



Finding of No Significant Impact

**National Telecommunications and Information
Administration**

Middle Mile Grant Program

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OVERVIEW

This document serves as the Finding of No Significant Impact (FONSI) for the following project awarded by the National Telecommunications and Information Administration (NTIA). NTIA has completed the **sufficiency review of the recipient’s Environmental Assessment (EA) and has determined that the project will not have a significant impact on the environment. The FONSI contains information related to the review.**

Recipient Name:	The Towers, LLC
Grant Project Name:	Copper Rock (US-GA-5665) – Proposed 235-Foot-Tall Self-Support Telecommunications Structure
Grant Award No.	08-40-MM228
EA Unique ID #:	EAXX-006-60-11D-1775208452
Program Location:	Haralson County, Georgia

PROGRAM SUMMARY

The NTIA awarded a grant to Zayo Group, LLC, a portion of which was subgranted to The Towers, LLC (The Towers), through the Middle Mile (MM) Grant Program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title IV, Section 60401, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act). The MM program provides funding to encourage the expansion and extension of middle mile infrastructure to reduce the cost of connecting unserved and underserved areas to the backbone of the internet (commonly referred to as the “last mile”) and to promote broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network. The Project is called Copper Rock (US-GA-5665) – Proposed 235-Foot-Tall Self-Support Telecommunications Structure and activities are scheduled to occur in Haralson County, Georgia.

The Towers, LLC completed an EA for this Project in April 2026. NTIA reviewed the EA and determined it is sufficient. The EA was posted on the NTIA’s Broadband USA (BBUSA) website for a 30-day comment period from May 15, 2026, through June 14, 2026. No comments were received during the comment period. A public notice indicating the availability of the EA for review on the BBUSA website was published in the Haralson Gateway Beacon on May 7, 2026.

The Project includes:

Project Activity 1 (Preferred Alternative): Construction and maintenance of a 235-foot-tall self-support telecommunications structure and associated ground-level equipment including a 50kW diesel backup generator within a 75-foot by 75-foot fenced compound which will be situated within a 100-foot by 100-foot lease area, a 90-foot-long by 30-foot-wide access/utility easement, a driveway apron and concrete culvert within the Rockmart Road right-of-way leading to an approximately 129-foot-long by 12-foot wide graded aggregate base drive culminating in a 75-foot-long by 12-foot-wide graded aggregate base turn-around area adjacent to the fenced compound, and a second culvert



located near the intersection of the access/utility easement and the lease area. Proposed overhead power would extend from a proposed power pole located within the proposed access/utility easement, just outside of the fenced compound to an existing power pole within the Rockmart Road right-of-way. Underground fiber would be installed in the access/utility easement within two two-inch conduits from the proposed compound to a new handhole located where the access/utility easement meets the Rockmart Road right-of-way. Proposed overhead power would extend from a proposed power pole located within the proposed access/utility easement just outside of the fenced compound to a proposed power pole located adjacent to the proposed access drive within the west side of the ROW, and then to an existing power pole on the east side of the ROW.

Based on a review of the analysis in the EA, NTIA has determined that the Project, implemented in accordance with the preferred alternative, and incorporating best management practices (BMPs) and protective measures identified in the EA, will not result in any significant environmental impacts. Therefore, the preparation of an Environmental Impact Statement (EIS) is not required. The basis for this determination is described in this FONSI.

Additional information and copies of the Executive Summary of the EA and FONSI are available to all interested persons and the public through the NTIA website (<https://broadbandusa.ntia.gov/funding-programs/documentation-and-reporting>) and the following contact:

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PROJECT PURPOSE AND NEED

PURPOSE

The purpose of the Proposed Action is to improve and enhance reliable wireless voice and data communications to surrounding areas of Haralson County, Georgia. The enhanced capabilities and reliability of voice and data communications resulting from the proposed action would provide additional economic and educational opportunities and access to previously inaccessible telehealth services for the surrounding communities.

NEED

Rural areas such as Haralson County, Georgia are consistently underserved communities as it relates to access to fiber and broadband communications infrastructure, which at one time was considered a luxury, but is now a basic utility for households and businesses. While improvements to communications technologies continue to evolve and improve, rural communities are geographically isolated with low population density, resulting in a lack of necessary investment in communications infrastructure. Further, the use of alternative means of such communication (such as satellite internet access) is prohibitively expensive for members of these communities. The lack of investment in such infrastructure results in disparities in education, economic opportunities, health, and overall quality of life for current and future members of these communities.

Current wireless coverage in areas surrounding the Proposed Action is weak, and without the Proposed Action, coverage is likely to get worse as demand in the areas of currently weak service is anticipated to increase. The Proposed Action would improve access to reliable and modern wireless communications capabilities for surrounding areas of Haralson County, Georgia in the vicinity of the Proposed Action site and provide much improved coverage to users in the area over the long term. Benefits to the population would include improved communications infrastructure, increased educational and economic opportunities, and better access to healthcare services, including telehealth services.



PROJECT DESCRIPTION

The following is a description of the Project:

The Proposed Action includes a proposed 235-foot-tall self-support telecommunications structure and associated ground-level equipment that would be constructed within a proposed 75-foot by 75-foot fenced compound which would be situated within a 100-foot by 100-foot proposed lease area. The proposed facility would include an approximately 90-foot-long by 30-foot-wide access/utility easement. A proposed approximately 129-foot-long by 12-foot-wide graded aggregate base access drive would be installed extending from the proposed fenced compound within the proposed lease area through the proposed access/utility easement to Rockmart Road, connected via a proposed apron and concrete culvert within the right-of-way. A second concrete culvert is proposed within the access/utility easement near where it meets with the proposed lease area. A proposed 75-foot-long by 12-foot-wide turn-around would be constructed adjacent to the eastern edge of the fenced compound area within the lease area. Ground level equipment within the compound would include a meter bank and a proposed 25-foot-long by 20-foot-wide Verizon equipment lease area, an equipment pad, utility H-frame, an approximately 17-foot-long ice bridge, and a 30K backup diesel generator. The proposed generator would be placed on a concrete slab. Proposed overhead power would extend from a proposed power pole located within the proposed access/utility easement just outside of the fenced compound to an existing power pole within the Rockmart Road right-of-way. Power plans have not been finalized, but the proposed overhead power route would connect to one of two power poles within the ROW, either the one on the west side of the ROW north of the proposed access drive or the existing pole on the east side of the ROW. Underground fiber would be installed in two two-inch conduits within the lease area from the fiber junction box within the Verizon lease area, to two proposed handholes located within the proposed turnaround area, to two handholes located where the proposed access/utility easement meets with the Rockmart Road right-of-way (ROW).

To manage stormwater runoff, a silt fence barrier is proposed around the north, west, and south sides of the lease area, the southern side of the access/utility easement, and the north side of the access drive within the ROW. The Proposed Action area would total approximately 13,168 square feet (0.3 acres). Tree clearing will be required within the project area. In addition, removal of minimal ruderal vegetation (grasses and weeds) within the project area would occur.

ANALYSIS OF ALTERNATIVES

The recipient's EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. NTIA conducted a review of the recipient's analysis of alternatives for implementing the Project to meet the purpose and need, including a review of the "no action" alternative. Each alternative was evaluated for impacts against the "no action" alternative and impacts from other alternatives, as a component of selecting the preferred alternative. The following summarizes the alternatives analyzed in the EA.

PREFERRED ALTERNATIVE

The build (proposed action) alternative will consist of the following:



- Construction of a 235-foot-tall self-support telecommunications structure and associated ground-level equipment that will be constructed within a proposed 75-foot by 75-foot fenced compound which will be situated within a 100-foot by 100-foot proposed lease area.
- Installation of a 90-foot-long by 30-foot-wide access/utility easement from Rockmart Road to the lease area.
- Installation of a 129-foot-long by 12-foot-wide graded aggregate base access drive within the 30-foot-wide access/utility easement and a culvert in the vicinity of the lease area.
- Installation of a driveway apron and culvert within the Rockmart Road right-of-way leading to the proposed access/utility easement.
- Installation of a 75-foot-long by 12-foot-wide graded aggregate base turn-around area adjacent to the east side of the fenced compound within the lease area.
- Installation of ground-level equipment within a 25-foot-long and 20-foot-wide equipment lease area within the fenced compound including an equipment pad, a utility H-frame, an ice bridge, and a 50kW backup diesel generator on a separate concrete pad.
- Installation of overhead power extending from a proposed power pole located within the proposed access/utility easement just outside of the fenced compound to an existing power pole within the Rockmart Road right-of-way. The proposed overhead power route would connect to one of two power poles within the ROW, either the one on the west side of the ROW north of the proposed access drive or the existing pole on the east side of the ROW.
- Installation of fiber within two (2) 2-inch conduits within the access/utility easement from the proposed compound to two new handholes where the access/utility easement meets the Rockmart Road right-of-way.
- Application of temporary erosion controls, including a silt fence barrier around the north, west, and south sides of the lease area, the southern side of the access/utility easement, and the north side of the access drive within the Rockmart Road right-of-way.
- In total, the Proposed Action area would total approximately 13,168 square feet (0.3 acres).

Construction is anticipated to begin in Summer 2026 and last for approximately 60 working days.

NO ACTION ALTERNATIVE

The 'No Action' Alternative, which must be assessed in accordance with Federal National Environmental Policy Act (NEPA), assumes no federal funding is provided by the Middle Mile (MM) Grant Program for the construction of the wireless telecommunications facility. The existing communications infrastructure in areas surrounding the proposed action will continue to operate in their current capacity with no changes



to communications capabilities for the surrounding communities and will provide no relief to the unserved or underserved rural communities.

Benefits of the no action alternative will include avoiding any potential impacts to the Project site location as a result of construction activities for the new tower facility (such as the generation of emissions of particulate matter, noise, and solid waste or impacts to any cultural resources) as well as any potential impacts to aesthetics in the area surrounding the Project site.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER DISCUSSION

No other feasible site candidate locations were considered. Zoning setback requirements and lack of landowner interest limited potential candidates within the relatively small search ring (0.2 miles). The small search ring was needed for the purpose of filling a specific coverage gap in the area.

FINDINGS AND CONCLUSIONS

The recipient's EA analyzed existing conditions and environmental consequences of the preferred alternative, other alternatives, and the no action alternative for potential impacts in the major resource areas of Noise, Air Quality, Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, and Human Health and Safety. The results of the analysis are summarized in the table below:



Resource Area ^a	Preferred Alternative	No Action Alternative
Noise	Less than Significant Impacts	No Impact
Air Quality	Less than Significant Impacts with Best Management Practices (BMPs) and Protective Measures Incorporated	No Impact
Geology and Soils	Less than Significant Impacts	No Impact
Water Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Biological Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Historical and Cultural Resources	Less than Significant Impacts	No Impact
Aesthetic and Visual Resources	Less than Significant Impacts	No Impact
Land Use	Less than Significant Impacts	No Impact
Infrastructure	Less than Significant Impacts	No Impact
Human Health and Safety	Less than Significant Impacts with BMPs and Protective Measures Incorporated	Negative Impact
^a This table presents all resource conditions presented in the EA within the relevant resource areas; however, the discussions that follow are focused on the resource conditions where potential impacts were identified.		

The sections that follow provide a brief narrative for those resource areas where there has been a potential impact indicated in the table above or provide a summary of the results of required consultation with the appropriate agency or agencies.

NOISE

The Project will create short-term increases in ambient noise levels during the construction period. Noise created by machinery used during installation will be temporary and localized in nature. To reduce noise impacts, construction activities will occur primarily during weekday daylight hours. The Project will also have intermittent, relatively minor long-term increases in noise levels due to operation of backup generators in the event of a power outage in the Project location. The expected A-weighted decibel level (dBA) produced by the generator is expected to be 81 dBA during maximum operating load, which would likely only occur during power outages. Additionally, the generator runs a self-test lasting approximately 30 minutes and will occur monthly and produce 65 dBA. Based on these considerations, no significant impacts on noise are expected to occur as a result of Project implementation.



AIR QUALITY

The Project will result in a temporary, localized increase in air emissions during construction due to equipment operation and ground disturbing activities. To minimize the generation of fugitive dust emissions as a result of ground disturbance, best management practices (BMPs) (e.g., wetting and stabilizing exposed soils, minimizing exposed soils, and minimizing traffic across unpaved areas) will be implemented. Generators will operate for short periods of time in the event of a power outage in the Project location, and during test runs. Only generator engines meeting current U.S. Environmental Protection Agency (EPA) air quality standards will be utilized. Additionally, the Project will comply with all state and local air quality regulations. Due to the limited Project scope and utilization of standard BMPs for air quality, there will be no significant impacts on air quality.

GEOLOGY AND SOILS

The Project will result in ground disturbing activities measuring approximately 0.3 acres. There are no unusual geologic features, known occurrences of important minerals, or known sensitive geologic features present within the Project area. The Project will not occur within soils designated as prime or unique farmlands or farmlands of statewide or local importance. The potential for soil erosion will be addressed through the implementation of erosion and sediment control BMPs. Based on the amount of soil disturbance that will be required for the proposed action and the use of BMPs, there will be no significant impacts on soil and geologic conditions.

WATER RESOURCES

The Project is not located within or near wetlands or surface waters and is not located within a sole source aquifer area or within a Special Flood Hazard Area of the 100-year floodplain. The anticipated regional groundwater levels at the Project site will be well beneath the extent of any excavation activities. No water withdrawals are proposed as part of Project activities. Where applicable, sediment and erosion control BMPs will be implemented, such as silt fencing or sediment traps and erosion control mats. The proposed implementation of stormwater management measures is expected to minimize the effects to water resources. Based on the lack of wetlands or surface waters within the Project area and the use of BMPs, the Project is not expected to result in significant impacts on water resources (including wetlands and other waters, water quality, stormwater runoff, hydrology, or floodplains).

BIOLOGICAL RESOURCES

An Official Species List generated from the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool and was reviewed for federally listed and proposed threatened and endangered species that may be present at the Project area. The IPaC list identified two endangered species, one proposed threatened species, and one experimental population, non-essential species as potentially occurring in the Project vicinity; however, since one of the threatened species is aquatic, it was eliminated from further review since there are no water resources at or in the vicinity of the project area. No critical habitats were identified within the Project site. Based on a review of the information provided



by IPaC, Georgia Wildlife Resources Division (GWRD), site inspections, and a Natural Resources Review, the Project site will not provide suitable habitat for federally or state-listed species. NTIA has determined that the Project will not jeopardize the continued existence of federally proposed species. A consultation request was submitted to the GWRD on October 13, 2025, and on December 1, 2025, the GWRD responded with a list of known aquatic element occurrences with the Hydrologic Unit Code (HUC) 10 watershed and within three miles for all other element occurrences. GWRD data identified no known state-protected species in the project area. All known element occurrences of state and federal protected species are over one mile from the project site. GWRD provided comments including 1) siting the project away from sensitive environmental resources, such as streams, wetlands, and critical wildlife habitat; 2) utilizing porous surfacing and implementing erosion and sediment control measures with biodegradable erosion matting material; and 3) considering USFWS communication tower guidance for minimizing impacts to migratory birds.

The Grantee committed to conform to all practicable USFWS recommended siting and construction measures for new towers as described in the USFWS *Recommended Best Management Practices for Communication Tower Design, Siting Construction, Operation, Maintenance, and Decommissioning* to the extent possible. As such, the proposed Project is not expected to adversely affect migratory birds. With the implementation of mitigation measures committed to by the Grantee, the Project will have no significant adverse impacts on biological resources.

HISTORICAL AND CULTURAL RESOURCES

On December 2, 2025, a Phase I Cultural Resources Survey for the proposed action was submitted to the Georgia Department of Community Affairs Historic Preservation Division (HPD). The HPD issued a finding on December 23, 2025, stating, “the tower, as proposed, will have no adverse effect to historic resources within its APE” for the Proposed Action.

Twelve federally recognized Tribes were identified that may attach religious and cultural significance to historic properties in the vicinity of the Project site. On November 28, 2025, the twelve Tribes were notified about the Project via the FCC’s Tower Construction Notification System, with their review period completed on December 28, 2026. All Tribal responses and requests for information were met, and it was determined that as of January 30, 2026, no further action was required and that NTIA’s Tribal coordination responsibilities under Section 106 have been met for this Project.

AESTHETIC VISUAL RESOURCES

The proposed action will include the installation of a 235-foot-tall self-support telecommunications tower and support equipment at grade. The proposed tower would be lit with medium-intensity dual red/white flashing lights. Tower lights would be white during the day and red at night. Construction would occur only during daytime hours, thus there would be no construction-related lighting associated with the Proposed Action. No sensitive aesthetic or visual receptors are located within the viewshed of the proposed action, thus no adverse impacts to aesthetic and visual resources are anticipated.



LAND USE

The Proposed Action would result in minimal changes to the overall land use for the larger tract on which the Proposed Action would take place, and the Proposed Action would not result in changes to surrounding property land uses.

INFRASTRUCTURE

The proposed action will require additional energy demand for the wireless facility; however, the overall increase in energy demand during construction and operation of the Project will be within the existing capabilities of local electrical distribution providers. The Project will not require water and sewer infrastructure, and no new public roadways will be required. Construction activities will result in a temporary and minimal increase in traffic on local roadways during the staging and construction phases of the project; however, these conditions will end once construction is complete; therefore, the Project will have no long-term impact on infrastructure.

HEALTH AND HUMAN SAFETY

No hazardous waste sites or registered underground storage tanks (UST) were identified within the vicinity of the Project. The Grantee will utilize the 811 (call before you dig) prior to ground disturbance and ensure workers operating heavy machinery and equipment are qualified by training or experience. During construction, Occupational Safety and Health Administration (OSHA) safety standards will be enforced for contractors and their employees. Following construction, the tower will be surrounded by barbed-wire fencing that will include gate access secured by a padlock to prevent and discourage public access to the site.

Overall, the Project will result in no adverse impacts to human health and safety and will enhance capabilities and reliability of voice and data communications, which will be beneficial to human health by providing additional economic and educational opportunities and improved access to telehealth services for Haralson County residents.

REASONABLY FORESEEABLE EFFECTS

As described throughout this FONSI, the Project will not have significant adverse impacts on any of the environmental resource areas evaluated in the EA. According to the Haralson County Joint Comprehensive Plan 2017-2026, there are no specific foreseeable actions for the Proposed Action area or adjoining areas. As such, reasonably foreseeable effects to the environment from the Proposed Action are minimal. Further, the minimal impacts to the environment from the Proposed Action would be outweighed by the benefits to the quality of life for the population surrounding the Proposed Action area; therefore, no significant reasonably foreseeable effects are anticipated to result from the Proposed Action.



PUBLIC COMMENT

NTIA conducted a public comment period for the EA. The public notice was placed in The Haralson Gateway Beacon circulations. The notice of the proposal and EA was also posted on NTIA's website for national exposure. The notice described the proposed Project and comment process and provided guidance on where to view the document and federal points of contact. The comment period began on May 15, 2026, and concluded on June 14, 2026. No comments were received.

DECISION

NTIA concludes that constructing and operating the Project as defined by the preferred alternative with the implementation of the identified BMPs and protective measures will not require additional mitigation. A separate mitigation plan is not required for the Project. The analysis indicates that the proposed action is not a major federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued June 15, 2026, by:

**AMANDA
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