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:	Meriadoc (US-GA-5748) – Proposed 255-Foot-Tall Self-Support Telecommunications Structure
Grant Award No.	08-40-MM228
EA Unique ID #:	EAXX-006-60-11D-1777291821
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 Meriadoc (US-GA-5748) – Proposed 255-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 19, 2026, through June 18, 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 14, 2026.

The Project includes:

- **Project Activity 1 (Preferred Alternative):** Construction and maintenance of a 255-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, an approximately 180-foot-long by 30-foot-wide access and utility easement, a 235-foot-long by 12-foot-wide gravel access drive extending from the proposed fenced compound within the lease area through the proposed access/utility easement to Ben Davis Road, connected to via a proposed apron within the Ben Davis Road right-of-way.

Approximately 200 feet of underground fiber would be installed in two two-inch conduits within the lease area and would be routed south-southeast, west-southwest, and south-southeast to two proposed handholes located within the turnaround area, and then would be routed west-southwest and north-northwest to two proposed handholes to be placed where the access/utility easement meets with the Ben Davis Road right-of-way. Underground power would follow the same route as the fiber from the lease area, through the access and utility easement, and to the intersection of the access and utility easement and Ben Davis Road over a distance of approximately 200 feet. The power route would then continue west-southwest and southwest along the south side of the Ben Davis Road ROW where it will connect at a meet point that will be coordinated with the local utility company approximately 80 feet west of where the access/utility easement meets the ROW in Haralson County, Georgia.

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:

Amanda Pereira

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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 255-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. An existing fenceline within the proposed lease area will be removed. The proposed facility would include an approximately 180-foot-long by 30-foot-wide gravel access/utility easement. A proposed approximately 235-foot-long by 12-foot-wide gravel access drive would be installed extending from the proposed fenced compound within the proposed lease area through the proposed access/utility easement to Ben Davis Road, connected via a proposed apron within the right-of-way. A proposed 50-foot-long by 12-foot-wide gravel turn-around would be constructed adjacent to the western edge of the fenced compound area within the lease area. Ground level equipment within the compound would include a proposed 25-foot long by 20-foot-wide Verizon equipment lease area, an equipment pad, utility H-frame, an approximately 15-foot-long ice bridge, and a 50kW backup diesel generator. The proposed generator would be placed on a concrete slab. Underground fiber would be installed in two two-inch conduits within the lease area from the fiber junction box within the Verizon lease area south-southeast, west-southwest, and south-southeast to two proposed handholes located within the proposed turnaround area; then west-southwest and north-northwest to two handholes located where the proposed access/utility easement meets with the Ben Davis Road right-of-way (ROW) over a distance of approximately 200 feet. Underground power would follow the same route as the fiber from the Verizon lease area along the proposed access/utility easement to the intersection of the access and utility easement and Ben Davis Road. The power route will then continue west-southwest and southwest along the south side of the Ben Davis Road ROW where it will connect at a meet point that will be coordinated with the local utility company approximately 80 feet west of where the access/utility easement meets the ROW.

In addition, to manage stormwater runoff, The Towers, LLC proposes a silt fence barrier around the east and south sides of the lease area and the western and eastern sides of the access/utility easement. Grading is also proposed along the access/utility easement and around the fenced compound as the project area slopes to the south.

In total, the Proposed Action area would total approximately 20,735 square feet (0.48 acres). Tree clearing will be required within the project area.

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:

- The construction of a 255-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. Construction of three (3) 173- to 180-foot-long by 20-foot-wide guy-wire easements.

- Installation of an approximately 180-foot-long by 30-foot-wide gravel access/utility easement traveling from the lease area to Ben Davis Road.

- Installation of a proposed approximately 235-foot-long by 12-foot-wide gravel access drive would be installed extending from the proposed fenced compound within the proposed lease area through the proposed access/utility easement to Ben Davis Road, connected via a proposed apron within the right-of-way.

- Installation of ground-level equipment within the compound including a proposed 25-foot long by 20-foot-wide Verizon equipment lease area, an equipment pad, utility H-frame, an approximately 15-foot-long ice bridge, and a 50kW backup diesel generator.

- Installation of underground fiber in two two-inch conduits within the lease area from the fiber junction box within the Verizon lease area south-southeast, west-southwest, and south-southeast to two proposed handholes located within the proposed turnaround area; then west-southwest and north-northwest to two handholes located where the proposed access/utility easement meets with the Ben Davis Road right-of-way (ROW) over a distance of approximately 200 feet.

- Installation of underground power would follow the same route as the fiber from the Verizon lease area along the proposed access/utility easement to the intersection of the access and utility easement and Ben Davis Road. The power route will then continue west-southwest and southwest along the south side of the Ben Davis Road ROW where it will connect at a meet point that will be coordinated with the local utility company approximately 80 feet west of where the access/utility easement meets the ROW.

- Application of temporary and permanent erosion controls, including a silt fence barrier around the east and south sides of the lease area and the western and eastern sides of the access/utility easement. Grading is also proposed along the access/utility easement and around the fenced compound as the project area slopes to the south.

- In total, the Proposed Action area would total approximately 20,735 square feet (0.48 acres).

Construction is anticipated to begin in 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

Two other candidate site locations within the search ring were considered. The first other tower location considered but eliminated from further discussion was a site located approximately 2,300 feet west of the Preferred Alternative location in a similarly wooded area. The first other tower location had less favorable conditions from construction and wireless coverage standpoints and did not provide an apparent benefit from an environmental impact standpoint, so it was eliminated from further consideration.

The second other tower location considered but eliminated was a site located approximately 3,100 feet southwest of the Preferred Alternative location in a similarly wooded area. The second other tower location had less favorable conditions from construction and wireless coverage standpoints and did not provide an apparent benefit from an environmental impact standpoint, so it was eliminated from further consideration.

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 0.48 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 threatened species, one proposed threatened species, and one experimental population species as potentially occurring in the Project vicinity. No critical habitats were identified within the Project site. Based on a review of the information provided by IPaC, the Georgia Department of Natural Resources (GADNR), 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 GADNR on June 30, 2020, and an update letter was sent on April 18, 2024. GADNR responded to the 2020 consultation request indicating the presence of critical habitat for the federally threatened finelined pocketbook (*Lampsilis altilis*) on a stretch of the Tallapoosa River approximately 0.4 miles north of the project site and indicated that measures taken to minimize stormwater runoff and erosion during construction will be protective of this species and its critical habitat. No response was received to the April 18, 2024 update.

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 June 25, 2020, a Phase I Cultural Resources Survey for the proposed action was submitted to the Georgia Historic Preservation Division (GAHPD). The GAHPD issued a finding on July 23, 2020, stating, “no historic properties that are listed in or eligible for listing in the NRHP will be affected by the proposed undertaking” for the Proposed Action.

Due to changes to the proposed tower structure, height, and design; the length of time since prior consultations; and/or changes in project ownership, addendum letters were sent out to HPD and Tribes in 2021, 2024, and 2025. The HPD issued a finding on June 29, 2021, stating, “HPD continues to concur that no historic properties that are eligible for or listed in the NRHP will be affected by the proposed undertaking” for the Proposed Action. No responses were received from HPD regarding the 2024 update letter. A response to the 2025 update letter was received on July 15, 2025, stating that the FCC NPA does not require notice of ownership changes and that the ownership update would be deleted from their system.

Twelve (12) federally recognized Tribes were identified that may attach religious and cultural significance to historic properties in the vicinity of the Project site. On June 19, 2020, the twelve Tribes were notified about the Project via the FCC’s Tower Construction Notification System, with their review period completed on August 6, 2021. All Tribal responses and requests for information were met. Following changes to the tower design, a new TCNS entry was filed under TCNS number 231366 on May 14, 2021, with the review period complete on July 23, 2021. All Tribal responses and requests for information were again met. Finally, update letters were sent on July 17, 2025, to which no responses have been received. As of August 17, 2025, it was determined that 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 255-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 2017-2027 Future Development Map, the Proposed Action area is zoned as Agricultural/Forest and there are no specific foreseeable actions for the Proposed Action area or adjoining areas. Reasonably foreseeable effects to the environment from the Proposed Action would be minimal, and these 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 19, 2026, and concluded on June 18, 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 24, 2026, by:

AMANDA PEREIRA

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