

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

1. PROJECT INFORMATION

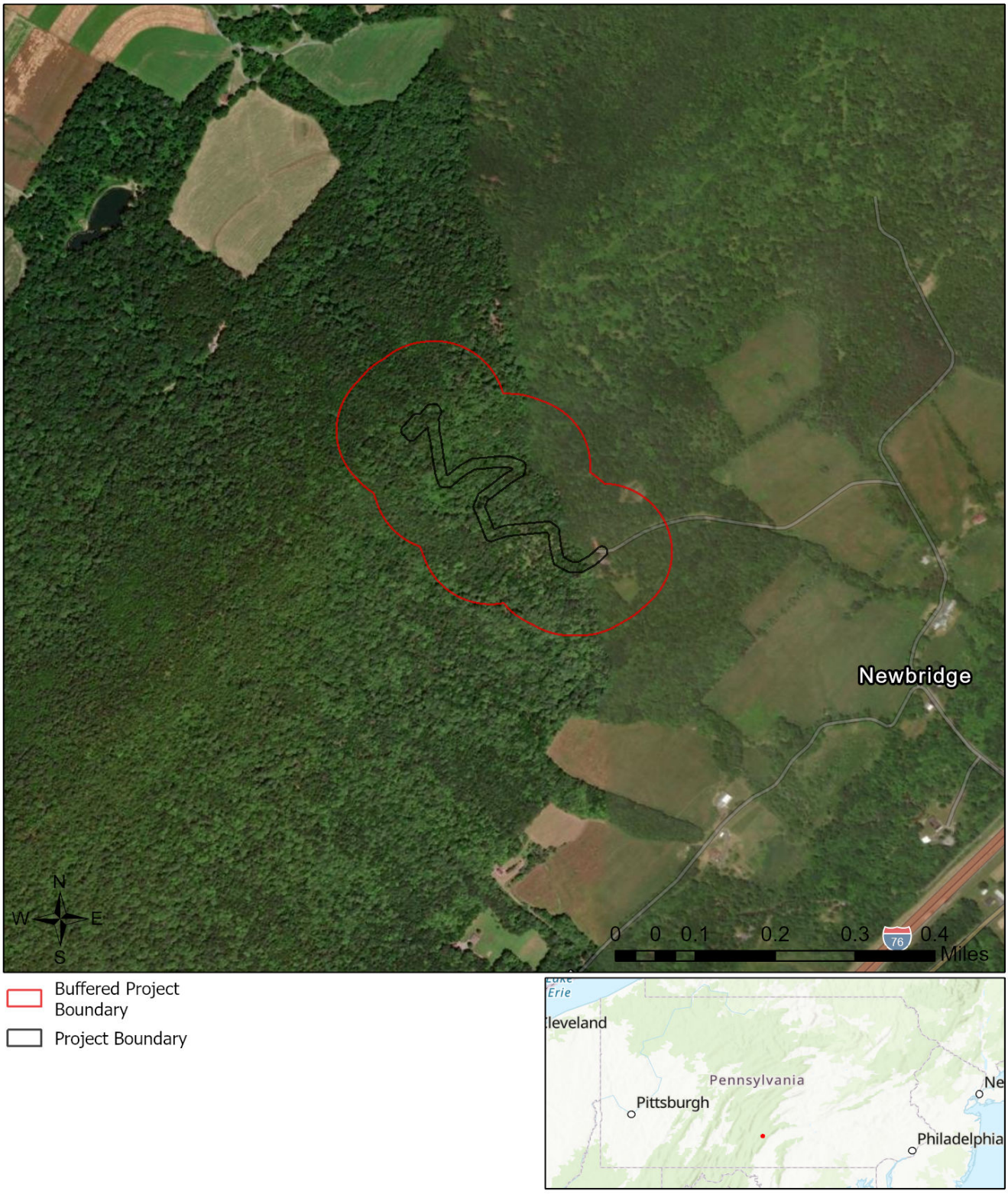
Project Name: **Spring Run Tower**
Date of Review: **6/18/2025 10:42:35 AM**
Project Category: **Communication, Cell or communication tower (include access roads in project area), new tower**
Project Area: **4.10 acres**
County(s): **Franklin**
Township/Municipality(s): **Fannett Township**
ZIP Code:
Quadrangle Name(s): **DOYLESBURG**
Watersheds HUC 8: **Conococheague-Opequon**
Watersheds HUC 12: **Headwaters West Branch Conococheague Creek**
Decimal Degrees: **40.149935, -77.735377**
Degrees Minutes Seconds: **40° 8' 59.7655" N, 77° 44' 7.3561" W**

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	**Conservation Measure**	**No Further Review Required, See Agency Comments**
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	**Potential Impact**	**MORE INFORMATION REQUIRED, See Agency Response**

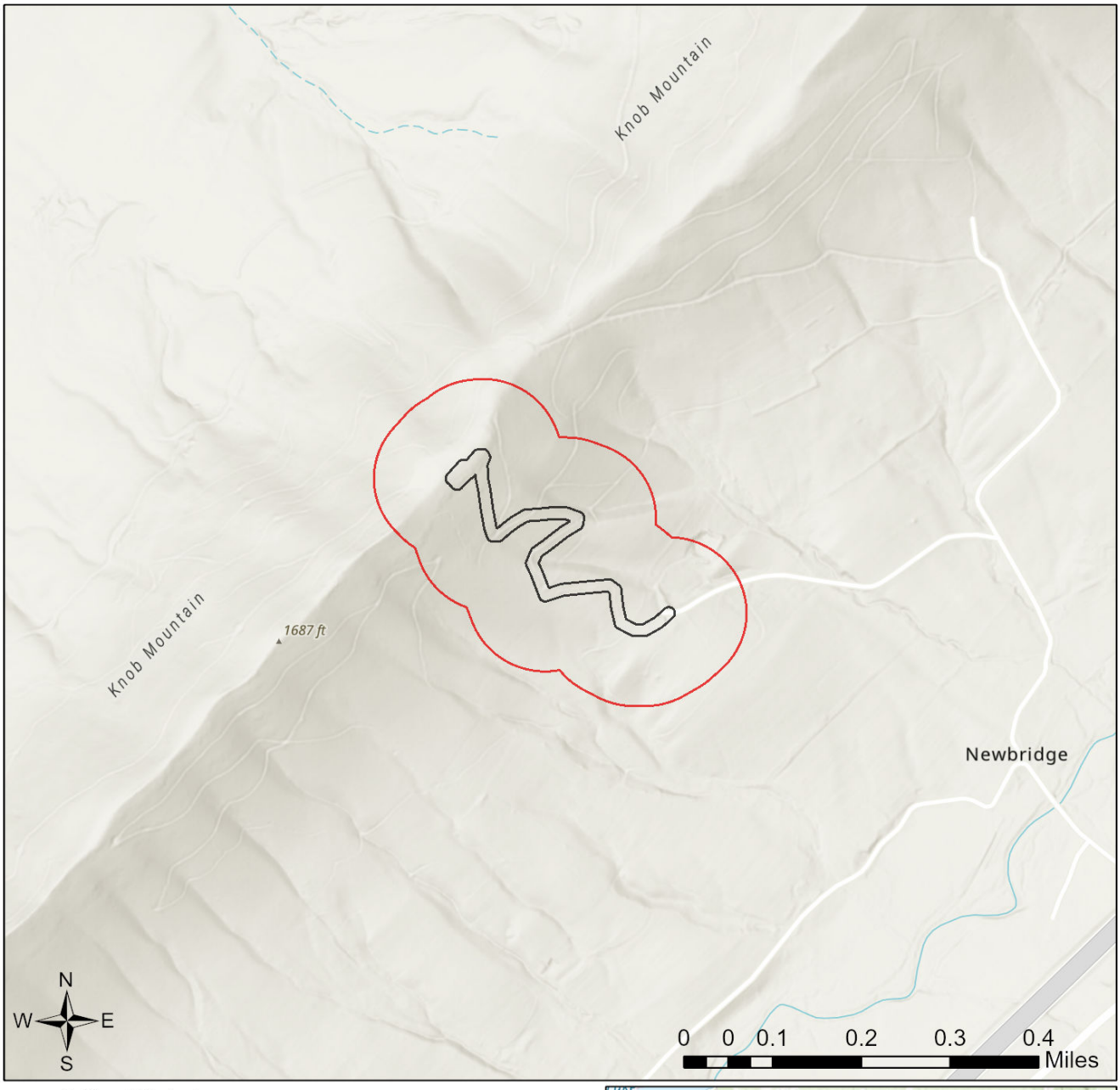
As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication 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.

Spring Run Tower



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Spring Run Tower



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA,

RESPONSE TO QUESTION(S) ASKED

Q1: Is tree removal, tree cutting or forest clearing necessary to implement all aspects of this project?
Your answer is: Yes

Q2: Will the action include disturbance to trees such as tree cutting (or other means of knocking down, or bringing down trees, tree topping. or tree trimming), pesticide/herbicide application or prescribed fire?
Your answer is: Yes

Q3: Does the action area contain any caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, culverts, or tunnels that could provide habitat for hibernating bats?
Your answer is: No

Q4: Does the action area contain any caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, culverts, or tunnels that could provide habitat for hibernating bats?
Your answer is: No

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:

Conservation Measure: Potential impacts to state and federally listed species which are under the jurisdiction of both the Pennsylvania Game Commission (PGC) and the U.S. Fish and Wildlife Service may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the U.S. Fish and Wildlife Service. No further coordination with the Pennsylvania Game Commission is required at this time.

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:

Information Request: Enter project information into IPaC (https://ecos.fws.gov/ipac/). Follow the step-by-step process to review this project's potential effect on federally listed species.

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 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). 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

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
NO Faxes Please

PA Fish and Boat Commission
Division of Environmental Services
595 E. Rolling Ridge Dr., Bellefonte, PA 16823
Email: RA-FBPACENOTIFY@pa.gov

PA Game Commission
Bureau of Wildlife Management
Division of Environmental Review
2001 Elmerton Avenue, Harrisburg, PA 17110-9797
Email: 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

APPENDIX E

FCC Form 620

Notification Date:

File Number:

FCC Wireless Telecommunications Bureau
New Tower ("NT") Submission Packet

Approved by OMB
3060 – 1039
See instructions for
public burden estimates

General Information

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

Applicant Information

3) FCC Registration Number (FRN): **0033898511**
4) Name: **Ambassador Towers LLC**

Contact Name

5) First Name: **Ben**	6) MI:	7) Last Name: **Momose**	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	**And /Or**	11) Street Address: **3105 Lincoln Highway East**		
12) City: **Paradise**			13) State: **PA**	14) Zip Code: **17562**
15) Telephone Number: **(210)448-2623**		16) Fax Number:		
17) E-mail Address: **bmomose@upwardbroadband.com**				

Consultant Information

18) FCC Registration Number (FRN): **0032349938**
19) Name: **Terracon Consultants**

Principal Investigator

20) First Name: **Suzanne**	21) MI:	22) Last Name: **Reece**	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box:	**And /Or**	26) Street Address: **27 Worlds Fair Drive**		
27) City: **Somerset**			28) State: **NJ**	29) Zip Code: **08873**
30) Telephone Number: **(908)822-4061**		31) Fax Number:		
32) E-mail Address: **Lizett.Jimenez@terracon.com**				

Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	(X) Yes ( ) No

34) Areas of Professional Qualification:

(X) Archaeologist

( ) Architectural Historian

( ) Historian

( ) Architect

( ) Other (Specify) _____

Additional Staff

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?	( ) Yes (X) No

If "YES," complete the following:

36) First Name:	37) MI:	38) Last Name:	39) Suffix:
40) Title:			

41) Areas of Professional Qualification:

( ) Archaeologist

( ) Architectural Historian

( ) Historian

( ) Architect

( ) Other (Specify) _____

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **NTIA TCNS No. 294977**

Site Information

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

3) Site Name: **Spring Run Tower**

4) Site Address: **17935 New Bridge Road**

5) Detailed Description of Project:

Construction of self-support telecommunications tower

Northeast of New Bridge Road and PA Turnpike

6) City: **Fannett Township**	7) State: **PA**	8) Zip Code: **17220**

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

10) Nearest Crossroads: **Northeast of New Bridge Road and PA Turnpike**

11) **NAD 83** Latitude (DD-MM-SS.S): **40-09-03.6** (X) N or ( ) S

12) **NAD 83** Longitude (DD-MM-SS.S): **077-44-13.5** ( ) 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):

(**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

15) Visual 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

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?	(**X**) **Y**es ( ) **N**o

2a) Tribes/NHOs contacted through TCNS Notification Number: _____ Number of Tribes/NHOs: **0**

2b) Tribes/NHOs contacted through an alternate system: **NTIA TCNS No. 294977** Number of Tribes/NHOs: **10**

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

Dates & Response

17) Date Contacted _____ 18) Date Replied _____

( ) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Historic Properties

Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?	( ) Yes (X) No
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?	( ) Yes (X) No
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.	( ) Yes (X) No

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: _____	( ) Yes ( ) No
12) Is this property eligible for listing on the National Register? Source: _____	( ) Yes ( ) No
13) Is this property a National Historic Landmark?	( ) Yes ( ) No

14) Direct Effects (Select One):

( ) No Effect on this Historic Property in APE

( ) No Adverse Effect on this Historic Property in APE

( ) Adverse Effect on this Historic Property in APE

15) Visual Effects (Select One):

( ) No Effect on this Historic Property in APE

( ) No Adverse Effect on this Historic Property in APE

( ) Adverse Effect on this Historic Property in APE

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):
2) Name: **Fannett Township**

Contact Name

3) First Name: **Georgia**	4) MI:	5) Last Name: **O'Donnell**	6) Suffix:
7) Title: **Secretary**			

Contact Information

8) P.O. Box:	**And /Or**	9) Street Address: **20299 Mountain Road**		
10) City: **Doylesburg**			11) State: **PA**	12) Zip Code: **17219**
13) Telephone Number: **(717)349-7598**		14) Fax Number:		
15) E-mail Address: **godonnell@pa.net**				

16) Preferred means of communication:

(**X**) E-mail

( ) Letter

( ) Both

Dates & Response

17) Date Contacted **05/23/2025** 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?	(**X**) **Y**es ( ) **N**o

Consulting Party

2) FCC Registration Number (FRN):
3) Name: **Franklin County Historical Society**

Contact Name

4) First Name: **Margaret**	5) MI:	6) Last Name: **Skrivseth**	7) Suffix:
8) Title: **Executive Director**			

Contact Information

9) P.O. Box:	**And /Or**	10) Street Address: **175 East King Street**		
11) City: **Chambersburg**			12) State: **PA**	13) Zip Code: **17201**
14) Telephone Number: **(814)643-5449**		15) Fax Number:		
16) E-mail Address: **history@franklinhistorical.org**				
17) Preferred means of communication: (**X**) E-mail ( ) Letter ( ) Both				

Dates & Response

18) Date Contacted **05/23/2025** 19) Date Replied _____

(**X**) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Additional Information

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

Designation of SHPO/THPO

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

SHPO/THPO

Name: 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:
Kathryn		Eisele	

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

EDUCATION

Master of Science, Osteoarcheology, 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.

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,

Suzanne Reece, MSC, RPA

PRINCIPAL INVESTIGATOR - ARCHAEOLOGY

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 build a telecommunications tower with associated antennas and equipment enclosures under the following specifications:

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

The project consists of an approximate 5,100 square-foot tower compound and an associated access/utility easement. The proposed self-support tower will be 199 feet in overall height. The project site and surrounding properties are also 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: 04/25/2025

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 Omahatribefcctcns@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 whetherthe project is for a tower, small cell, or collocation. Our response can be given faster

with this information.

3. 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.

4. 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.

5. Director - Lora Nuckolls - Eastern Shawnee Tribe of Oklahoma - 70400 East HWY 60 - Wyandotte, OK - celltower@estoo.net - 918-238-5151 (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 requesting our most current copy.

6. THPO - Sherri Clemons - Wyandotte Nation - 64700 E, Hwy 60 - Wyandotte, OK - 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. We will advise if we require additional information.

7. THPO - Tonya Tipton - Shawnee Tribe - 29 South 69A Highway - Miami, OK - 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 contactthe Shawnee Tribe via email at TCNS@shawnee-tribe.com

Thank you for the opportunity to comment.

8. THPO - Jonathan Windy Boy - Chippewa Cree Tribe of the Rocky Boy's Reservation - 96 Clinic Rd North - Box Elder, MT - rep32jwb@gmail.com; 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 and 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.

9. 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 - 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

Thank you

10. THPO, Archaeologist - Susan Bachor - Delaware Tribe of Indians - 126 University Circle Stroud Hall, Rm. 437 - Bartlesville, OK - historicpreservation@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 theproject. 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 Pennsylvaniais 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 Midwesternregion 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 officeprefers 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 DelawareTribe 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.

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

12. 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

13. 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

14. SHPO - Barbara Franco - Pennsylvania Historical and Museaum 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: 04/22/2025

Notification ID: 294977
Project Number: 73
Applicant: Upward Broadband
Applicant Contact: Kathy Eisele

Project Type(s): Towers

Region(s) affected (State, County): PENNSYLVANIA, FRANKLIN

Address or Geographical Location Description: Proposed 195-foot self-support telecommunications tower (overall height
199 feet) with associated access/utility easement and lease area, located 2,500 ft Southwest of 16832 S. Dry Run Road, Dry Run (Fannett Township), Franklin County, PA 17220

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

May 23, 2025

Fannett Township
20299 Mountain Road
Doylesburg, Pennsylvania 17219
ATTN: Georgia O'Donnell, Secretary/Treasurer
Phone: 717-349-7598 / Email: godonnell@pa.net

RE: Invitation to Comment as a Consulting Party on a Proposed Telecommunications Tower

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

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 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

May 23, 2025

Franklin County Historical Society
175 East King Street
Chambersburg, Pennsylvania 17201
ATTN: Margaret Skrivseth, Executive Director
Phone 814-643-5449 / Email: history@franklinhistorical.org

RE: Invitation to Comment as a Consulting Party on a Proposed Telecommunications Tower

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

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 and (856) 813-3267.

Sincerely,
Terracon Consultants, Inc.

Kathryn A. Eisele
Sr. Project Manager

Attachment: Project Location Map with APE

LocaliQ
Pennsylvania
GANNETT

PO Box 630531 Cincinnati, OH 45263-0531

AFFIDAVIT OF PUBLICATION

Lizett Jimenez
Terracon
27 Worlds Fair DR
Somerset NJ 08873-1353

STATE OF WISCONSIN, COUNTY OF BROWN

The Public Opinion, a newspaper published in the city of Chambersburg, Franklin County, State of Pennsylvania, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

05/30/2025

and that the fees charged are legal.
Sworn to and subscribed before on 05/30/2025

PUBLIC NOTICE: Ambassador Towers LLC is proposing to build a 199-ft Self-Support Telecommunications Tower. There is no proposed lighting. The site location is 17935 New Bridge Rd, Fannett Township (Spring Run), Franklin Co, PA 17262 (40° 09' 03.6" N, 77° 44' 13.4" W). The Federal Communications Commission (FCC) Antennas Structure Registration (ASR, Form 854) filling number is A1312096.
ENVIRONMENTAL EFFECTS – Interested persons may review the application (www.fcc.gov/asr/applications) by entering the filing number. Environmental concerns may be raised by filing a Request for Environmental Review (www.fcc.gov/asr/environmentalrequest) and online filings are strongly encouraged. The mailing address to file a paper copy is: FCC Requests for Environmental Review, Attn: Ramon Williams, 45 L Street NE, Washington, DC 20554.
HISTORICAL PROPERTY EFFECTS - Public comments regarding potential effects on historic properties may be submitted within 30-days from the date of this publication to: L. Jimenez, Terracon, 27 Worlds Fair Dr, Ste 4, Somerset, NJ 08823, 908-822-4061, or Lizett.Jimenez@terracon.com

Legal Clerk

Notary, State of WI, County of Brown

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KAITLYN FELTY
Notary Public
State of Wisconsin

AREAS OF POTENTIAL EFFECTS

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

A. Direct Effects

The direct APE was determined to be the approximate 5,100 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: Spring Run
17935 New Bridge Road
Spring Run, Fannett Township
Franklin County, Pennsylvania 17262

May 28, 2025 | Project Number: J8237080

Prepared for:

Ambassador Towers LLC.
Paradise, Pennsylvania

Prepared by:

Suzanne Reece, MSc, RPA
Josh Duncan, BA
Terracon Consultants, Inc.
Blue Bell, Pennsylvania

Table of Contents

Executive Summary

Ambassador Towers LLC. proposes to construct a new communications tower and support facility near Spring Run, Fannett Township in Franklin County, Pennsylvania. The project includes the construction of a self-supported tower, an equipment compound, a temporary construction area, a utility corridor, and development of an access road. 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:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

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 Archaeological Crew Chief 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 Spring Run, Fannett Township, Franklin County, Pennsylvania. The proposed overall height will be 199-feet, with appurtenances. The proposed project area is located within undeveloped land on a mountain crest. 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 within a tower compound, with a temporary construction easement immediately northeast of the compound, a utility easement extending southeast down the mountain to existing utilities, and an access drive that largely follows an existing dirt road. 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.

The Natural Resource Conservation Service's (NRCS) Web Soil Survey (2025) records eight soil within the project area. This soil is summarized below in Table 1.

Table 1. Soils Within the Project Area.

Soil Name	Approx. Percentage of Project Area	Associated Landscape	Hydric Soil Rating
Berks channery silt loam, 3 to 8 percent slopes	7	Ridges, mountain slopes	No
Buchanan channery loam, 3 to 8 percent slopes	1.1	Hillslopes, mountain slopes	No
Dekalb-Hazleton cobbly sandy loams, 25 to 75 percent slopes, rubbly	35.8	Hillslopes	No

Soil Name	Approx. Percentage of Project Area	Associated Landscape	Hydric Soil Rating
Laidig gravelly loam, 8 to 25 percent slopes, extremely stony	18.8	Mountains	No
Sideling gravelly loam, 8 to 15 percent slopes	3.2	Mountain slopes	No
Sideling and Hazleton soils, 25 to 60 percent slopes, extremely stony	19.8	Mountain slopes	No
Weikert channery silt loam, 8 to 15 percent slopes	8.6	Ridges	No
Weikert very channery silt loam, 25 to 65 percent slopes	5.7	Ridges	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 20 to 70 percent, with an average visibility of 40 percent. At the time of the survey, boulders, rocks, trees, decaying leaves, and other vegetation covered much of the proposed project area, with portions of the existing access road having been previously cleared of vegetation and debris. Vegetation within the project area primarily consisted of trees, ferns, and other woodland undergrowth. The closest, named body of water to the project area is the West Branch of Conococheague Creek, which is located approximately 0.7-miles to the southeast of the proposed tower location.

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+)

Franklin 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 1784 and was named for Benjamin Franklin (PHMC 2023). The land that became Franklin County was cut from a portion of Cumberland County, which itself was cut from Lancaster County, Pennsylvania in 1750. The county seat of Franklin County is Chambersburg, founded by Benjamin Chambers in 1764 and incorporated as a borough in 1803 (PHMC 2023). Chambers' original settlement, however, was the earliest permanent Euro-American settlement in the region and was founded in 1730 (PHMC 2023).

It is known from historical, oral, and archaeological data that, prior to settlement of the area that would become Franklin County by Euro-American settlers, the land was inhabited and by Indigenous Native Americans. Archaeological data indicates that Indigenous habitation in Franklin County goes back at least 10,000 years, with evidence from sites such as Ebbert Springs, which has provided hunting artifacts and tools that date to the early paleo period in the region (Franklin County 2023). Evidence from this site, and others, show that portions of Franklin County have been continually occupied from that time into the present, though evidence of permanent settlements is scarce, and the area seems to have been used primarily as hunting grounds and as a transportation corridor for Native Peoples moving throughout the region (Franklin County 2023). Little is known about the earliest peoples in the region, however, by the time colonization began in Pennsylvania, the area of Franklin County was populated and visited by various tribal groups, including the Susquehannock, Lenni Lenape (Delaware), Shawnees, and members of the Iroquoian Confederacy, among others (Franklin County 2023).

Early historical records indicate that Euro-American settlers began forming permanent settlements in the area in the 1720s, with a larger influx of settlers arriving in the years between 1730 and 1740 (Franklin County 2023). These colonial-era settlers were largely comprised of Scots Irish immigrants, though many German immigrants are also recorded as settling there in the first half of the 18th century as well (Richard 1887). This was a period of high tension concerning the relationship between Native inhabitants and the new colonial settlers in the region, as the land being inhabited by the new settlers included highly valued hunting grounds that had been used by the Native peoples for thousands of years (M'Cauley 1878). Many skirmishes occurred in the region between these groups during this period, leading to Benjamin Chambers' construction of Chamber's Fort in 1755, in present-day Chambersburg, for the protection of Euro-American settlers moving into the area (Franklin

County 2023). The Iroquoian Confederacy, who claimed control of the region, sold the land that would include Franklin County to the Colony of Pennsylvania during the Albany Treaty of 1754 (PHMC 2023), and a large swathe of land just south of Blue Mountain had already been sold to the Colony of Pennsylvania at the Treaty of Philadelphia in 1736 (Cumberland County 2008). These treaties and land sales by the Iroquoian Confederacy, who did not actually live in this region but claimed control over it, led to resentment forming between them and the tribal groups who did occupy the region (Cumberland County 2008). This meant that fighting between settlers and native inhabitants continued into the following decades, leading this region to play a role in the overarching French and Indian war that was taking place along the colonial frontier (PHMC 2023).

By the 1780s, much of the fighting with local Native populations in the area had ceased due to Indian removal and Euro-American settlements began to grow, leading to an increase in local populations, industry, and economies. In 1837, the introduction of the Cumberland Valley Railroad provided many new marketing opportunities in Franklin County (PHMC 2023). While agriculture and the Iron industry were the early leaders of the industry in the region, the 19th century saw the growth of paper, lumber, and stone industries which overtook the local iron industry as it declined due to competition with other local iron producers (PHMC 2023). Agriculture has remained an important staple of the Franklin County economy to this day, and the county currently ranks second in the state of Pennsylvania in the production of milk, apples, peaches, and meat (Franklin County: About 2023). Tourism in the region based on outdoor activities such as hunting and fishing in the county's vast areas of wilderness have also become a major part of the Franklin County's economy in the 20th and 21st centuries (Franklin County: About 2023).

Fannett Township lies in the northern tip of Franklin County, with the Tuscarora state Forest lying just north of its borders. The Township is named after a promontory in County Donegal, Ireland, known as Fannett's Point (Richard 1887). The valley that comprises the majority of Fannett Township has been known variously as the "Tuscarora Path," and later as "Path Valley," suggesting this valley's role as a Native path before the arrival of Euro-American settlers (Richard 1887).

Information related to the early settlement of Fannett Township is scarce, though it appears to have been formed as a legal entity in 1761, prior to the formation of Franklin County in 1784 (Richard 1887). A portion of Fannett Township was carved off in 1791 in order to form Metal Township, also in Franklin County (Richard 1887). While the early Indigenous history of the area is largely the same as that related to Franklin County in general, colonial-era records indicate that Euro-Americans were settling in the future Fannett Township as early as 1737, with the arrival of Samuel Bechtel (Richard 1887). Agreements with local Native populations were supposed to keep colonial settlers out of this area, and in 1750 the magistrates of Cumberland County went to the area and arrested the settlers living there illegally and burned their houses and other structures (Richard 1887). When the land was purchased from local Natives later in the 1750s, many of those early settlers returned to the area (Richard 1887). A "list of taxables" dated 1786 shows that settlement in the area

greatly increased in the decades following the purchase of the land from Native groups, and the Village of Concord was established in the township in 1791 (M'Cauley 1878). Other villages established in Fannett Township in the 18th and early 19th centuries are Spring Run, established 1767, and Dry Run, originally called Morrowstown, established in 1838, though there was a post office there since 1825 (M'Cauley 1878). The Village of Doylesburg in Fannett township was laid out in 1852 and named in 1854 (Richard 1887). Little is written concerning the early industry and economy of Fannett Township, though numerous churches, a post office, and a "fair mercantile business" are mentioned concerning Fannett Township in the 19th century. In modern times it can be seen from aerial photographs from the 20th and 21st that much is of the township is agriculturally based, and, like its parent parcel, Franklin County, it benefits from ample wilderness areas that bring tourism related to hunting, fishing, and other outdoor activities.

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.

A series of historical USGS topographic maps were reviewed for information on historic-age land usage. The reviewed maps ranged in date from 1923 to 2023. No development or man-made structures are depicted within the project area on the reviewed topographic maps. A portion of the Tuscarora Trail is depicted to the northwest of the project area on maps provided by the client. The trail will not be impacted by the proposed project.

Aerial photographs dating from 1957 to 2022 were reviewed for information on land use history. A portion of the proposed access road and transmission corridor, near where the current landowner's residence is located, is depicted as having been cleared of trees in 1957. The area is reforested in subsequent photographs. No structures are visible in this location until 1994. The driveway up to the house can be seen in photographs after 2004. No significant additional development can be seen in the subsequent photographs.

5.0 Fieldwork

The fieldwork for the Phase I survey was conducted on May 15, 2025. 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 tower location is at

the top of a mountain crest, so portions of the project area were found to be very steep or boulder fields. Overview photographs of the project area can be found in Appendix B.

A series of shovel tests were excavated within the proposed tower compound. No shovel tests were excavated within the proposed access or utility corridor due to a combination of steep slopes, shallow bedrock, and not disturbing the existing two-track road. 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. Each of the excavated shovel tests encountered bedrock at shallow depths, and subsurface soils were not encountered. 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. A representative photograph of a shovel test can be found in Appendix B, Figure 22. The locations of the shovel tests can be seen on a recent aerial photograph in Appendix B, Figure 23.

Table 2. Shovel Test Profiles and Artifact Data.

Shovel Test	Depth Below Ground Surface	Soil Description	Notes
1	0-20 cm	10YR 2/2 loam	Bedrock at base.
2	0-20 cm	10YR 2/2 loam	Bedrock at base.
3	0-20 cm	10YR 2/2 loam	Bedrock at base.
4	0-10 cm	10YR 2/2 loam	Bedrock at base.
5	0-20 cm	10YR 2/2 loam	Bedrock at base.

6.0 Summary and Recommendations

A Phase I survey was conducted near Spring Run, Fannett Township, Franklin 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.

Prepared by:

SReece

Suzanne Reece, MSc, RPA
Principal Investigator

Kathryn A Eisele for

Marilyn Zenko
Senior Archaeologist

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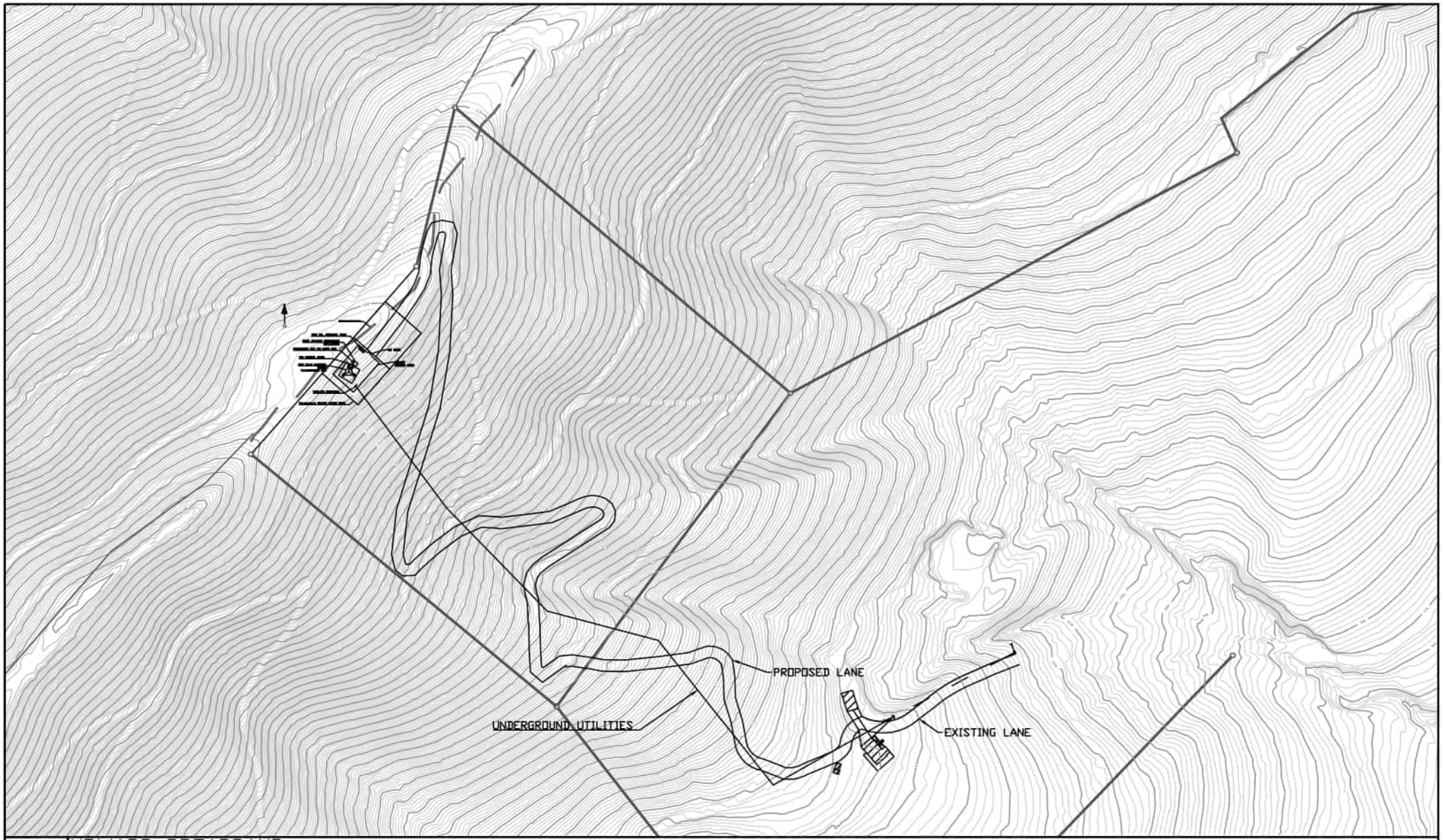
Appendix A
Site Plan and Maps



UPWARD BROADBAND

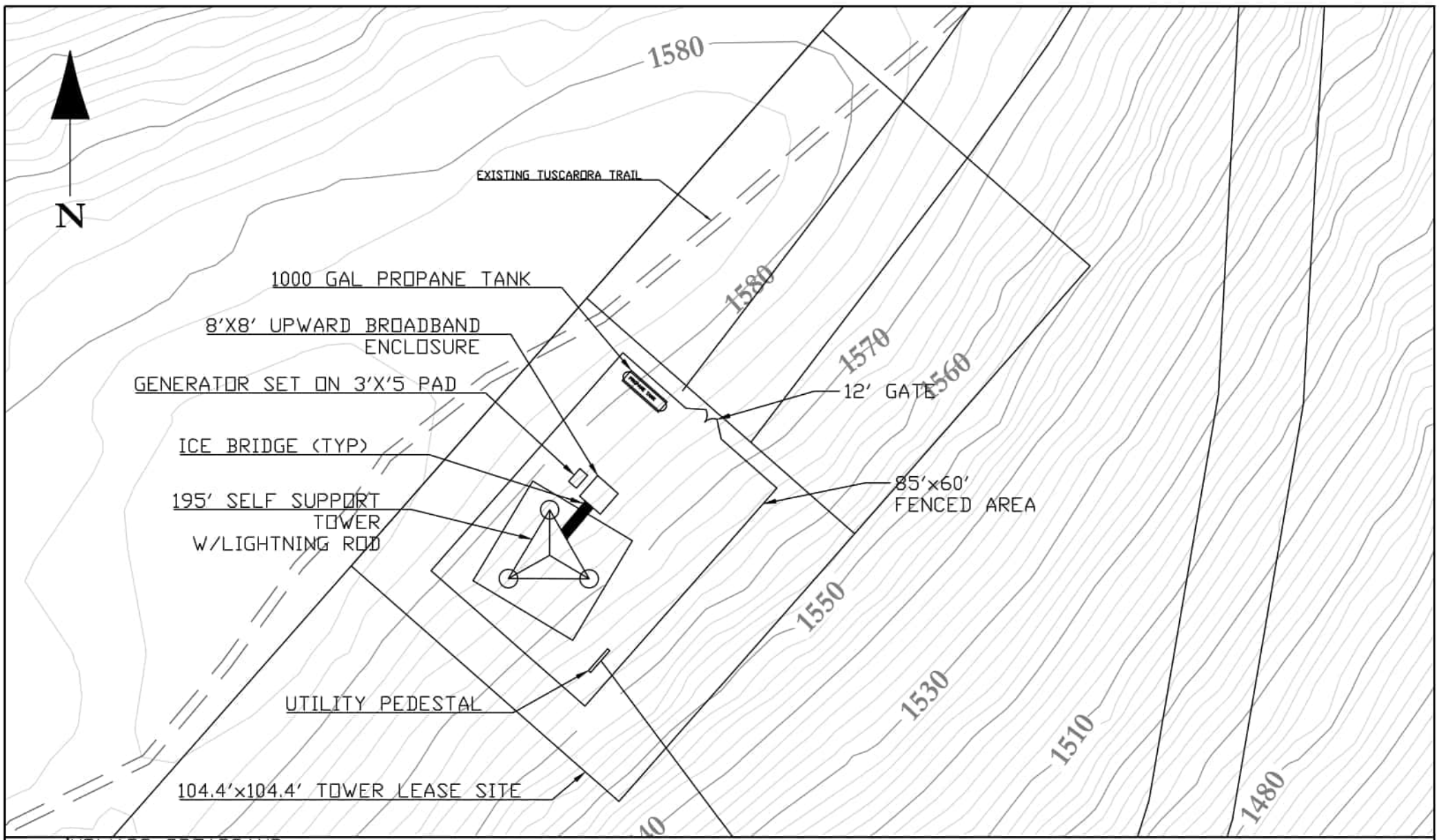
SHEET 1 OF 1

Job Name: Spring Run

Preliminary Site Plan Final

Spring Run Tower: 40.15091, -77.73687

BY:BSR | DATE:3/14/25 | Spring Run.dwg



UPWARD BROADBAND

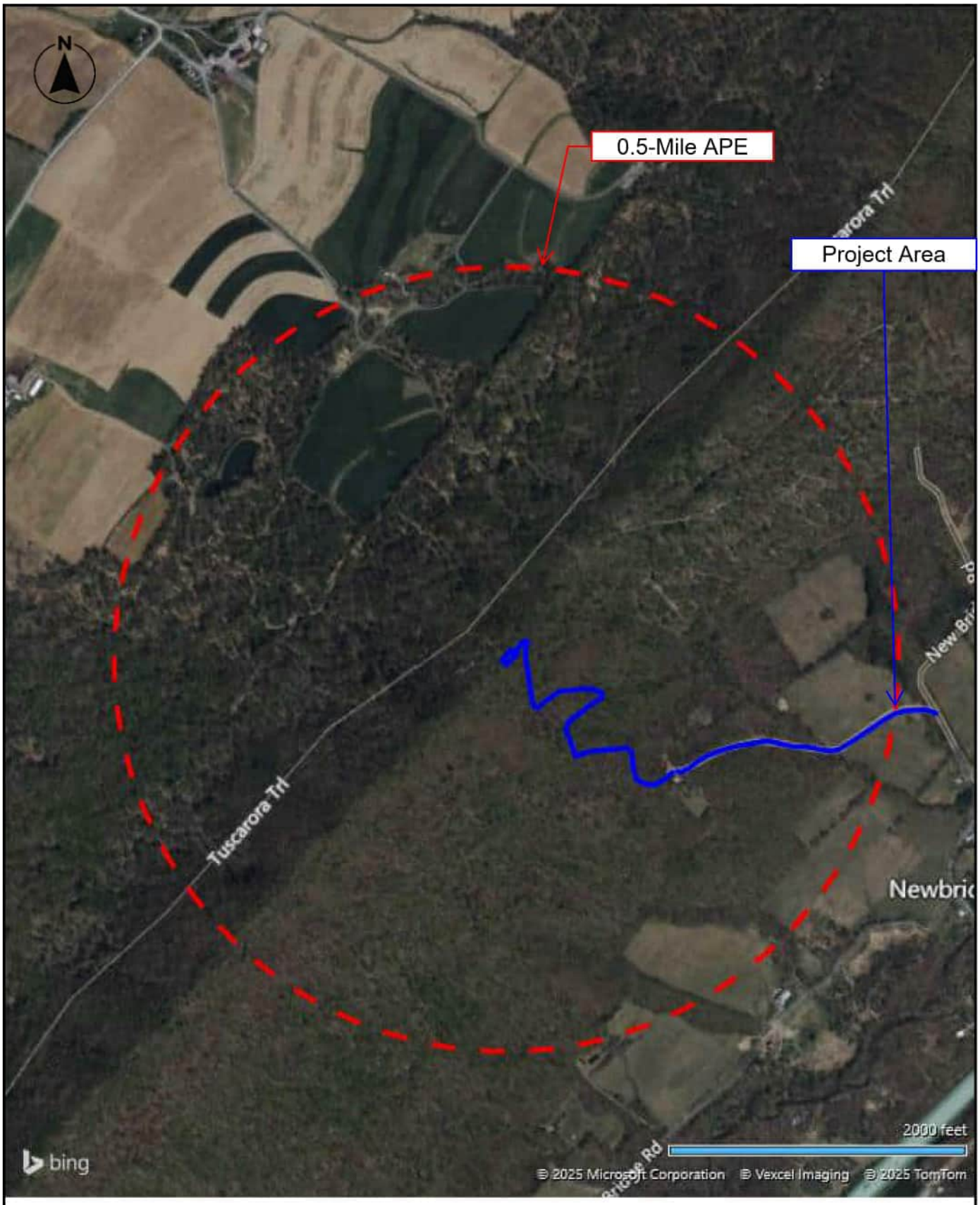
Job Name: UB/NTIA Spring Run

Spring Run Tower: 40.15091, -77.73687

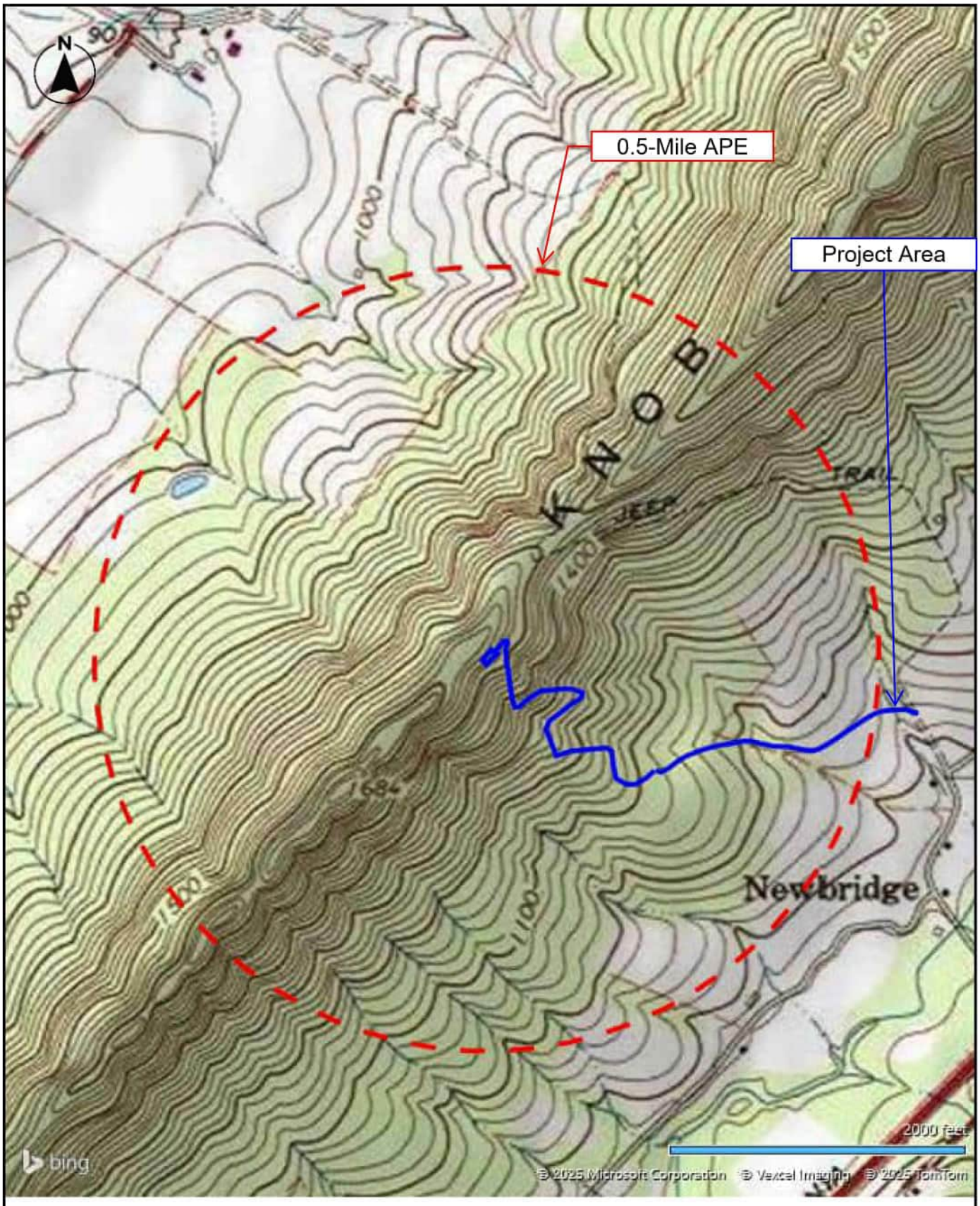
BY:BSR | DATE:3/14/25 | Spring Run.dwg

SHEET 1 OF 1

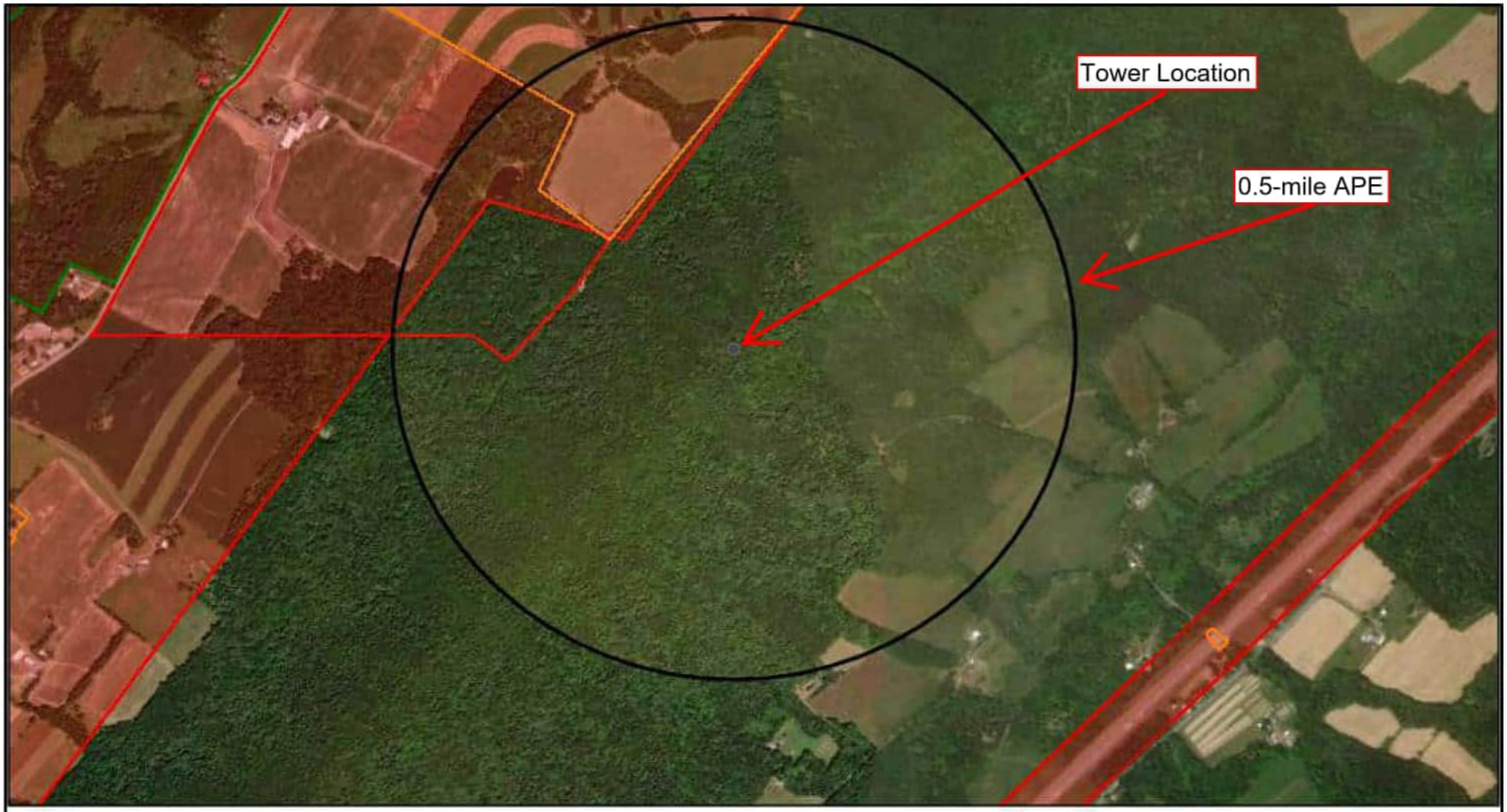
Preliminary Site Plan Final



Project No. J8237080 **Scale:** AS SHOWN **Client:** Upward Broadband LLC	Terracon 844 N Lenola Rd, Ste 1 Moorestown, NJ 08057-1052	SITE DIAGRAM NTIA EA Section 8	Exhibit 1



Project No. J8237080 **Scale:** AS SHOWN **Client:** Upward Broadband LLC **Date:**	Terracon 844 N Lenola Rd, Ste 1 Moorestown, NJ 08057-1052	SITE DIAGRAM NTIA EA Section 8	Exhibit 2



4/15/2025

Above Ground Resource

Eligible

Not Eligible

Undetermined

District Resource

Not Eligible

1:18,056

0 0.1 0.2 0.4 mi

0 0.17 0.35 0.7 km

Maxar

N

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

Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

844 N Lenola Rd, Ste 1

Moorestown, NJ 08057-1052

PA SHARE Cultural Resources Map with 0.5-mile APE

Spring Run Tower

17935 New Bridge Road

Fannett Township (Spring Run), Franklin County PA

Please refer to Appendix F for Site Photographs

NO HISTORIC PROPERTIES MEMO

Site Name:	Spring Run Tower
Terracon Project Number:	J8237080
Address:	17935 New Bridge Road
City, County, State:	Fannett Township (Spring Run), Franklin County, PA
Latitude / Longitude:	40° 09' 03.6" N / 77° 44' 13.5" W
Proposed Lease Area:	5,100 square feet
Proposed Tower Height:	199 feet (overall), including attachments
Tower Type:	Self-Support
TCNS Number:	294977

Federal Communications Commission (FCC) regulations require that the client consider the effects of the proposed undertaking on historic properties in compliance of the *National Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission* (Nationwide PA [FCC 04-222]) and the National Historic Preservation Act (NHPA), as amended. In fulfillment of these requirements, Terracon conducted a historic resource records review for the proposed project.

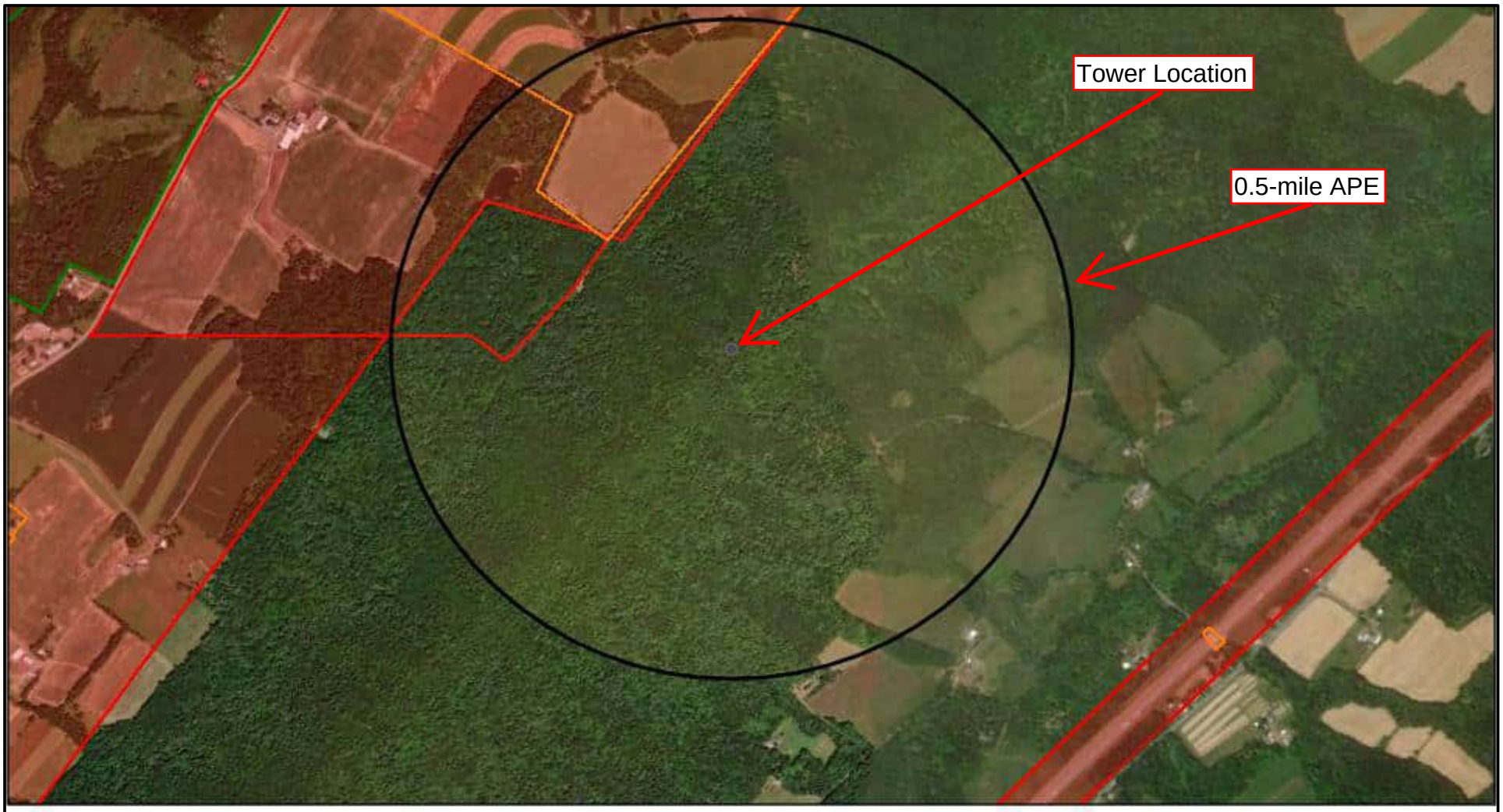
The goal of the review was to determine if National Register of Historic Places (NRHP) eligible or NRHP-listed historic resources are located within the visual area of potential effect (APE) for the project.

The APE for visual effects is therefore considered to be a half-mile radius, per the 2004 Programmatic Agreement (Section VI.4.a), which defines the visual APE as a half-mile radius for towers 200 feet or less in height (unless otherwise determined through consultation between the applicant and the local SHPO office).

Records Review

File review of the State Historic Preservation Office resources was conducted by an SOI-qualified Principal Investigator for the project's visual APE. Based on the result of the file review, no NRHP listed or NRHP eligible resources were identified in the APE; therefore, no further work was conducted regarding visual impacts.

There are no known cultural resources, archaeological sites, or historic properties within the half-mile visual APE that are listed in or eligible for listing in the NRHP. Therefore, Terracon recommends a finding that no historic properties are within the APE for visual effects.



4/15/2025

Above Ground Resource

Eligible

Not Eligible

Undetermined

District Resource

Not Eligible

1:18,056

0 0.1 0.2 0.4 mi

0 0.17 0.35 0.7 km

Maxar

N

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

Project:	J8237080
Scale:	AS SHOWN
Client:	Upward Broadband
Date:	April 2025

Terracon

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

PA SHARE Cultural Resources Map with 0.5-mile APE

Spring Run Tower

17935 New Bridge Road
Fannett Township (Spring Run), Franklin County PA

Pennsylvania State Historic Preservation Office
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

June 3, 2025

Sent Via PA-SHARE

RE: ER Project # 2025PR02820.001, Spring Run, National Telecommunications and Information Admini, Fannett Township, Franklin 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 Sara-Ladd Manley at samanley@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 Sara-Ladd Manley at samanley@pa.gov.

Sincerely,

Barbara Frederick
Environmental Review Division Manager

APPENDIX F

Photo 1 View of the tower site, facing north

Photo 2 View of the tower site, facing west

Photo 3 View of the tower site, facing south

Photo 4 View of the tower site, facing east

Photo 5 View from the tower site, facing north

Photo 6 View from the tower site, facing west

Photo 7 View from the tower site, facing south

Photo 8 View from the tower site, facing east

Photo 9 View of the beginning of New Bridge Road, facing northwest from Amberson Rd (Going under this bridge appears to be the only access the to the tower site's access easement)

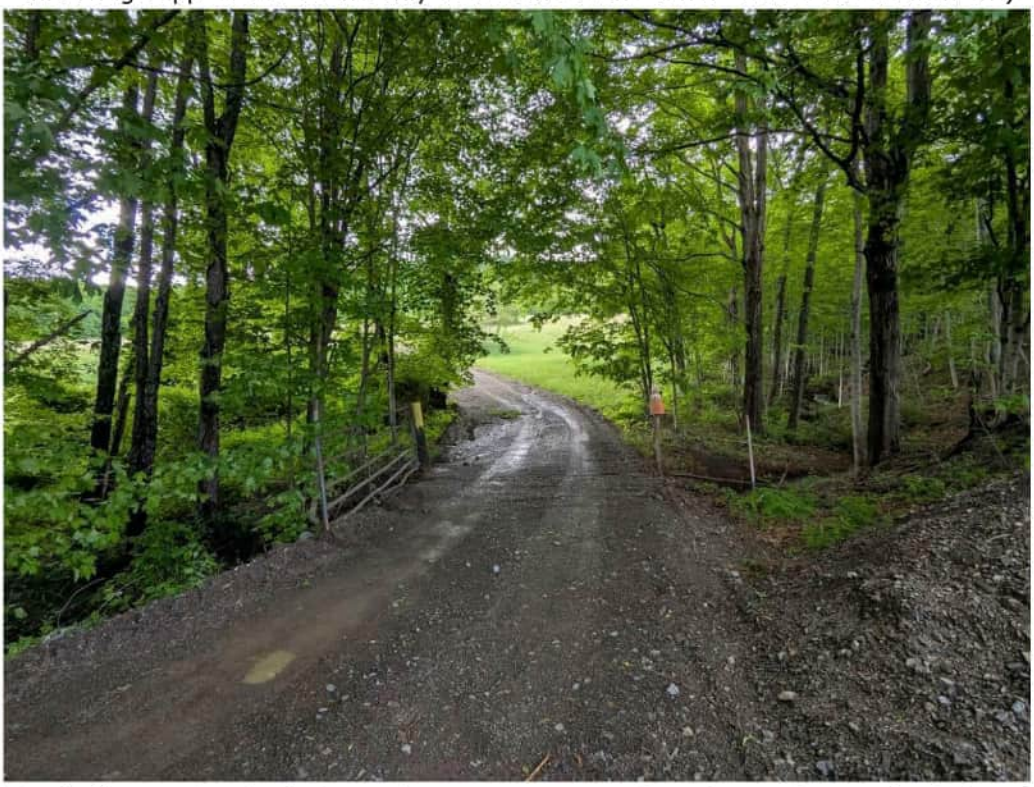


Photo 10 View of the beginning of the access easement, facing west from New Bridge Rd

Photo 11 View of the eastern section of the access easement, facing northeast toward New Bridge Rd

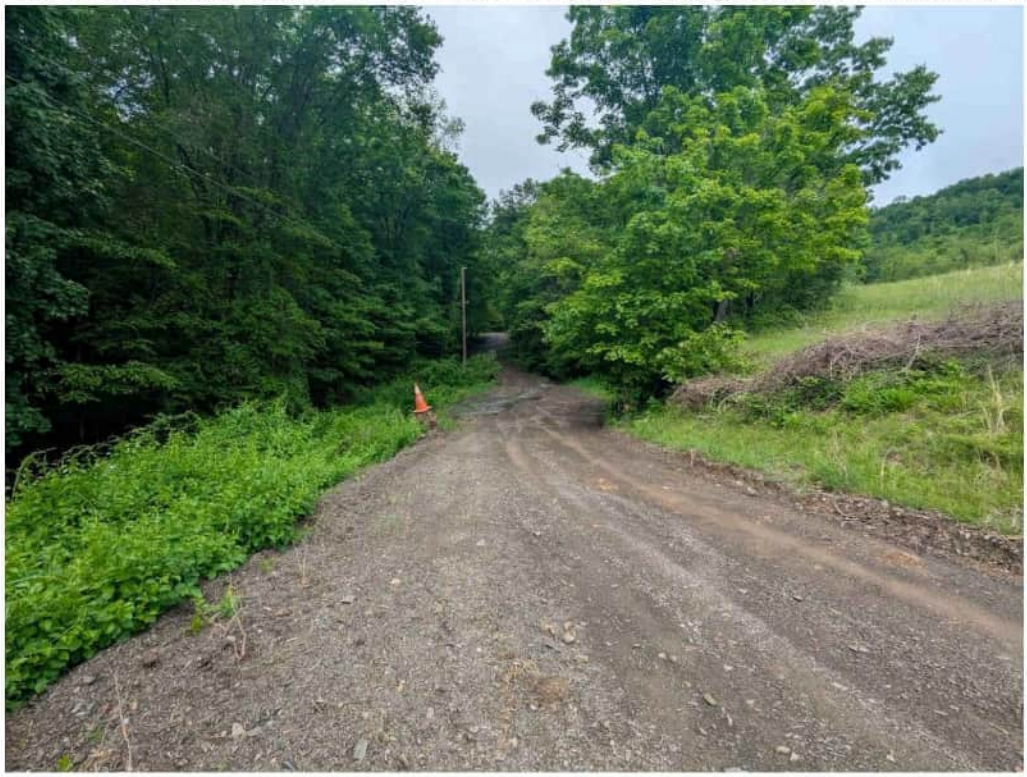


Photo 12 View of the eastern section of the access easement, facing west

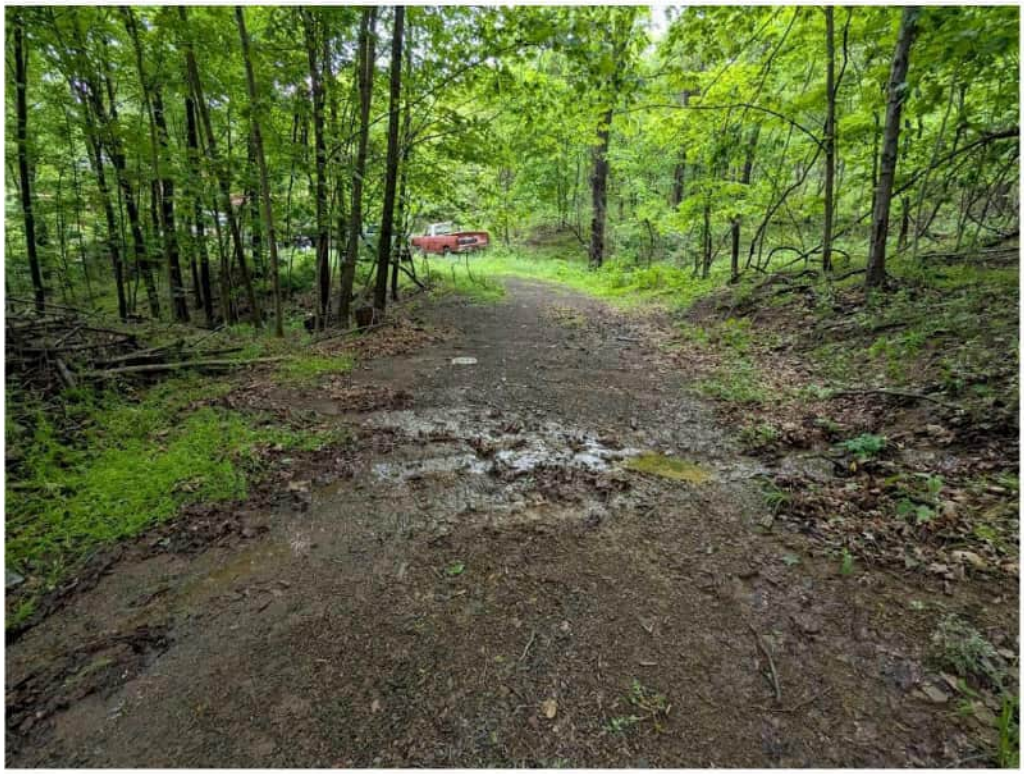


Photo 13 View of the access easement west of the landowner's homestead, facing east-northeast

Photo 14 View of the western section of the access easement, facing west

Photo 14 View of the access easement, facing north

Photo 15 View of the access easement, facing northwest

Photo 16 View of the access easement, facing northeast

Photo 17 View of the access easement, facing north-northeast

Photo 18 View of the access easement at the top of the ridge, facing south-southwest

Photo 19 View of the utility easement, facing south-southeast from the tower site

Photo 20 View of the utility easement, facing south-southeast down the mountain

Photo 21 View of the utility easement, facing south-southeast down the mountain

Photo 22 Showing an example of a typical shovel test pit (STP #5) within the tower compound (generally 20 cm to bedrock)

Photo 23 Locations of the excavated shovel tests in relation to the project area on a recent aerial photograph.