

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

THE APPLICATION OF	)	
APC TOWERS IV, LLC,	)	
A DELAWARE LIMITED LIABILITY COMPANY AND	)	
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS	)	
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC	)	CASE NO.: 2026-00157
CONVENIENCE AND NECESSITY TO CONSTRUCT	)	
A WIRELESS COMMUNICATIONS FACILITY	)	
IN THE COMMONWEALTH OF KENTUCKY	)	
IN THE COUNTY OF ROCKCASTLE	)	

SITE NAME: LV TURKEYTOWN

* * * * *

RESPONSE TO COMMENT FROM BENNY BURCHETT

APC Towers IV, LLC, a Delaware limited liability company, and Cellco Partnership d/b/a Verizon Wireless (“Applicants”), by counsel, make this Response to the comment submitted by Benny Burchett in the within proceeding. Applicants respectfully state, as follows:

1. Mr. Burchett has raised generalized concerns to the Kentucky Public Service Commission (“PSC”) regarding the wireless communications facility proposed in the within Application. As discussed herein, there is no ground for denial of the subject application, and substantial evidence supports approval of the requested Certificate of Public Convenience and Necessity (“CPCN”).

2. In response to Mr. Burchett’s generalized concerns regarding property values, Applicants have attached as **Exhibit 1** a report from Glen D. Katz, MAI, SRA, AI-GRS,

AI-RRS, a property valuation expert, concluding that the proposed tower will not have a negative impact on surrounding property values. In fact, since public utilities provide a platform for economic sustainability, community growth, safety and education, they support positive influences on value and demand for real estate.

3. The PSC issued a Final Order in the CPCN proceedings involving a new tower proposal in Case No. 2024-00284 on April 7, 2025. Even though tower opponents alleged claims of damage to property value, the PSC explained “to obtain a CPCN, Co-Applicants must demonstrate a need for such facilities and an absence of wasteful duplication.” (PSC Order of April 7, 2025 at p. 4). The PSC found that those statutory standards had been met. The PSC concluded “...the Commission is limited to the statutory elements of a CPCN.” *Id.* Thus, even if claims of property value reduction were proven, which Applicants do not concede, there would be no lawful basis to deny the requested CPCN.

4. In response to Mr. Burchett’s generalized concerns regarding radio frequency emissions, it is important to clarify that, pursuant to KRS Chapter 100 and the Telecommunications Act of 1996, the environmental effects of radio frequency emissions are not at issue in this case and may not be considered by the PSC in its evaluation of the proposed wireless communications facility. Radio frequency emissions are the subject of federal regulations, and the Telecommunications Act of 1996 expressly prohibits state regulation of wireless communications facilities on the basis of environmental effects of radio frequency emissions. This prohibition is codified at 47 USC § 332(c)(7), as follows:

“No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the [Federal Communications] Commission’s regulations concerning such emissions.” *Id.* at 47 U.S.C. § 332(c)(7).

5. Cellco Partnership d/b/a Verizon Wireless is licensed by the Federal Communications Commission (“FCC”) to provide wireless communications service to the area to be served by the proposed wireless communications facility, and a copy of the relevant FCC licenses granted to Cellco Partnership d/b/a Verizon Wireless and its subsidiaries are included as part of **Exhibit A** to the within Application. Accordingly, Applicants are subject to the FCC regulations referenced at 47 USC § 332(c)(7).

6. The U.S. Court of Appeals for the Sixth Circuit has upheld the prohibition of consideration of the environmental effects of radio frequency emissions in Kentucky Public Service Commission proceedings on wireless communications facilities. Specifically, in *Telespectrum, Inc. v. PSC*, 227 F.3d 414 (6th Cir. 2000), the Court held:

“[C]oncerns of health risks due to the emissions may not constitute substantial evidence in support of denial by statutory rule, as no state or local government or instrumentality thereof may regulate the construction of personal wireless facilities 'on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions.' 47 U.S.C. § 332(c)(7)(B)(iv).” *Id.* at 425.

7. The Sixth Circuit reemphasized the federal statutory prohibition of consideration of radio frequency emissions effects in its 2017 Opinion in *Robbins v. New Cingular Wireless PSC, LLC*, 854 F.3d 315 (6th Cir. 2017):

“Congress passed the TCA to foster industry competition in local markets, encourage the development of telecommunications technology, and provide consumers with affordable access to telecommunications services. *Telecommunications Act of 1996*, Preamble, *Pub. L. No. 104-104, 110 Stat. 56 (1996)*. The TCA furthers those goals by preventing local governments from impeding the siting and construction of cell towers that conform to the FCC's RF-emissions standards. See 47 U.S.C. § 332(c)(7)(B)(iv). By delegating the task of setting RF-emissions levels to the FCC, Congress authorized the federal government—and not local governments—to strike the proper balance between protecting the public from RF-emissions exposure and promoting a robust telecommunications infrastructure. See *id.*; *In the Matter of Procedures for Reviewing Requests for Relief from State*

& Local Regulations Pursuant to Section 332(c)(7)(b)(v) of the Commc'ns Act of 1934 in the Matter of Guidelines for Evaluating the Env'tl. Effects of Radiofrequency Radiation, 12 F.C.C. Rcd. 13494, 13505 (1997)." Id. at 319-320.

In short, the U.S. Court of Appeals for the Sixth Circuit, in multiple published opinions from 2000 to 2017, has upheld and enforced the federal Telecommunications Act of 1996's prohibition on regulation of proposed cellular towers based on environmental effects of radio frequency emissions.

8. In response to Mr. Burchett's generalized concerns regarding the environmental and ecological impacts of the proposed wireless communications facility, Applicants have attached as **Exhibit 2** a National Environmental Policy Act ("NEPA") Environmental Checklist Report prepared by Environmental Corporation of America ("ECA"), an independent environmental consulting firm. ECA evaluated the proposed facility using the FCC's NEPA Environmental Checklist and applicable federal regulations. As part of its review, ECA evaluated whether the proposed facility would affect designated wilderness areas or wildlife preserves, federally listed threatened or endangered species and critical habitat, historic properties, Native American religious or cultural sites, floodplains, wetlands or other jurisdictional waters, surface features, and other environmental resources regulated under the FCC's environmental review process. ECA also reviewed compliance with applicable FCC requirements relating to lighting, radio frequency exposure, and the FCC's Antenna Structure Registration environmental notification process. The report concludes that "In summary, ECA has found no evidence that adverse environmental impacts or effects, as defined in the FCC Rules contained in 47 CFR §§ 1.1301 through 1.1320, would result from the proposed undertaking."

9. In response to Mr. Burchett's generalized concerns regarding the aesthetic and

scenic impact of the proposed wireless communications facility, the U.S. Court of Appeals for the Sixth Circuit has repeatedly held that lay opinion or generalized aesthetic concerns do not constitute substantial evidence justifying denial of an application for a wireless communications facility. Although Mr. Burchett cites research concerning perceived landscape quality and community satisfaction, such generalized opinions regarding the appearance of a proposed tower do not constitute the type of substantial evidence required to support denial of a CPCN. Any decision rendered by state or local authorities must be in writing and supported by substantial evidence in a written record. Federal courts within the Sixth Circuit have defined "substantial evidence" in prior cases. For example, a locality's own zoning requirements may constitute substantial evidence. *Cellco Partnership v. Franklin Co., KY*, 553 F. Supp. 2d 838, 845-846 (E.D. Ky. 2008). Of course, in this instance, unincorporated Rockcastle County has not adopted zoning requirements. Courts within the Sixth Circuit have found that lay opinion is not substantial evidence. *Cellco Partnership at 852*; *T-Mobile Central, LLC v. Charter Township of West Bloomfield*, 691 F.3d 794, 804 (6th Cir. 2012). They have likewise found that unsupported opinion is not substantial evidence. *Cellco Partnership at 849*. Generalized expressions of concern regarding "aesthetics" are not substantial evidence. *Cellco Partnership at 851*. Claims that a tower is unsightly are generalized aesthetic concerns and the same objection could be made by any resident in any area in which a tower is placed. *Cellco Partnership at 852*. General concerns that a tower is ugly or unwanted near an individual's residence are not sufficient to satisfy the Sixth Circuit's substantial evidence standard. *T-Mobile Central at 800*. Finally, anyone who opposes a tower in their backyard can claim it would be bad for the community, not aesthetically pleasing, or otherwise objectionable,

but such claims do not constitute substantial evidence. *T-Mobile Central at 801.*

10. In response to Mr. Burchett's suggestion that Applicants pursue alternative solutions, including co-location on an existing structure, deployment of small-cell technology, or selection of another site, Applicants respectfully state that such alternatives were thoroughly evaluated during the site selection process. Verizon Wireless' radio frequency engineers conducted studies and testing to identify the area in which a tower must be located to remedy the existing service gap, a map of which is provided as **Exhibit N** to the within Application. Verizon Wireless' equipment must be located within this area and at the proposed height in order to close this service gap, as explained in Paragraphs 28-29 of the within Application. As explained in Paragraph 11 of the within Application, Verizon Wireless then investigated whether existing structures or wireless communications facilities were available for co-location within the search area, but no suitable or available co-location opportunity existed. Mr. Burchett offers no engineering analysis or other substantial evidence demonstrating that the proposed facility could be replaced by a co-located installation, small-cell technology, or another location while still satisfying Verizon Wireless' service objectives. Finally, to the extent Mr. Burchett suggests additional community consultation to identify an alternative location, Applicants note that the unincorporated portion of Rockcastle County has not adopted planning and zoning regulations, nor has it adopted regulations regarding the placement, construction and modification of wireless communications facilities. Any property purchased in unincorporated Rockcastle County is acquired with the understanding that the surrounding neighbors are free to develop their property in any manner they desire without regulation from local government or input from area residents. For this reason,

area residents have no reasonable expectation of input regarding land use of surrounding properties or the impact a proposed land use will have on their property.

11. The proposed facility has been designed, configured, and located in such a manner that it will prevent or limit potential adverse effects on surrounding properties. The general area where the proposed facility will be located is predominantly rural in character with sparse residential uses. The tower is set back from the public roadway and is well screened from nearby parcels and uses. Tower placement at this location is the most suitable and least intrusive method available for resolving the existing service gap in this area. As presented in the subject Application, there is no valid basis for denial, and substantial evidence supports the granting of the requested CPCN.

WHEREFORE, there being no ground for denial of the subject application and substantial evidence in support of the requested CPCN, Applicants respectfully request the Kentucky Public Service Commission:

- (a) Accept this Response for filing;
- (b) Implement affirmative measures to prevent introduction and consideration of testimony and other evidence on radio frequency issues from its deliberations on the subject application for approval of a wireless telecommunications facility, pursuant to KRS Chapter 100 and the Telecommunications Act of 1996;
- (c) Issue a Certificate of Public Convenience and Necessity to construct and operate the WCF at the location set forth herein without further delay; and
- (d) Grant Applicants any other relief to which they are entitled.

Respectfully submitted,



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And



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of August 2026, a true and accurate copy of the foregoing was electronically filed with the PSC and sent by U.S. Postal Service first class mail, postage prepaid, to Benny Burchett, 1248 Fort Harrod Way, Crab Orchard, KY 40419.



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And



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Attorneys for Applicants

EXHIBIT 1
REAL ESTATE VALUATION REPORT

Real Estate Value Impact Study

For

**Proposed Wireless Communications Facility
APC Towers IV, LLC, and
Cellco Partnership d/b/a Verizon Wireless
Site Name: LV Turkeytown
PSC Project #: 2026-00157
Assessor Parcel Number: 004-00-018
9311 Dysart Way
Crab Orchard, Rockcastle County
Kentucky 40419**

Date of Report:

July 27, 2026

Prepared For:

**Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602**

Prepared By:

**Glen D. Katz, MAI, SRA, AI-GRS, AI-RRS
Realty Solutions Co., Inc.
3815 Stonyrun Circle
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July 27, 2026

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Realty Solutions Co., Inc.
Finding Answers to Real Estate Questions

Subject: Real Estate Value Impact Study, Proposed Wireless Communications Facility
APC Towers IV, LLC, and Cellco Partnership d/b/a Verizon Wireless
Site Name: LV Turkeytown
PSC Project #: 2026-00157
Assessor Parcel Number: 004-00-018
9311 Dysart Way
Crab Orchard, Rockcastle County, Kentucky 40419

Commissioners:

I have completed an impact study regarding potential influence of wireless communications tower facilities on market value of surrounding properties. The study consists of analyzing sale activity and value trends of properties located in proximity to tower structures and tower systems, as compared to properties which are not in proximity but are otherwise competitive as replacements in the market.

Where people live is completely dependent on infrastructure and utilities. We have roads, sidewalks, speed humps, on-site utility easements, water lines, sewer and storm drains, natural gas piping, electric lines strung on poles, water towers, cell towers, high voltage overhead transmission towers, light poles, street signage, fire hydrants, and communications and electric service fixtures. Whether buried or overhead, all are expected, they are visible in some fashion, and they are necessary where we live.

Utilities provide a platform for economic sustainability, community growth, and safety. These factors in turn influence value and demand for real estate. Based on the actions of buyers, occupants, and sellers of real estate, it is clear that communications towers are part of this platform. Consistently, measured market activity shows this type of facility has not, and does not, negatively impact surrounding property; instead, providing significant positive impact on value and demand for real estate. There are no indications for value diminution of properties with suburban or low-density residential and agricultural characteristics similar to the project neighborhood, or neighborhoods in general.

This report is intended solely for use by Applicant, and the identified governmental review panel for the project, Kentucky Public Service Commission. The intended use of the reported opinions and conclusions is to assist Applicant, and the governmental review panel in making permitting decisions regarding the subject project. The undersigned, Glen D. Katz, MAI, SRA, AI-GRS, AI-RRS, recognizes this report will be submitted as part of the public record.

The attached report is a summary of the research and analysis performed. Thank you for the opportunity to present this information. Please contact me if you have questions or comments.

Respectfully,

A handwritten signature in black ink that reads "Glen D. KATZ". The signature is written in a cursive style with capital letters for the last name.

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Scope of Work

Project identification

The project is identified by the site description contained in the project application. Construction plans and aerial maps are reviewed. Neighborhood and market characteristics are identified to understand the four forces that affect value:

- social forces;
- economic forces;
- governmental forces, and;
- environmental forces

Facility Description

The facility will be in a low-density residential and agricultural area. Construction will be comprised of a 245' guyed structure with 5' lightning arrestor, totaling height of 250 feet. Base elevation will be ~923.1 feet AMSL. The construction will be located on an approximately 100' x 100' leased site with a 75' x 75' fenced compound. There will be supporting storage cabinets and gravel ground cover. There is designed space for co-location of other wireless service providers in the facility. The facility will be accessed by an easement drive extending from the west side of Dysart Way. These characteristics comprise the most common features of wireless communications facilities in similar areas of the United States.

Data researched

Existing tower facilities, wireless communications, high voltage electric overhead transmission, or water tower storage tanks, are identified for analysis based on residential and commercial exposures. In some cases, there are multiple towers involved in a utility system, such as high voltage electric overhead transmission lines.

Value Definition

The research analysis is based on 'market value' of real estate. The federal definition via the FDIC is one of the most widely accepted description of market value.

Market value means the most probable price which a property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby:

- (1) Buyer and seller are typically motivated;*
- (2) Both parties are well informed or well advised, and acting in what they consider their own best interests;*
- (3) A reasonable time is allowed for exposure in the open market;*
- (4) Payment is made in terms of cash in U.S. dollars or in terms of financial arrangements comparable thereto; and*
- (5) The price represents the normal consideration for the property sold unaffected by special or creative financing or sales concessions granted by anyone associated with the sale.*

Analysis Applied

This analysis and report is solely focused on analyzing a specific element of value; if there is a negative impact of cell tower structures on surrounding property values. While the predominant knowledge is that utilities and infrastructure, including cellular phone service, provide positive value impacts, the negative impact question remains.

Sales of residential properties are tracked to establish rates of change in value due to external exposures, market conditions, and determine potential influence from proximity to tower facilities. Comparison is made between value trends of properties in proximity, and without proximity to tower facilities. Three methods of data extraction are discussed:

- Analysis of “before and after” sale data. This method tracks value trends before and after installation of a tower facility. Property sale data before a facility is installed is compared to sale data occurring after a facility is installed. This method will have limitations when a facility installation occurred in the distant past. Older sales occurring before the installation frequently experience significant changes before they are resold: physical changes such as renovation, updating, addition, and/or economic changes (i.e., 2007-2009 recession, Covid-19 pandemic, changes in highest and best use, etc.) In these cases, value change over a long time period may be attributed to multiple overriding sources, and allocating value change solely to tower influence can be misleading.
- Comparison of “unit-value” of properties that are functionally identical in all aspects except proximity. The unit value will typically be price per-square-foot of gross living area (sale price / above-grade living area). The information will reveal any differences between proximity categories. While providing excellent evidence, this method has limitations due to the variety of property differences and related difficulty in matching properties that are adequately similar with the exception of proximity.
- One of the most common analysis methods is “market conditions” value trend analysis. This compares value trends of properties located with proximity to existing tower facilities, to value trends of properties located without proximity. Rates of value change due to market conditions are compared between the two property types to extract any differences due to proximity to a tower facility.

The case study is based on analysis of residential properties. Because those kinds of properties sell more often and tend to be more homogeneous than commercial or agricultural properties, there is a better opportunity of finding comparable sales that meet the criteria of being similar enough with respect to the value-determining variables.

In all cases, the methodologies allow controlling physical and locational attributes of the two sets of properties. Price and value effects or differences due to other characteristics of the properties are held constant, and any effect due to proximity is isolated. For this study, because of the data available, the “before and after” and “market conditions” methods are utilized.

Data Summary

History of Proximity Impact

Proximity impact is a frequent question in real estate. In the course of studying value impact due to proximity of private or public utility facilities to residential, commercial, and agricultural properties, I have analyzed wireless communications tower facilities, high-voltage overhead transmission lines (HVOT), storage towers, oil pipelines, agricultural facilities, and federal interstates. For this report, the analysis consists of analyzing value trends of properties in proximity to utility tower facilities.

Residential and commercial properties, whether urban, suburban or rural, and agricultural properties, follow similar demand patterns. In an article published in *The Appraisal Journal*, (no. 1 (Winter 2012): 30-45), James A. Chalmers identifies three general characteristic that drive property sensitivity to price effects:

- use;
- size; and
- uniqueness.

Of all property types, if there is an impact from an external source, urban and suburban residential properties will be the most sensitive.

Non-suburban, rural residential and commercial properties are often part of agricultural or recreational environments. Site sizes are larger, or they may be adjacent to large land parcels. They are also unique; because of the low-density development characteristics, there are few available, and even fewer available with specific classes of features such as site size, quality, floor plan, or auxiliary buildings. Low density development area properties are similar to urban and suburban properties in terms of use, but are superior in the sensitivity categories of site size and uniqueness/scarcity. In summary, they share the same use characteristics, but are more resilient than other residential and commercial categories.

Rockcastle County has not adopted planning and zoning for unincorporated areas of the County, and the project neighborhood is not subject to local zoning regulation. This is a frequent occurrence in low-density development and rural areas, and there are risks accepted by property owners because of the lack of control on land uses. Without localized land-use regulations, all legal uses of land are available. Land uses with a high impact on surrounding properties or a community in general, typically are characterized as producing adverse noise, odor, traffic, lighting, view, or neglected construction.

As a result, there is a higher risk expectation by buyers when making purchase decisions, regarding the quality and type of use of neighboring un-zoned properties. These risks are reflected in prices paid and resulting value trends. Regardless of these risks and buyer activity, communities without strict land-use controls continue to expand and develop need and demand for utilities. The neighborhoods and communities remain influenced by social, economic, governmental, and environmental forces. There is no difference in regard to the positive impact from utilities and infrastructure on surrounding values if a neighborhood does not have strict land-use zoning regulations.

Questions on Property Ownership

Concepts regarding property rights, property insurability, and mortgages, are frequent topics on value influence for discussion from property owners. The following information is provided for insight.

Property Rights: Property owners near cell tower facilities retain all rights normally associated with ownership. There are no additional easements, encroachments, encumbrances, fees, or use restrictions on surrounding properties.

Insurability: There are no insurability risk changes to physical property, ownership, or insurance availability or cost change. Interviews with property owners, insurance professionals, lenders, and title companies, confirm there are no conflicts on availability or premiums for physical property, or title insurance, for properties located near cell towers.

Mortgage Terms: The following national programs influencing mortgages are researched to determine status of cell towers in relation to residential mortgage financing. In all cases, there is no influence on mortgage availability or terms.

FHA: Federal Housing Administration (FHA) through the Dept. of Housing and Urban Development (HUD), is the largest insurer of mortgage in the world and provides mortgage insurance on loans made by FHA-approved lenders throughout the U.S. FHA has minimum property standards contained in *HUD Handbook 4000.1*. In particular, there is a section on “Externalities” and requirements for property compliance. Externalities are off-site conditions that have an adverse influence on a property, such as heavy traffic, special airport hazards, proximity to high pressure gas lines, high voltage electric overhead transmission lines and local distribution lines, smoke, fumes, and other offensive or noxious odors, and stationary storage tanks.

Cell towers are not identified as a specific hazard for surrounding properties and are not a specific criterion for hazard analysis in obtaining FHA/HUD funding insurance for mortgage lenders.

VA: Veterans Administration (VA) helps Servicemembers, Veterans, and eligible surviving spouses become homeowners. VA provides home loan guaranty benefits and other housing-related programs to help buy, build, repair, retain, or adapt homes for occupancy. VA Home Loans are provided by private lenders such as banks and mortgage companies. VA guarantees a portion of the loan and lowers risk as a result, enabling lenders to provide borrowers with more favorable terms.

VA guidelines (Chapters 10 and 12) identify *HUD Handbook 4000.1* as the resource for minimum property requirements. In addition, in reiterating hazard issues in the VA guidelines, cell towers are not identified or mentioned as a specific hazard for surrounding properties. Cell towers are not a criterion for hazard analysis in obtaining VA loans.

USDA: United States Department of Agriculture (USDA), through its Rural Development program (RD), makes direct loans as well as assisting approved lenders in providing low- and moderate-income households the opportunity to own adequate, modest, decent, safe, and sanitary dwellings as their primary residence in eligible rural areas. The program provides loan guarantees to approved lenders in order to reduce the risk of extending 100% loans to eligible rural homebuyers. USDA publishes *Handbook 3550 (HB 3550)* containing minimum property requirements for USDA

loan programs. Cell Towers are not included for consideration and are not a specific criterion in hazard analysis for obtaining loans under USDA programs.

FNMA: Federal National Mortgage Association (FNMA, aka Fannie Mae) is a government-sponsored enterprise (GSE). Fannie Mae purchases and guarantees mortgages made to borrowers via the secondary mortgage market. The mortgages it purchases and guarantees must meet strict criteria. Its “*Selling Guide*” publication is a primary information guide for secondary mortgage market lending. The *Selling Guide* does not include cell towers for specific analysis in the publication. Cell towers are not a hazard criterion in analysis for obtaining mortgage loans that will be purchased by Fannie Mae.

FHLMC: The Federal Home Loan Mortgage Corporation, (FHLMC, aka Freddie Mac) is a government-sponsored enterprise (GSE). Freddie Mac purchases and guarantees mortgages made to borrowers via the secondary mortgage market. The mortgages it purchases and guarantees must meet strict criteria. Its “*Seller/Servicer Guide*” publication is a primary information guide for secondary mortgage market lending. The *Seller/Servicer Guide* does not include cell towers for any specific analysis in the publication. Cell towers are not a hazard criterion in analysis for obtaining mortgage loans that will be purchased by Freddie Mac.

In addition, national, regional, local, and private sources of mortgage financing for commercial, industrial, agricultural, and residential property, have similar guidelines. In summary, cellular tower structures are not identified as a hazard criterion in making mortgage loan decisions.

Impact Study Methodology

This impact study consists of studying real estate value trends at existing tower locations. The methodology is comprised of;

- paired sales and sale/resale analyses, focusing on measurement of value change due to market conditions, and;
- direct comparison of properties with, and without, physical or view proximity exposure.

Specifically, the following steps form the analysis:

- Identify existing tower locations with surrounding developed land uses.
- Examine the neighborhood and market area to determine if there are compatible and competing properties with adequate sale volume to provide reliable and valid results.
- Categorize sales by proximity characteristics for measurement of influence: A distance of 500’ to 750’ is the threshold of measure for the close-proximity category, depending on the topography and direction of development characteristics. At further distances, the category changes to non-proximity, as tower views become blurred or obscured by topography, trees, roofs, tanks, power lines, or other towers.
- Track value change over time for the two proximity categories and compare the results to determine if there is a difference due to tower facility exposure, or;
- Track value change of properties before and after a tower facility is constructed. Then compare results to determine if there is a difference between the categories attributed to tower facility exposure.

Based on the data and analysis for tower projects, values and rates of value change for proximity and non-proximity properties are similar. There is no compelling evidence that either the anticipation of, or the existence of, tower facilities negatively impact surrounding property values. This is not unexpected. Market forces that drive real estate value also create complimentary demand for utility infrastructure projects. These market forces are discussed as follows:

- **Social Forces:** There has been an exponential increase in digital data, and the public demands satisfying that need as part of the core supply of communication services. In particular, cellular service is essential infrastructure and has become a predominant function in businesses, schools, and social services. Regarding U.S. households, over 76% adults live in homes served solely by cellular phone service, and over 86% of children live in homes with only cellular service. Regarding emergency services, over 70% of emergency calls are made with cellular phones. As a result, anything less than consistent in-building service is detrimental to value and demand for real estate.
- **Economic Forces:** Economic forces are influenced by; employment, wages, business, schools, and regional community development. Communications facilities are required for education and efficient and competitive diversification of work forces. Cellular service has a direct connection to economic development. Cellular signal capacity creates a significant number of positive impacts for its users and their communities.
- **Governmental Forces:** Government responds to community needs for, laws and policies, public services, zoning, and building codes. Many jurisdictions have comprehensive plans requiring government agencies to expand utilities and services. The regulations enabling utilities and infrastructure are a direct reaction to public needs, particularly for education, economic purposes, and health and safety services. Another major impact of governmental influence in expansion of public services is developing wider choices of service providers, which translates to competition in service quality and costs for consumers. This helps erase the digital divide problem, which is the economic gap between those who have adequate access to services and those who do not. This gap is influenced by income, location, and level of education among other factors, and can affect development in areas where the divide exists.

As stated in the data summary, the subject neighborhood does not have strict land-use zoning regulations. Buyers have absorbed the risk associated with lack of zoning when making purchase decisions regarding the quality and type of use of neighboring un-zoned properties, and related influences on value. Regardless of these risks and buyer activity, communities without strict land-use controls continue to expand and develop need for utilities and infrastructure on a positive trend.

- **Environmental Forces:** Environmental forces are the final determining factor. They deal with climate, topography/soil, natural barriers, transportation systems and linkages, and the nature and desirability of the neighborhood surrounding a property. These forces shape population location, growth, and where supporting infrastructure will be most effective and valuable as a resource.

Study Conclusions

As illustrated by measured market response, both in this report and in nationally published studies, the forces of value are consistent. Utilities and related services are essential to meeting current and future requirements for progressive standards of living. Utilities and related services, by nature, expand to meet demands of expanding population and community growth. The benefits of communication facilities for economic and community development are clear. Without adequate services, there will be a tendency for decreasing demand and property values in a community. Where services already exist, coverage and data capacity may need to be adjusted due to population changes. As a result of meeting population needs, telecommunications facilities have become a part of the landscape in the same way that power, telephone, and other utilities have. Like all utilities, there is requirement for telecommunications facilities in strategic locations in any community.

Property owners near tower facilities, highly visible utility structures, associated easements, etc., are not penalized on value. There is no loss of land. There are no increased occupancy or ownership costs, whether residential, commercial, or agricultural. There is no loss of income for income producing or farm rental property. There is no impact to agricultural efficiency. There are no changes to ownership rights. Insurability is not affected. Mortgage terms to buyers and owners are not influenced.

Consistently, communications tower structures, like overhead electric distribution lines, water towers, and buried utility easements, are beneficial and necessary infrastructure. As a result of expanding utilities and increased services, neighborhoods and properties experience positive influences. Because of the deployment of cellular facilities over the past several decades, owners and buyers of real estate expect excellent cell phone reception, and that connectivity requires adequate infrastructure. Cell towers satisfy demand and are visibly absorbed by the landscape of a neighborhood and lifestyles of the population. Cell towers are much like other modern infrastructure. Although cell towers may be noticed initially, they quickly fade into the background and have no negative effect on value – just as streets, easements, telephone poles, utility lines, streetlights, and the other visible infrastructure components of modern life do not generally have negative influences on real estate values.

Therefore, based on the actions of market participants buying, investing, and selling real estate properties, consistent market evidence shows this type of tower facility has not, and does not, negatively impact surrounding property, and supports the positive influences on value and demand for real estate due to expansion of utilities and infrastructure, which includes wireless telecommunications tower infrastructure.

Addendum

Professional Disclosure

I certify that:

- The statements of fact contained in this report are true and correct to the best of my knowledge and belief.
- The reported analyses, opinions and conclusions are my personal, impartial, and unbiased professional analyses, opinions, and conclusions.
- I have no present or prospective interest in the project that is the subject of this report and no personal interest with respect to the parties involved.
- I have no bias with respect to the project that is the subject of this report or to the parties involved with this assignment.
- My engagement and compensation for completing this assignment is not contingent upon the development or reporting of a predetermined opinion that favors the cause of the client, the magnitude of the opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this report.
- This report complies with applicable sections of the Uniform Standards of Professional Appraisal Practice for Valuation Services and Appraisal Practice: Preamble, Definitions, Ethics Rule, Jurisdictional Exception Rule, Competency Rule.

A handwritten signature in black ink that reads "Glen D. KATZ". The signature is written in a cursive, slightly stylized font.

Glen D. Katz, MAI, SRA, AI-GRS, AI-RRS

Professional Qualifications

Glen Katz has been in the field of real estate analysis for over 30 years. Beginning in both the commercial and residential arenas, he has transitioned to roles as consultant, reviewer, subject matter expert witness, and appraisal practice instructor. As principal of Realty Solutions Co. Inc., relationships have been developed with user-clients, peer appraisers, and appraisal firms. Resulting projects have been performed individually and as coordinating peer groups.

In appraisal practice, Mr. Katz has achieved the Appraisal Institute MAI (general/commercial) designation, and SRA (residential) designation. In specialized appraisal practice, Mr. Katz has achieved the Appraisal Institute appraisal review designations of AI-GRS (general/commercial) and AI-RRS (residential), as well as completing the following Appraisal Institute Professional Development Programs:

- Litigation
- Valuation of the Components of a Business Enterprise
- Valuation of Conservation Easements
- Valuation of Sustainable Buildings: Residential
- Valuation of Sustainable Buildings: Commercial

As a reviewer of appraisals, Mr. Katz serves clients in both the litigation and lending fields. Appraisal review reports are commonly performed under Uniform Standards of Professional Appraisal Practice (USPAP), Uniform Appraisal Standards for Federal Land Acquisitions (Yellowbook), and local jurisdictional guidelines.

As a subject matter expert witness, Mr. Katz has participated in cases regarding land and building damage, proximity influence, insurance claims, property tax assessment, construction defects, divorce settlements, boundary disputes, zoning noncompliance, bankruptcy, and alleged fraud.

As an appraisal practice instructor, Katz is qualified to teach the following Appraisal Institute residential, commercial, and specialized appraisal practice courses and seminars.

- Appraisal of Manufactured Homes Featuring Next Generation Manufactured Homes
- Basic Appraisal Principles (Associate instructor)
- Basic Appraisal Procedures (Associate instructor)
- Desktop Appraisals (Bifurcated, Hybrid) and Evaluations
- FHA Appraising for Valuation Professionals: FHA Single Family Housing Appraisal Requirements
- General Appraiser Sales Comparison Approach (Associate instructor)
- General Appraiser Site Valuation and Cost Approach (Associate instructor)
- Ignorance Isn't Bliss: Understanding an Investigation by a State Appraiser Regulatory Board or Agency
- Inconsistency: It's hiding in Plain Sight in Your Residential Appraisal – Next Level Analysis
- Litigation Assignments for Residential Appraisers: Doing Expert Work on Atypical Cases
- Residential Applications: Using Technology to Measure and Support Assignment Results
- Residential Market Analysis and Highest and Best Use (Associate instructor)
- Residential Sales Comparison and Income Approaches (Associate instructor)
- Residential Site Valuation and Cost Approach (Associate instructor)
- Rural Area Appraisals: Freddie Mac Guidelines and Property Eligibility Requirements
- The Cost Approach; Unnecessary or Vital to a Healthy Practice:
- Valuation Overview of Accessory Dwelling Units

Areas of appraisal expertise include:

- Commercial, industrial, complex residential, agricultural, special purpose properties
- Appraisal review, commercial and residential
- Proximity impact
- Eminent domain
- Expert witness/litigation support
- Property damages
- Insurance claims and reconstruction cost analysis
- Tax Appeal
- Estate valuation
- Green/high performance residential and commercial construction (sustainable/energy efficient)

Education

- Bachelor of Science in Business Administration, Marketing, University of Louisville
- Study focusing on real estate economics, Eastern Kentucky University
- Ongoing real estate economics education has been obtained through the Appraisal Institute, and other professional groups serving specific real estate related fields.

Professional Qualifications and Memberships

- Certified General Real Property Appraiser, Kentucky License #1533
- MAI designated Member, Appraisal Institute
 - *(MAI designation is held by professionals who can provide services relating to all types of real property, such as value opinions, evaluations, review, consulting, and advice regarding investment decisions, among others. Property types may include commercial, industrial, agricultural, residential, vacant land and others.)
- SRA designated Member, Appraisal Institute
 - *(SRA designation is held by professionals who can provide services relating to residential properties, including opinions of value, evaluations, review, consulting, and advice regarding investment decisions, among others)
- AI-GRS designated Member, Appraisal Institute
 - *(AI-GRS designation is held by professionals who can provide reviews of appraisals, including commercial, industrial, agricultural, residential, vacant land and others.
- AI-RRS designated Member, Appraisal Institute
 - *(AI-RRS designation is held by professionals who have the tools to provide reviews and address the related issues unique to residential real property appraisals.
- Professional Development Programs – Appraisal Institute
 - Litigation
 - Valuation of the Components of a Business Enterprise
 - Valuation of Conservation Easements
 - Valuation of Sustainable Buildings: Commercial
 - Valuation of Sustainable Buildings: Residential

Appraisal Institute Service

- 2008 to 2017, 2020 to present – Education Chair, Bluegrass Chapter, Appraisal Institute
- 2018-2021 – Appraisal Institute National Education Committee Liaison, Region V (Indiana, Kentucky, North Carolina, Ohio, Virginia, West Virginia)
- 2018 – President, Bluegrass Chapter, Appraisal Institute
- 2013, 2014 and 2016 – Leadership Development & Advisory Council, Appraisal Institute
- Candidate Advisor - MAI, SRA, AI-GRS, and AI-RRS, Appraisal Institute

ADVANCED STUDY CURRICULUM

Provider	Title/Content
Appraisal Institute Professional Development Programs	Valuation of Sustainable Buildings: Commercial - Registry Valuation of Sustainable Buildings: Residential - Registry Valuation of the Components of A Business Enterprise - Registry Litigation Professional Development Program - Registry Valuation of Conservation Easements - Registry General Demonstration Report - Capstone Program Instructor Qualifying Conference Leadership Development & Advisory Council - Washington D.C.
Appraisal Institute Courses	Uniform Appraisal Standards for Federal Land Acquisitions (Yellowbook) Appraisal of Manufactured Homes Featuring Next-Generation Manufactured Homes Application & Interpretation of Simple Linear Regression Quantitative Analysis Practical Applications in Appraising Green Commercial Properties Residential & Commercial Valuation of Solar Case Studies in Appraising Green Residential Buildings Review Theory - General Review Theory - Residential Fundamentals of Separating Real Property, Personal Property, and Intangible Business The Appraiser as an Expert Witness: Preparation and Testimony Litigation Appraising: Specialized Topics and Applications Condemnation Appraising: Principles and Applications Valuation of Conservation Easements Advanced Sales Comparison & Cost Approaches Advanced Residential Report Writing, Part II Advanced Residential Applications & Case Studies, Part I
Appraisal Institute and Related Seminars	Practical Application of Fundamental Analysis Complex Valuation Inconsistency: it's Hiding in Plain Sight in Your (Residential) Appraisal Inconsistency: it's Hiding in Plain Sight in Your (General) Appraisal Avoiding Bias: Building a Bias Defense Appraising in Floodplains Litigation Assignments for Residential Appraisers: Doing Expert Work on Atypical Cases Valuation Overview of Accessory Dwelling Units The Cost Approach: Unnecessary or Vital to a Healthy Practice? Artificial Intelligence, AVMs, and Blockchain: Implications for Valuation Rural Area Appraisals: Freddie Mac Guidelines and Property Eligibility Requirements Advanced Spreadsheet Modeling for Valuation Applications Income Approach for Residential Appraisers Marketability Studies: Advanced Considerations & Applications Appraising Distressed Commercial Real Estate: Here We Go again REO Appraisal: Appraisal of Residential Property Foreclosure Evaluating Residential Construction Evaluating Commercial Construction Regression Analysis in Appraisal Practice: Concepts & Applications Self Storage Economics and Appraisal Subdivision Valuation: A Comprehensive Guide Appraising Convenience Stores Appraisal of Nonconforming Uses Appraisal of Special-Purpose Properties Dynamics of Office Building Valuation Environmental Risk and the Appraisal Process

(Continued Next Page)

Provider	Title/Content
International Right of Way Association	Course 105 - The Uniform Act - Executive Summary
Marshall Valuation Service	Commercial Cost Approach Certification Program
American Bankers Association	Federal Appraisal Policies: Hotlines, Complaint Forms and Revised Policy Statements
CCIM Institute	Course CI-101, Financial Analysis for Commercial Investment Real Estate Course CI-103, User Decision Analysis for Commercial Investment Real Estate Course CI-104, Investment Analysis for Commercial Investment Real Estate Course 411, Gap Analysis and Real Estate Market Dynamics Course 412, Economics of Commercial Leases, and 1031 Exchanges
HUD/FHA	HUD/FHA Appraiser Test and Certification The Model Energy Code, U.S. Department Of Energy Appraising FHA Properties
Home Builders Association of Louisville	Site Planning Basics of Building; Blueprint Reading, Building Codes, Siting
CLE International	Eminent Domain, the Law of Condemnation and Land Use
Eastern Kentucky University	Real Estate Finance, RST 330 Advanced Appraisal Application / Income Property Valuation, RST 410 Appraisal of Residential Property, RST 340
University of Louisville	Bachelor of Science in Business Administration - Marketing

Case Studies

The case studies are developed through researching market activity of residential properties in neighborhoods adjacent to tower facilities. After identification of a tower facility, whether wireless communications, high voltage electric overhead transmission, or water storage tower, sale activity of homes are analyzed. The following methods of data extraction are discussed.

Market Conditions Value Trend Analysis

For projects that have been in place for a long period, market conditions analysis is very applicable. The steps of analysis consist of:

- Research properties with tower proximity that have sold repeatedly in the identified period.
- Determine the periodic rate of market value change, appreciation or depreciation, for properties in the proximity category.
- Research properties in the same neighborhood, without tower proximity, with repeat or back-to-back sales.
- Determine the periodic rate of market value change, appreciation or depreciation for properties in the non-proximity category.
- Compare value change trends between the two groups of properties to extract any value change differences related to proximity influence.

Before and After Method

For projects recently constructed, the before and after method steps of analysis consist of:

- Research residential properties with tower proximity that sold prior to the tower installation and then sold again after the tower installation.
- Determine the periodic rate of market value change, appreciation or depreciation, for properties in the proximity category.
- Research properties in the same neighborhood without tower proximity that sold prior to the tower installation and then sold again after the tower installation.
- Determine the periodic rate of market value change, appreciation or depreciation, for properties in the non-proximity category.
- Compare value change trends between the two groups of properties to extract any value change differences related to proximity influence.

Methodology Summary

The time range for sale data is from 2011 and onward, not including sales and resales spanning the Covid 19 pandemic impact. This minimizes potential influence from significant imbalance between supply and demand resulting from the Covid 19 pandemic. To track rates of value change during the period, repeat or back-to-back sales of individual residential properties inside and outside a proximity distance range of 500' to 750' from a facility are researched.

To focus on the influence market conditions and proximity on appreciation or depreciation, emphasis is placed on properties with stable physical characteristics, and without unusual sale conditions or buyer/seller motivation influences. Specifically, sales involving properties with the following characteristics are discounted from analysis:

- Properties with substantial physical changes that influence value between the initial and subsequent transfers, such as renovation, construction addition, or suffering from deferred maintenance or neglect resulting in unusual physical deterioration and market response.
- Properties with distress socioeconomic characteristics, such as foreclosure, short-sales, auctions, and sales of bank-owned homes.
- Properties with unusual buyer or seller motivations, such as family transactions, estate liquidation, or investor activity in a predominantly owner-occupied market.
- Properties close to interstates and limited access roads are avoided to ensure home sales were not affected by highway access or traffic noise variables.
- In the study, sale price is adjusted by deducting seller-paid concessions if they occur.

If the above types of transfer activity are prevalent in a neighborhood, the facility and neighborhood is removed from consideration. The focus is to measure market activity that is not influenced by unusual property-specific or market-specific characteristics.

The following case studies illustrate analysis for two categories of tower facilities; wireless communications tower facilities and high voltage electric overhead transmission lines (HVOT). Two of the case studies compare rates of value change between proximity and non-proximity properties at existing facilities, and one case study additionally compares values of proximity and non-proximity properties before and after installation of a tower facility. In the case of the HVOT study, there are multiple towers involved in the utility system.

Case Study Introduction

Case Study 1 – This study involves a high voltage electric overhead transmission power line corridor with 100' height lattice construction towers. The corridor traverses a residential single-family and condominium neighborhood. The tower structures and overhead electric lines in this location are in easements amidst residential subdivision development, crossing a public street in a long diagonal direction, and continuing through residential subdivision development. The tower structures are generally spaced approximately 1,000' apart.

The project was installed pre-1993. The value evidence represents sales and resales of properties within 500' proximity to the facility, and outside 500' proximity to the facility. Rates of value change for each of the categories measured, and the results of the two categories of proximity are compared to analyze any potential impact.

Case Study 2 – This study involves a wireless communications facility adjacent to a residential single-family and condominium neighborhood. The tower structure is 219’ height, self-support construction.

Installation of the project occurred in 2002. The value evidence represents sales and resales of properties within 500’ proximity to the facility, and outside 500’ proximity to the facility. Rates of value change of each of the categories are measured, and the two categories are compared to analyze any potential impact.

Case Study 3 – This study involves a wireless communications facility adjacent to a residential single-family detached neighborhood. The structure is 140’ height, monopole construction.

Installation of the project occurred in 2016. The value evidence represents sales and resales of properties within 750’ proximity to the facility, and outside 750’ proximity to the facility. Rates of value change in each of the categories are measured, and the two categories are compared to analyze any potential impact.

For Case Study 3, it is important to note there are repeat sales of individual properties in each category, before and after installation, which illustrate consistent values and rates of value change.

Case Study 1 – Group 1 (Proximity Sales)

- Facility: High voltage electric overhead transmission power lines and lattice construction towers, residential single-family detached and condominium subdivision location.
- Address: Gutenberg Road, Louisville, Jefferson County, Kentucky
- FCC Identification: N/A
- Year of installation: Pre-1993
- Information source: Maps and individual research
- Neighborhood location: Jeffersontown
- Property Group Identification: Within 600' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2020. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is 5.00% to 15.57%. The average rate of annual appreciation is 9.66%, and the median or middle point of the range is 8.54%. The average sale price per square foot of above grade living area is \$182.

Address		Sold Date	Sale Price	% Change	Months	% Change /Year
4603 Scott	Ct	4/30/2024	\$305,000	17.31%	32	6.49%
4603 Scott	Ct	8/31/2021	\$260,000			
4615 Haeringdon	Dr	9/9/2022	\$286,500	15.06%	24	7.48%
4615 Haeringdon	Dr	9/4/2020	\$249,000			
4808 Redmon	Ct	11/2/2022	\$272,000	6.67%	10	7.68%
4808 Redmon	Ct	12/20/2021	\$255,000			
4810 Hat	Ct	7/24/2024	\$280,000	20.69%	38	6.50%
4810 Hat	Ct	5/19/2021	\$232,000			
4901 Bova	Way	4/24/2023	\$290,500	27.13%	30	10.85%
4901 Bova	Way	10/23/2020	\$228,500			
8906 Hatlerhall	Dr	12/11/2023	\$242,800	15.67%	38	5.00%
8906 Hatlerhall	Dr	10/23/2020	\$209,900			
9403 Gutenberg	Rd	6/28/2022	\$250,100	29.38%	24	14.63%
9403 Gutenberg	Rd	6/25/2020	\$193,300			
9405 Gutenberg	Rd	12/30/2021	\$225,000	12.95%	17	9.40%
9405 Gutenberg	Rd	8/14/2020	\$199,200			
10506 Vintage Creek	Dr	5/17/2023	\$365,000	41.47%	38	13.05%
10506 Vintage Creek	Dr	3/13/2020	\$258,000			
10700 Vintage Creek	Dr	6/30/2022	\$400,000	31.15%	24	15.57%
10700 Vintage Creek	Dr	6/30/2020	\$305,000			

Case Study 1 – Group 2 (Non-Proximity Sales)

- Facility: High voltage electric overhead power lines and lattice construction towers, residential single-family detached and condominium subdivision location.
- Address: Gutenberg Road, Louisville, Jefferson County, Kentucky
- FCC Identification: N/A
- Year of installation: Pre-1993
- Information source: Maps and research
- Neighborhood location: Jeffersontown
- Property Group Identification: Outside 600' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2020. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is 2.48% to 19.20%. The average rate of annual appreciation is 8.91%, and the median or middle point of the appreciation range is 8.58%. The average sale price per square foot of above grade living area is \$184.

Address	Sold Date	Sale Price	% Change	Months	% Change /Year
4102 Willowview Blvd	3/7/2022	\$242,500	19.46%	23	9.95%
4102 Willowview Blvd	3/23/2020	\$203,000			
4208 Willowview Blvd	8/4/2023	\$290,000	10.27%	24	5.12%
4208 Willowview Blvd	8/2/2021	\$263,000			
4220 Willowview Blvd	5/16/2022	\$286,700	26.08%	20	15.28%
4220 Willowview Blvd	8/31/2020	\$227,400			
4407 Renaissance Dr	3/21/2024	\$445,000	14.10%	19	8.97%
4407 Renaissance Dr	8/25/2022	\$390,000			
4520 Stony Brook Dr	6/17/2024	\$326,000	18.55%	32	6.86%
4520 Stony Brook Dr	10/4/2021	\$275,000			
4614 Stony Brook Dr	9/13/2021	\$280,000	4.67%	6	9.58%
4614 Stony Brook Dr	3/19/2021	\$267,500			
4702 Nottinghamshire Dr	5/2/2024	\$257,500	5.32%	17	3.69%
4702 Nottinghamshire Dr	11/23/2022	\$244,500			
4804 Clarmar Rd	4/27/2021	\$270,000	10.66%	9	13.55%
4804 Clarmar Rd	7/14/2020	\$244,000			
4808 Chenwood Ln	12/1/2021	\$389,000	34.14%	21	19.20%
4808 Chenwood Ln	2/21/2020	\$290,000			
4823 Napa Ridge Way	2/17/2023	\$395,000	9.72%	11	10.29%
4823 Napa Ridge Way	3/9/2022	\$360,000			
5003 Stony Brook Dr	7/12/2024	\$237,700	24.45%	40	7.36%
5003 Stony Brook Dr	3/18/2021	\$191,000			
5006 Flora Springs Cir	4/10/2024	\$359,600	30.76%	43	8.49%
5006 Flora Springs Cir	8/27/2020	\$275,000			
5007 Stony Brook Dr	9/22/2021	\$255,000	13.84%	13	12.92%
5007 Stony Brook Dr	8/27/2020	\$224,000			
5101 Jonar Ct	7/6/2023	\$300,500	21.66%	24	10.97%
5101 Jonar Ct	7/15/2021	\$247,000			
5112 Fairwood Ln	4/11/2024	\$215,000	30.30%	50	7.28%
5112 Fairwood Ln	2/12/2020	\$165,000			
5113 Stony Brook Dr	8/31/2023	\$295,000	10.07%	23	5.34%
5113 Stony Brook Dr	10/12/2021	\$268,000			
5120 Stony Brook Dr	4/7/2023	\$275,000	30.33%	33	11.02%
5120 Stony Brook Dr	7/6/2020	\$211,000			
5306 Idlewood Ln	11/22/2023	\$261,000	3.16%	4	9.78%
5306 Idlewood Ln	7/27/2023	\$253,000			

Address	Sold Date	Sale Price	% Change	Months	% Change /Year
8412 Michael Edward Dr	7/11/2022	\$315,000	25.95%	21	14.76%
8412 Michael Edward Dr	10/7/2020	\$250,090			
8503 Image Way	8/1/2022	\$294,900	16.10%	23	8.58%
8503 Image Way	9/15/2020	\$254,000			
8600 Ivinell Ave	7/24/2023	\$275,750	30.38%	35	10.43%
8600 Ivinell Ave	8/25/2020	\$211,500			
8601 Chipstone Ct	7/24/2024	\$285,000	18.75%	46	4.90%
8601 Chipstone Ct	9/25/2020	\$240,000			
8605 Chipstone Ct	8/28/2023	\$294,400	15.00%	25	7.19%
8605 Chipstone Ct	7/28/2021	\$256,000			
8704 Wattlee Rd	8/29/2022	\$273,000	10.98%	20	6.50%
8704 Wattlee Rd	12/21/2020	\$246,000			
8909 Michael Edward Dr	3/23/2022	\$252,000	5.00%	8	7.45%
8909 Michael Edward Dr	7/21/2021	\$240,000			
9208 Morgan Jaymes Ct	12/13/2021	\$310,000	25.00%	23	13.24%
9208 Morgan Jaymes Ct	1/24/2020	\$248,000			
9308 Justine Ct	7/5/2023	\$276,000	33.27%	37	10.84%
9308 Justine Ct	6/10/2020	\$207,100			
10117 John Ashley Ct	7/1/2022	\$307,500	3.54%	2	17.44%
10117 John Ashley Ct	4/18/2022	\$297,000			
10203 Westwego Pl	3/17/2023	\$275,000	14.58%	21	8.27%
10203 Westwego Pl	6/11/2021	\$240,000			
10205 Westwego Pl	1/5/2024	\$285,000	35.71%	47	9.13%
10205 Westwego Pl	2/7/2020	\$210,000			
10502 Monticello Forest Cir	9/13/2023	\$293,000	7.96%	12	7.94%
10502 Monticello Forest Cir	9/12/2022	\$271,400			
10511 Bayport Rd	8/15/2023	\$266,500	2.90%	14	2.48%
10511 Bayport Rd	6/15/2022	\$259,000			
10514 Firview Ct	4/21/2023	\$240,000	6.71%	17	4.76%
10514 Firview Ct	11/22/2021	\$224,900			
10727 Vine Hill Dr	2/9/2024	\$355,000	2.54%	27	1.12%
10727 Vine Hill Dr	11/5/2021	\$346,200			
10907 Conti Ln	5/20/2024	\$243,100	33.13%	36	10.93%
10907 Conti Ln	5/10/2021	\$182,600			
11601 Locust View Ct	1/8/2024	\$272,000	7.09%	31	2.74%
11601 Locust View Ct	6/9/2021	\$254,000			
11612 Chinook Ct	10/27/2023	\$334,000	17.19%	38	5.47%
11612 Chinook Ct	9/4/2020	\$285,000			

Case Study 1 Reconciliation

The sale evidence represents sales and resales of residential properties in a neighborhood containing a high voltage electric overhead transmission power lines with lattice construction towers. The tower facility existed prior to construction of homes in the neighborhood. There is volume sale evidence for analysis between 2020 and 2024. The proximity sales show a slightly higher average rate of appreciation, and a similar median rate. The price per square foot of living area is also similar.

The difference between all indications is negligible and not statistically significant. Comparing proximity sales to non-proximity sales in the neighborhood, both categories show a consistent trend of value change, and price based on dwelling size per square foot. In summary, there is no negative value impact from the tower facility.

Case Study 2 – Group 1 (Proximity Sales)

- Facility: Wireless Communications Facility, self-support construction, 219' height, residential single-family detached and condominium subdivision location
- Address: 8400 Bardstown Road, Louisville, Jefferson County, Kentucky
- FCC Registration: 1232839
- Year of installation: 03/7/2002
- Information source: FCC recordings, maps, and individual research
- Neighborhood location: Fern Creek
- Property Group Identification: Inside 500' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2014. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is 0.64% to 3.29%. The average annual appreciation is 2.25%, and the median or middle point of the range is 2.67%.

Address	Sold Date	Sale Price	% Change	Months	% Change /Month	% Change /Year
8503 Missionary Ct	9/27/2018 8/12/2014	\$302,000 \$268,500	12.48%	50	0.25%	3.02%
8505 Missionary Ct	8/25/2017 4/28/2015	\$239,000 \$225,000	6.22%	28	0.22%	2.67%
8931 Gentlewind Way	5/15/2018 7/13/2015	\$280,000 \$275,000	1.82%	34	0.05%	0.64%
8937 Gentlewind Way	3/15/2019 1/8/2016	\$282,000 \$268,000	5.22%	38	0.14%	1.64%
10619 Glenmary Springs Dr	11/14/2016 11/24/2014	\$244,900 \$229,950	6.50%	24	0.27%	3.29%
			Average		0.19%	2.25%
			Median		0.22%	2.67%

Case Study 2 – Group 2 (Non-Proximity Sales)

- Facility: Wireless Communications Facility, self-support construction, 219' height, residential single-family detached and condominium subdivision location
- Address: 8400 Bardstown Road, Louisville, Jefferson County, Kentucky
- FCC Registration: 1232839
- Year of installation: 03/7/2002
- Information source: FCC recordings, maps, and individual research
- Neighborhood location: Fern Creek
- Property Group Identification: Outside 500' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2014. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is -0.25% to 3.60%. The average annual appreciation is 2.26%, and the median or middle point of the range is 2.22%.

Address	Sold Date	Sale Price	% Change	Months	% Change /Month	% Change /Year
8607 Sanctuary Ln	3/30/2016 7/25/2014	\$245,000 \$231,000	6.06%	20	0.30%	3.60%
8622 Sanctuary Ln	12/21/2017 7/13/2015	\$265,000 \$257,500	2.91%	29	0.10%	1.19%
8627 Sanctuary Ln	10/31/2018 8/5/2016	\$279,300 \$280,900	-0.57%	27	-0.02%	-0.25%
8728 Broadwood Ct	6/11/2019 2/16/2016	\$204,000 \$166,000	22.89%	40	0.57%	6.90%
8737 Broadwood Ct	4/29/2019 6/6/2014	\$188,900 \$162,500	16.25%	59	0.28%	3.31%
8819 Gentlewind Way	5/18/2018 5/22/2015	\$255,000 \$243,000	4.94%	36	0.14%	1.65%
8903 Gentlewind Way	9/30/2016 8/1/2014	\$307,500 \$290,000	6.03%	26	0.23%	2.78%
10105 Cedar Garden Dr	11/1/2019 5/30/2018	\$299,900 \$286,130	4.81%	17	0.28%	3.38%
10500 Parkhurst Ct	8/27/2018 7/14/2017	\$220,000 \$219,500	0.23%	13	0.02%	0.20%
10502 Gentlewind Ct	2/29/2016 2/19/2014	\$270,000 \$267,500	0.93%	24	0.04%	0.46%
10504 Providence Dr	10/19/2017 7/3/2014	\$254,000 \$248,700	2.13%	40	0.05%	0.65%
10614 Providence Dr	9/20/2019 2/18/2014	\$290,000 \$245,000	18.37%	67	0.27%	3.28%
			Average		0.19%	2.26%
			Median		0.18%	2.22%

Case Study 2 Reconciliation

The evidence represents sales and resales of residential properties in a neighborhood containing a wireless communications tower facility. The tower existed prior to construction of homes in the project. There is volume sale evidence for analysis between 2014 and 2020. The rates of value change between the two categories are consistent. The non-proximity sales show a slightly higher average rate of appreciation, and the proximity sales show a slightly higher median rate.

Additionally, the average sale price per square foot of gross living area and total living area for each proximity category is illustrated in the following table.

Category	In Proximity	Outside Proximity
Price Per Square Foot Gross Living Area	\$111	\$116
Price Per Sq. Foot Total Finished Area	\$99	\$108

The difference between all indications is negligible and not statistically significant. Comparing proximity sales to non-proximity sales in the neighborhood, both categories show a consistent trend of value change, and price based on dwelling size per square foot. In summary, there is no negative value impact from the tower facility.

Case Study 3 – Group 1 (Proximity Sales)

- Facility: Wireless Communications Facility, monopole construction, 140' height, residential single-family detached location
- Address: 7200 Woodhaven Road, Louisville, Jefferson County, Kentucky
- FCC Registration: 1298049
- Year/Date of installation: 05/13/2016
- Information source: FCC recordings, maps, and individual research
- Neighborhood location: Woodhaven
- Property Group Identification: Inside 750' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2011. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is 2.79% to 9.47%. The average appreciation is 5.73%, and the median or middle point of the range is 5.58%. Note that sales of 5900 Woodhaven Ridge Court, 5921 Woodhaven Ridge Court, and 6005 Hurstview Road occur before and after the facility installation, and the sales of 5914 Woodhaven Ridge occurred prior to the installation. The rates of value change are consistent.

Street #	Street	St	Sale Date	Adj Sale Price	Percent Change	Months	% Annual Change
5900	Woodhaven Ridge	Ct	8/22/2011	\$180,000			
5900	Woodhaven Ridge	Ct	10/19/2017	\$211,000	17.22%	74	2.79%
5914	Woodhaven Ridge	Ct	12/14/2012	\$155,000			
5914	Woodhaven Ridge	Ct	8/1/2014	\$172,675	11.40%	20	7.00%
5921	Woodhaven Ridge	Ct	12/20/2011	\$125,000			
5921	Woodhaven Ridge	Ct	1/24/2013	\$138,000	10.40%	13	9.47%
5921	Woodhaven Ridge	Ct	10/22/2014	\$148,000	7.25%	21	4.16%
5921	Woodhaven Ridge	Ct	7/25/2018	\$187,400	26.62%	45	7.08%
6005	Hurstview	Rd	7/30/2013	\$124,900			
6005	Hurstview	Rd	4/20/2018	\$148,000	18.49%	57	3.91%
					Annual Average		5.73%
					Annual Median		5.58%

Case Study 3 – Group 2 (Non-Proximity Sales)

- Facility: Wireless Communications Facility, monopole construction, 140' height, residential single-family detached and condominium subdivision location
- Address: 7200 Woodhaven Road, Louisville, Jefferson County, Kentucky
- FCC Registration: 1298049
- Year/Date of installation: 05/13/2016
- Information source: FCC recordings, maps, and individual research
- Neighborhood location: Woodhaven
- Property Group Identification: Outside 750' proximity to facility installation
- Reconciliation: The data represents sale activity beginning 01/01/2011. Each property transferred two or more times in the period. The price difference between transfers of each property is value change due to market conditions. The range of annual value change is 2.31% to 7.99%. The average appreciation is 4.97%, and the median or middle point of the range is 5.21%. Note that sales of 7118 Ridge Creek Road, 7102 Ridge Creek Road, and 7403 Covey Place occurred before and after the tower facility installation. The rates of value change are consistent.

Street #	Street	St	Sale Date	Adj Sale Price	Percent Change	Months	% Annual Change
5904	Bluffington	Ct	7/28/2011	\$124,000			
5904	Bluffington	Ct	11/21/2012	\$130,685	5.39%	16	4.08%
7102	Ridge Creek	Rd	10/3/2011	\$135,500			
7102	Ridge Creek	Rd	5/6/2016	\$149,900	10.63%	55	2.31%
7118	Ridge Creek	Rd	3/28/2011	\$119,000			
7118	Ridge Creek	Rd	3/25/2016	\$150,000	26.05%	60	5.21%
7215	Chestnut Tree	Ln	6/10/2011	\$131,000			
7215	Chestnut Tree	Ln	11/1/2013	\$140,000	6.87%	29	2.87%
7403	Covey	Pl	2/26/2014	\$135,500			
7403	Covey	Pl	10/31/2016	\$156,000	15.13%	32	5.65%
7404	Covey	Pl	2/8/2013	\$109,000			
7404	Covey	Pl	12/30/2015	\$130,000	19.27%	35	6.67%
7405	Stone Bluff	Ct	3/28/2017	\$190,000			
7405	Stone Bluff	Ct	8/27/2018	\$211,500	11.32%	17	7.99%
					Annual Average		4.97%
					Annual Median		5.21%

Case Study 3 Reconciliation

The evidence represents sales and resales of residential properties in a neighborhood containing a wireless communications tower facility. Tower installation occurred after homes were constructed in the neighborhood. There is volume sale evidence for analysis between 2011 and 2020. The non-proximity sales show a slightly higher median rate of appreciation, and the proximity sales show a slightly higher average rate. As noted, properties with sales both before and after the installation date illustrate consistent values trends.

Additionally, the average sale price per square foot of gross living area and total living area for each proximity category is illustrated in the following table.

Category	In Proximity	Outside Proximity
Price Per Square Foot Gross Living Area	\$116	\$115
Price Per Sq. Foot Total Finished Area	\$93	\$88

The difference between all indications is negligible and not statistically significant. Comparing proximity sales to non-proximity sales in the neighborhood, both categories show a consistent trend of value change, and price based on dwelling size per square foot. In summary, there is no negative value impact from the tower facility.

EXHIBIT 2
NEPA ENVIRONMENTAL CHECKLIST REPORT



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

FCC NEPA Environmental Checklist Report

TCNS ID 308132

**APC Towers, LLC Site - LV
Turkeytown (KY-4170)**

**Dysart Way
Crab Orchard, Rockcastle
County, Kentucky**

ECA Project No. 26-000456



SUBMITTED TO:

APC Towers, LLC
8601 Six Forks Road, Suite 250
Raleigh, NC 27615

PREPARED BY:

Environmental Corporation of America
1375 Union Hill Industrial Court, Suite A
Alpharetta, GA 30004



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

June 5, 2026

APC Towers, LLC
8601 Six Forks Road, Suite 250
Raleigh, NC 27615

Attention: Mr. Jonathan Greene

**Subject: FCC NEPA Environmental Checklist Report
TCNS ID #308132
Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project No. 26-000456**

Dear Mr. Greene:

Environmental Corporation of America (ECA) is pleased to provide this FCC NEPA Environmental Checklist report for the construction of a proposed telecommunications facility.

Based upon our evaluation of the project area and consultation with Agency sources, the preparation of an Environmental Assessment is **not required** for the proposed facility.

We appreciate this opportunity to provide you with these professional services. If you have any questions regarding this report or the project in general, please call at your convenience.

Sincerely yours,
Environmental Corporation of America

Lillian Alvarado
Project Manager

Jesse Garbowski
Senior NEPA Specialist

NEPA Checklist Summary

Introduction

ECA understands that a proposed 250-foot tall guyed-type telecommunications structure (overall height including appurtenances) would be constructed within a proposed 100-foot by 100-foot lease area. The proposed lease area would be accessible by a proposed approximate 302-foot long by 30-foot wide access/utility easement and would include three proposed a proposed approximate 135-foot long by 30-foot wide guy-wire easement 1, a proposed approximate 135-foot long by 30-foot wide guy-wire easement 2, and a proposed approximate 143-foot long by 30-foot wide guy-wire easement 3.

ECA has used the *FCC NEPA Environmental Checklist* in our evaluation of the undertaking for FCC Environmental Compliance (see Appendix A). Where applicable, we have consulted the Agency sources indicated in Appendices B through H.

NEPA Discussion

Wilderness Areas and Wildlife Preserves [47 CFR § 1.1307(a)(1) & 47 CFR § 1.1307(a)(2)]

The appropriate USGS Topographic Map and the National Map Viewer indicate the project area is not located within an officially designated wilderness area or wildlife preserve (see Appendix B).

Protected Species [47 CFR § 1.1307(a)(3)]

Based on the information reviewed and our site inspection, ECA has found no evidence that suitable habitat is present within the proposed project area for federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring in the project area vicinity. The proposed undertaking would have no effect on federally threatened or endangered species or designated critical habitat. In addition, the proposed project would not jeopardize the continued existence of federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat (see Appendix C).

Historic Properties [47 CFR § 1.1307(a)(4)]

The New Tower Submission Packet (FCC Form 620), Section 106 Review documentation was prepared for the proposed undertaking. The Section 106 Review documentation found that the proposed telecommunications facility would not affect any Historic Properties (as described in the March 7, 2005 NPA). The Section 106 Review documentation was submitted to the Kentucky Heritage Council (KHC) on April 10, 2026. The KHC responded on April 15, 2026, concurring with ECA's finding of, "No Adverse Effect to historic properties for this undertaking" (see Appendix D).

Indian Religious Sites [47 CFR § 1.1307(a)(5)]

ECA identified federally recognized tribes that may attach religious and cultural significance to Historic Properties within the area of the proposed undertaking utilizing the Tower Construction

Notification System (TCNS) under TCNS ID 308132. All Native American Tribes that have expressed interest within this area have either concurred with the project or expressed no further interest (see Appendix E).

If inadvertent discoveries of Native American cultural materials or human remains are made during construction, all work should cease and potentially affected Tribes, as well as the State Historic Preservation Office should be notified immediately. ECA recommends that a statement to this effect be incorporated into the construction plans, drawings, and documents for the facility.

Floodplains [47 CFR § 1.1307(a)(6)]

According to the appropriate Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel, the project area would not be located in a Special Flood Hazard Area of the 100-year floodplain (see Appendix F).

Significant Change in Surface Features [47 CFR § 1.1307(a)(7)]

Based on the research performed and our site visit, it does not appear that jurisdictional waters or wetlands would be impacted (see Appendix G). Further, the construction and operation of the proposed facility would not cause a substantial change in the character of surface features or the land used.

High Intensity White Lights [47 CFR § 1.1307(a)(8)]

We understand that high intensity white lights would not be deployed in conjunction with the proposed undertaking.

Radiofrequency Exposure [47 CFR § 1.1307(b)]

FCC licensees transmitting from antennas must comply with the established criteria regarding radiofrequency exposure limits in accordance with FCC Code of Federal Regulations [47 CFR § 1.1307, § 1.1310] published at the time of this report. For radiofrequency exposure assessment, ECA relies solely on the project engineers.

FCC Antenna Structure Registration (ASR) [47 CFR §17.4]

ECA initiated the Environmental Notification process through the Antenna Structure Registration system pursuant to 47 CFR 17.4. The local notice was published on March 26, 2026, and the national notice was published on April 2, 2026, (see Appendix H). ECA understands that no public comments were received within the 30-day comment period. We understand that the FCC has determined that the application does not require further environmental processing and Part 2 of the application can be completed.

Conclusion & Limitations

In summary, ECA has found no evidence that adverse environmental impacts or effects, as defined in the FCC Rules contained in 47 CFR Sections 1.1301 through 1.1320, would result from the proposed undertaking.

ECA notes that the findings of this report are based upon information provided by the customer, including precise locations and specifications of the proposed project activities. Any changes to the design of the proposed facility may warrant further review. Please contact us if any such changes are proposed.

APPENDICES

Appendix A: FCC NEPA Environmental Checklist

Appendix B: USGS Topographic Quadrangle Map / National Map Viewer

Appendix C: Protected Species Information

Appendix D: Section 106 Review Documentation

Appendix E: Native American Information

Appendix F: Floodplain Information

Appendix G: Wetlands Information

Appendix H: Antenna Structure Registration Information

APPENDIX A

FCC NEPA Environmental Checklist



FCC NEPA Environmental Checklist

47 CFR 1.1307(a) & 47 CFR 17.4

Site Information

Site Name: LV Turkeytown	Site Number: KY-4170
ECA ID: 26-000456	Date: 6/5/2026

FCC NEPA Checklist [47 CFR 1.1307(a)]

NEPA Category	Yes	No
Will the facility be located in an officially designated wilderness area?	☐	☒
Special Stipulations/Contingencies: NA		
Will the facility be located in an officially designated wildlife preserve?	☐	☒
Special Stipulations/Contingencies: NA		
Will the facility affect federally listed, threatened or endangered species or designated critical habitats?	☐	☒
Special Stipulations/Contingencies: NA		
Is the facility likely to jeopardize the continued existence of any federally proposed threatened or endangered species or likely to result in the destruction or adverse modification of proposed critical habitats?	☐	☒
Special Stipulations/Contingencies: NA		
Will the facility adversely affect districts, sites, buildings, structures, objects, or other cultural resources listed, or eligible for listing, in the National Register of Historic Places?	☐	☒
Special Stipulations/Contingencies: NA		
Will the facility affect Indian religious sites?	☐	☒
Special Stipulations/Contingencies: NA		
Will the facility be located in a Special Flood Hazard Area of the 100-year floodplain [OR] will the finished floor elevation of the proposed facility be elevated less than one (1) foot above the base flood elevation of the Special Flood Hazard Area of a 100-year floodplain?	☐	☒
Special Stipulations/Contingencies: NA		
Will the construction of the facility involve a significant change in surface features (e.g., wetland fill, deforestation, or water diversion)?	☐	☒
Special Stipulations/Contingencies: NA		
Will the antenna or tower and/or supporting structure be equipped with high intensity white lights and be located in or near a residential neighborhood, as defined by the applicable zoning law?	☐	☒
Special Stipulations/Contingencies: NA		

FCC Antenna Structure Registration (ASR) Requirements [47 CFR 17.4]

ASR Environmental Notification Process	Yes	No/NA
If an ASR application was required or voluntarily submitted, has the FCC determined that additional environmental review is required prior to granting Antenna Structure Registration for the proposed facility?	☐	☒

IF ANY OF THE QUESTIONS ABOVE ARE ANSWERED "YES", FURTHER ACTION MAY BE REQUIRED FOR FCC ENVIRONMENTAL PURPOSES.

Lillian Alvarez

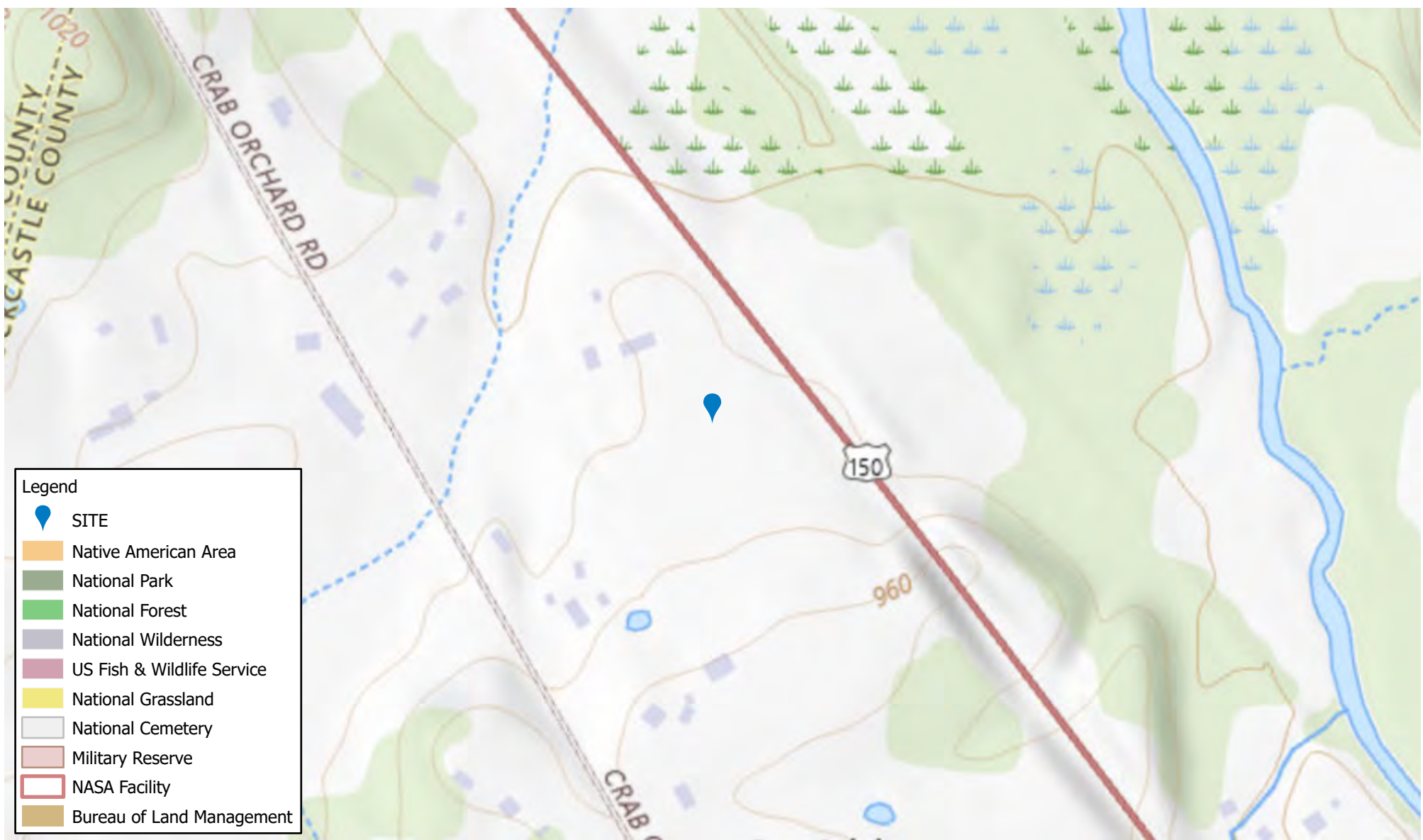
PROJECT MANAGER

Ja. Abbi

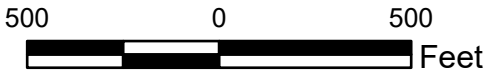
REVIEWED BY

APPENDIX B

USGS Topographic Map & National Map Viewer



- Legend
- SITE
 - Native American Area
 - National Park
 - National Forest
 - National Wilderness
 - US Fish & Wildlife Service
 - National Grassland
 - National Cemetery
 - Military Reserve
 - NASA Facility
 - Bureau of Land Management



Date Generated: 2/27/2026
Source: USGS The National Map

The National Map

ECA ID: 26-000456



APPENDIX C

Protected Species Information



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

April 23, 2026

APC Towers, LLC
8601 Six Forks Road, Suite 250
Raleigh, NC 27615

Attention: Mr. Jonathan Greene

Subject: Informal Biological Assessment
Threatened, Endangered, and Proposed Threatened and Endangered Species
Proposed 250-Foot Tall Guyed Telecommunications Structure (Overall Height with
Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
Brodhead, KY USGS Quadrangle Map
Latitude: 37° 25' 50.0" N Longitude: 84° 27' 34.8" W
ECA Project No. 26-000456
IPaC Project Code: 2026-0073082

Dear Mr. Greene:

Environmental Corporation of America (ECA) is assisting APC Towers, LLC (Applicant) with Federal Communications Commission (FCC) National Environmental Policy Act (NEPA) documentation for the proposed project. Pursuant to the July 9, 2003 delegation letter, Applicants for wireless towers are the FCC's non-federal designee for informal Section 7 consultation under the Endangered Species Act (ESA); therefore, the Applicant is responsible for making a determination of effect to federally listed and proposed threatened or endangered species or critical habitat and initiating informal consultation with the United States Fish and Wildlife Service (USFWS) where applicable.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA has made "no effect" determinations for federally threatened and endangered species identified by the USFWS as potentially occurring within the project area. Therefore, consultation with the USFWS would not be required at this time. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

BACKGROUND

The project area location is shown on Figure 1 in Attachment A. Figure 2 is a site vicinity plan that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. APC Towers, LLC plans to construct a 250-foot tall guyed telecommunications structure (overall height including appurtenances)

within a proposed 100-foot by 100-foot lease area. The site would be accessible and receive utilities via a proposed approximately 302-foot long by 30-foot wide access/utility easement. The proposed facility would also include three guy-wire easements ranging from 135-foot long to 143-foot long by 30-foot wide which would traverse from the tower center in northeasterly, southeasterly, and southwesterly directions. The proposed tower structure is anticipated to utilize FAA Style E (medium intensity, dual red/white strobes) lighting.

The proposed lease area and the majority of the proposed access/utility easement is occupied by an agricultural field. The remainder of the proposed access/utility easement is occupied by a grassed field border. The proposed access/utility easement would originate at Dysart Way and would traverse in a southeasterly, then southwesterly direction before terminating at the proposed lease area. Photographs of the project area are included in Attachment B. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2 in Attachment A.

Based on the National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as a wetland were observed within the project area. Therefore, it does not appear that the proposed project would result in impacts to wetlands or waters.

PURPOSE

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

REVIEW OF AVAILABLE DOCUMENTATION AND SITE INSPECTION

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during our March 20, 2026, site visit, which was conducted by Chase Rodriguez of ECA.

DISCUSSION OF FINDINGS

Because the proposed undertaking would not result in impacts to surface waters or wetlands, aquatic species are not a concern for this undertaking and are excluded from the discussion. The nearest surface water is a pond located approximately 290 feet northwest of the proposed project area at its closest point. Non-aquatic species recognized by the USFWS as potentially inhabiting the project area vicinity are listed in the table below along with a habitat description and a finding of effect for each.

Species Conclusion Table

Common/Scientific Name & Habitat	Federal Status	Finding of Effect
Gray bat <i>(Myotis grisescens)</i> Habitat: Roost sites are almost exclusively in caves; Winter roosting sites in deep vertical caves; Can be found in storm sewer systems	Endangered	No suitable habitat; No effect

Common/Scientific Name & Habitat	Federal Status	Finding of Effect
Indiana bat <i>(Myotis sodalis)</i> Habitat: Summer habitat includes small to medium river and stream corridors with well developed riparian woods; woodlots within 1 to 3 miles of small to medium rivers and streams; and upland forests; Caves and mines are utilized as hibernacula	Endangered	No suitable habitat; No effect
Tricolored bat <i>(Perimyotis subflavus)</i> Habitat: Site is located within hibernating range; During the spring, summer, and fall, primarily roost among living and dead leaf clusters of live or recently dead deciduous hardwood trees; during the winter, hibernate in caves and mines	Proposed Endangered	No suitable habitat; No jeopardy
Virginia big-eared bat <i>(Corynorhinus (=Plecotus) townsendii virginianus)</i> Habitat: Caves typically in limestone karst regions dominated by mature hardwood forests of hickory, beech, maple, and hemlock; Prefers cool, well-ventilated caves for hibernation; Roost sites are often near cave entrances or in places where there is considerable air movement	Endangered	No suitable habitat; No effect
Monarch butterfly <i>(Danaus plexippus)</i> Habitat: Breeding areas are virtually all patches of milkweed in North America and some other regions; Overwintering habitats are certain high altitude Mexican conifer forests or coastal California conifer or Eucalyptus groves	Proposed Threatened	No suitable habitat; No jeopardy
Virginia spiraea <i>(Spiraea virginiana)</i> Habitat: Periodically flood-scoured banks of high-gradient mountain streams, meander scrolls, point bars, natural levees, and braided features of lower stream reaches, and occasionally near disturbed rights-of-way	Threatened	No suitable habitat; No effect

The proposed project area is occupied by an agricultural field and a grassed field border. Land surrounding the project area is occupied by residential development and wooded, grassed, and agricultural land.

Listed Species

No suitable habitat for federally threatened or endangered species identified by the USFWS as potentially occurring in the project area vicinity was observed within the project area during ECA's site visit. Additionally, the proposed project area is not located within designated or proposed critical habitat.

CONCLUSIONS

Based on the information reviewed and our site inspection, ECA has found no evidence that suitable habitat is present within the proposed project area for federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring in the project area vicinity. The proposed undertaking would have no effect on federally threatened or endangered species or designated critical habitat. In addition, the proposed project would not jeopardize the continued existence of federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

CLOSURE

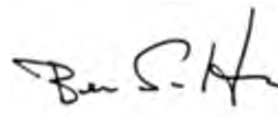
Chase Rodriguez conducted the site visit and area inspection. Ashley Bean collected the applicable information and compiled this report. Ben Salter reviewed this report. Mr. Salter is a Principal Scientist, and his resume is included in Attachment D.

We appreciate the opportunity to provide these professional services. For any questions or additional information, please contact Ashley Bean, by email at ashley.bean@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004.

Sincerely yours,
Environmental Corporation of America

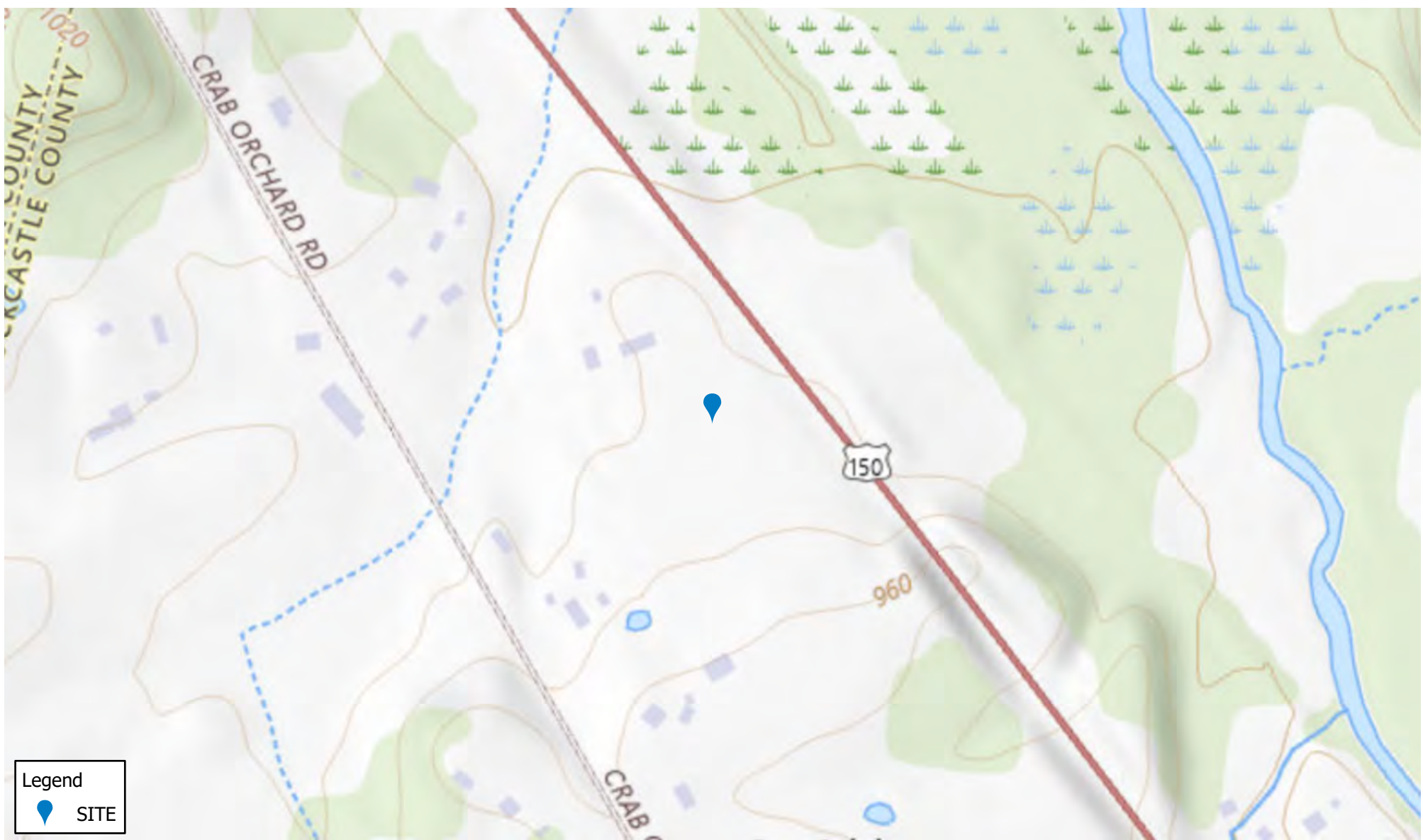


Ashley Bean
Project Scientist



Ben Salter
Principal Scientist

ATTACHMENT A:
FIGURES



Date Generated: 2/27/2026
Source: Maxar, The National Map

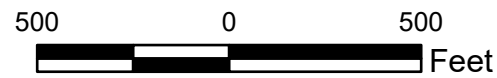
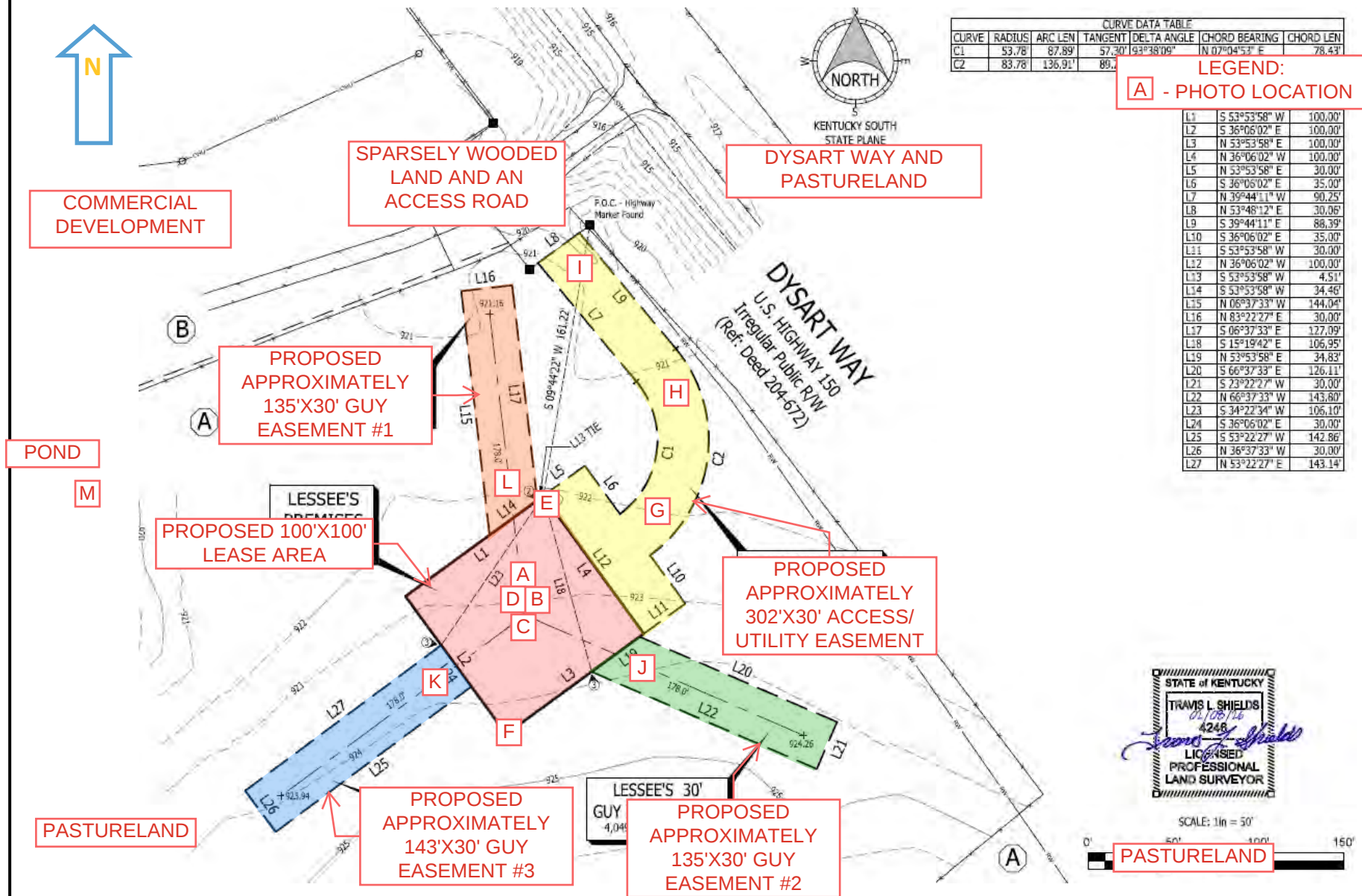


Figure 1: USGS Topographic Map

ECA ID: 26-000456





Source: Survey Drawing provided by Client

Figure 2: Site Vicinity Plan

ECA ID: 26-000456





Figure 3: Site Location Map

ECA ID: 26-000456





Date Generated: 2/27/2026

Source: U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands_team@fws.gov

Wetlands Map

ECA ID: 26-000456





Date Generated: 2/27/2026
Source: FEMA's National Flood Hazard Layer

FEMA Floodplain Map

ECA ID: 26-000456





Date Generated: 2/27/2026
Source: USDA NRCS, Esri

Soil Map

ECA ID: 26-000456



Map Unit Symbol	Map Unit Name	Farmland Classification	Water Table Depth (cm)	Drainage Class
Tilsit (TIC)	Tilsit silt loam, 6 to 12 percent slopes	Farmland of statewide importance	61	Moderately well drained
Stendal (So)	Stendal silt loam, terrace	Prime farmland if drained	30	Somewhat poorly drained

ATTACHMENT B:
PHOTOGRAPHS



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Photographs

ECA ID: 26-000456





E: Southeasterly Overview of the Proposed Lease Area



F: Northwesterly Overview of the Proposed Lease Area



G: Northwesterly View of the Proposed Access/Utility Easement



H: Westerly View of the Proposed Access/Utility Easement

Photographs

ECA ID: 26-000456





I: Westerly View of Existing Access Road from the Proposed Access/Utility Easement



J: Northeasterly View of the Proposed Northeastern Guy Wire Easement #2



K: Southerly View of the Proposed Southern Guy Wire Easement #3



L: Northwesterly View of the Proposed Northwestern Guy Wire Easement #1

Photographs

ECA ID: 26-000456





M: Representative Overview of Pond Southwest of Subject Property

Photographs

ECA ID: 26-000456



ATTACHMENT C:
PROTECTED SPECIES INFORMATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Kentucky Ecological Services Field Office
J C Watts Federal Building, Room 265
330 West Broadway
Frankfort, KY 40601-8670
Phone: (502) 695-0467 Fax: (502) 695-1024
Email Address: kentuckyes@fws.gov

In Reply Refer To:

04/07/2026 15:54:33 UTC

Project Code: 2026-0073082

Project Name: 26-000456

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

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:

Kentucky Ecological Services Field Office

J C Watts Federal Building, Room 265

330 West Broadway

Frankfort, KY 40601-8670

(502) 695-0467

PROJECT SUMMARY

Project Code: 2026-0073082

Project Name: 26-000456

Project Type: Communication Tower New Construction

Project Description: Communication Tower New Construction

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@37.4306875,-84.45960317637233,14z>



Counties: Rockcastle County, Kentucky

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 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. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, 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
Gray Bat <i>Myotis grisescens</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6329 General project design guidelines: https://ipac.ecosphere.fws.gov/project/CIHVSDIW3NGP7KMM6V4PCSNP5I/documents/generated/6422.pdf	Endangered
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. This species only needs to be considered under the following conditions: The project area includes 'potential' habitat. All activities in this location should consider possible effects to this species. Species profile: https://ecos.fws.gov/ecp/species/5949 General project design guidelines: https://ipac.ecosphere.fws.gov/project/CIHVSDIW3NGP7KMM6V4PCSNP5I/documents/generated/6422.pdf	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered
Virginia Big-eared Bat <i>Corynorhinus (=Plecotus) townsendii virginianus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8369 General project design guidelines: https://ipac.ecosphere.fws.gov/project/CIHVSDIW3NGP7KMM6V4PCSNP5I/documents/generated/6422.pdf	Endangered

CLAMS

NAME	STATUS
Salamander Mussel <i>Simpsonaias ambigua</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6208	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> 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
Virginia Spiraea <i>Spiraea virginiana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1728	Threatened

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.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ashley Bean

Address: 1340 Patton Avenue

City: Asheville

State: NC

Zip: 28806

Email: ashley.bean@eca-usa.com

Phone: 8285050755



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Kentucky Ecological Services Field Office
J C Watts Federal Building, Room 265
330 West Broadway
Frankfort, KY 40601-8670
Phone: (502) 695-0467 Fax: (502) 695-1024
Email Address: kentuckyes@fws.gov

In Reply Refer To:

04/07/2026 16:03:37 UTC

Project code: 2026-0073082

Project Name: 26-000456

Subject: Technical Assistance letter for the project named '26-000456' for the endangered Indiana bat and its critical habitat in the proposed project location, pursuant to the Indiana Bat Determination Key (DKey)

Dear Ashley Bean:

The U.S. Fish and Wildlife Service (Service) received on **April 07, 2026** your effect determination(s) for the '26-000456' using the Indiana Bat DKey within the Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance of the Service's Indiana Bat DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Indiana Bat (<i>Myotis sodalis</i>)	Endangered	No effect

Consultation Status

No Effect Determinations: : Species with No effect determinations are those for which you determined the proposed Action would have “no effect” on the species. There is no statutory requirement for the federal action agency to request concurrence with that determination; however, the federal action agency should document the supporting information for this determination in their files. This documentation would typically demonstrate a lack of suitable habitat within the action area, show that no impacts to suitable habitat would occur, or provide information that the species is not reasonably certain to occur in the action area even though suitable habitat is present.

The Service recommends that your agency contact the Kentucky Ecological Services Field Office or re-evaluate the Action in IPaC if: 1) the scope, timing, duration, or location of the Action changes, 2) new information reveals the Action may affect listed species or designated

critical habitat, or 3) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Kentucky Ecological Services Field Office should take place before project changes are final or resources committed.

In addition to the Indiana bat, the following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Gray Bat *Myotis grisescens* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Salamander Mussel *Simpsonaias ambigua* Proposed Endangered
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered
- Virginia Big-eared Bat *Corynorhinus (=Plecotus) townsendii virginianus* Endangered
- Virginia Spiraean *Spiraea virginiana* Threatened

To address effects to other federally listed or proposed species and/or their designated critical habitat, you can request project-specific review by following the instructions in the “Next Steps” section of your species list letter, or you may use another determination key, if available.

Additional Coordination

To request additional technical assistance or consultation, please contact the Kentucky Ecological Services Field Office . When you contact the office, please provide all relevant site-specific information regarding the proposed Action. The Kentucky Ecological Services Field Office will respond within 30 to 60 days of your submittal.

Action Description

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

1. Name

26-000456

2. Description

The following description was provided for the project '26-000456':

Communication Tower New Construction

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@37.4306875,-84.45960317637233,14z>



QUALIFICATION INTERVIEW

1. Does the project intersect the Indiana bat species list area?

Automatically answered

Yes

2. Will the proposed action involve Federal funding, permitting, or authorization, or will it be carried out by a Federal Agency?

Yes

3. Does the proposed action include a communication tower requiring Federal Communication Commission (FCC) authorization or approval?

Yes

4. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) the lead Federal Agency for this action?

No

5. Are you the lead Federal Action Agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

Yes

6. Will the proposed Action involve construction or operation of a wind turbines?

No

7. Will the proposed Action involve blasting, other than a fireworks display?

No

8. Will the proposed Action involve a new point source discharge from a facility other than a water treatment plant or storm water system?

No

9. 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

10. Will the proposed Action include the removal, replacement, repair and/or maintenance of an existing bridge?

No

11. Will the proposed Action involve perennial stream loss that would require an individual permit under 404 of the Clean Water Act?

No

12. Will the proposed Action involve discharge of sediment into a stream?

No

13. Does the Action Area contain any caves (including their associated sinkholes, fissures, or other karst features), rockshelters, underground quarries, or abandoned mine portals (including associated underground workings)?

No

14. Will the proposed project result in the removal of trees?

No

15. Based on the responses you have provided, we believe that the proposed Action is consistent with the type of Actions programmatically evaluated by the Service under the standing analyses that supports this determination key. These Actions typically conclude with "no effect" or "may affect - not likely to adversely affect" determinations for the Indiana bat.

What determination do you want to make for the Indiana bat:

Note: IPaC will not provide a concurrence for "no effect" determinations, because there is no statutory requirement to request concurrence from the Service. IPaC will provide concurrence for "May affect – not likely to adversely affect" determinations. If you choose "May affect – likely to adversely affect" or "Unsure," additional coordination with the Service is recommended.

No effect

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ashley Bean

Address: 1340 Patton Avenue

City: Asheville

State: NC

Zip: 28806

Email: ashley.bean@eca-usa.com

Phone: 8285050755

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Kentucky Ecological Services Field Office
J C Watts Federal Building, Room 265
330 West Broadway
Frankfort, KY 40601-8670
Phone: (502) 695-0467 Fax: (502) 695-1024
Email Address: kentuckyes@fws.gov

In Reply Refer To:

04/07/2026 16:33:55 UTC

Project code: 2026-0073082

Project Name: 26-000456

Subject: Technical Assistance letter for the project named '26-000456' for specified threatened and endangered species that may occur in your proposed project location consistent with the Kentucky Determination Key (DKey)

Dear Ashley Bean:

The U.S. Fish and Wildlife Service (Service) received on **April 07, 2026** your effect determination(s) for the '26-000456' (Action) using the Kentucky (DKey) within the Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance of the Service's Kentucky DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Gray Bat (<i>Myotis grisescens</i>)	Endangered	No effect
Virginia Big-eared Bat (<i>Corynorhinus (=Plecotus) townsendii virginianus</i>)	Endangered	No effect
Virginia Spiraera (<i>Spiraea virginiana</i>)	Threatened	No effect

Consultation Status

No Effect Determinations: Species with No effect determinations are those for which you determined the proposed Action would have “no effect” on the species. There is no statutory requirement for the federal action agency to request concurrence with that determination; however, the federal action agency should document the supporting information for this determination in their files. This documentation would typically demonstrate a lack of suitable habitat within the action area, show that no impacts to suitable habitat would occur, or provide

information that the species is not reasonably certain to occur in the action area even though suitable habitat is present.

Coordination with the Kentucky Ecological Services Office is complete. Thank you for considering Federally listed species during your project planning.

The Service recommends that your agency contact the Kentucky Ecological Services Field Office or re-evaluate the Action in IPaC if: 1) the scope, timing, duration, or location of the Action changes, 2) new information reveals the Action may affect listed species or designated critical habitat, or 3) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Kentucky Ecological Services Field Office should take place before project changes are final or resources committed.

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Indiana Bat *Myotis sodalis* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Salamander Mussel *Simpsonia ambigua* Proposed Endangered
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

To address effects to other federally listed or proposed species and/or their designated critical habitat, you can request project-specific review by following the instructions in the “Next Steps” section of your species list letter, or you may use another determination key, if available.

Additional Coordination

To request additional technical assistance or consultation, please contact the Kentucky Ecological Services Field Office . When you contact the office, please provide all relevant site-specific information regarding the proposed Action. The Kentucky Ecological Services Field Office will respond within 30 to 60 days of your submittal.

Action Description

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

1. Name

26-000456

2. Description

The following description was provided for the project '26-000456':

Communication Tower New Construction

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@37.4306875,-84.45960317637233,14z>



QUALIFICATION INTERVIEW

1. Will the proposed Action involve Federal funding, permitting, or authorization, or will it be carried out by a Federal Agency?

Yes

2. Does the proposed action include a communication tower requiring Federal Communication Commission (FCC) authorization or approval?

Yes

3. Are you the lead Federal Action Agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

Yes

4. [Hidden Semantic] Does the action area intersect critical habitat?

Automatically answered

No

5. Will the proposed Action involve construction or operation of wind turbines?

No

6. Will the proposed Action involve blasting (other than a fireworks display)?

No

7. Will the proposed Action involve a new point source discharge from a facility other than a water treatment plant or storm water system?

No

8. 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)?

No

9. Will the proposed Action include the removal, replacement, repair and/or maintenance of an existing bridge or culvert?

No

10. Will the proposed Action involve perennial stream loss that would require an individual permit under 404 of the Clean Water Act?

No

11. Will the proposed Action involve discharge of sediment into a stream?

No

12. Does the Action Area contain any caves (including their associated sinkholes, fissures, or other karst features), rockshelters, underground quarries, or abandoned mine portals (including associated underground workings)?

No

13. [Hidden Semantic] Does the Action Area intersect the Kentucky AOI of the gray bat?

Automatically answered

Yes

14. Will the proposed Action involve drilling or boring?

Yes

15. Prior to the drilling or boring, will the project proponent conduct appropriate preliminary evaluations to ensure that proposed drilling or boring is unlikely to encounter karst voids or other voids?

Yes

16. Will the project proponent contact the Field Office if potentially suitable gray bat hibernacula or roosting habitat is encountered during drilling or boring?

Yes

17. Based on the responses you have provided, we believe that the proposed Action is consistent with the type of Actions programmatically evaluated by the Service's Kentucky Field Office under the standing analyses that support this determination key. These Actions typically conclude with "no effect" or "may affect - not likely to adversely affect" determinations for the gray bat.

What is your effect determination for the **gray bat**?

Note: IPaC will not provide a concurrence for "no effect" determinations, because there is no statutory requirement to request concurrence from the Service. IPaC will provide concurrence for "May affect – not likely to adversely affect" determinations. If you choose "May affect – likely to adversely affect" or "Unsure," additional coordination with the Service is recommended.

1. "No effect"

18. [Hidden Semantic] Does the Action Area intersect the Kentucky AOI of the Virginia big-eared bat?

Automatically answered

Yes

19. Will the proposed Action involve activities that occur within 1,000 feet from a cliffline? A cliffline is a naturally occurring, exposed, and nearly vertical rock structure at least 10 feet tall and 100 feet long.

No

20. Based on the responses you have provided, we believe that the proposed Action is consistent with the type of Actions programmatically evaluated by the Service's Kentucky Field Office under the standing analyses that support this determination key. These Actions typically conclude with "no effect" or "may affect - not likely to adversely affect" determinations for the Virginia big-eared bat.

What is your effect determination for the **Virginia big-eared bat**?

Note: IPaC will not provide a concurrence for "no effect" determinations, because there is no statutory requirement to request concurrence from the Service. IPaC will provide concurrence for "May affect – not likely to adversely affect" determinations. If you choose "May affect – likely to adversely affect" or "Unsure," additional coordination with the Service is recommended.

1. "No effect"

21. Will all activities occur within an area that is paved, graveled, and/or inside a structure?

No

22. Does the Action Area include forested slopes?

No

23. Does the Action Area include streams and/or areas within a 300-foot buffer from a stream?

No

24. Will the proposed Action involve herbicide application?

No

25. Will the proposed Action involve ground disturbance?

Yes

26. Will the proposed Action involve vegetation removal or mowing?

Yes

27. [Hidden Semantic] Does the project area intersect the AOI for Virginia spiraea?

Automatically answered

Yes

28. Based on the responses you have provided, we believe that the proposed Action is consistent with the type of Actions programmatically evaluated by the Service under the standing analyses that supports this determination key. These Actions typically conclude with "no effect" or "may affect - not likely to adversely affect" determinations for Virginia Spiraea.

What is your effect determination for the **Virginia Spiraea**:

Note: IPaC will not provide a concurrence for "no effect" determinations, because there is no statutory requirement to request concurrence from the Service. IPaC will provide concurrence for "May affect – not likely to adversely affect" determinations. If you choose "May affect – likely to adversely affect" or "Unsure," additional coordination with the Service is recommended.

1. "No effect"

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ashley Bean

Address: 1340 Patton Avenue

City: Asheville

State: NC

Zip: 28806

Email: ashley.bean@eca-usa.com

Phone: 8285050755

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission

LiDAR



4/7/2026

3DEP Elevation - Hillshade USGSTopo



Red: Band_1
Green: Band_2
Blue: Band_3

USGS National Map 3D Elevation Program (3DEP), March 25, 2026., USGS
The National Map: National Boundaries Dataset, 3DEP Elevation Program,



Legend

-  SITE
-  Final Critical Habitat Features
-  Proposed Critical Habitat Features



Date Generated: 2/27/2026
Source: U.S. Fish and Wildlife Service

Critical Habitat for Threatened & Endangered Species

ECA ID: 26-000456



ATTACHMENT D:
RESUME



Ben Salter, PWS

Vice President of Environmental and Ecological Services/Principal Scientist
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
ben.salter@eca-usa.com

EDUCATION

Western Carolina University

Master of Science, Biology, August 2004

Cullowhee, NC

Georgia College & State University

Bachelor of Science, Biology, December 1998
Chemistry Minor

Milledgeville, GA

Short Courses/Specialized Training

OSHA HAZWOPER, 40-hour, 2016
Asbestos Building Inspector, 2015
Tennessee Hydrologic Determination Training Course, 2014
Applying the NEPA Process and Writing Effective NEPA Documents, 2013
Interagency Coordination for Endangered Species, 2013
NEPA Cumulative Effects Analysis, 2013
SonoBat Workshop, 2013
Overview of NHPA Section 106, 2013
GA DOT Coastal Wetland Plant Identification w/ Dr. Bob Mohlenbrock, 2010
Airports Council International – North American NEPA Workshop, 2009
NC State Stream Restoration Design Principles, 2007
Rosgen Level 1 – Applied Fluvial Geomorphology, 2006
VDEQ Stream Impact and Compensation Assessment Manual Workshop, 2006
VIMS Perennial Stream Workshop, 2005

PROFESSIONAL REGISTRATIONS

Society of Wetland Scientists, Professional Wetland Scientist, 2012 to present
EPA AHERA-Accredited Asbestos Building Inspector, 1999 to 2002; 2015 to present

PROFESSIONAL EXPERIENCE

November 2007 – Present

Environmental Corporation of America

Asheville, NC

Position: Principal Scientist, Vice President of Environmental and Ecological Services

Responsibilities:

Technical Compliance Lead and Manager of ECA Environmental Team and Services including Phase I and II ESA, NEPA, T&E Species and Migratory Bird Assessment/Consultation, and Wetlands/Waters delineation and permitting; Responsible for client management, staff development, final QA/QC review, and overall success, efficiency, and technical/regulatory oversight for managed services.

April 2006 – November 2007

Blue Ridge Ecological

Waynesville, NC

Position: Principal Scientist, Partner

Responsibilities:

Partner/Principal Scientist in natural resource management firm focused on fisheries/lake management, watershed assessment, water quality monitoring, and biological assessment.

January 2005 – November 2007

Malcolm Pirnie, Inc.

Newport News, VA

Position: Project Environmental Scientist

Responsibilities:

Wetland and Stream Scientist, National Environmental Policy Act Specialist, and Environmental Scientist; Primary responsibilities included EA and EIS writer, wetland and stream field scientist, and environmental site assessor.

August 2002 – December 2004 **Western Carolina University** Cullowhee, NC
Position: Research and Teaching Assistant
Responsibilities:
Fisheries Scientist and Biology/Ecology Laboratory Instructor

May 2003 – September 2003 **United States Forest Service** Asheville, NC
Position: Biological Science Technician
Responsibilities:
Fisheries scientist for southern Appalachian brook trout project. Collected brook trout tissue samples in headwater streams throughout Western North Carolina and conducted genetic analysis for determining origin.

January 1999 – May 2002 **Environmental Corporation of America** Alpharetta, GA
Position: Project Scientist/Manager
Responsibilities:
Project manager for environmental projects including Phase I and II Environmental Assessments, FCC NEPA assessment, asbestos and lead-based paint inspection, and abatement monitoring and specification preparation, cultural resource assessments, threatened and endangered species surveys, wetland delineation, groundwater monitoring and remediation system installation, geotechnical investigation, construction materials testing, and telecommunications tower construction plan review.

JOURNAL PUBLICATIONS

Miller, JR, **EB Salter**, JB Anderson, PJ Lechler, SL Kondrad, PF Galbreath. 2005. Influence of Temporal Variations in Water Chemistry on the Pb Isotopic Compositions of Rainbow Trout (*Oncorhynchus mykiss*). Science of the Total Environment, 350, p. 204-224.

REPRESENTATIVE EXPERIENCE

Wetland/Waters Delineation and Section 404/401 Permitting

Project/Field Scientist and Principal Scientist involvement in wetland/waters delineations and assessments and associated Section 404/401 (Nationwide and Individual Permits), CZMA, and local permitting for projects in over 20 states; Regulatory Lead and staff management in support of all company wetlands/waters related services for the past 10 years.

Phase I and II ESA, Hazardous Remediation/Waste Handling, and Health and Safety Compliance

Qualified Environmental Professional per 40 CFR 312.10(b); Project Scientist/Manager and Principal Scientist involvement in Phase I and II ESAs throughout the nation on a variety of property types including commercial, industrial, municipal, government, communications, and residential facilities, and large undeveloped tracts; Field Staff and Technical Lead for field execution, scoping, and regulatory compliance related to Phase II ESA and coordination of remediation of impacted soil and associated waste disposal and handling as necessary; Primary Phase II and waste disposal and handling experience with existing and proposed communications facilities but with involvement at commercial, industrial, residential, and fuel station/automotive facilities; Technical Lead for preparation of Health and Safety Plans and impacted media management plans for communications facilities across the nation.

National Environmental Policy Act Evaluation/Documentation

Project Manager, Principal Scientist, and lead agency/stakeholder liaison for NEPA related services nationwide for numerous lead federal agencies; Involvement with EIS, EA, Categorical Exclusions, and Feasibility Studies; Expert FCC NEPA Scientist with over 20 years in the communications industry; Commonly works with a prominent Native American Indian Tribe in the Southeast to prepare NEPA documentation for projects located on Tribal-owned lands.

Threatened and Endangered Species and Migratory Bird Evaluation/Consultation

Project and Principal level involvement in thousands of T&E species evaluations and consultations with the USFWS and State Wildlife Agencies including technical assistance, programmatic agreement, self-certification, informal, and formal consultations; Field and Principal level participation in hundreds of migratory bird nest evaluations at communications facilities to ensure compliance with the Migratory Bird Treaty Act; Technical Compliance/Regulatory Lead and staff management in support of all company T&E and migratory bird-related services.

APPENDIX D

Section 106 Review Documentation



ANDY BESHEAR
GOVERNOR

TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL
THE STATE HISTORIC PRESERVATION OFFICE

LINDY CASEBIER
SECRETARY

JACQUELINE COLEMAN
LT. GOVERNOR

410 HIGH STREET
FRANKFORT, KENTUCKY 40601
(502) 564-7005
www.heritage.ky.gov

CRAIG A. POTTS
EXECUTIVE DIRECTOR &
STATE HISTORIC PRESERVATION OFFICER

April 15, 2026

Dina Bazzill
1375 Union Hill Industrial Court
Suite A
Alpharetta, GA 30004
Email: dina.bazzill@eca-usa.com

RE: Above and Below Ground: APC Towers, LLC, **TCNS# 308132**, LV Turkeytown
Proposed New 250-Ft Tower on Dysart Way in Rockcastle County, Kentucky,
FCC Form 620 **and;**

*Phase I Archaeology Report for a Proposed 250-Ft Tall Tower in Rockcastle
County, Kentucky*

Report by: Mackenzie Tabeling and Matthew Beazley

Dear Ms. Bazzill,

Thank you for your recent submission of the documentation pertaining to this undertaking. We understand your client is proposing to install a new 250-ft telecommunications tower and associated equipment in Crab Orchard, Kentucky.

The Phase I report discusses the survey results of approximately 0.72 acre. Field methods include pedestrian survey and supplemental shovel testing. No cultural resources were identified during this investigation. We accept this report without revisions.

Based upon our review, there are no Eligible or Listed historic age resources within the Area of Potential Effect (APE) of the proposed project.

We would concur with a finding of **No Adverse Effect** for this undertaking.



An Equal Opportunity Employer M/F/D

RE: Above and Below Ground: APC Towers, LLC, **TCNS# 308132**, LV Turkeytown Proposed New 250-Ft Tower on Dysart Way in Rockcastle County, Kentucky, FCC Form 620

If you have any questions, please contact Stephanie Dooley or Kimberly Busby of my staff at stephanie.dooley@ky.gov or kimberly.busby@ky.gov.

Sincerely,



Craig A. Potts,
Executive Director and
State Historic Preservation Officer

KHC #: 260632
CP: sd, kb

Mount Vernon Signal

PHONE 606-256-2244

"Serving Rockcastle County Since 1887"

FAX 606-256-9526

Perlina M. Anderkin, Publisher

Paige Bengel, Advertising Mgr.

Affidavit of Publication

I, Spencer Bengel, of the Mount Vernon Signal, do hereby
certify that the publication of tower construction
for APC Towers, LLC was inserted
into the Mount Vernon Signal on the following dates:

Date: 3-26-26 Page 4 Col. 3-26-2026

Date: _____ Page _____ Col. _____

Date: _____ Page _____ Col. _____

Date: _____ Page _____ Col. _____

Signature Spencer Bengel

Subscribed and sworn to before me this 21st day of May.
20 26.

Notary Public Sandy Duka
My commissioner expires 9-12-29

Obituaries

Peggy Sue Edwards

Peggy Sue Edwards, 67, departed this life on Monday, March 16, 2026, at her residence in Brodhead. Peggy was born June 22, 1958, a daughter to the late Millard and Betty Miller Sutton. On December 19, 1982, she married David Edwards and they were married for 43 years, from that union came one child, Daniel Edwards.



Peggy retired from the Public Works Dept. in the town of Mooresville, IN. She attended Mt. Zion Baptist Church, and she enjoyed fishing, birdwatching, but most of all she enjoyed spending time with family and friends. Peggy was a woman of strong opinions, and of strong heart, those who knew her felt this deeply, she will be dearly missed.

Those left to celebrate her life are: her husband, David Edwards; her son, Daniel Edwards; her granddaughter, Bailey Edwards; and her sisters, Tanagene Blanton of Brodhead, and Judy Stevens of CA.

Besides her parents she was preceded in death by her brother, Tony Michael Sutton.

A private graveside service was held at Piney Grove Cemetery on Thursday, March 19, 2026, with Bro. Nathan Deleon officiating.

Marvin E. Owens Home for Funerals is honored to serve the Peggy Edwards family.

Ruby Thompson

Ruby Mae Thompson, 90, of Brodhead, died Sunday, March 22, 2026.

Funeral services were conducted Wednesday, March 25, 2026 at Dowell & Martin Funeral Home. Burial was in Fairview Cemetery.

A complete obituary will appear in next week's Signal.

Please visit www.DowellMartin.com or Dowell & Martin Funeral Home's Facebook page to view online obituary.

Let the Bible Speak

Tune in to "Let the Bible Speak," with Brett Hickey, on Sunday mornings at 6:30 a.m. on WDKY Fox TV.

KING'S EYE CARE

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Notice

APC Towers, LLC is proposing to construct a 250-foot tall (overall height) guyed telecommunications structure near Dysart Way, Crab Orchard, Rockcastle County, Kentucky (37° 25' 50.0" N, 84° 27' 34.8" W). The proposed tower is anticipated to utilize FAA Style E (medium intensity, dual red/white strobes) lighting.

APC Towers, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places. Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.

In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only raise environmental concerns and can be filed online using the FCC pleadings system at www.fcc.gov or mailed to FCC Requests for Environmental Review, Attn: Ramon Williams, 45 L Street NE, Washington, DC 20554 within 30 days of the date that notice of this proposed action is published on the FCC's website. Refer to File No. A1378777 when submitting the request and to view the specific information about the proposed action. 26-000456/ARC

“Thinking History”

by Jerry Hopkins

God made us to think. That is why He gave us minds and bodies with which to relate to the world in which He placed us and where He wants to meet us. Thinking is good for the soul; it is good for society and the many elements it involves—groups, institutions, organizations, families, schools and governments. One of the most important facets of this intellectual exercise is history.

My wife and I have been reading a book titled The Daniel Plan about the biblical character Daniel and how he responded to the crisis situation in which he found himself. He trusted God, but he also responded in important ways, acting and thinking. He was conscious of history and truth as he sought to live for God in a godly and good manner. He fasted and prayed. He read God's Word and he worshipped God in one of the most worldly and wicked societies. The authors of this exceptional book said, "Thoughts are automatic. They just happen. They are based on complex chemical reactions and information from the past. And what most people don't know is that thoughts are sneaky and they lie. They lie a lot. It is often these uninvestigated thoughts that provide the emotional fuel for anger, anxiety, depression, and unhealthy behaviors"

Thoughts are more than the creation of our body chemistry. I do not believe they are "automatic" because we can question and change our thinking. This is why I have combined these two words "thinking history," so as to engage all of those who read and think with me about acting on what we learn and how we live that we might obey God and honor the Lord Jesus Christ. This process is addressed in The Daniel Plan whose authors say, "If you never question your erroneous negative thoughts, you believe them 100 percent and then you act as if the lies in your head are true. For example, if you think your husband never listens to you, even though he has on many occasions, you act as if he doesn't, and you feel justified in yelling at him. If you think you are a failure, even though you have had many successes, you are more likely to give up easily." We need to think about our history and what is really, actually, factually true. Much of what we are hearing and seeing today is NOT TRUE. We are intentionally deceived and led astray. Our history is being rewritten so as to make us embrace lies. For this reason we must consider that learning involves both reading and thinking. As one engages in both these exercises a result is the recording and expression in writing the thoughts that emerge. Thus, John Piper argues in his great book on "thinking" about this exercise in pursuing a knowledge and relationship with God. He says, echoing both Calvin and Augustine, "I count myself one of the number of those who write as they learn and learn as they write." So must you and I in this effort of thinking history.

History has often been equated with kingdoms—earthly powers, powerful personalities, persuasive ideologies, fateful decisions and political resolutions. It has been about communities, families, groups, societies, nations and all they entail.

This is true of the Christian faith—the family of faith, the community of the committed, the society of the saved. History is about the story of these relationships coming under the term ecclesia. The fact of the ecclesiastical cannot be ignored. It is a reality. It is part of God's kingdom and comes directly under His sovereignty and authority.

For this reason Hebrews

12:28-29 becomes very important historically—"Therefore, since we are receiving a kingdom which cannot be shaken, let us have grace, by which we may serve God acceptably with reverence and godly fear. For our God is a consuming fire." "We are receiving a kingdom" with power, persuasion. It is continuing, consuming, engaging and irresistible.

History is also about memory, manners and a Master. "Looking unto Jesus the author and finisher of our faith; who for the joy that was set before Him endured the cross, despising the shame, and is set down at the right hand of the throne of God. For consider Him that endured such contradictions of sinners against Himself, lest ye be wearied and faint in your minds" (Hebrews 13:2-3). Often we falter and faint in our thinking and acting, fighting and resisting the lies.

This is why we need to remember who we are, kingdom citizens, representatives of God in a flawed and failing world. We are what Paul said, "Ambassadors of Christ" (2 Corinthians 5:20). Manners are about remembering and about conduct, about our behavior in community. We must not forget sometimes we entertain strangers as angels unaware and that many are in bonds and suffering adversity and hardship. Not only must we know and understand the Master as a representative leader as the Hebrews writer says, "Remember them which have the rule over you, who have spoken unto you the word of God: whose faith follow, considering the end of their conversation" (Hebrews 13:7). That word "conversation" in this text is not just about talking, it is about the manner of living and leading. Leadership is important, but as important is followship. This verse is about followship. Paul reminds us that we "have a Master in heaven" (Colossians 4:1).

At the heart of all history is the reality of God—Who He is and how He has manifest Himself in each present moment. History and time are coursing through our veins and our relationships, but they do not limit God. God transcends both history and time. He exists outside time and oversees all his-

tory from beginning to end.

History is about what God has done. It is about what He is doing right now in us and for us, even through us. Consider the past and how God has worked. This is why we have history, the text of experience, the real testi-

mony, the verbal story of God's work in His true and timely Word. So let us "think history" as we face our trials and troubles now.

There is so much more that can be said and shared about "thinking history."

What Shall It Profit a Man? Mark 8:36

In a world driven by success, wealth, and achievement, the words of Jesus still stand as a powerful question: "What shall it profit a man, if he shall gain the whole world, and lose his own soul?"

Every day, people invest their time and energy, chasing things that will not last: money, recognition, and possessions. While these may bring temporary satisfaction, they cannot meet our deepest needs. Jesus reminds us that the soul is of greater value than anything this world can offer. A person may gain everything outwardly and still be empty within. No amount of success can replace a lost relationship with God.

The truth is simple and sobering: eternity is more important than the present moment.

One day, each of us will stand before God. What will matter then is not what we gained in this life, but whether we were faithful to Him.

The question remains, what are we gaining, and what might we be losing?

Everyone Welcome

Robby Cable - 606-305-8452

109 Providence Cemetery Rd. • Brodhead

Providence
CHURCH of CHRIST

Come Worship With Us! Sunday Morning Bible Study: 9:30
Sunday Morning Worship: 10:20- Sunday Evening Worship: 6:00
Wednesday Evening Bible Study: 7:00

The David M. Smith Veterans Center/ Rockcastle Veterans Memorial Park

Vietnam Veterans Remembrance Day 2026

Everyone is invited to our annual Vietnam Veterans Remembrance Day

This year's ceremony will be held on

March 28, 2026

11:00 a.m. to 1 p.m.

We encourage everyone to reach out to their friends, family, neighbors, co-workers and anyone else who may have served in Vietnam, and invite them to this event.

Let us give them the welcome home they deserved 50 years ago.

There will be speeches, military honors & other activities.

Those running for political office are invited but this is strictly a Remembrance Day event. There is no campaigning at this event. We appreciate your cooperation in this.

Pie Auction & Soup Dinner Benefit!

Saturday, April 4th 2026 • 6PM

Featuring

The Medley Boys

Enjoy Delicious Homemade Soups & Bid on Tasty Pies!

Proceeds Will Go Toward

The "Livingston Homecoming"

@ The Depot
9174 Main Street
Livingston

Bid on Pie!

Lex Chesnut

From: E106
Sent: Sunday, April 12, 2026 12:39 PM
To: Project Managers
Subject: FW: Section 106 New Filing Submitted- Email ID #12392693

Dina M. Bazzill – MA, RPA (She/Her)
Environmental Corporation of America (ECA)
252-412-7960 (mobile)

From: towernotifyinfo@fcc.gov <towernotifyinfo@fcc.gov>
Sent: Friday, April 10, 2026 3:17 PM
To: Dina Bazzill <dina.bazzill@eca-usa.com>
Subject: Section 106 New Filing Submitted- Email ID #12392693

The following new Section 106 filing has been submitted:

File Number: 0011991922
TCNS Number: 308132
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 04/13/2026

Applicant: APC Towers, LLC
Consultant: ECA-USA
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: APC Towers, LLC Site - LV Turkeytown (KY-4170)
Site Address: Dysart Way
Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456
Site Coordinates: 37-25-50.0 N, 84-27-34.8 W
City: Crab Orchard
County: ROCKCASTLE
State: KY
Lead SHPO/THPO: Kentucky Heritage Council

Consultant Contact Information:
Name: ECA-USA
Title:
PO Box: 30004
Address: 1375 Union Hill Industrial Ct
Suite A
City: Alpharetta

State: GA
Zip: 30004
Phone: 770-667-2040
Fax:
Email: dina.bazzill@eca-usa.com

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

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

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

KENTUCKY HERITAGE COUNCIL COVER SHEET FOR SECTION 106 SUBMISSIONS

We want to help you with your project as early in the process as possible. Our reviewers need up to 30 days to review and provide comments to you for your proposal. If you are using federal funds or permits, you definitely need us. If you are working through the e-Clearing House (KHC does not use e-Clearinghouse), or need environmental review, you'll likely need us. DON'T WAIT! We're here to help. Submit your documentation in a single attachment to our INHERIT portal: <https://heritage.ky.gov/compliance/Pages/overview.aspx>

SECTION 1: APPLICANT INFORMATION	
Project Applicant: APC Towers, LLC	
Contact Person (name & position): Dina Bazzill, Principal Investigator	
Return Address: 1375 Union Hill Industrial Court, Alpharetta, GA 30004	
Telephone: 770-667-2040	E-mail: dina.bazzill@eca-usa.com
Project Title: APC Towers, LLC Site - LV Turkeytown (KY-4170)	
SECTION 2: AGENCY INFORMATION	
Federal Agency: FCC	
Agency Contact Person (name & position): Ellen Saint Onge	
Telephone: 208-418-2002	E-mail: ellen.saintonge@fcc.gov
SECTION 3: PROJECT LOCATION	
Street Address (or other location): Dysart Way	
City: Crab Orchard	County: Rockcastle County
Lat (Dec/Deg): 37° 25' 50.0" N; 37.430563°	Long (Dec/Deg): 84° 27' 34.8" W; -84.459676°
SECTION 4: PROJECT TYPE (please check all that apply)	
Proposed Activity: ☐ Demolition ☐ Rehabilitation ☐ Structural Relocation ☐ Trails ☒ New Construction ☐ Land and/or Building Acquisition ☐ Sewer/Water Lines ☐ Roads/Bridges ☐ Non-Construction Planning/Refinancing ☐ Other (describe):	
SECTION 5: IDENTIFICATION OF KNOWN HISTORIC PROPERTIES	
OSA Preliminary Site Check #: FY26-13767	
Provide a detailed description of your project. If necessary, include it in your pdf attachments. APC Towers, LLC plans to construct a 250-foot tall overall height guyed-type telecommunications structure within a proposed 100-foot by 100-foot (30-meter by 30-meter) lease area. The proposed lease area would be accessible by a proposed approximate 302-foot long by 30-foot wide (92-meter by 9-meter) access/utility easement, and would include a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 1, a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 2, and a proposed approximate 143-foot long by 30-foot wide (44-meter by 9-meter) guy-wire easement 3.	
Is there anything over 50 years of age in or visible from the project location? ☒ Yes ☐ No	
SECTION 6: ATTACHMENTS - Attach All.	
All documentation should be labeled with the project name or site address. ☒ Clear, current photographs of the project site and anything over 50 years of age in or visible from it. ☒ Site map/plan indicating the exact location and boundaries of the project area. ☒ Detailed description of the project (may include plans, scope of work, and other available information.) ☒ Documentation of prior ground disturbance (e.g. maps, photographs, underground utility plans, etc.) ☒ Any known information about the history/use of the property and local significance. ☒ Results of your Preliminary Records Review from the Site Identification web portal.	

If you have questions, email Nicole.Konkol@ky.gov.



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

Section 106 Review

TCNS ID 308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Including Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way
Crab Orchard, Rockcastle County,
Kentucky

ECA Project No. 26-000456



SUBMITTED TO:

Kentucky Heritage Council
410 High Street
Frankfort, Kentucky 40601

PREPARED BY:

Environmental Corporation of America
1375 Union Hill Industrial Court, Suite A
Alpharetta, GA 30004



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

April 10, 2026

Kentucky Heritage Council
410 High Street
Frankfort, Kentucky 40601

Attention: **Craig Potts**
Executive Director and State Historic Preservation Officer

Subject: **Section 106 Review**
TCNS ID #308132
Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project No. 26-000456

Dear Mr. Potts:

Environmental Corporation of America's (ECA) client, APC Towers, LLC, is proposing to construct a telecommunications facility as described in the following FCC Form 620, New Tower (NT) Submission Packet. ECA understands that APC Towers, LLC plans to construct a 250-foot tall overall height guyed-type telecommunications structure within a proposed 100-foot by 100-foot (30-meter by 30-meter) lease area. The proposed lease area would be accessible by a proposed approximate 302-foot long by 30-foot wide (92-meter by 9-meter) access/utility easement, and would include a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 1, a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 2, and a proposed approximate 143-foot long by 30-foot wide (44-meter by 9-meter) guy-wire easement 3.

ECA has identified and evaluated Historic Properties, if any, within the Area of Potential Effect (APE) for visual and direct effects as directed in Section VI.D.1 and 2 of the Nationwide Programmatic Agreement, effective on March 7, 2005. We identified no Historic Properties listed in the National Register of Historic Places (NRHP) within the ¼-mile APE for visual effects or within the APE for direct effects.

According to the Kentucky Heritage Council (KHC) Kentucky Cultural Resources Map, no Historic Properties eligible for listing on the NRHP were identified within the ¼-mile APE for visual effects or the APE for direct effects.

Based on field observation and historic aerial photographs, a historic house with associated outbuildings is located on the parent tract. Aerials indicate that the house was constructed between 1960 and 1980. Based on the appearance and form of the house it was likely constructed in the mid-1960s. The house is a side-gabled bungalow with a brick veneer exterior. It has non-historic vinyl windows, and a non-historic metal door with an oval light. The front porch appears non-historic. It has a concrete slab foundation with a gabled roof and round decorative metal porch supports which mimic Doric columns. There is vinyl siding in the gable. The house has a large, non-historic, gabled addition on the southeast façade which wraps around to the northeast façade. The addition is clad in vinyl siding. There is one historic barn on the parcel to the northeast of the house. It is wood framed with a main, gabled mass and a shed wing. Siding is vertical wood and roof is covered in metal roofing. Doors consist of non-historic sliding doors and non-historic double doors. There are two non-historic outbuildings on the parcel. One is a pre-fabricated metal storage building and the other is a wood frame garage with vinyl siding.

The historic house and barn do not embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or embody high artistic values either individually or as contributing resources to a potential district. In addition, both buildings have undergone extensive alterations which have compromised their historic appearance. The barn is not representative of the types documented in the Agricultural and Domestic Outbuildings in Central and Western Kentucky, 1800-1865 (Criterion C). No information was uncovered to suggest that the property is associated with events that have made a significant contribution to broad patterns of our history or that the property was directly associated with or reflective of a historic period/theme in Kentucky's agricultural context (Criterion A). In addition, no information was uncovered to suggest the property is associated with lives of persons significant in our past (Criterion B) or that it has yielded or may be likely to yield information important in history or prehistory (Criterion D). As a result, it is the opinion of ECA that this property is not eligible for listing in the NRHP either individually or as a potential district, and there are no historic properties on the parent tract.

During a background database search conducted by the Kentucky Office of State Archaeology (KOSA) on March 5, 2026, (FY26-13767), four previously recorded archaeological surveys and eight previously recorded archaeological sites were identified within a 2-kilometer background research radius but outside of the APE for direct effects. During our fieldwork, we uncovered no archaeological sites. See the separate archaeological assessment for further details. Based on our findings, we recommend no further consultation under Section 106 Review of the National Historic Preservation Act for this proposed undertaking.

Based on this documentation, prepared in accordance with the Nationwide Programmatic Agreement effective March 7, 2005, ECA believes that this proposed undertaking would have no effect on any Historic Properties identified in accordance with the NPA. Therefore, ECA recommends a finding of No Historic Properties Affected for the proposed undertaking for the APE for visual and direct effects.

We are submitting this letter on behalf of APC Towers, LLC to seek concurrence with this finding and to comply with Federal Communications Commission (FCC) requirements as identified in 47 CFR 1.1307. We request your concurrence with our finding. Please contact Dina M. Bazzill at 252-412-7960 or dina.bazzill@eca-usa.com with questions or comments.

Sincerely,
Environmental Corporation of America

A handwritten signature in black ink, appearing to read "Lex Chesnut". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Lex Chesnut, MSc
Senior Project Manager

A handwritten signature in black ink, appearing to read "Shannon Lowman". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Shannon Lowman, MA, RPA
Principal Investigator

Notification Date:

File Number:

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): 0023897788
4) Name: APC Towers, LLC

Contact Name

5) First Name: Jonathan	6) MI:	7) Last Name: Greene	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 8601 Six Forks Road, Suite 250	
12) City: Raleigh		13) State: NC	14) Zip Code: 27615
15) Telephone Number: (704)724-8382		16) Fax Number:	
17) E-mail Address: jgreene@apctowers.com			

Consultant Information

18) FCC Registration Number (FRN): 0011662921
19) Name: ECA-USA

Principal Investigator

20) First Name: Dina	21) MI:	22) Last Name: Bazzill	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box: 30004	And /Or	26) Street Address: 1375 Union Hill Industrial Ct Suite A	
27) City: Alpharetta		28) State: GA	29) Zip Code: 30004
30) Telephone Number: (770)667-2040		31) Fax Number:	
32) E-mail Address: dina.bazzill@eca-usa.com			

Professional Qualification

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

Additional Staff

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

If "YES," complete the following:

36) First Name: Lex	37) MI:	38) Last Name: Chesnut	39) Suffix:
40) Title: MSc - Project Manager			
41) Areas of Professional Qualification: (☒) Archaeologist () Architectural Historian () Historian () Architect () Other (Specify) _____			

36) First Name: Shannon	37) MI:	38) Last Name: Lowman	39) Suffix:
40) Title: MA, RPA - Principal Investigator			
41) Areas of Professional Qualification: (☒) Archaeologist () Architectural Historian (☒) Historian () Architect () Other (Specify) _____			

36) First Name: Chase	37) MI:	38) Last Name: Rodriguez	39) Suffix:
40) Title: MA, RPA - Project Archaeologist			
41) Areas of Professional Qualification: (☒) Archaeologist () Architectural Historian () Historian () Architect () Other (Specify) _____			

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **308132**

Site Information

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

3) Site Name: **APC Towers, LLC Site - LV Turkeytown (KY-4170)**

4) Site Address: **Dysart Way**

5) Detailed Description of Project:

The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

6) City: **Crab Orchard**

7) State: **KY**

8) Zip Code: **40419**

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

10) Nearest Crossroads: **Dysart Way and Gum Sulpher Road**

11) NAD 83 Latitude (DD-MM-SS.S): **37-25-50.0**

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

12) NAD 83 Longitude (DD-MM-SS.S): **084-27-34.8**

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

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **76.2** () Feet (**X**) Meters

14) Tower Type (Select One):

(**X**) Guyed lattice tower

() Self-supporting lattice

() Monopole

() Other (Describe):

Project Status

15) Current Project Status (Select One):

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

() Construction has commenced, but is not completed

Construction commenced on: _____

() Construction has been completed

Construction commenced on: _____

Construction completed on: _____

Determination of Effect

14) Direct Effects (Select One):

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

15) Visual Effects (Select One):

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

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Yes</u> (☐) <u>No</u>
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>308132</u>		Number of Tribes/NHOs: <u>11</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Bad River Band of Lake Superior Tribe of Chippewa Indians

Contact Name

5) First Name: Lawrence	6) MI:	7) Last Name: Plucinski	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
(☐) Replied/No Interest	
(☐) Replied/Have Interest	
(☐) Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
(☐) Replied/No Interest	
(☐) Replied/Have Interest	
(☐) Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es (☐) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>308132</u>		Number of Tribes/NHOs: <u>11</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
(☐) Replied/No Interest	
(☐) Replied/Have Interest	
(☐) Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted <u>03/12/2026</u>	11) Date Replied <u>03/12/2026</u>
(☐) No Reply	
(☒) Replied/No Interest	
(☐) Replied/Have Interest	
(☐) Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>308132</u>		Number of Tribes/NHOs: <u>11</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Omaha Tribe of Nebraska

Contact Name

5) First Name: Jarell	6) MI:	7) Last Name: Grant	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Andrea	6) MI: A	7) Last Name: Hunter	8) Suffix: PhD
9) Title: THPO			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>308132</u>		Number of Tribes/NHOs: <u>11</u>
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: <u>0</u>

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Peoria Tribe of Indians of Oklahoma

Contact Name

5) First Name: Burgundy	6) MI: J	7) Last Name: Fletcher	8) Suffix:
9) Title: Tribal Historic Preservation Officer			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Ponca Tribe of Indians of Oklahoma

Contact Name

5) First Name: Liana	6) MI: S	7) Last Name: Hesler	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: 308132		Number of Tribes/NHOs: 11
2b) Tribes/NHOs contacted through an alternate system:		Number of Tribes/NHOs: 0

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted 03/11/2026	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribe/NHO Contacted Through TCNS

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

Contact Name

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

Dates & Response

10) Date Contacted 03/11/2026	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>308132</u> Number of Tribes/NHOs: <u>11</u>	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: <u>0</u>	

Tribe/NHO Contacted Through TCNS

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

Contact Name

5) First Name: Sherri	6) MI:	7) Last Name: Clemons	8) Suffix:
9) Title: THPO			

Dates & Response

10) Date Contacted <u>03/11/2026</u>	11) Date Replied _____
(☒) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Other Tribes/NHOs Contacted

Tribe/NHO Information

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

Contact Name

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

Contact Information

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

Dates & Response

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

Historic Properties

Properties Identified

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

Historic Property

4) Property Name:
5) SHPO Site Number:

Property Address

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

Status & Eligibility

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

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

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):
2) Name: Rockcastle County Fiscal Court

Contact Name

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

Contact Information

8) P.O. Box: 755	And /Or	9) Street Address:	
10) City: Mt. Vernon		11) State: KY	12) Zip Code: 40456
13) Telephone Number: (606)256-2856		14) Fax Number:	
15) E-mail Address: hholbrook@rockcastlecountyky.com			
16) Preferred means of communication: (☒) E-mail () Letter () Both			

Dates & Response

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

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

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

Consulting Party

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

Contact Name

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

Contact Information

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

Dates & Response

18) Date Contacted _____	19) Date Replied _____
() No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Designation of SHPO/THPO

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

SHPO/THPO

Name: Kentucky Heritage Council

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: Shannon	MI:	Last Name: Lowman	Suffix:
Signature: 			Date: 4/10/2026

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

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

ATTACHMENT A

RESUMES ON FILE AT KENTUCKY HERITAGE COUNCIL



Dina M. Bazzill, MA, RPA

Principal Archaeologist/Historian
1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004
(770) 667-2040 Ext. 111
dina.bazzill@eca-usa.com

EDUCATION

East Carolina University
M.A., Maritime Studies
Graduated: May 2007
GPA: 3.89/4.0

Greenville, NC

Southwest Missouri State University
B.A., Anthropology, minor in Antiquities
Graduated: May 2004, Magna Cum Laude
Grade-Point Average: 3.8/4.0

Springfield, MO

PROFESSIONAL CERTIFICATIONS

Secretary of the Interior's 36CFR61 Professional Qualification Standards for Archaeology and History since 2007

Register of Professional Archaeologist since 2007

Section 106 Training Certification from SRI Foundation, 2009

Advanced Section 106 Training Certification from the Advisory Council on Historic Preservation, 2009

NEPA Compliance and Cultural Resources Training Certification from the National Preservation Institute, 2009

Section 4 (f) Compliance for Historic Properties Training Certification from the National Preservation Institute, 2009

Identification and Management of Traditional Cultural Properties Training Certification from the National Preservation Institute, 2009

Tribal Consultation Training Certification from the SRI Foundation, 2010

RELATED EMPLOYMENT

June 2007 – Present **Environmental Corporation of America**

Alpharetta, GA

Position: Principal Investigator

Responsibilities:

- Archaeological and historical research.
- Conducting archaeological and historical site assessments for Section 106 compliance.
- Authoring Section 106/archaeological assessment/phase one environmental impact reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies.

REPRESENTATIVE EXPERIENCE

June 2007 - Present **Section 106 Cell Tower Evaluations**

USA

Dina M. Bazzill, Principal Archaeologist/Historian

Goals: The scope of work for these projects has included archaeological and historic standing structures site assessments for the Section 106 review process in forty different states.

May/June 2011 **Chicago and North Western Railway Bridge Replacement: Phase I Underwater Archaeological Survey**

Oshkosh, WI

Dina M. Bazzill, Principal Archaeologist/Historian

Goals: The scope of work for this project included a Phase I side-scan sonar survey for the replacement of the Chicago and North Western Railway Line over the Fox River in Oshkosh, Winnebago County, Wisconsin. The side-scan sonar survey was performed by Jerry Guyer of Pirate's Cove Diving Inc. Dina M. Bazzill performed the necessary research, analyzed the side-scan sonar data, and prepared a report in conformance with Wisconsin Historical Society Guidelines.

- April/May 2010 **Snowbird Youth Center Phase I** Robbinsville, NC
Dina M. Bazzill, Field Director and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a survey for a proposed Eastern Band of Cherokee Indians Youth Center located on Forest Service land in Robbinsville, North Carolina. High probability landforms were tested as per Forest Service archaeological testing guidelines. Shovel tests were excavated at 65-foot intervals, where appropriate. Key staff members included Dina M. Bazzill, Field Director and John P. McCarthy, Principal Director. Dina M. Bazzill authored the report, with the assistance of John P. McCarthy.
- April/May 2010 **CabeJail Phase I - EBCI Reservation** Cherokee, NC
Dina M. Bazzill, Project Archaeologist and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a survey for a proposed jail located on the Eastern Band of Cherokee Indians reservation in Cherokee, North Carolina. The entire proposed property was systematically surveyed utilizing guidelines provided by the EBCI THPO office. Shovel tests were excavated at 65-foot intervals, where appropriate. Key staff members included Dina M. Bazzill, Project Archaeologist and John P. McCarthy, Principal Director. John P. McCarthy authored the report, with the assistance of Dina M. Bazzill.
- October /November 2009 **Old #4 Sewer Line Replacement - EBCI Indian Reservation** Cherokee, NC
Dina M. Bazzill, Field Director and John P. McCarthy, Principal Investigator
Goals: The scope of work for this project included a systematic survey for a proposed sewer line replacement located on the Eastern Band of Cherokee Indian Reservation in Cherokee, North Carolina. A pedestrian survey was conducted, and shovel tests were conducted as per EBCI THPO office guidelines. This entailed excavating shovel tests at 65-foot intervals, where appropriate. Crew members included Dina M. Bazzill, Field Director, who supervised Mary E. Seagrave, field technician, Dave McGlothlin, field technician, and Landon Abernethy, field technician. John P. McCarthy oversaw the fieldwork and the report preparations, with assistance from Dina M. Bazzill.
- July 2009 **Phase II Archaeological Site Delineation** Lewis Creek, IN
Dina M. Bazzill, Principal Investigator
Goals: The scope of work for this project included delineating a circa 1840 pioneer homestead located in Lewis Creek, Indiana in order to determine National Register of Historic Places eligibility. Dina M. Bazzill served as Principal Investigator and supervised Mary E. Seagrave, Project Archaeologist. Artifacts recovered from the field work were analyzed and photographed by Dina M. Bazzill. A Section 106 Review was prepared by Dina M. Bazzill and submitted to the Indiana State Historic Preservation Office for their review and comment.
- April/May 2008 **City of Norcross - Proposed Greenspace Park** Norcross, GA
Dina M. Bazzill, Field Director and Principal Investigator
Goals: The scope of work for this project includes a Phase I survey of a seven acre tract of land in the City of Norcross, Georgia. ECA evaluated archaeological and historic resources present within the survey area and advise the City of Norcross on how best to preserve these resources and utilize them for educational purposes. In addition, a comprehensive user friendly report was produced.
- November 2007 **Deep Testing for Archaeological Deposits** Nashville, TN
Artis West, Principal Investigator
Goals: The scope of work for this project included placing 10-foot deep two trenches with the proposed APE for direct effects for a proposed cell tower located adjacent to the Harpeth River in Nashville, Tennessee. Backfill soil was selectively sampled and negative findings were recorded. A report summarizing the findings was prepared and accepted by the Tennessee Historical Commission, Division of Archaeology.



Alexa Chesnut, MSc

Project Manager
1375 Union Hill Industrial Court, Suite A
Alpharetta, GA 30004
lex.chesnut@eca-usa.com
(770) 667-2040

EDUCATION

University of York

Master of Science (MSc), Funerary Archaeology
January 2026

York, England, UK

University of Texas at Austin

Bachelor of Arts (BA), Anthropology
Bachelor of Arts (BA), Iberian and Latin American Languages and Cultures
December 2020

Austin, TX

PROFESSIONAL EXPERIENCE

November 2025 – Present

Environmental Corporation of America

Alpharetta, GA

Position: Project Manager

Responsibilities:

- Authoring Section 106 Review/Archaeological Assessment reports
- Preparation of Species Impact Reports/Information Biological Assessments
- Management and completion of NEPA Environmental Checklists/Documentation
- Conducted Phase I environmental survey of sites.

May 2022 – July 2024

SWCA Environmental Consultants

San Antonio, TX

Position: Cultural Resources Technician

Responsibilities:

- Participated in Phase I, II, and III archaeological projects in Texas and Oklahoma.
- Developed specialized skills such as excavation of human remains, deep testing, and curation.

January 2022 – May 2022

Tennessee Valley Archaeological Research

Huntsville, AL

Position: Archaeology Field Technician

Responsibilities:

- Participated in Phase I archaeological projects across the Southeastern United States.



Shannon Lowman, MA, RPA

Principal Archaeologist

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

(770) 667-2040

shannon.lowman@eca-usa.com

EDUCATION

Georgia State University

M.A., Biological Archaeology, May 2017

Atlanta, GA

University of Georgia

B.A., Archaeology and Anthropology, 2013

Athens, GA

PROFESSIONAL CERTIFICATIONS

Secretary of the Interior's 36CFR61 Professional Qualification Standards archaeology and history
Register of Professional Archaeologists since 2017

Georgia Council of Professional Archaeologists since 2021

PROFESSIONAL EXPERIENCE

July 2017 – Present

Environmental Corporation of America

Alpharetta, GA

Position: SOI qualified Principal Archaeologist

Responsibilities:

Conducting archaeological and historical background research and site assessments for Section 106 compliance; Authoring Section 106/archaeological assessment/phase one environmental assessment reports for submission to clients, SHPO offices, tribes, consulting parties, and other state agencies; Authoring Fish and Wildlife species impact reports; Producing NEPA reports; Directing field crews and authoring reports for state DOT projects; Principal review of Section 106 reports; Conducted archaeological research and excavation in the following states: Georgia, Louisiana, Mississippi, Illinois, Kentucky, North Carolina, Indiana, Texas, Arkansas, Tennessee, Virginia, South Carolina, Oklahoma, Kansas, California, Florida, New Mexico, Nevada, Arizona, Colorado, Montana, Idaho, Washington, Oregon, Wyoming, Puerto Rico

August 2016 – May 2017

Georgia State University

Atlanta, GA

Position: Graduate Assistant

Responsibilities:

Teaching Assistant and Writing Across the Curriculum consultant for Human Variation and Research Assistant for the archiving of past archaeological records.

June 2016 – August 2016

Tumilaca la Chimba Archaeology Project

Moquegua, Peru

Position: Graduate Field Archaeologist

Responsibilities:

Supervised local field technicians and undergraduate students; Conducted archaeological research and excavation of mortuary contexts; Collected data pertinent to Master's thesis publication; Completed osteological analysis on remains excavated from current and past field seasons; Sorted, labeled, and cataloged prehistoric artifacts

August 2012 – May 2013

UGA Laboratory of Archaeology

Athens, GA

Position: Georgia Archaeological Site File Technician

Responsibilities:

Completed state site searches for various CRM firms; Coded and filed site forms and reports;
Uploaded and mapped new sites on GNARGIS database and quad maps

June- July 2012

University of Georgia Field School

Lumpkin, GA

Position: Field student at Singer-Moye Indian Mound Site

REPRESENTATIVE PROJECT EXPERIENCE

Over 300 Telecommunication Compliance Projects Managed

Federal Communications Commission NEPA Investigations

Project Manager for Hundreds of Projects Nationwide

State Department of Transportation Section 106 Compliance

Project Manager and Project Principal Investigator Participation in Several State and Federally Funded DOT Roadwork Projects, Specifically in North Carolina and Georgia



Chase Rodriguez, MA, RPA

Project Archaeologist

1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004

(770) 527-5507

chase.rodriguez@eca-usa.com

EDUCATION

Georgia State University
M.A., Anthropology, 2025

Atlanta, GA

Kennesaw State University
B.A., Anthropology, 2023

Kennesaw, GA

PROFESSIONAL EXPERIENCE

June 2025 – Present **Environmental Corporation of America**

Alpharetta, GA

Position: Staff Archaeologist

Responsibilities:

Conducting archaeological and historical background research and site assessments for Section 106 compliance; Authoring Section 106/archaeological assessment/phase one environmental assessment reports for submission to clients. Traveling weekly to conduct archaeological research for projects. Employed excavation techniques through pedestrian surveys and shovel test pits to identify and assess cultural resources. Ensured project accuracy and completeness by maintaining detailed and legible field notes and photographs. Participated in report preparations contributing to site forms and resources assessment while adhering to established deadlines. Maintained excellent communication and collaboration with team members throughout projects.

May 2024 – June 2024 **UNCW Archaeological Field School**

Wilmington, NC

Position: Field School Student

Responsibilities:

Investigated archaeological and historical heritage of the Cape Fear region. Uncovering lives of enslaved people during the 1700s. Archaeological surface surveying. Excavation techniques, including shovel testing, shovel scraping, and leveling soil with trowels. Record-keeping and mapping the levels of units. Testing the color of soil using a Munsell Color Chart. Conducting field trips to local archaeological sites. Lab artifact processing, including cleaning artifacts, inventorying artifacts, float sampling, and processing photographs of unit levels. Use of the total station for mapping points of units.

ATTACHMENT B

SITE INFORMATION

1: Photographs

The following photographs were taken using a digital camera from a height of 5'10".

- a:** Directional photographs taken from the Proposed Tower Site.
- b:** Photographs of all listed or eligible properties within the Areas of Potential Effects, if any.
- c:** Photographs from listed or eligible properties within the Area of Potential Effects looking toward the proposed tower site, if any.
- d:** Google Earth 2024 aerial photograph showing APE for visual effects.



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area



E: Northerly Overview of the Proposed Lease Area



F: Southerly Overview of the Proposed Lease Area



G: Northeasterly View of the Proposed Access/Utility Easement



H: Southwesterly View of the Proposed Access/Utility Easement



I: Northwesterly View of the Proposed Access/Utility Easement



J: Southeasterly View of the Proposed Access/Utility Easement



K: Southerly Overview of the Proposed Guy Easement 1



L: Northwesterly Overview of the Proposed Guy Easement 2



M: Northeasterly Overview of the Proposed Guy Easement 3



N: Overview of Shovel Test Pit Two (STP2)



O: Soil Profile of Shovel Test Pit Two (STP2)



P: Northeasterly View of Historic Barn on Parent Tract



Q: Northeasterly View of Non-historic Shed on Parent Tract



R: Southeasterly View of Non-historic Garage on Parent Tract



S: Southeasterly View of Historic House on Parent Tract



Source: Google Earth 2024

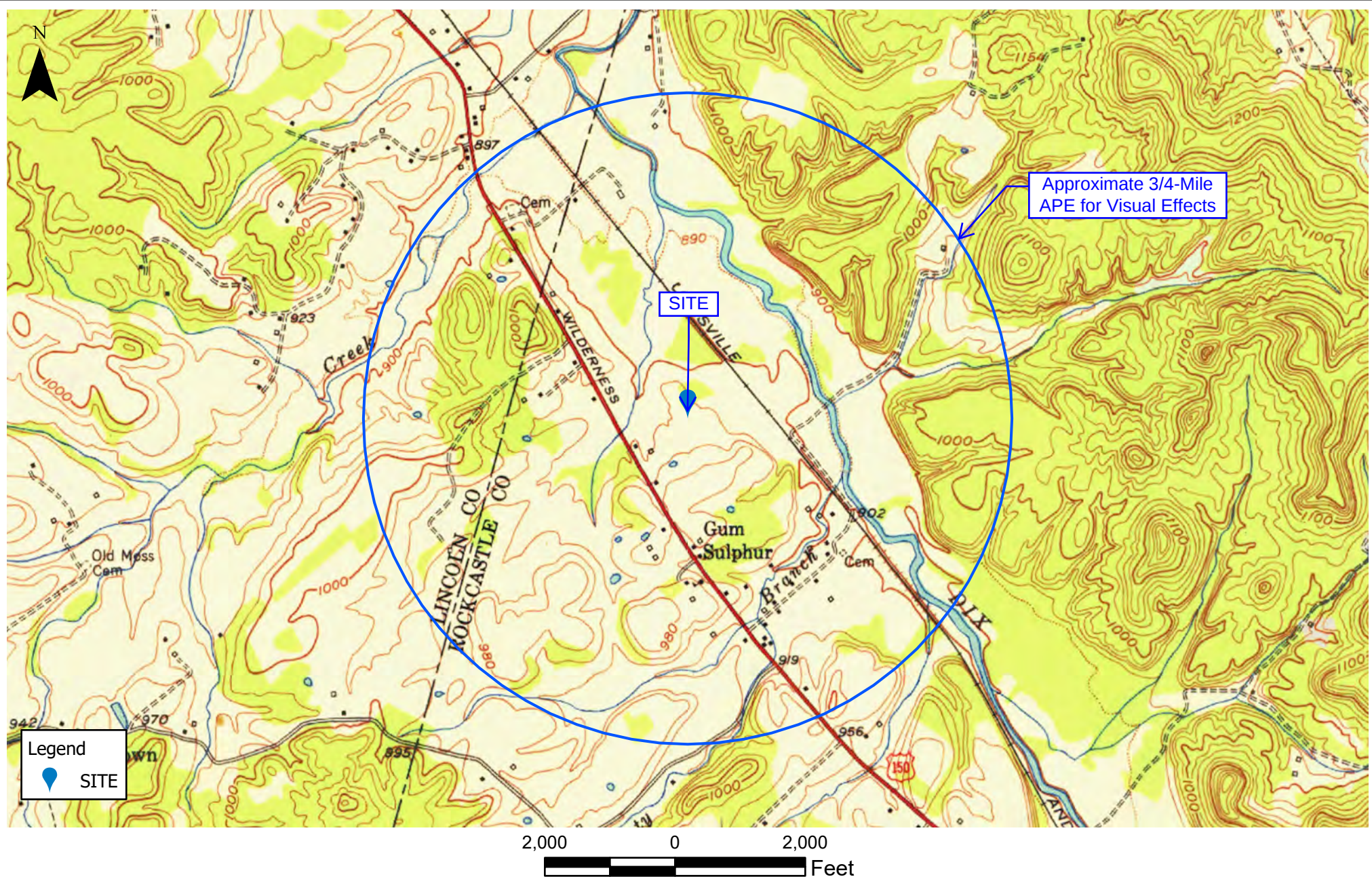
Attachment B-1d: Aerial Photograph

ECA ID: 26-000456

ECA

2: Maps

- a:** 7.5-Minute topographic maps showing the Area of Visual Effects and the location of any identified historic properties.
- b:** 7.5-Minute topographic map showing the Area of Direct Effects including any new access roads or other easements.
- ci-ii:** Site Vicinity Plan showing the location of the proposed tower site, any new access roads, easements, additional structures, utility lines, fences and shovel test pit excavations.
- d:** State Map showing site location.



Source: USGS Topographic Map 7.5-Minute Series, *Brodhead, KY* (1953)

APE for Visual Effects = 3/4 Mile

Attachment B-2a: APE for Visual Effects

ECA ID: 26-000456





Source: USGS Topographic Map 7.5-Minute Series, *Brodhead, KY* (1953)

Attachment B-2b: APE for Direct Effects

ECA ID: 26-000456



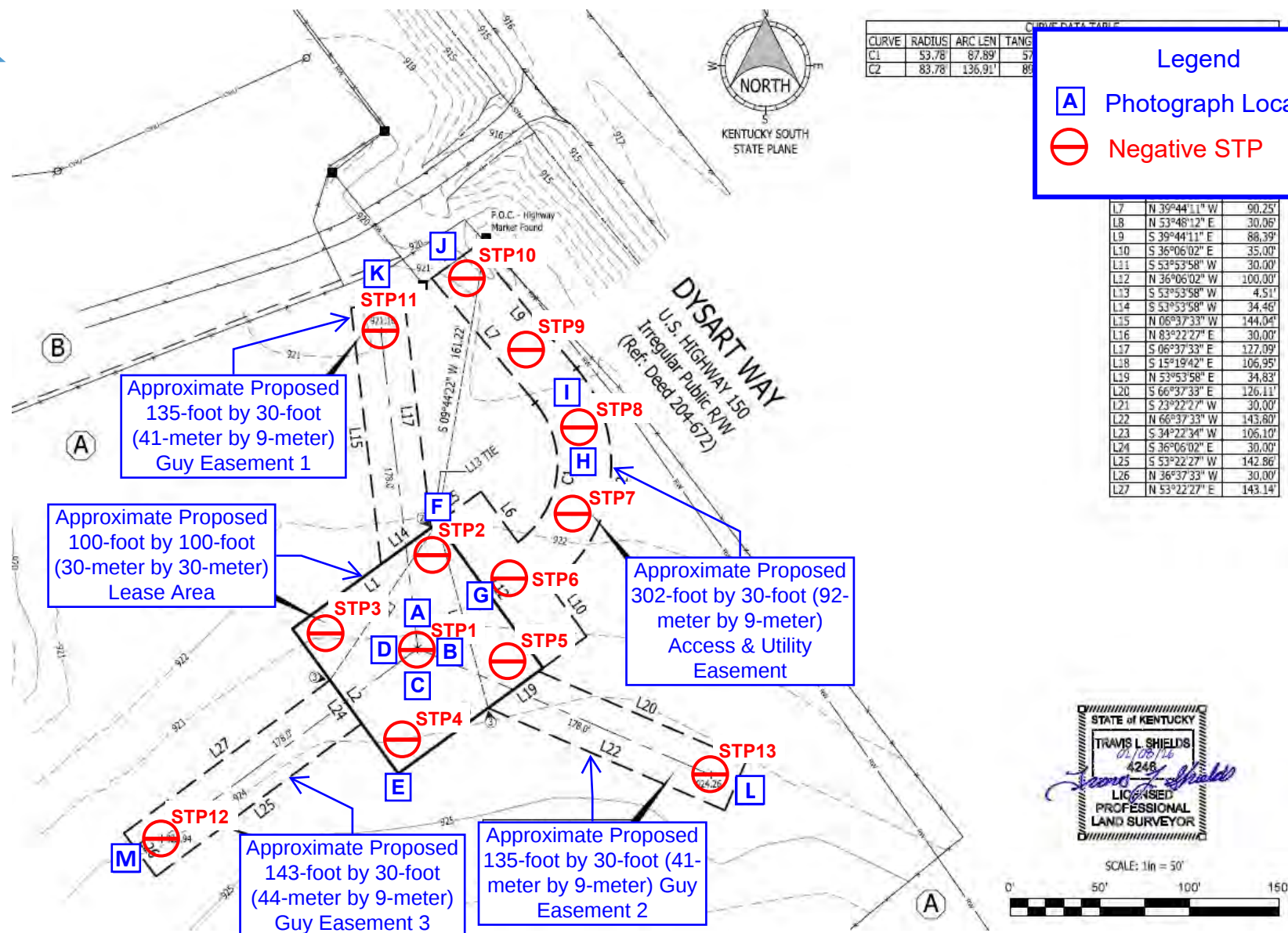


CURVE	RADIUS	ARC LEN	TANG
C1	53.78	87.89	57
C2	83.78	136.91	86

Legend

- A Photograph Location
- ⊖ Negative STP

L7	N 39°44'11" W	90.25'
L8	N 53°48'12" E	30.06'
L9	S 39°44'11" E	88.39'
L10	S 36°06'02" E	35.00'
L11	S 53°53'58" W	30.00'
L12	N 36°06'02" W	100.00'
L13	S 53°53'58" W	4.51'
L14	S 53°53'58" W	34.46'
L15	N 06°37'33" W	144.04'
L16	N 83°22'27" E	30.00'
L17	S 06°37'33" E	127.09'
L18	S 15°19'42" E	106.95'
L19	N 53°53'58" E	34.83'
L20	S 66°37'33" E	126.11'
L21	S 23°22'27" W	30.00'
L22	N 66°37'33" W	143.80'
L23	S 34°22'34" W	106.10'
L24	S 36°06'02" E	30.00'
L25	S 53°22'27" W	142.86'
L26	N 36°37'33" W	30.00'
L27	N 53°22'27" E	143.14'

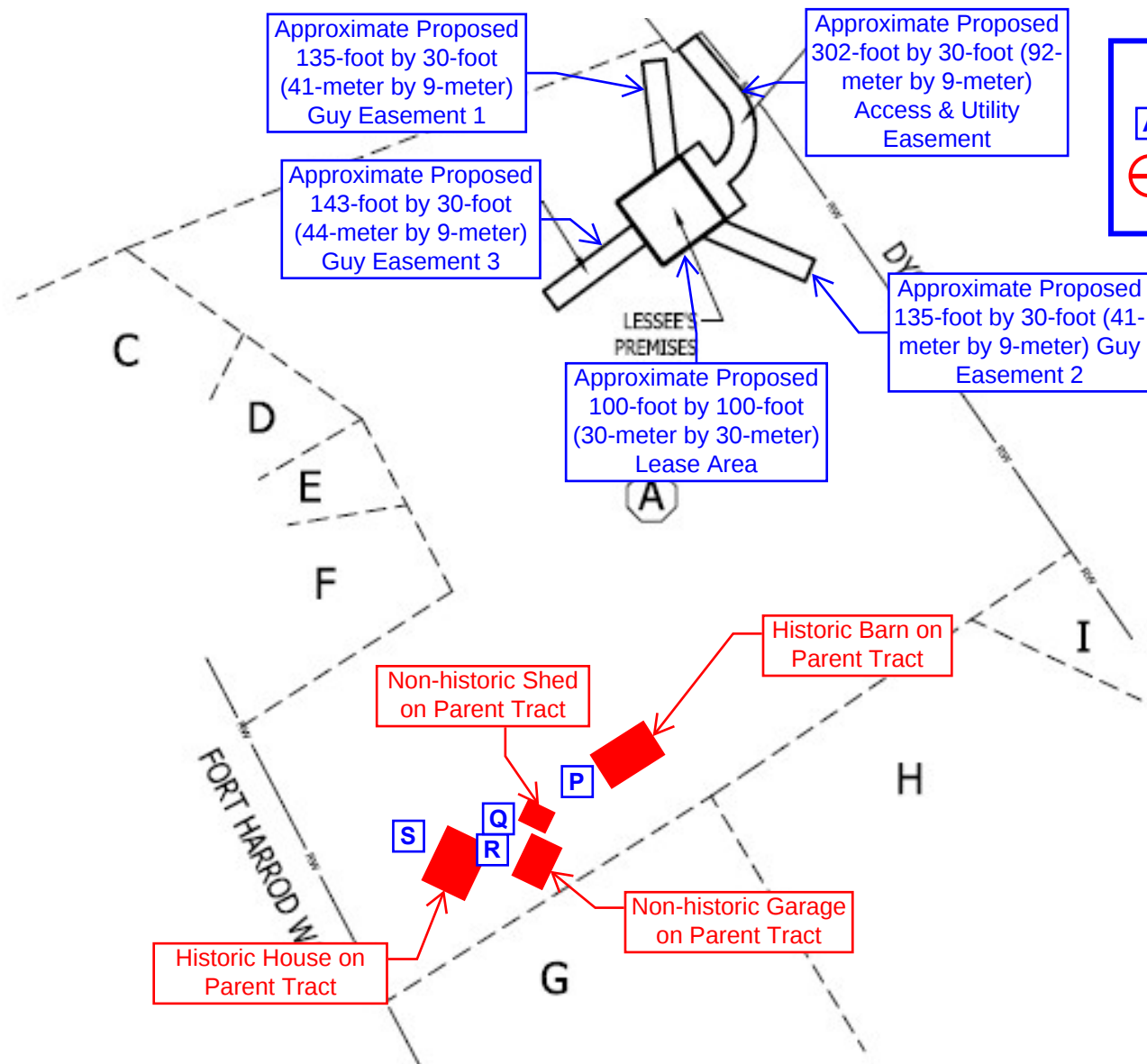


Source: Survey Drawing provided by Applicant

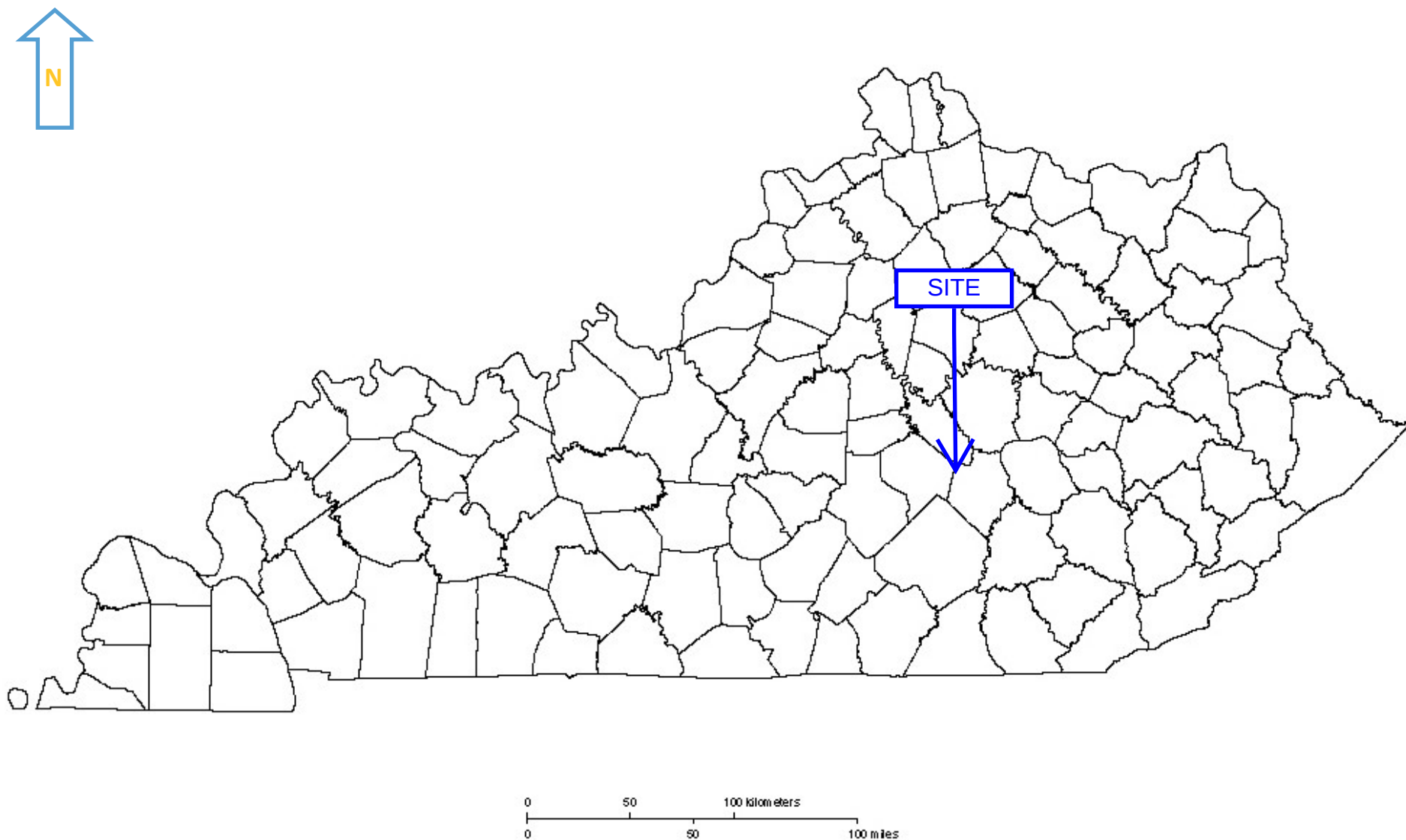
Attachment B-2ci: Site Vicinity Plan

ECA ID: 26-000456

ECA



Source: Survey Drawing provided by Applicant



Source: Yellowmaps.com (2021)

Attachment B-2d: State Map

ECA ID: 26-000456



ATTACHMENT C

DETERMINATION OF EFFECT

1: Areas of Potential Effects

a: Direct Effects

The APE for direct effects is limited to the site of the proposed tower and surrounding easements, as described in the Nationwide Programmatic Agreement.¹ For this particular undertaking the area of disturbance would include a proposed 100-foot by 100-foot (30-meter by 30-meter) lease area, a proposed approximate 302-foot long by 30-foot wide (92-meter by 9-meter) access/utility easement, a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 1, a proposed approximate 135-foot long by 30-foot wide (41-meter by 9-meter) guy-wire easement 2, and a proposed approximate 143-foot long by 30-foot wide (44-meter by 9-meter) guy-wire easement 3. The general APE for direct effects is shown in Attachment B-2b and Attachment B-2ci-ii.

b: Visual Effects

The APE for visual effects is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of Historic Properties.² Unless otherwise noted, the area of potential effect for visual effect is as described in the Nationwide Programmatic Agreement:

- If the proposed tower is 200 feet or less in overall height, the APE is ½ mile in radius from the proposed tower.
- If the proposed tower is more than 200 feet in height and no more than 400 feet in height, the APE is ¾-mile in radius from the proposed tower.
- If the proposed tower is more than 400 feet in height, the APE is 1 ½ miles in radius from the proposed tower.³

The APE for visual effects is shown in Attachment B-2a: Area of Visual Effect.

2: Mitigation of Effect

a: Copies of correspondence and summaries of oral communications with SHPO/THPO and any consulting parties including descriptions of alternatives that have been considered in order to avoid, minimize, or mitigate any adverse effects.

Not Applicable.

¹ Section VI.C.2 of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

² Section II.3 of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

³ Section VI.C.4.a-c of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222).

ATTACHMENT D

TRIBAL AND NHO INVOLVEMENT

ECA made notification through the FCC Tower Construction Notification System (TCNS) in order to identify Indian Tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the tower project within the APE for direct or visual effects. All Tribes that have expressed an interest in the proposed undertaking and requested a copy of this submission packet will be provided with a copy, with the exception of those Tribes that have elected to receive no documentation. All interested Tribes will be provided an opportunity to comment in accordance with the FCC's rules. Copies of all relevant documents received to date, including correspondence, are provided in the following pages.

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name: LV Turkeytown			Site Number: KY-4170			NOO Date: 03/13/2026	
TCNS #: 308132			ECA Project#: 26-000456			ECA PM: ARC	
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of FCC Escalation	Tribal Response Date	Tribal Response
1	Omaha Tribe of Nebraska		Electronic	OmahaTribelcc@outlook.com ; jarell.grant@theomahatribe.com			
2	Ponca Tribe of Indians of Oklahoma		Electronic	106notifications@ponca-nsn.gov			
3	Eastern Band of Cherokee Indians		Electronic	syerka@nc-chokeee.com			
4	Bad River Band of Lake Superior Chippewa Indians		Electronic	thpo@badriver-nsn.gov ; deputythpo@badriver-nsn.gov			
5	Cherokee Nation		Electronic	historicpreservation@cherokee.org ; gwen-terrapin@cherokee.org			
6	Osage Nation		Electronic	TCNS@osagenation-nsn.gov ; christinacheshewalla@osagenation-nsn.gov			
7	United Keetoowah Band of Cherokee Indians		Electronic	tcns@ukb-nsn.gov ; rcain@ukb-nsn.gov			
8	Eastern Shawnee Tribe of Oklahoma	NA	Mail	celltower@estoo.net	NA	03/12/2026	Cleared via TCNS
9	Wyandotte Nation		Electronic	sclemons@wyandotte-nation.org			
10	Peoria Tribe of Indians of Oklahoma		Electronic	thpo@peoriatribe.com			
11	Shawnee Tribe		Electronic	tcns@shawnee-tribe.com			

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Thursday, March 5, 2026 20:01
To: tribal.notify
Subject: Proposed Tower Structure Info - Email ID #9458915

Dear Dina M Bazzill,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 03/05/2026

Notification ID: 308132

Tower Owner Individual or Entity Name: APC Towers, LLC

Consultant Name: Dina M Bazzill

Street Address: 1375 Union Hill Industrial Court

City: Alpharetta

State: GEORGIA

Zip Code: 30004

Phone: 770-667-2040

Email: tribal.notify@eca-usa.com

Structure Type: GTOWER - Guyed Structure Used for Communication Purposes

Latitude: 37 deg 25 min 50.0 sec N

Longitude: 84 deg 27 min 34.8 sec W

Location Description: Dysart Way

City: Crab Orchard

State: KENTUCKY

County: ROCKCASTLE

Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Ground Elevation: 281.6 meters

Support Structure: 74.7 meters above ground level

Overall Structure: 76.2 meters above ground level

Overall Height AMSL: 357.8 meters above mean sea level

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Friday, March 13, 2026 03:01
To: tribal.notify
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER
CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9460796

Dear Applicant:

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

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

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

1. THPO Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 433) - electronic mail
Exclusions: Please note we have updated procedures. Please email us at Omahatribefcctcns@outlook.com

2. THPO Liana S Hesler - Ponca Tribe of Indians of Oklahoma - 101 White Eagle Drive Ponca City, OK - 106notifications@ponca-nsn.gov - 580-382-6633 - electronic mail

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

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

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

4. THPO Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) Olanah, 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. Gwen Terrapin - Cherokee Nation - (PO Box: 948) Tahlequah, OK - historicpreservation@cherokee.org; gwen-terrapin@cherokee.org - 918-772-4165 - electronic mail

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

Wado,
Cherokee Nation

6. THPO Andrea A Hunter PhD - Osage Nation - 627 Grandview Avenue Osage Nation Historic Preservation Office Pawhuska, OK - TCNS@osagenation-nsn.gov; christinacheshewalla@osagenation-nsn.gov - 918-287-5328 - electronic mail

Exclusions: The Osage Nation has an interest in this proposed cell tower project. Do not send the FCC Form 620. Please send project submittals to Fawn Cheshewalla: TCNS@osagenation-nsn.gov or contact the ONHPO at (918) 287-5328. Consultation Procedures can be found at osageculture.com. Thank you.

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

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

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

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

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

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

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

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

9. THPO Sherri Clemons - Wyandotte Nation - 8 Turtle Drive Wyandotte, OK - sclemons@wyandotte-nation.org - 918-678-6344 - electronic mail

Exclusions: 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.

10. Tribal Historic Preservation Officer Burgundy J Fletcher - Peoria Tribe of Indians of Oklahoma - 118 S. Eight Tribes Trail Miami, OK - thpo@peoriatribe.com - 918-540-2535 (ext: 9234) - electronic mail

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

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

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

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

Thank you for the opportunity to comment.

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

12. Chief of Staff, Deputy SHPO Theodore Hild - Illinois Historic Preservation Agency - 1 Old State Capitol Plaza Springfield, IL - ted_hild@ihpa.state.il.us - -- - electronic mail

13. SHPO Robert E Carter Jr - Department of Natural Resources - 402 West Washington Street Indiana Govt. Center South, Room W256 Indianapolis, IN - dhp@dnr.state.in.us - 317-232-1646 - electronic mail

14. Deputy SHPO Jon C Smith - Department of Natural Resources - 402 West Washington Street Indiana Govt. Center South, Room W256 Indianapolis, IN - jsmith@dnr.state.in.us - 317-232-1646 - electronic mail

15. Environmental Review Coordinator Jill Howe - Kentucky Heritage Council - 410 High Street Frankfort, KY - jill.howe@ky.gov - 502-564-7005 - electronic mail

16. SHPO Dru Buntin Ms - Acting Director, State Department of Natural Resources - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-4732 - electronic mail

17. Deputy SHPO David Kelly Mr - Division of State Parks Director - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-9392 - electronic mail

18. Deputy SHPO Toni M Prawl Dr - State Historic Preservation Office (Missouri) - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-7858 - electronic mail

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

20. 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

21. SHPO & Executive Director Donna Neary - Kentucky Heritage Council - 300 Washington Street Frankfort, KY - donna.neary@ky.gov - 502-564-7005 - electronic mail

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

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

Notification Received: 03/05/2026

Notification ID: 308132

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: APC Towers, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: GTOWER - Guyed Structure Used for Communication Purposes

Latitude: 37 deg 25 min 50.0 sec N
Longitude: 84 deg 27 min 34.8 sec W
Location Description: Dysart Way
City: Crab Orchard
State: KENTUCKY
County: ROCKCASTLE

Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Ground Elevation: 281.6 meters
Support Structure: 74.7 meters above ground level
Overall Structure: 76.2 meters above ground level
Overall Height AMSL: 357.8 meters above mean sea level

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

<https://www.fcc.gov/wireless/available-support-services>

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

Thank you,
Federal Communications Commission

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

ATTACHMENT E

HISTORIC PROPERTIES

Method of Identification:

The following sources and records were reviewed to identify Historic Properties within the Area of Potential Effect (APE) for visual and direct effects:

- i. Properties listed in the National Register;
- ii. Properties formally determined eligible for listing by the Keeper of the National Register;
- iii. Properties that the SHPO/THPO certifies are in the process of being nominated to the Nation Register;
- iv. Properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local government representing the Department of Housing and Urban Development (HUD); and
- v. Properties listed in the SHPO/THPO Inventory that the SHPO/THPO has previously evaluated and found to meet the National Register Criteria, and that are identified accordingly in the SHPO/THPO Inventory.⁴
- vi. General Phase I Archaeology Survey (See separate report)

⁴ Section VI.D.1.a.i-v of the Nationwide Programmatic Agreement (WT Docket No. 03-128; FCC-222)

1: Historic Properties Identified in the APE for Direct Effects

a: Historic Properties identified within the APE for direct effects.

If any Historic Properties were identified, see *Historic Properties* pages within the FCC Form 620.

b: Historic Properties within the APE, not listed in “a,” that ECA Considers to be Eligible for Listing in the National Register as a result of ECA’s research.

ECA has identified no Historic Properties within the area for direct effects.

c: Description of techniques and methodology used to identify Historic Properties within the APE for direct effects.

See *Archaeological Assessment*, Attachment E-1c.

2: Historic Properties Identified in the APE for Visual Effects

- a: Historic Properties Identified in the APE for visual effects that are listed in the National Register, have been formally determined eligible by the Keeper of the National Register, or have been evaluated and found to meet NR criteria for listing by the SHPO/THPO and are identified as such in the SHPO/THPO inventory.**

If any historic resources were identified, see Historic Properties pages within the FCC Form 620, or if more than ten identified historic resources see Cultural Resource Report, Attachment E-2a.

- b: Historic Properties, not listed in part “a,” that are in the APE for visual effects that were identified through the comments of Indian Tribes, NHOs, local government, or members of the public.**

See *Historic Properties* pages within the FCC Form 620.

- c: Properties listed in part “a,” which ECA considers no longer eligible for inclusion in the National Register**

Not Applicable.

ATTACHMENT E-1c

Phase I Archaeological Assessment

The Phase I Archaeological Survey Report for APC Towers, LLC Site - LV Turkeytown (KY-4170) identified no precontact or historic cultural artifacts or remains. Therefore, the archaeological survey resulted in a finding of no effect on any archaeological sites listed or eligible for listing in the *National Register of Historic Places*.

ATTACHMENT F

LOCAL GOVERNMENT INVOLVEMENT

Contact Information

- a: List of all government agencies contacted and a summary of contact including copies of relevant documents.**

Please see the *Local Government* pages of the FCC Form 620 for a list of agencies contacted. Documentation of our correspondence follows this page.

- b: Local government agencies that will be contacted but have not as of this date.**

Not Applicable.

Lex Chesnut

From: Lex Chesnut
Sent: Thursday, March 12, 2026 14:51
To: hholbrook@rockcastlecountyky.com
Subject: FCC, Proposed Guyed Telecommunications Structure, Crab Orchard, Rockcastle County, KY
Attachments: CPL_26-000456_Co Fiscal Court.pdf

Subject:
Proposed 250-Foot Guyed Telecommunications Structure
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project #: 26-000456

Hello!

Please see the attached consulting party letter for the project listed above and let us know if you have any concerns related to historic properties.

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com





ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

March 12, 2026

Rockcastle County Fiscal Court
P. O. Box 755
Mt. Vernon, KY 40456
hholbrook@rockcastlecountyky.com
(606) 256-2856

**Subject: Proposed 250-Foot Guyed Telecommunications Structure
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project #: 26-000456**

Dear Howell Holbrook,

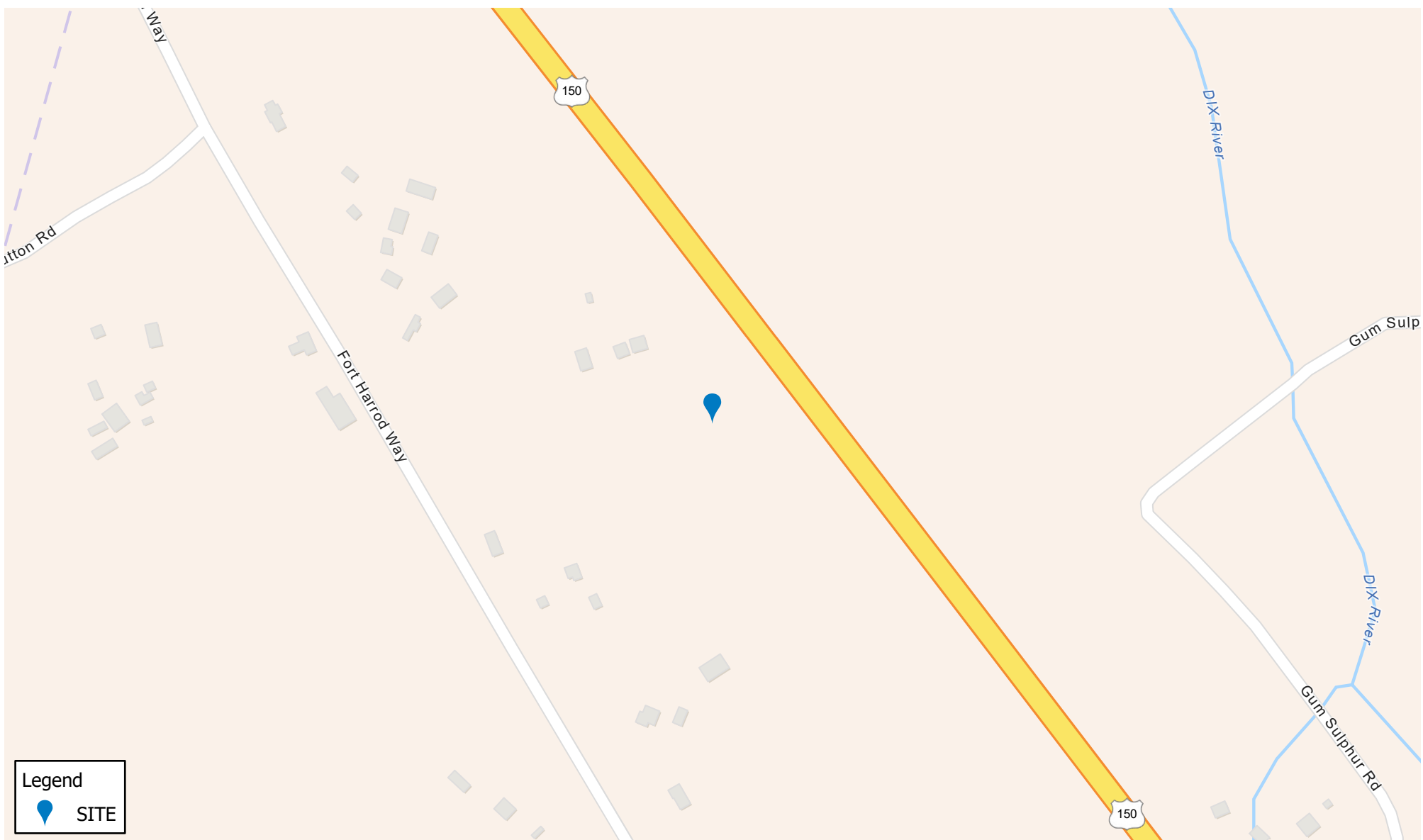
APC Towers, LLC is proposing to construct a 250-foot tall guyed telecommunications structure near Dysart Way, Crab Orchard, Rockcastle County, Kentucky (37° 25' 50.0" N, 84° 27' 34.8" W). **A map is included for your reference.** In accordance with the Federal Communications Commission (FCC) regulation at 47 C.F.R. 1.1307(a)(4), we are providing notice to you and seeking any comments that you may have regarding the effect of the proposed action described above on **Historic Properties** in your community. Please note that a **historic property** is defined in Section II.A.9. of the FCC's 2004 Nationwide Programmatic Agreement as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the **National Register of Historic Places (NRHP)**. Based on your level of interest in the project, you may wish to become a consulting party. ***This notice is not intended to supplant any local zoning or permitting requirements but is necessary before we can request review of the action by the State Historic Preservation Office (SHPO).***

We welcome any comments that you may have regarding any **Historic Properties listed on or eligible for listing on the NRHP** that may be affected by the undertaking. Please direct your comments to Annamarie Howell, Environmental Corporation of America, 1375 Union Hill Industrial Court, Suite A, Alpharetta, Georgia 30004, 770-667-2040 x 108 or via email to publicnotice@eca-usa.com. As we would like to submit the project to the SHPO for review as soon as possible, we request that you provide any documents that you may have within 30 days. Thank you for your cooperation.

Sincerely,
Environmental Corporation of America

Lex Chesnut
Project Manager

Eric Johnson
Program Manager



Date Generated: 2/27/2026
Source: Maxar, Esri Community Maps

Streetmap

ECA ID: 26-000456



ATTACHMENT G

CONSULTING PARTY LETTERS

Public Involvement by Legal Notices, Letters, or Public Meetings

Copies of all relevant documents, including correspondence and legal notices, are provided in the following pages.

Subject Name:
Client Reference: 26-000456

Notice Type

Miscellaneous

InkLink Notice ID

122065

Ad Number

Not Yet Provided

Notice Created

03/12/2026 02:07 PM

Run Dates

03/23/2026

Newspaper

Mount Vernon Signal

County, State

ROCKCASTLE, KY

Status

AWAITING PUBLISHER

Documents

Payment/Receipt

Audit Log

Notes

Download Notice Document

Download Your Original Notice Document

Download Payment

When the notice completes the affidavit will be available

Original Notice Text

APC Towers, LLC is proposing to construct a 250-foot tall (overall height) guyed telecommunications structure near Dysart Way, Crab Orchard, Rockcastle County, Kentucky (37° 25' 50.0" N, 84° 27' 34.8" W). The proposed tower is anticipated to utilize FAA Style E (medium intensity, dual red/white strobes) lighting.

APC Towers, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places.

Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.

In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only

ATTACHMENT H

DESIGNATION OF SHPO/THPO

SHPO/THPO Specific Forms

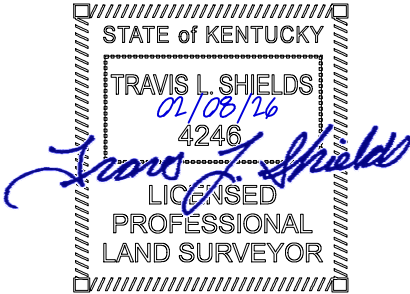
The following pages include copies of all additional forms specific to the Section 106 Review process for the lead SHPO/THPO reviewing this filing.

GENERAL NOTES:

1. This Survey is prepared exclusively to show site conditions and/or for use in support of instruments related to Leases and Easements as may be shown hereon. Any property boundary information shown hereon is a composite of information gathered from current or previous Surveys, Plat & Deed Description and/or Assessor’s Tax Maps as may be referenced hereon. This Survey is not a Boundary Survey of any Tax Parcels or Deed Tracts, and does not create, combine, or divide any existing properties.
2. Survey shown hereon was performed under the supervision of a state-registered Land Surveyor and conforms to all applicable State Board Requirements.
3. Instruments Used: One or more of: Topcon Total Station, Topcon Hiperlite Plus GPS, Carlson Surveyor Data Collector, DJI UAV.
4. Where shown, improvements (utilities, buildings, trees, fences, etc.) are based on field Survey and/or aerial mapping.
5. Any Underground Utilities shown according to surface markings made by others, found at time of survey. Additional marked utilities outside the area covered by this survey map may be shown in provided CAD Files. Utility Markings may not be comprehensive, and conditions may change after the time of survey: this survey does not relieve design and construction personnel of the responsibility to determine the locations of underground utilities prior to land disturbance activities. See also 2021 ALTA Standards, page 10, "Note to clients..."
6. This Survey is presented in the format required by Clients. Clients are advised that Official Jurisdictions may require the Survey to be presented in another format with additional notes and certifications. In the event other formats, notes or certifications are requested by applicable jurisdictions, it is the responsibility of the Client to request same be prepared by Surveyor. Survey as published is not intended to be suitable for recording as a Subdivision Plat.
7. This survey may have been reduced or enlarged in size due to subsequent reproduction. This should be taken into consideration when obtaining scaled data.
8. Geographic Coordinates, if published, meet FAA Accuracy Code 1A, and are accurate to within ± 20 feet horizontally and to within ± 3 feet vertically, reference: FAA Order 8260.19K, Section 2-11-3 b.(1).
9. Any Flood Zone information presented hereon is according to current FEMA Flood Map information as may be referenced hereon. No Flood Elevation Survey of Certification performed.
10. This survey is not valid without the original signature seal of a State-Licensed Land Surveyor, and is not complete without the total of sheets as specified in Survey Title Blocks.
11. Unless indicated otherwise by reference to Record Instruments, any Lessee's Leases, Premises or Easements shown hereon are NOT YET OF RECORD and may be subject to change pending review and approval by Carrier, applicable jurisdictions and/or other involved parties.
12. Any Survey Markers placed as required by Standards of Practice and/or Client request represent the Leases and/or Easements as requested or designed by Clients at the time of this survey issue and may not reflect changes to site design which have not been communicated to Surveyor in the form of a Survey revision request. Surveyor shall not be liable for any circumstance arising as a result of revisions to Site Design (which may invalidate existing survey markers) occurring after the date of this Survey issue.

SURVEYOR'S CERTIFICATION

To: APC Towers IV, LLC and Old Republic National Title Insurance Company:
I hereby certify that this survey was completed in accordance with the current requirements of the Standards of Practice for Surveying in the State of Kentucky to the best of my knowledge, information, and belief.



Travis L. Shields
Kentucky PLS
License No. 4246

PROPOSED TOWER LOCATION DATA

Latitude: NORTH: 37.430563° 37° 25' 50.03"
Longitude: WEST: 84.459676° 84° 27' 34.83"
Ground Elev: 923.1 FEET AMSL (NAVD88)
Benchmark: DK3326 KYTH CORS ARP

PARENT TAX PARCEL

PAUL GALE BARRETT & NIETA GAIL BARRETT
TAX PARCEL: 004-00-018

NORTH ORIENTATION

KENTUCKY SOUTH STATE PLANE COORDINATE SYSTEM
Based on GPS Survey relative to NGS CORS Network, NAD83 (2011)
ELEVATION DATUM: NAVD88, GEOID 12B
DATE OF SURVEY: 01-28-26

Method: RTK (CORS); Confidence Level: 95%
Positional Accuracy: HZ ± 0.10'
EPOCH 2010.0000
Convergence: 0.78253310°; Combined Scale Factor: 0.99990759

FLOOD DATA

FEMA FLOOD MAP PANEL: 21203C0075C, Effective Date: 08-03-2009
Surveyed Area appears to lie within: ZONE X (Areas of Minimal Flood Hazard)

TITLE EXAMINATION:

See Sheet #5

SURVEY ISSUE DATA

#	DETAILS	DATE	DRAWN	APP
0	Original Survey Issue	02-08-2026	NB	TLS

LOCATION MAP

NOT TO SCALE



SURVEY MAP LEGEND

- HIGHWAY MARKER FOUND
- ⊗ UTILITY POLE
- ⊕ SITE BENCHMARK
- * PROPOSED EQUIPMENT LOCATION

- R/W RIGHT-OF-WAY
- C/L CENTER LINE
- AU ACCESS & UTILITY
- ESMT EASEMENT
- P.O.C. POINT OF COMMENCEMENT
- P.O.B. POINT OF BEGINNING
- Sq Ft SQUARE FEET

- PAVEMENT EDGE
- GRAVEL EDGE
- DITCH
- FENCE
- OVERHEAD UTILITY LINES
- 5' CONTOURS
- 1' CONTOURS
- MARKED UG PIPELINES

- PUBLIC R/W
- TAX PARCEL BOUNDARY
- TIE LINE
- LESSEE'S PREMISES
- LESSEE'S EASEMENTS



THE LAND CONSULTANTS LLC
2820 15TH AVE SW
HUNTSVILLE, AL 35805
423.304.6722

PREPARED FOR



APC TOWERS IV, LLC

8601 Six Forks Rd, Suite 250,
Raleigh, NC 27615

(Not a Boundary Survey of Parent Lands. Not intended for fee simple Land Transfer)

SITE SURVEY
LV TURKEYTOWN
Site Number: KY-4170
Dysart Way, Crab Orchard, KY 40419
Rockcastle County, Kentucky

COVER SHEET

DWG#: 26025
ISSUE #: 0
ISSUE DATE: 02-08-2026
SEE SHEET #1

SHEET
1
OF
5

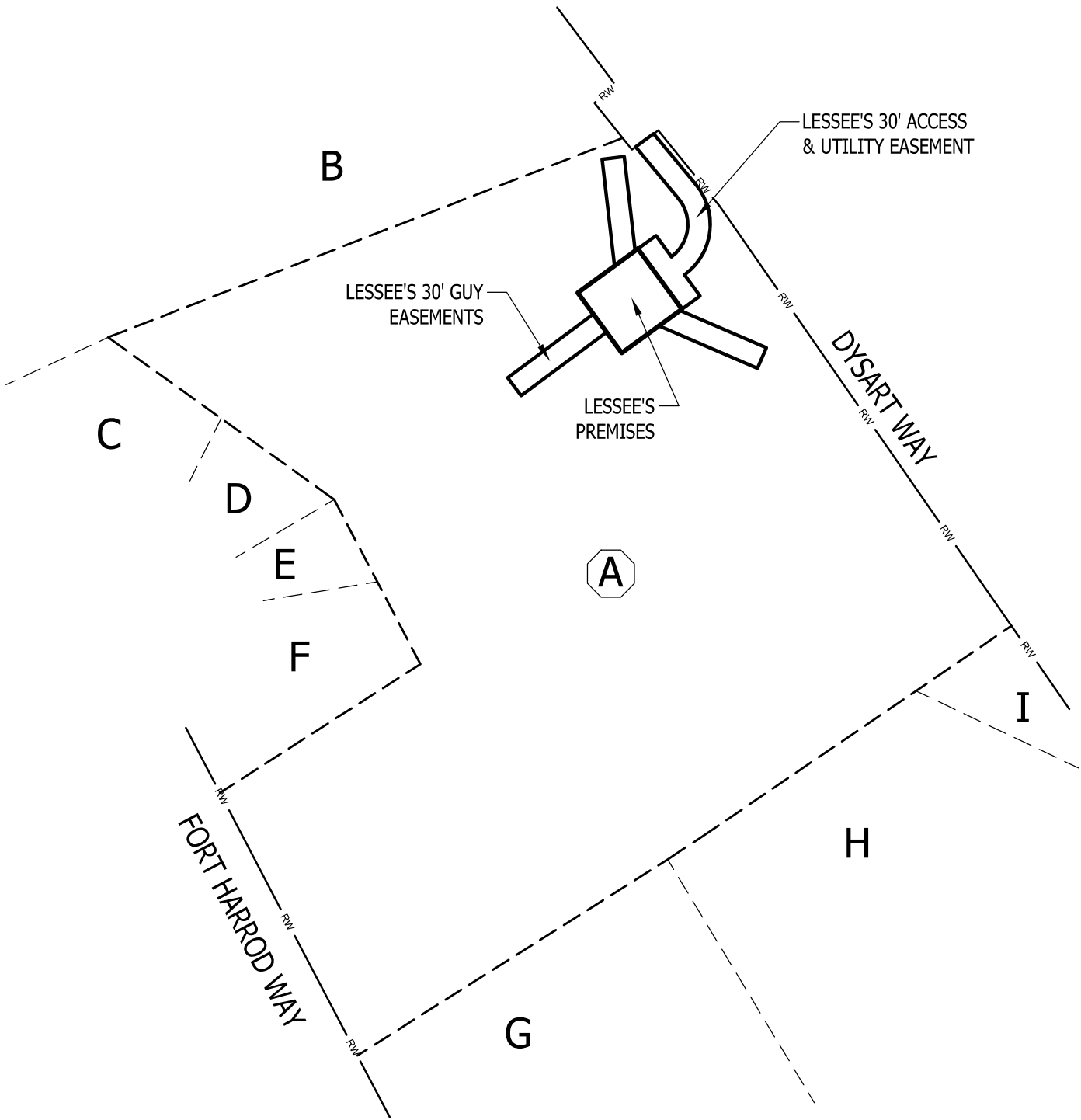
PROPERTY INFORMATION

PARENT TAX PARCEL

- A. PAUL GALE BARRETT & NIETA GAIL BARRETT
TAX PARCEL: 004-00-018
DEED BOOK 143, PAGE 323

ADJOINING TAX PARCELS

- B. GREGORY W. COULTON ...
TAX PARCEL: 004-00-014
DEED BOOK 227, PAGE 537
- C. SANDRA GRAVES BURKE
TAX PARCEL: 004-00-015
DEED BOOK 145, PAGE 195
- D. ALISON BIRNEY
TAX PARCEL: 004-00-015.01
DEED BOOK 280, PAGE 144
- E. MARGARET T. MCCOLLUM
TAX PARCEL: 004-00-016
DEED BOOK 169, PAGE 533
- F. CHARLES NAPIER
TAX PARCEL: 004-00-017
DEED BOOK 188, PAGE 268
- G. BENNY R. & SHARON BURCHETT
TAX PARCEL: 004-00-019.02
DEED BOOK 195, PAGE 308
- H. BURCHETT BENNY RAY
TAX PARCEL: 004-00-019
DEED BOOK 275, PAGE 476
- I. GARLAN CUMMINS ...
TAX PARCEL: 004-00-019.01
DEED BOOK 258, PAGE 64



OVERVIEW MAP CAVEAT:
OVERVIEW MAP IS NOT A SURVEY BUT A VICINITY / LOCATION MAP INTENDED
ONLY TO SHOW SURVEYED PROPERTY IN RELATION TO SURROUNDING AREA.
VESTING AND ADJOINING PARCEL BOUNDARIES ARE NOT INCLUDED IN OR
CERTIFIED BY THIS SURVEY. BOUNDARY LINES ARE A COMPOSITE OF DEED,
PLAT AND/OR TAX MAP INFORMATION
SEE SURVEY MAP FOR ALL MATTERS RELATED TO SITE SURVEY



THE
LAND CONSULTANTS
LLC
2820 15TH AVE SW
HUNTSVILLE, AL 35805
423.304.6722

PREPARED FOR



APC TOWERS IV, LLC

8601 Six Forks Rd, Suite 250,
Raleigh, NC 27615

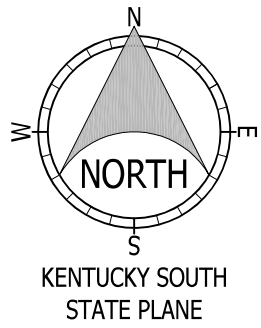
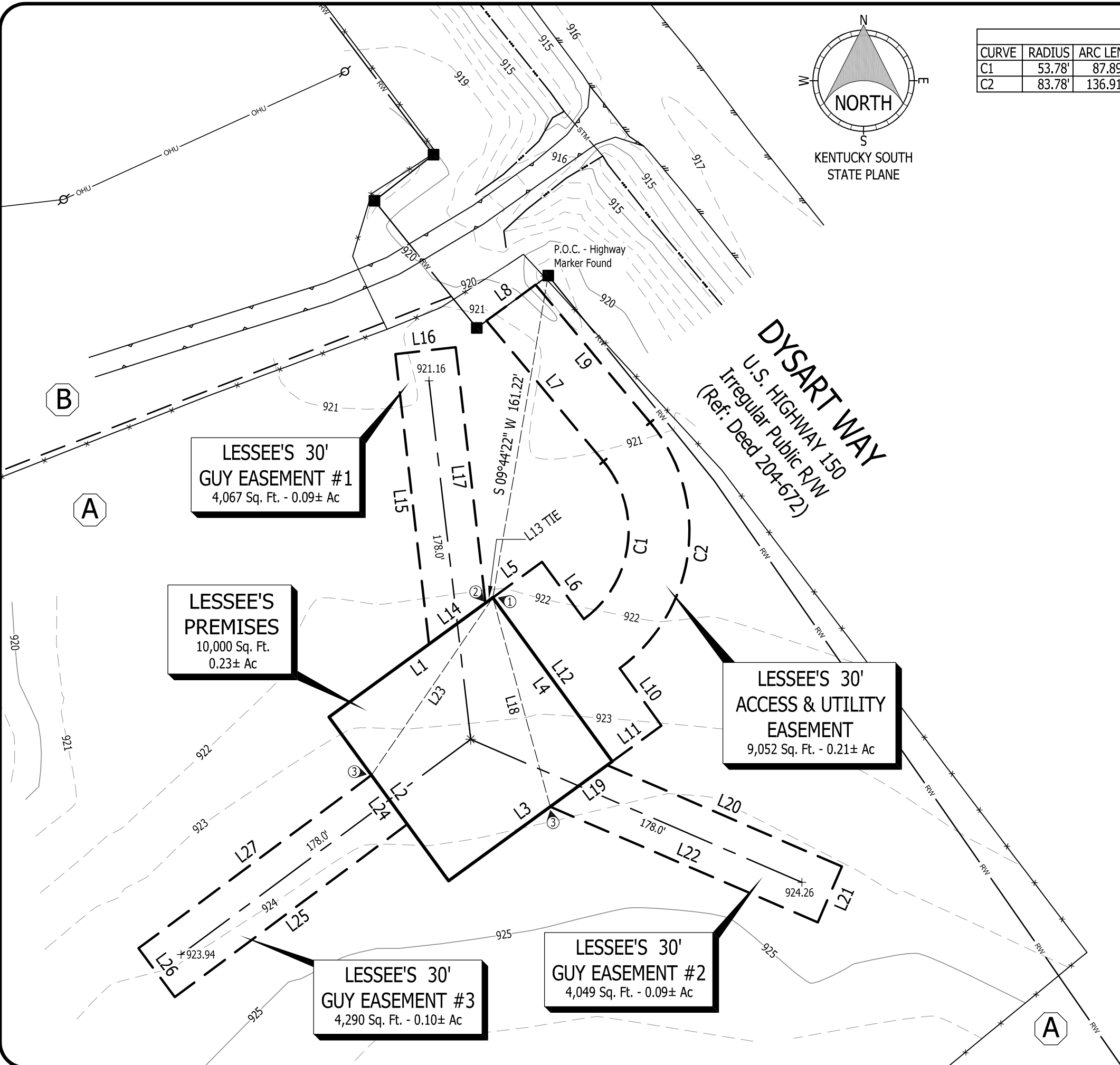
(Not a Boundary Survey of Parent Lands. Not intended for fee simple Land Transfer)

SITE SURVEY
LV TURKEYTOWN
Site Number: KY-4170
Dysart Way, Crab Orchard, KY 40419
Rockcastle County, Kentucky

OVERVIEW MAP

DWG#: 26025
ISSUE #: 0
ISSUE DATE: 02-08-2026
SEE SHEET #1

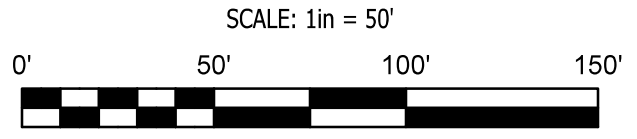
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2
OF
5



CURVE DATA TABLE						
CURVE	RADIUS	ARC LEN	TANGENT	DELTA ANGLE	CHORD BEARING	CHORD LEN
C1	53.78'	87.89'	57.30'	93°38'09"	N 07°04'53" E	78.43'
C2	83.78'	136.91'	89.27'	93°38'09"	S 07°04'53" W	122.18'

LINE DATA TABLE		
LINE	BEARING	DISTANCE
L1	S 53°53'58" W	100.00'
L2	S 36°06'02" E	100.00'
L3	N 53°53'58" E	100.00'
L4	N 36°06'02" W	100.00'
L5	N 53°53'58" E	30.00'
L6	S 36°06'02" E	35.00'
L7	N 39°44'11" W	90.25'
L8	N 53°48'12" E	30.06'
L9	S 39°44'11" E	88.39'
L10	S 36°06'02" E	35.00'
L11	S 53°53'58" W	30.00'
L12	N 36°06'02" W	100.00'
L13	S 53°53'58" W	4.51'
L14	S 53°53'58" W	34.46'
L15	N 06°37'33" W	144.04'
L16	N 83°22'27" E	30.00'
L17	S 06°37'33" E	127.09'
L18	S 15°19'42" E	106.95'
L19	N 53°53'58" E	34.83'
L20	S 66°37'33" E	126.11'
L21	S 23°22'27" W	30.00'
L22	N 66°37'33" W	143.80'
L23	S 34°22'34" W	106.10'
L24	S 36°06'02" E	30.00'
L25	S 53°22'27" W	142.86'
L26	N 36°37'33" W	30.00'
L27	N 53°22'27" E	143.14'

STATE of KENTUCKY
TRAVIS L. SHIELDS
02/08/26
4246
LICENSED
PROFESSIONAL
LAND SURVEYOR





THE
LAND CONSULTANTS
LLC

2820 15TH AVE SW
HUNTSVILLE, AL 35805
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PREPARED FOR

**APC Towers**

APC TOWERS IV, LLC

8601 Six Forks Rd, Suite 250,
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SITE SURVEY

LV TURKEYTOWN

Site Number: KY-4170

Dysart Way, Crab Orchard, KY 40419

Rockcastle County, Kentucky

SITE SURVEY

DWG#: 26025
ISSUE #: 0
ISSUE DATE: 02-08-2026
SEE SHEET #1

SHEET
3
OF
5

Bibliography

Google Earth

2024 Aerial Photograph.

Kentucky Heritage Council

2025 Kentucky Cultural Resources Map.

<https://kyshpo.maps.arcgis.com/apps/instant/basic/index.html?appid=f0e5df189a9b4e89bfe93bc0666a02a3>. Accessed March 2026.

Kentucky Office of State Archaeology

2026 Archaeological Site Check FY26-13767.

National Register Information System (NRIS)

2025 National Register of Historic Places

<http://www.nps.gov/nr>. Accessed March 2026.

United States Federal Communications Commission (FCC)

2005 Federal Communications Commission Federal Register, 47 CFR Part 1, Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act; Final Rule, WT Docket No. 03-128; FCC 04-222. Washington, DC.

United States Geological Survey (USGS)

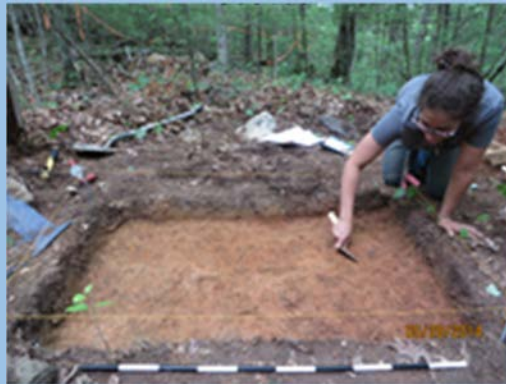
1953 *Brodhead, KY* Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington, DC.

Yellowmaps.com

2021 *Blank County Map of Kentucky*.

<https://www.yellowmaps.com/map/kentucky-blank-map-99.htm#ym-viewmap>. Accessed April 2026.

Phase I Archaeology Report
For a Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
FY26-13767



ECA Project#: 26-000456

TCNS ID #: 308132

Report Date: April 10, 2026

Lead Federal Agency:
Federal Communications Commission

Submitted By:

Lex Chesnut, MSc
Project Manager
LEX.CHESNUT@ECA-USA.COM

Shannon Lowman, MA, RPA
Principal Investigator
SHANNON.LOWMAN@ECA-USA.COM



ABSTRACT

Environmental Corporation of America's client, APC Towers, LLC, is proposing to construct a 250-foot tall (overall height) guyed-type telecommunications structure located near Dysart Way, Crab Orchard, Rockcastle County, Kentucky. ECA conducted a Phase I Archaeological Assessment of the Area of Potential Effects (APE) consisting of background research, field investigations, and preparation of this report. The total acreage surveyed was 0.72 acres (0.29 hectares).

ECA reviewed cultural records and databases and did not identify any archaeological sites or surveys within or near the APE for direct effects. If any archaeological sites or cultural resource surveys were identified during ECA's research outside the APE for direct effects, they are discussed further in the Site File Research section of this report. During the course of the field survey portion of this archaeological assessment, no archaeological cultural resources were encountered.

ECA believes that the proposed undertaking would have no effect on any archaeological resources that are listed in or eligible for listing in the National Register of Historic Places. Based on our findings related to archaeological resources, we recommend no further consultation under Section 106 Review of the National Historic Preservation Act for this proposed undertaking.

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Appendix A: Kentucky Office of State Archaeology Research

**Resumes of key personnel involved with the project can be provided upon request.*

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INTRODUCTION

Environmental Corporation of America was contracted by APC Towers, LLC to perform an archaeological assessment as part of the Section 106 Review process for a proposed telecommunications facility. The proposed facility would be located near Dysart Way, Crab Orchard, Rockcastle County, Kentucky. The purpose of our work was to determine whether any archaeological cultural resources might exist within the proposed project area (APE for direct effects). The total acreage surveyed was 0.72 acres (0.29 hectares).

The Area of Potential Effect (APE) is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist” (FCC 2003). For purposes of this work, the APE for direct effects is the actual physical impact area. The APE for direct effects is further described in the following table.

Table 1: APE for Direct Effects Description

Proposed Lease Area	Proposed Access/Utility Easement	Proposed Guy Easement 1	Proposed Guy Easement 2	Proposed Guy Easement 3
100-ft by 100-ft (30m x 30m)	302-ft by 30-ft (92m x 9m)	135-ft by 30-ft (41m x 9m)	135-ft by 30-ft (41m x 9m)	143-ft by 30-ft (44m x 9m)
The total acreage surveyed was 0.72 acres (0.29 hectares)				

ECA conducted a Phase I Archaeological Survey of the Area of Potential Effects (APE) consisting of background research, field investigations, and preparation of this report. The investigation was conducted in compliance with Section 106 of the National Historic Preservation Act of 1966 and adheres to the Specifications for Archaeological Fieldwork and Assessment Reports (March 1991 and updated in 2006) issued by the Kentucky Heritage Council.

ECA understands that APC Towers, LLC plans to construct a 250-foot tall guyed-type structure within the lease area. The proposed lease area would be located within a grassed field with sparse trees along the boundaries of the parent tract and would be accessed by a proposed access/utility

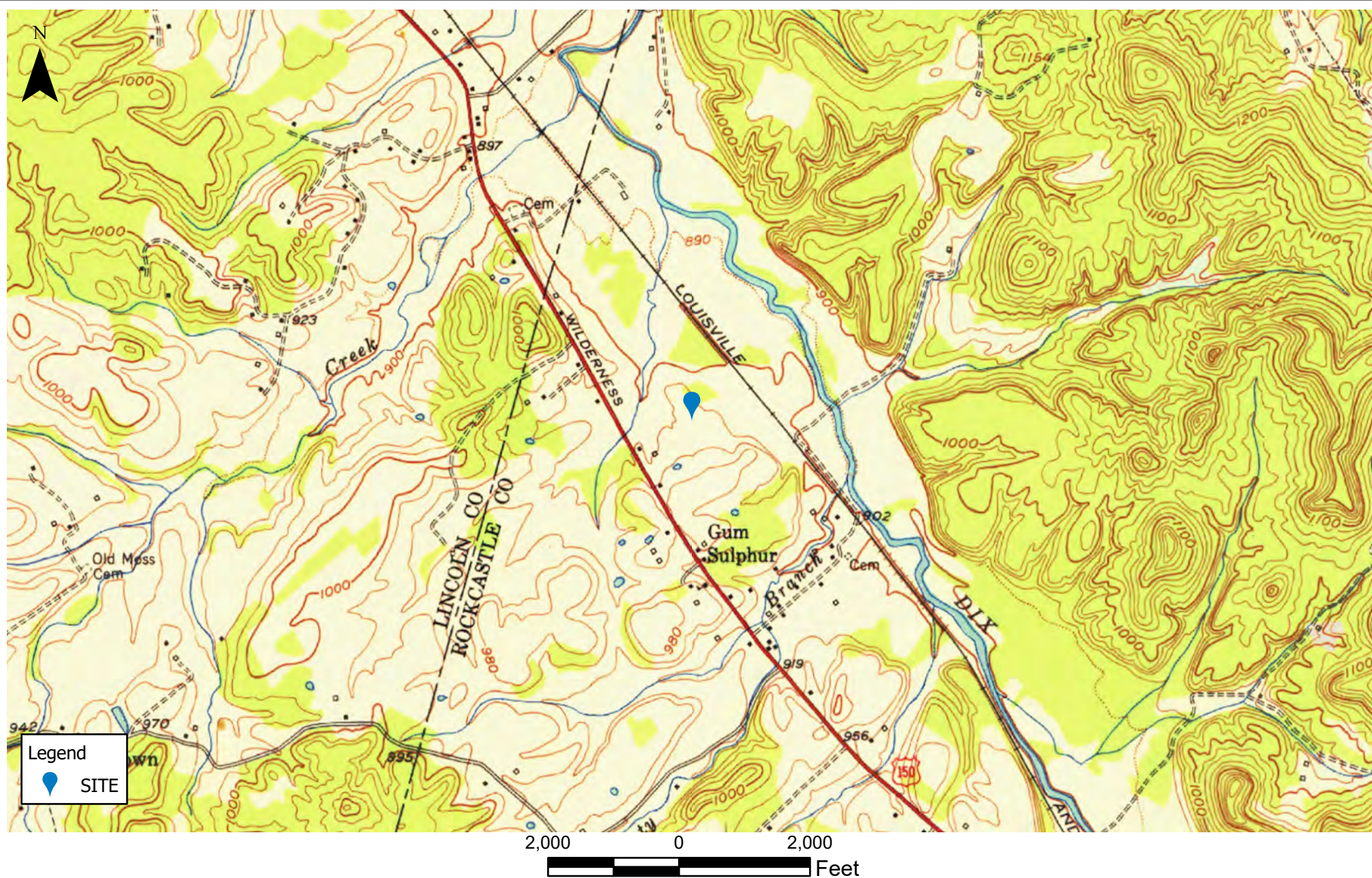
easement. The proposed access/utility easement would traverse in a southeasterly direction from an unnamed road near US Highway 150/Dysart Way and make a turn in a southwesterly direction before terminating at the proposed lease area. The proposed project area would also include three proposed guy easements, extending through the field in NW, SE, and SW directions from the proposed lease area.

Table 2: Project Location Information

Tower Coordinates (NAD83) (degrees/minutes/seconds)	Tower Coordinates (UTM)	Tower Elevation (feet/meters)	Township/Range/Section
37° 25' 50.0" N, 84° 27' 34.8" W	Zone 16N 724767E 4145667N	924 / 281.6	NA

The goal of the investigation was to document the presence or absence of potentially significant archaeological resources eligible for listing on the National Register of Historic Places (NRHP) in the APE. The Kentucky Office of State Archaeology provided ECA with the archaeological site and survey files for those previously identified within the 2-kilometer background search radius. If any archaeological sites or cultural resource surveys were identified during ECA's research outside the APE for direct effects, they are discussed further in the Site File Research section of this report. During the course of the field survey portion of this archaeological assessment which included a pedestrian survey and systematic shovel testing, no archaeological sites or cultural resources were encountered.

The archaeological investigation was conducted on March 18, 2026, by Chase Rodriguez, MA, RPA, Project Archaeologist, within the APE for direct effects and the APE for visual effects. Approximately six hours were spent conducting the archaeological investigation. No restrictions were encountered during any phase of the archaeological investigation, and no archaeological materials were discovered during the field investigation. Therefore, the following is an abbreviated report as provided in Section VI of Specifications for Archaeological Fieldwork and Assessment Reports (Kentucky Heritage Council 1991: 29).



Source: USGS Topographic Map 7.5-Minute Series, Brodhead, KY (1953)

Figure 1: Site Location Plan

ECA ID: 26-000456





Source: USGS Topographic Map 7.5-Minute Series, *Brodhead, KY* (1953)

Figure 2: APE for Direct Effects

ECA ID: 26-000456



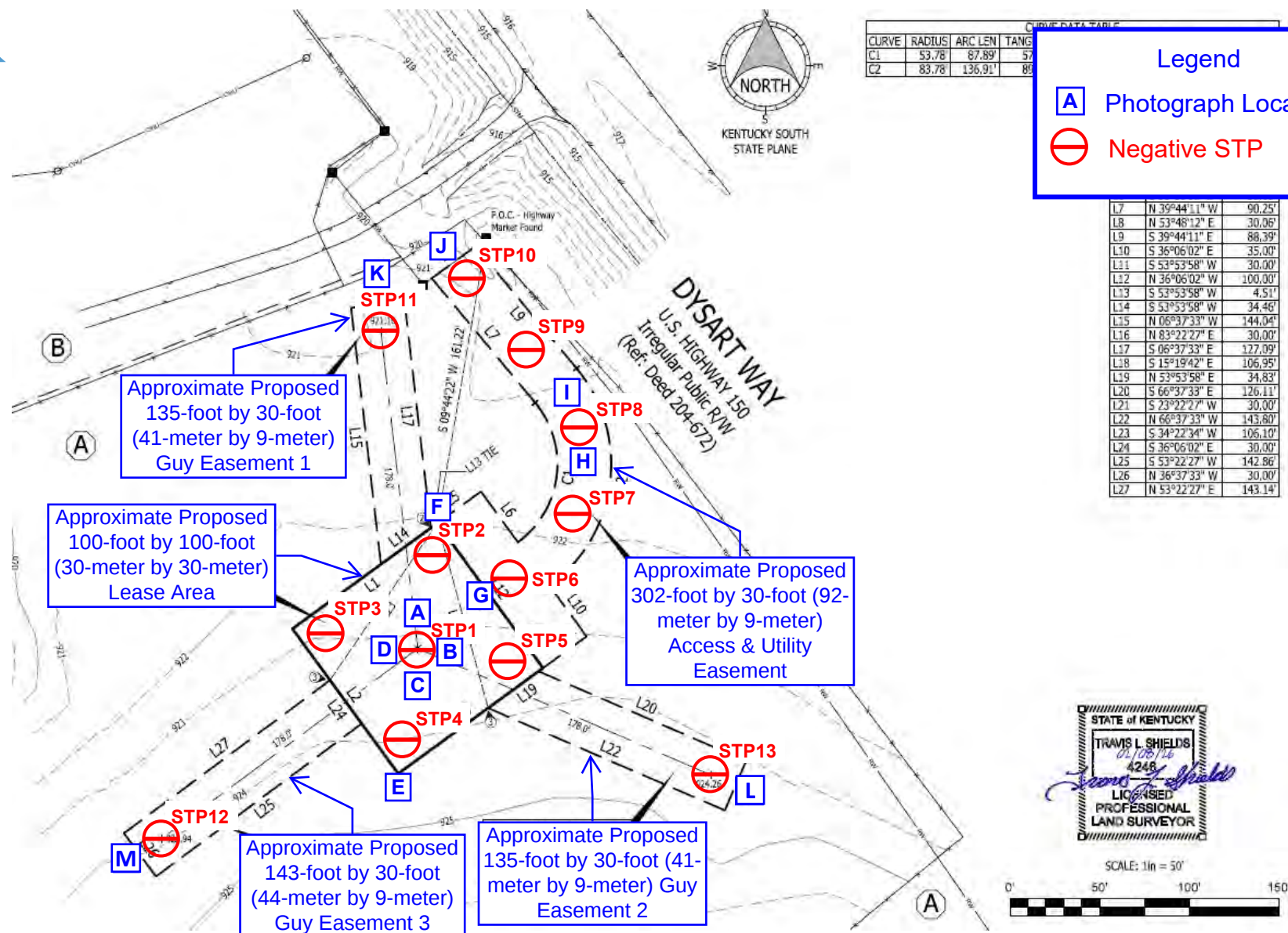


CURVE	RADIUS	ARC LEN	TANG
C1	53.78	87.89	57
C2	83.78	136.91	86

Legend

- Photograph Location
- Negative STP

L7	N 39°44'11" W	90.25'
L8	N 53°48'12" E	30.06'
L9	S 39°44'11" E	88.39'
L10	S 36°06'02" E	35.00'
L11	S 53°53'58" W	30.00'
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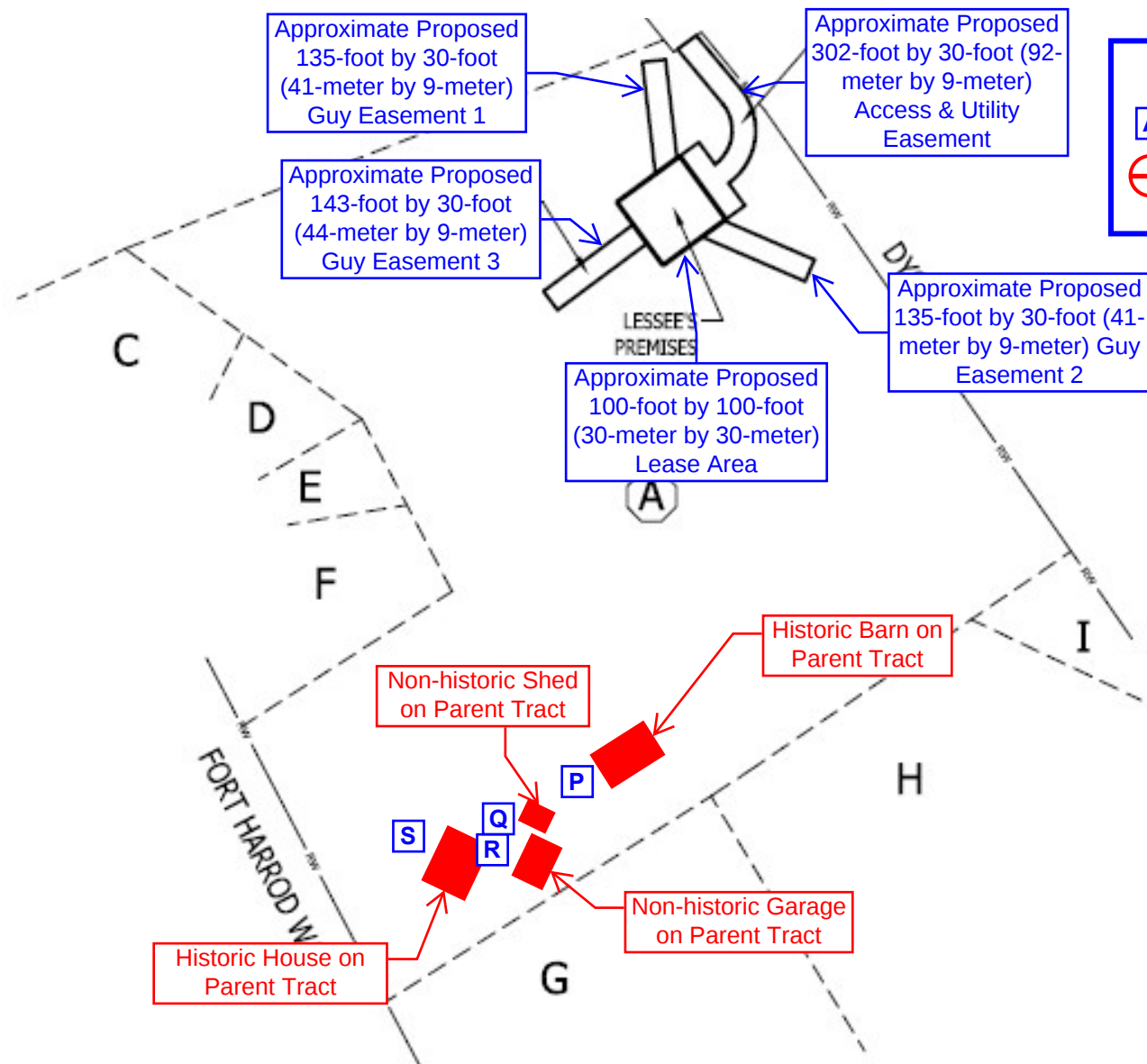


Source: Survey Drawing provided by Applicant

Figure 3a: Site Vicinity Plan

ECA ID: 26-000456



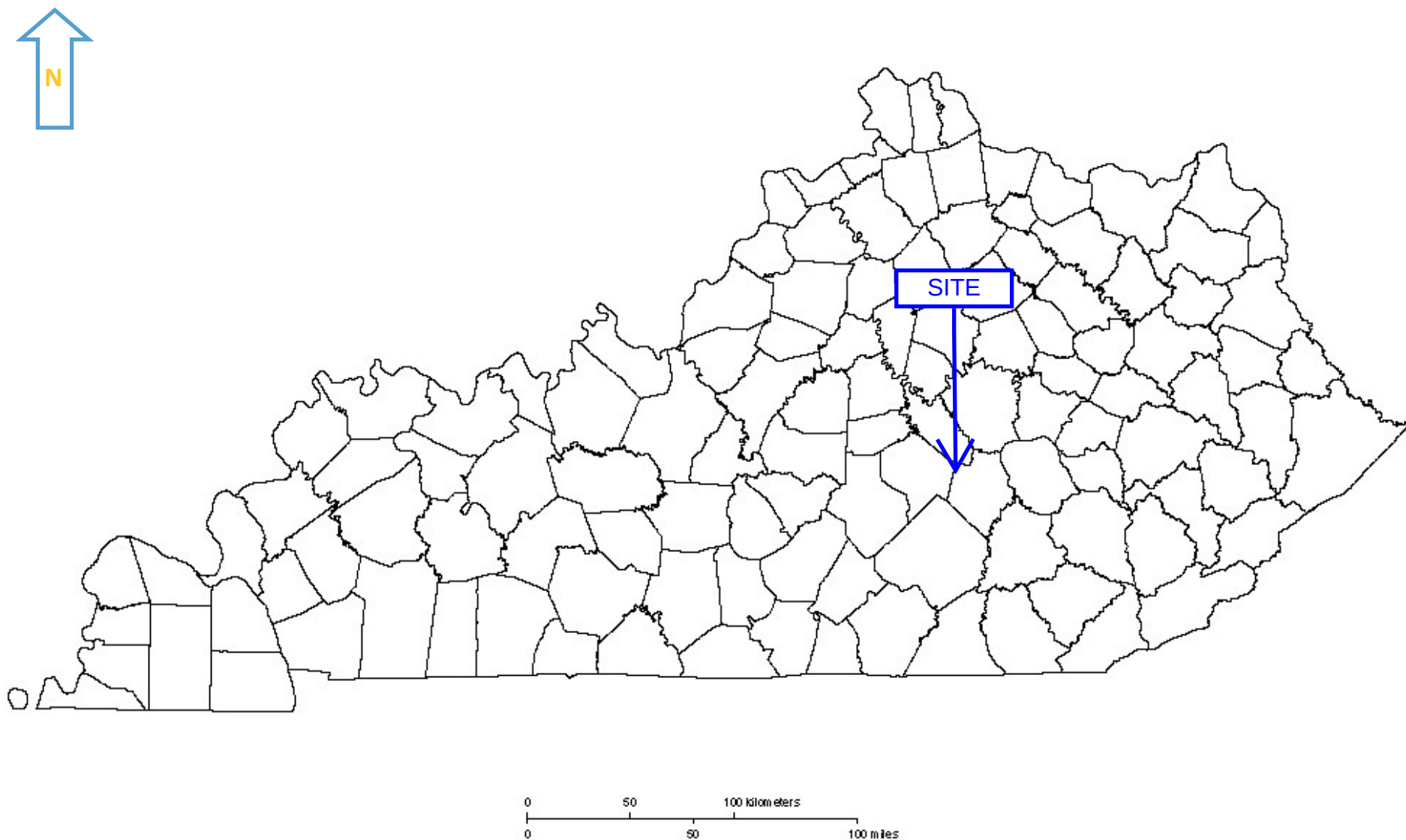


Source: Survey Drawing provided by Applicant

Figure 3b: Site Vicinity Plan

ECA ID: 26-000456





Source: Yellowmaps.com (2021)

Attachment B-2d: State Map

ECA ID: 26-000456

ECA

ENVIRONMENTAL SETTING

Geologically, the Property is located within the Interior Low Plateaus Physiographic Province. At the southeastern edge of the Central Lowlands, where the Pleistocene glaciers reached their highest extent, lie the Interior Low Plateaus. Paleozoic sandstone, shale, and limestone strata that are nearly entirely horizontal make up the Interior Low Plateaus. The Cincinnati Arch is a fold axis that divides the entire province from northeast to southwest. Mammoth Cave National Park and other well-developed karst topography define the province's limestone. Although Mammoth Cave's mapping is still in progress, the caverns there are currently the longest in the world, measuring 300 miles (480 kilometers). The caves have huge halls, a large underground river, and are beautifully ornamented with travertines and gypsum crystals. Coal, oil, and natural gas are abundant but small-scale mineral resources found in the Interior Low Plateaus. Furthermore, phosphate and fluorite, which are required to make steel, are mined widely in the area (NPS 2025).

According to the USDA Soil Survey, soils found at the Property consist of Tilsit silt loam, 6 to 12 percent slopes (T1C), and Stendal silt loam, terrace (So). Descriptions of the dominant mapped soil types are displayed in the table below.

Table 3: Mapped Soil Types within the Project Area

Mapped Soil Type	Soil Series Description	Known Subsoil	Typical Subsoil Depth Below Surface
Tilsit	Consists of moderately well drained soils that formed in silty residuum from interbedded acid siltstone, soft shale, or fine-grained sandstone on hills and ridges.	Yellowish brown (10YR 5/6) silty clay loam	9-19 inches (23-48 cm)
Stendal	Consists of very deep, somewhat poorly drained soils that formed in acid, silty alluvium. These soils are on flood plains and flood-plain steps.	Light yellowish brown (10YR 6/4) silt loam	8 to 17 inches (20 to 43 cm)

(Source: NRCS)

CULTURAL HISTORY

The Paleoindian period ranged from at least 12,000 to 8,000 B.C. During the paleo period people lived in small groups and moved frequently, carrying their belongings and building temporary shelters. Kentucky was much colder and wetter and people likely followed large game, such as mammoth and bison into the region. Diagnostic materials from the Paleoindian period include well-crafted, high quality large spear points (Pollack 2008).

The Archaic period ranged from 8,000 to 1,000 BC. During the Archaic period people tended to live in one place for longer periods of time than the previous Paleoindian period. However, they were still quite mobile. Camps were typically located where area resources were easily exploitable. Diagnostic materials from the Archaic time period include spear points with notched and stemmed bases (Pollack 2008).

The Woodland Period ranged from 1,000 BC to 1,000 AD and is marked by an introduction to pottery. Additionally, people in the Woodland period devoted more time to gardening, however hunting and gathering were still prevalent. Toward the end of the Woodland period the bow and arrow were developed. Diagnostic materials from the woodland period include arrow heads, pottery and larger projectile points with squared shoulders (Pollack 2008).

The Late Prehistoric Period ranged from 1000 to 1750 AD. During the Late Prehistoric period people began to live and farm in large settlements year-round. Many settlements contained stockades around rectangular houses. Diagnostic materials from the Late Prehistoric period include intricate pottery, true arrow heads, and earth works (Pollack 2008).

In the 17th Century, the first Europeans, French explorers and traders, entered the Kentucky Region. Historic settlement began around 1750 as English colonists explored tributaries of the Ohio River. Conquest of the Shawnee and agreements with the Cherokees allowed for more permanent settlements to be established during the 1770s; however, many were raided by Indians

before and after the Revolutionary war. The most famous of these settlers was Daniel Boone and his family. Agriculture was introduced to the area with crops such as tobacco, corn and hemp. Through the early 1800s most large settlements were formed by religious groups, Baptists and Catholics. The issue of slavery split many churches, towns and families (Yater 1987).

As early as 1750, settlers arrived in east central Kentucky. Issac Lindsey, who was in the area for a hunting expedition in 1767, noted a river with a lone limestone rock jutting out of the ridge above and named it Rockcastle River (Kentucky Historical Society). Rockcastle County was established as the 52nd Kentucky County in 1810 and named for Rockcastle River which runs along the southeast border (Kentucky Historical Society; Rockcastle County). Mt. Vernon, the county seat, was located at the intersection of three major stagecoach and wagon routes in Kentucky, Wilderness Road, Boone Trace, and Sheltoewe Trace, making the area a hub for travel and trade. Major industries of early Rockcastle County included agriculture (production of corn, tobacco, and livestock), timber, and limestone quarrying. The area is home to the Great Saltpetre Cave which was mined for saltpeter during the War of 1812. By the mid-20th century, Rockcastle County was a major center for country music (Rockcastle County). Today, the local economy is largely sustained by manufacturing, tourism, and the country music industry. Notably, Rockcastle County is home to the Kentucky Music Hall of Fame (Rockcastle Co. Industrial Development Authority).

LAND USE HISTORY

According to historic aerial photographs, the proposed project area was an agricultural field near Brodhead Road in 1950. By 1983, a house and barn had been constructed to the southwest of the project area on the parent tract. By 2010, US Highway 150/Dysart Way was constructed northeast of the project area and adjacent to part of the proposed access/utility easement. The proposed project area has remained relatively unchanged since 2010.

SITE FILE RESEARCH

National Register of Historic Places

The National Register of Historic Places (NRHP) is the Nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The National Park Service, which is part of the U.S. Department of the Interior, administers the National Register. ECA conducted a review of the NRHP to determine whether any listed Historic Properties were located within or near the APE for direct effects. The document search revealed no NRHP-listed Historic Properties within the ¾-mile APE for visual effects or the APE for direct effects (NRIS 2025).

Based on field observation and historic aerial photographs, a historic house with associated outbuildings is located on the parent tract. Aerials indicate that the house was constructed between 1960 and 1980. Based on the appearance and form of the house it was likely constructed in the mid-1960s. The house is a side-gabled bungalow with a brick veneer exterior. It has non-historic vinyl windows, and a non-historic metal door with an oval light. The front porch appears non-historic. It has a concrete slab foundation with a gabled roof and round decorative metal porch supports which mimic Doric columns. There is vinyl siding in the gable. The house has a large, non-historic, gabled addition on the southeast façade which wraps around to the northeast façade. The addition is clad in vinyl siding. There is one historic barn on the parcel to the northeast of the house. It is wood framed with a main, gabled mass and a shed wing. Siding is vertical wood and roof is covered in metal roofing. Doors consist of non-historic sliding doors and non-historic double doors. There are two non-historic outbuildings on the parcel. One is a pre-fabricated metal storage building and the other is a wood frame garage with vinyl siding.

The historic house and barn do not embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or embody high artistic values either individually or as contributing resources to a potential district. In addition, both buildings have undergone extensive alterations which have compromised their historic appearance. The barn is not representative of the types documented in the Agricultural and Domestic Outbuildings in Central and Western Kentucky, 1800-1865 (Criterion C). No information was uncovered to suggest that the property is associated with events that have made a significant contribution to broad patterns of our history or that the property was directly associated with or reflective of a historic period/theme in Kentucky's agricultural context (Criterion A). In addition, no information was uncovered to suggest the property is associated with lives of persons significant in our past (Criterion B) or that it has yielded or may be likely to yield information important in history or prehistory (Criterion D). As a result, it is the opinion of ECA that this property is not eligible for listing in the NRHP either individually or as a potential district, and there are no historic properties on the parent tract.



Source: Google Earth 2024

Figure 5: Aerial Photograph

ECA ID: 26-000456

ECA



Source: Google Earth 2013

Figure 6: Aerial Photograph

ECA ID: 26-000456

ECA



Source: Google Earth 2010

Figure 7: Aerial Photograph

ECA ID: 26-000456

ECA



Source: Google Earth 2008

Figure 8: Aerial Photograph

ECA ID: 26-000456





Source: Google Earth 1997

Figure 9: Aerial Photograph

ECA ID: 26-000456





Source: USDA Aerial Photograph provided by Historicaerials.com (1983)

Figure 10: Aerial Photograph

ECA ID: 26-000456





Source: USDA Aerial Photograph provided by Historicaerials.com (1960)

Figure 11: Aerial Photograph

ECA ID: 26-000456





Source: USGS Aerial Photograph provided by Historicaerials.com (1950)

Figure 12: Aerial Photograph

ECA ID: 26-000456



PREVIOUS INVESTIGATIONS AND SUMMARY OF KNOWN SITES

During a review of archaeological site records conducted by the Kentucky Heritage Council at the Kentucky Office of State Archaeology on March 5, 2026 (FY26-13767), four previously identified archaeological surveys and eight previously identified archaeological sites were identified within a 2-kilometer background research radius but outside the APE for direct effects.

Survey 579768 was conducted by Jack M. Schock. The purpose of the survey was for a cultural reconnaissance of approximately five acres for a proposed highway soil borrow pit in Rockcastle County, Kentucky. Fieldwork took place in 1994.

Survey 579808 was conducted by Jack M. Schock. The purpose of the survey was a cultural reconnaissance of approximately one acre for a proposed highway soil borrow pit in Lincoln County, Kentucky. Fieldwork took place in 1994.

Survey 580932 was conducted by Richmond. The purpose of the survey was an archeological reconnaissance of the proposed US 150 upgrade From Crab Orchard to KY 461 at Mount Vernon, Lincoln and Rockcastle Counties, Kentucky. Fieldwork took place in 1998.

Survey 585385 was conducted by Marcie Venter. The purpose of the survey was an archaeological survey of previously unsurveyed parcels along the Highway 150 realignment in Lincoln County, Kentucky. Fieldwork took place in 2008.

Table 4: Archaeological Surveys Identified Within a 2-Kilometer Research Radius

Site No.	Report Title	Report By	Year	Approximate Location from Tower at Nearest Point
579768	A Cultural Reconnaissance of Approximately Five Acres for a Proposed Highway Soil Borrow Pit in Rockcastle County, Kentucky	Jack M. Schock	1994	4,850 feet (1,478 meters) N

Site No.	Report Title	Report By	Year	Approximate Location from Tower at Nearest Point
579808	A Cultural Reconnaissance of Approximately One Acre for a Proposed Highway Soil Borrow Pit in Lincoln County, Kentucky	Jack M. Schock	1994	5,100 feet (1,554 meters) N
580932	An Archeological Reconnaissance of the Proposed US 150 Upgrade From Crab Orchard to KY 461 at Mount Vernon, Lincoln and Rockcastle Counties, Kentucky. Contract Publication Series 98-42	Richmond	1998	250 feet (76 meters) NE
585385	An Archaeological Survey of Previously Unsurveyed Parcels along the Highway 150 Realignment in Lincoln County, Kentucky	Marcie Venter	2008	6,100 feet (1,859 meters) NW

Table 5: Archaeological Sites Identified Within a 2-Kilometer Research Radius

Site No.	Site Type	NRHP Evaluation Status	Approximate Location from Tower at Nearest Point
15Li101	Open habitation w/o mounds	Inventory site (does not presently meet NR criteria)	4,850 feet (1,478 meters) NW
15Rk56	Open habitation w/o mounds	National Register status not assessed	2,350 feet (716 meters) N
15Rk57	Open habitation w/o mounds	National Register status not assessed	2,000 feet (609 meters) N
15Rk58	Historic farm / residence	National Register status not assessed	1,750 (533 meters) SE
15Rk89	Historic farm / residence	Inventory site (does not presently meet NR criteria)	1,350 feet (411 meters) SE
15Rk90	Open habitation w/o mounds	Inventory site (does not presently meet NR criteria)	5,500 feet (1,676 meters) SE
15Rk93	Open habitation w/o mounds	National Register status not assessed	2,500 feet (762 meters) SE
15Rk94	Historic farm / residence	National Register status not assessed	2,150 feet (655 meters) SE

SURVEY PREDICTIONS

Eight archaeological sites and four archaeological surveys were previously documented within 2-kilometers of the subject site, but no previously identified archaeological sites or survey reports are located within the APE for direct effects. It is always possible that some remnant of such a site could be present and contain important archaeological information. Based on the past land use and historic aerial photographs and maps it appears that the project area has a moderate sensitivity for precontact and historic archaeological resources.

FIELD CONDITIONS

ECA understands that APC Towers, LLC plans to construct a 250-foot tall guyed-type structure within the lease area. The proposed lease area would be located within a grassed field with sparse trees along the boundaries of the parent tract and would be accessed by a proposed access/utility easement. The proposed access/utility easement would traverse in a southeasterly direction from an unnamed road near US Highway 150/Dysart Way and make a turn in a southwesterly direction before terminating at the proposed lease area. The proposed project area would also include three proposed guy easements, extending through the field in NW, SE, and SW directions from the proposed lease area.

Table 6: Surface Visibility within the APE for Direct Effects

Proposed Lease Area	Proposed Access/Utility Easement	Proposed Guy Easement 1	Proposed Guy Easement 2	Proposed Guy Easement 3
50% due to grasses	50% due to grasses	50% due to grasses	50% due to grasses	50% due to grasses



A: Northerly View from Near the Center of the Proposed Lease Area



B: Easterly View from Near the Center of the Proposed Lease Area



C: Southerly View from Near the Center of the Proposed Lease Area



D: Westerly View from Near the Center of the Proposed Lease Area

Attachment B-1a: Photographs

ECA ID: 26-000456





E: Northerly Overview of the Proposed Lease Area



F: Southerly Overview of the Proposed Lease Area



G: Northeasterly View of the Proposed Access/Utility Easement



H: Southwesterly View of the Proposed Access/Utility Easement



I: Northwesterly View of the Proposed Access/Utility Easement



J: Southeasterly View of the Proposed Access/Utility Easement



K: Southerly Overview of the Proposed Guy Easement 1



L: Northwesterly Overview of the Proposed Guy Easement 2



M: Northeasterly Overview of the Proposed Guy Easement 3



N: Overview of Shovel Test Pit Two (STP2)



O: Soil Profile of Shovel Test Pit Two (STP2)



P: Northeasterly View of Historic Barn on Parent Tract



Q: Northeasterly View of Non-historic Shed on Parent Tract



R: Southeasterly View of Non-historic Garage on Parent Tract



S: Southeasterly View of Historic House on Parent Tract

FIELD METHODS

The methodology for the Phase I intensive field survey for this project was determined by the professional opinions and experience of our principal and staff archaeologists, applicable SHPO guidelines, and applicable tribal guidelines. The survey was performed by Chase Rodriguez, MA, RPA, Project Archaeologist, on March 18, 2026. Approximately six hours of field time was recorded for the Phase I intensive field study. The total acreage surveyed was 0.72 acres (0.29 hectares).

The entire Project Area (the APE for direct effects) was subject to a pedestrian reconnaissance. Exposed ground surfaces were examined and other evidence suggesting the presence of archaeological resources, such as foundations, topographic anomalies, etc., were sought. In accordance with the Specifications for Archaeological Fieldwork and Assessment Reports (March 1991 and updated in 2006) areas with a slope greater than 15% were assessed via a pedestrian survey with visual inspection at approximately 16-foot (5m) intervals.

A subsurface survey was also conducted within the APE for direct effects. ECA determined that five shovel test pits (STPs) within the proposed lease area, five STPs within the proposed access/utility easement, one STP within the proposed guy easement 1, one STP within the proposed guy easement 2, and one STP within the proposed guy easement 3 would be sufficient. All shovel test pits were excavated at 65-foot (20m) intervals and measured 16-inches by 16-inches (41cm by 41cm) square in size. Shovel test pits are terminated when one of the following four conditions are met: a depth of 36 inches (91cm) is reached, or until sterile subsoil, bedrock, or the water table is encountered. All excavated soils were screened through a six-millimeter wire mesh archaeology screen to isolate any cultural artifacts.

FIELD SURVEY RESULTS

Five STPs were excavated in the proposed lease area; five STPs were excavated within the proposed access/utility easement; one STP was excavated within the proposed guy easement 1; one STP was excavated within the proposed guy easement 2; and one STP was excavated within the proposed guy easement 3. Shovel test dimension measurements and soil characteristics are listed in the following table:

Table 7: Shovel Test Pit Descriptions

Shovel Test Pit (STP)	Munsell Color	Texture	Depth		Artifacts encountered
			Inches	cm	
STP1	10YR 3/2 very dark grayish brown	clay loam	0-4	0-11	No
	2.5Y 5/3 light olive brown; terminated at water table	clay loam	4-8	11-21	No
STP2	2.5Y 4/2 dark grayish brown	clay loam	0-8	0-21	No
	10YR 6/6 brownish yellow mottled with 10YR 6/2 light brownish gray	silty clay loam	8-12	21-31	No
STP3	10YR 3/2 very dark grayish brown	clay loam	0-5	0-13	No
	2.5Y 5/3 light olive brown mottled with 10YR 6/6 brownish yellow; terminated at water table	silty clay loam	5-9	13-23	No
STP4	10YR 3/2 very dark grayish brown	clay loam	0-3	0-8	No
	2.5Y 5/3 light olive brown; terminated at water table	clay loam	3-6	8-16	No
STP5	10YR 4/2 dark grayish brown	clay loam	0-1	0-3	No
	10YR 6/6 brownish yellow mottled with 10YR 6/4 light yellowish brown	clay loam	11-17	28-44	No
STP6	2.5Y 5/2 grayish brown	clay loam	0-4	0-11	No
	2.5Y 5/3 light olive brown; terminated at water table	clay loam	4-10	11-26	No
STP7	10YR 3/2 very dark grayish brown	clay loam	0-3	0-8	No
	10YR 5/2 grayish brown; terminated at water table	clay loam	3-9	8-23	No
STP8	10YR 4/2 dark grayish brown; terminated at water table	clay loam	0-4	0-11	No
STP9	10YR 3/2 very dark grayish brown	clay loam	0-3	0-8	No
	10YR 5/2 grayish brown; terminated at water table	clay loam	3-7	8-18	No
STP10	10YR 4/2 dark grayish brown	clay loam	0-4	0-11	No
	2.5Y 5/3 light olive brown; terminated at water table	clay loam	4-9	11-23	No

Shovel Test Pit (STP)	Munsell Color	Texture	Depth		Artifacts encountered
			Inches	cm	
STP11	10YR 4/2 dark grayish brown; terminated at water table, very muddy	clay loam	0-7	0-18	No
STP12	10YR 3/2 very dark grayish brown	clay loam	0-2	0-6	No
	2.5Y 5/3 light olive brown; terminated at water table	clay loam	2-7	6-18	No
STP13	2.5Y 5/3 light olive brown; terminated at water table	clay loam	0-9	0-23	No

No artifacts were identified during ECA's pedestrian or subsurface survey. Subsoil characteristics generally matched the range of characteristics for the mapped soil.

LABORATORY METHODS

Since no artifacts were recovered during the field survey, no laboratory methods were employed.

CURATION

Since no archaeological sites were identified, artifact curation is not applicable to this work. All field notes, project photographs, and reports associated with this project will be curated at ECA's Alpharetta, Georgia office.

RECOMMENDATIONS

During the course of this archaeological assessment, no archaeological sites or cultural resources were located in the APE for direct effects. We believe that no archaeological cultural resources will be affected by the proposed project. Therefore, we recommend a finding of No Effect for the proposed undertaking as it relates to archaeology. We request your concurrence with our finding.

If inadvertent discoveries of buried cultural materials or human remains are found during construction, all work should cease and potentially affected Tribes, as well as the State Historic Preservation Office should be notified immediately.

CLOSURE

We are submitting this report for APC Towers, LLC to seek concurrence with our finding and to comply with Federal Communications Commission (FCC) requirements as identified in 47 CFR 1.1307. Chase Rodriguez, MA, RPA, Project Archaeologist, performed the fieldwork. Lex Chesnut, MSc, Project Manager, conducted background research and wrote the report. Shannon Lowman, MA, RPA, Principal Investigator, reviewed this assessment. We request your concurrence with our finding. Please contact our office with questions or comments or if additional information is required.

REFERENCES CITED

Google Earth

- 2024 Aerial Photograph
- 2013 Aerial Photograph
- 2010 Aerial Photograph
- 2008 Aerial Photograph
- 1997 Aerial Photograph

HistoricAerials.com

- 1983 Aerial Photograph
- 1960 Aerial Photograph
- 1950 Aerial Photograph

Kentucky Heritage Council (KHC)

- 1991 Specifications for Archaeological Fieldwork and Assessment Reports. Frankfort Kentucky.
- 2025 Kentucky Cultural Resources Map.
<https://kyshpo.maps.arcgis.com/apps/instant/basic/index.html?appid=f0e5df189a9b4e89bfe93bc0666a02a3>. Accessed March 2026.

Kentucky Historical Society

- 2025 *Rockcastle County, 1810*. Kentucky Historical Society.
<https://history.ky.gov/markers/rockcastle-county-1810>. Accessed April 2026.

Kentucky State Archaeology Office

- 2026 Archaeological Site Check FY26-13767

National Park Service

- 2025 Physiographic Provinces.
<https://www.nps.gov/nr>. Accessed March 2026.

National Register Information System (NRIS)

- 2025 National Register of Historic Places.
<http://www.nps.gov/nr>. Accessed March 2026.

Natural Resources Conservation Service, Soil Survey (NRCS)

- 2021 *Stendal*. Official series description.
https://soilseries.sc.egov.usda.gov/OSD_Docs/S/STENDAL.html
- 2015 *Tilsit*. Official series description.
https://soilseries.sc.egov.usda.gov/OSD_Docs/T/Tilsit.html

Pollack, David.

- 2008 *The Archaeology of Kentucky: An Update, Volume One*. Kentucky Heritage Council.

Rockcastle Co. Industrial Development Authority

2021 *Our History*. Rockcastle Co. Industrial Development Authority.
<https://rockcastlecountyky.com/our-history>. Accessed April 2026.

Rockcastle County

2026 *History*. Rockcastle County.
<https://www.rockcastletourism.com/information/history/>. Accessed April 2026.

United States Department of Agriculture (USDA)

2026 Web Soil Survey.
<http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed March 2026.

United States Federal Communications Commission (FCC)

2005 Federal Communications Commission Federal Register, 47 CFR Part 1, Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act; Final Rule, WT Docket No. 03-128; FCC 04-222. Washington, DC.

United States Geological Survey (USGS)

1953 Brodhead, KY Quadrangle Map, 7.5-minute series. U.S. Geological Survey, Washington, DC.

Yellowmaps.com

2021 *Blank County Map of Kentucky*.
<https://www.yellowmaps.com/map/kentucky-blank-map-99.htm#ym-viewmap>. Accessed April 2026.

APPENDIX E

Native American Information

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name: LV Turkeytown			Site Number: KY-4170			NOO Date: 3/13/2026	
TCNS #: 308132			ECA Project#: 26-000456			ECA PM: ARC	
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of FCC Escalation	Tribal Response Date	Tribal Response
1	Omaha Tribe of Nebraska	4/10/2026	Electronic	OmahaTribetcns@outlook.com jarell.grant@theomahatribe.com	5/21/2026	6/5/2026	Cleared via Escalation
2	Ponca Tribe of Indians of Oklahoma	4/10/2026	Electronic	106notifications@ponca-nsn.gov	5/21/2026	6/5/2026	Cleared via Escalation
3	Eastern Band of Cherokee Indians	4/10/2026	Electronic	sverka@nc-chokeee.com	NA	4/12/2026	Cleared via 30-Day Agreement
4	Bad River Band of Lake Superior Chippewa Indians	4/10/2026	Electronic	thpo@badriver-nsn.gov deputythpo@badriver-nsn.gov	NA	4/12/2026	Cleared via 30-Day Agreement
5	Cherokee Nation	4/10/2026	Electronic	historicpreservation@cherokee.org ; gwen-terrapin@cherokee.org	NA	5/12/2026	Cleared via TCNS
6	Osage Nation	4/10/2026	Electronic	TCNS@osagenation-nsn.gov ; christinacheshewalla@osagenation-nsn.gov	5/21/2026	6/5/2026	Cleared via Escalation
7	United Keetoowah Band of Cherokee Indians	4/10/2026	Electronic	tcns@ukb-nsn.gov ; rcain@ukb-nsn.gov	5/21/2026	6/5/2026	Cleared via Escalation
8	Eastern Shawnee Tribe of Oklahoma	NA	Mail	celltower@estoo.net	NA	3/12/2026	Cleared via TCNS
9	Wyandotte Nation	4/10/2026	Electronic	sclemons@wyandottenation.org	5/21/2026	6/5/2026	Cleared via Escalation
10	Peoria Tribe of Indians of Oklahoma	4/10/2026	Electronic	thpo@peoriatribe.com	5/21/2026	6/5/2026	Cleared via Escalation
11	Shawnee Tribe	4/10/2026	Electronic	tcns@shawnee-tribe.com	5/21/2026	6/5/2026	Cleared via Escalation

TCNS Notification Statements

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Thursday, March 5, 2026 20:01
To: tribal.notify
Subject: Proposed Tower Structure Info - Email ID #9458915

Dear Dina M Bazzill,

Thank you for submitting a notification regarding your proposed construction via the Tower Construction Notification System. Note that the system has assigned a unique Notification ID number for this proposed construction. You will need to reference this Notification ID number when you update your project's Status with us.

Below are the details you provided for the construction you have proposed:

Notification Received: 03/05/2026

Notification ID: 308132
Tower Owner Individual or Entity Name: APC Towers, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: GTOWER - Guyed Structure Used for Communication Purposes
Latitude: 37 deg 25 min 50.0 sec N
Longitude: 84 deg 27 min 34.8 sec W
Location Description: Dysart Way
City: Crab Orchard
State: KENTUCKY
County: ROCKCASTLE

Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Ground Elevation: 281.6 meters
Support Structure: 74.7 meters above ground level
Overall Structure: 76.2 meters above ground level
Overall Height AMSL: 357.8 meters above mean sea level

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Friday, March 13, 2026 03:01
To: tribal.notify
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER
CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9460796

Dear Applicant:

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

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

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

1. THPO Jarell Grant - Omaha Tribe of Nebraska - (PO Box: 368) Macy, NE - jarell.grant@theomahatribe.com; mark.parker@theomahatribe.com - 402-837-5391 (ext: 433) - electronic mail
Exclusions: Please note we have updated procedures. Please email us at Omahatribefcctcns@outlook.com

2. THPO Liana S Hesler - Ponca Tribe of Indians of Oklahoma - 101 White Eagle Drive Ponca City, OK - 106notifications@ponca-nsn.gov - 580-382-6633 - electronic mail

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

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

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

4. THPO Lawrence Plucinski - Bad River Band of Lake Superior Tribe of Chippewa Indians - (PO Box: 39) Olanah, 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. Gwen Terrapin - Cherokee Nation - (PO Box: 948) Tahlequah, OK - historicpreservation@cherokee.org; gwen-terrapin@cherokee.org - 918-772-4165 - electronic mail

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

Wado,
Cherokee Nation

6. THPO Andrea A Hunter PhD - Osage Nation - 627 Grandview Avenue Osage Nation Historic Preservation Office Pawhuska, OK - TCNS@osagenation-nsn.gov; christinacheshewalla@osagenation-nsn.gov - 918-287-5328 - electronic mail

Exclusions: The Osage Nation has an interest in this proposed cell tower project. Do not send the FCC Form 620. Please send project submittals to Fawn Cheshewalla: TCNS@osagenation-nsn.gov or contact the ONHPO at (918) 287-5328. Consultation Procedures can be found at osageculture.com. Thank you.

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

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

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

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

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

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

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

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

9. THPO Sherri Clemons - Wyandotte Nation - 8 Turtle Drive Wyandotte, OK - sclemons@wyandotte-nation.org - 918-678-6344 - electronic mail

Exclusions: 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.

10. Tribal Historic Preservation Officer Burgundy J Fletcher - Peoria Tribe of Indians of Oklahoma - 118 S. Eight Tribes Trail Miami, OK - thpo@peoriatribe.com - 918-540-2535 (ext: 9234) - electronic mail

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

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

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

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

Thank you for the opportunity to comment.

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

12. Chief of Staff, Deputy SHPO Theodore Hild - Illinois Historic Preservation Agency - 1 Old State Capitol Plaza Springfield, IL - ted_hild@ihpa.state.il.us - -- - electronic mail

13. SHPO Robert E Carter Jr - Department of Natural Resources - 402 West Washington Street Indiana Govt. Center South, Room W256 Indianapolis, IN - dhp@dnr.state.in.us - 317-232-1646 - electronic mail

14. Deputy SHPO Jon C Smith - Department of Natural Resources - 402 West Washington Street Indiana Govt. Center South, Room W256 Indianapolis, IN - jsmith@dnr.state.in.us - 317-232-1646 - electronic mail

15. Environmental Review Coordinator Jill Howe - Kentucky Heritage Council - 410 High Street Frankfort, KY - jill.howe@ky.gov - 502-564-7005 - electronic mail

16. SHPO Dru Buntin Ms - Acting Director, State Department of Natural Resources - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-4732 - electronic mail

17. Deputy SHPO David Kelly Mr - Division of State Parks Director - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-9392 - electronic mail

18. Deputy SHPO Toni M Prawl Dr - State Historic Preservation Office (Missouri) - (PO Box: 176) Jefferson City, MO - MOSection106@dnr.mo.gov - 573-751-7858 - electronic mail

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

20. 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

21. SHPO & Executive Director Donna Neary - Kentucky Heritage Council - 300 Washington Street Frankfort, KY - donna.neary@ky.gov - 502-564-7005 - electronic mail

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

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

Notification Received: 03/05/2026

Notification ID: 308132

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: APC Towers, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: GTOWER - Guyed Structure Used for Communication Purposes

Latitude: 37 deg 25 min 50.0 sec N
Longitude: 84 deg 27 min 34.8 sec W
Location Description: Dysart Way
City: Crab Orchard
State: KENTUCKY
County: ROCKCASTLE

Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Ground Elevation: 281.6 meters
Support Structure: 74.7 meters above ground level
Overall Structure: 76.2 meters above ground level
Overall Height AMSL: 357.8 meters above mean sea level

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

<https://www.fcc.gov/wireless/available-support-services>

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

Thank you,
Federal Communications Commission

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Follow-Up Documents

Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:34
To: 'Omahatribefcctcns@outlook.com'; 'jarell.grant@theomahatribe.com'; mark.parker@theomahatribe.com
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Omaha Tribe of Nebraska via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review
TCNS ID #308132
Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:48
To: 106notifications@ponca-nsn.gov
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Ponca Tribe of Indians of Oklahoma via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:54
To: syerka@nc-chokeee.com
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Eastern Band of Cherokee Indians via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:56
To: thpo@badriver-nsn.gov; deputythpo@badriver-nsn.gov
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Band of Lake Superior Chippewa Indians via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:57
To: historicpreservation@cherokee.org; gwen-terrapin@cherokee.org
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Cherokee Nation via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:57
To: 'TCNS@osagenation-nsn.gov'; 'christinacheshewalla@osagenation-nsn.gov'
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Osage Nation via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:58
To: 'tcns@ukb-nsn.gov'; 'rcain@ukb-nsn.gov'
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the United Keetoowah Band of Cherokee Indians via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:59
To: sclemons@wyandotte-nation.org
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Wyandotte Nation via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review
TCNS ID #308132
Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 16:59
To: 'thpo@peoriatribes.com'
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Peoria Tribe of Indians of Oklahoma via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Lex Chesnut

From: Lex Chesnut
Sent: Friday, April 10, 2026 17:00
To: tcns@shawnee-tribe.com
Subject: TCNS 308132 Guyed Tower Section 106 Review
Attachments: TCNS 308132_LV Turkeytown_KY-4170_Section 106_ECA_26-000456.pdf; TCNS 308132_LV Turkeytown_KY-4170_Arch Assessment_ECA_26-000456.pdf

Hello,

Please see the attached Section 106 Review documentation (FCC Form 620) for the following project based on interest expressed by the Shawnee Tribe via the FCC Tower Construction Notification System (TCNS). Thank you

Section 106 Review

TCNS ID #308132

Proposed 250-Foot Tall Guyed-Type Telecommunications Structure

(Overall Height Includes Appurtenances)

APC Towers, LLC Site - LV Turkeytown (KY-4170)

Dysart Way

Crab Orchard, Rockcastle County, Kentucky

ECA Project No. 26-000456

Best,
Lex Chesnut (she/her), MSc
Environmental Corporation of America (ECA)
(512) 734-2303
lex.chesnut@eca-usa.com



Additional Tribal Correspondence

Environmental Corp. of America
1375 Union Hill Industrial Court
Suite A
Alpharetta, GA 30004



Phone: 770-667-2040
Fax No.: 770-667-2041

From: Lex Chesnut
lex.chesnut@eca-usa.com

Cherokee Nation
PO Box 948
Tahlequah, OK 74465
ATTENTION: Gwen Terrapin

TRANSMITTAL COVER SHEET

Date: April 27, 2026

Subject: TCNS ID #308132
Proposed 250-Foot Tall Guyed-Type Telecommunications Structure
(Overall Height Includes Appurtenances)
APC Towers, LLC Site - LV Turkeytown (KY-4170)
Dysart Way
Crab Orchard, Rockcastle County, Kentucky
ECA Project No. 26-000456

Greetings,

Attached is the review fee for the above reference project. Please do not hesitate to email or call with any questions or concerns regarding this project.

Sincerely,

A handwritten signature in black ink that reads "Lex Chesnut". The signature is fluid and cursive.

Lex Chesnut
Project Manager



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

Office of the Principal Chief

Chuck Hoskin Jr.
Principal Chief
ᏌᏍ ᏆᏆᏍ ᏌᏉᏍ
ᏃᏍᏍᏉᏍ

Bryan Warner
Deputy Principal Chief
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April 13, 2026

ECA
Attn: Dina Bazzill

VIA: Email: dina.bazzill@eca-usa.com

Re: TCNS 308132

The Cherokee Nation (Nation) is in receipt of your correspondence about **TCNS 308132** and appreciates the opportunity to provide comment upon this proposed facility deployment.

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

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

Wado,

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

Referrals

Lillian Alvarado

From: towernotifyinfo@fcc.gov
Sent: Thursday, May 21, 2026 8:02 AM
To: tribal.notify
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #39787

The Towers, LLC
Dina M Bazzill
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 05/14/2026 and 05/21/2026. Our contact with these Tribal Nations or NHOs was sent on 05/21/2026.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 05/21/2026, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

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

Sincerely,
Ellen Saint Onge
Federal Preservation Officer
Federal Communications Commission
ellen.saintonge@fcc.gov

1) See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, Second Report and Order, FCC 18-30 (Mar. 30, 2018) (Wireless Infrastructure Second Report and Order).

2) See id. at paras. 111-112.

LIST OF PROPOSED COMMUNICATIONS TOWERS

Tribe Name: Mille Lacs Band of Ojibwe Indians
Tribe Name: Omaha Tribe of Nebraska
Tribe Name: Otoe-Missouria Tribe of Indians
Tribe Name: Ottawa Tribe of Oklahoma
Tribe Name: Ponca Tribe of Indians of Oklahoma
Tribe Name: Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
Tribe Name: Rosebud Sioux Tribe
Tribe Name: Sac and Fox Nation
Tribe Name: Santee Sioux Nation of Nebraska
Tribe Name: Sisseton-Wahpeton Oyate of the Lake Traverse Reservation
Tribe Name: Winnebago Tribe of Nebraska
Tribe Name: Wyandotte Nation

TCNS# 307751 Referred Date: 05/19/2026 Location: 1 Ram Way, Covington, GA Detailed Description of Project: The applicant plans to construct a 150-foot tall (overall height) monopole telecommunications structure within a proposed 45-foot by 80-foot lease area. Additional details can be found in the Section 106 documentation. 26-000385

Tribe Name: Coushatta Indian Tribe
Tribe Name: Kialegee Tribal Town
Tribe Name: Thlopthlocco Tribal Town
Tribe Name: Seminole Tribe of Florida
Tribe Name: Shawnee Tribe

TCNS# 308132 Referred Date: 05/19/2026 Location: Dysart Way, Crab Orchard, KY Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Tribe Name: Omaha Tribe of Nebraska
Tribe Name: Osage Nation
Tribe Name: Peoria Tribe of Indians of Oklahoma
Tribe Name: Ponca Tribe of Indians of Oklahoma
Tribe Name: Shawnee Tribe
Tribe Name: United Keetoowah Band of Cherokee Indians in Oklahoma
Tribe Name: Wyandotte Nation

TCNS# 307389 Referred Date: 05/19/2026 Location: County Road 2330/ Avenue J, Lubbock, TX Detailed Description of Project: The applicant plans to construct a 140-foot tall (overall height) monopole telecommunications structure within a proposed 50-foot by 50-foot lease area. Additional details can be found in the Section 106 documentation. 26-000294

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Tonkawa Tribe
Tribe Name: Wichita and Affiliated Tribes

TCNS# 308331 Referred Date: 05/19/2026 Location: US-277, San Angelo, TX Detailed Description of Project: The applicant plans to construct a 265-foot tall (overall height) self-supporting lattice telecommunications structure within a proposed 60-foot by 60-foot lease area. Additional details can be found in the Section 106 documentation. 26-000351

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Kialegee Tribal Town
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe

Tribal Clearances

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Tuesday, May 12, 2026 11:58 AM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; historicpreservation@cherokee.org; gwen-terrapin@cherokee.org
Subject: Reply to Proposed Tower Structure (Notification ID: 308132) - Email ID #9510071

Dear Dina M Bazzill,

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

The following message has been sent to you from Gwen Terrapin of the Cherokee Nation in reference to Notification ID #308132:

The Cherokee Nation (Nation) is in receipt of your correspondence for tower project, TCNS No. 308132 located in Rockcastle County, KY and appreciates the opportunity to provide comments upon this project.

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

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

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

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

Additionally, due to the historic presence of our people in the project area, inadvertent discoveries of human remains and related NAGPRA items may occur, even in areas of existing or prior development. Should this occur, we request all work cease and Cherokee Nation be notified immediately at (918) 931-7161. In such discovery, other appropriate agencies will need to be contacted immediately as well.

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

Wado,

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

Notification Received: 03/05/2026
Notification ID: 308132
Tower Owner Individual or Entity Name: APC Towers, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: GTOWER - Guyed Structure Used for Communication Purposes
Latitude: 37 deg 25 min 50.0 sec N
Longitude: 84 deg 27 min 34.8 sec W
Location Description: Dysart Way
City: Crab Orchard
State: KENTUCKY
County: ROCKCASTLE

Detailed Description of Project: The applicant plans to construct a 250-foot tall (overall height) guyed telecommunications structure within a proposed 100-foot by 100-foot lease area. Additional details can be found in the Section 106 documentation. 26-000456

Ground Elevation: 281.6 meters
Support Structure: 74.7 meters above ground level
Overall Structure: 76.2 meters above ground level
Overall Height AMSL: 357.8 meters above mean sea level

This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

Lex Chesnut

From: towernotifyinfo@fcc.gov
Sent: Thursday, March 12, 2026 09:29
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; celltower@estoo.net
Subject: Reply to Proposed Tower Structure (Notification ID: 308132) - Email ID #9464812

Dear Dina M Bazzill,

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

The following message has been sent to you from Director Lora Nuckolls of the Eastern Shawnee Tribe of Oklahoma in reference to Notification ID #308132:

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

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

Notification Received: 03/05/2026
Notification ID: 308132
Tower Owner Individual or Entity Name: APC Towers, LLC
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

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Latitude: 37 deg 25 min 50.0 sec N
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This e-mail may contain trade secrets or privileged, undisclosed, or otherwise confidential information. If you have received this e-mail in error, you are hereby notified that any review, copying, or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Thank you for your cooperation.

APPENDIX F

Floodplain Information



Date Generated: 2/27/2026
Source: FEMA's National Flood Hazard Layer

FEMA Floodplain Map

ECA ID: 26-000456



APPENDIX G

Wetland Information



500 0 500 Feet

Date Generated: 2/27/2026

Source: U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands_team@fws.gov

Wetlands Map

ECA ID: 26-000456



APPENDIX H

Antenna Structure Registration Information

Mount Vernon Signal

PHONE 606-256-2244

"Serving Rockcastle County Since 1887"

FAX 606-256-9526

Perlina M. Anderkin, Publisher

Paige Bengé, Advertising Mgr.

Affidavit of Publication

I, Spencer Bengé, of the Mount Vernon Signal, do hereby
certify that the publication of tower construction
for APC Towers, LLC was inserted
into the Mount Vernon Signal on the following dates:

Date: 3-26-26 Page 4 Col. 3-26-2026

Date: _____ Page _____ Col. _____

Date: _____ Page _____ Col. _____

Date: _____ Page _____ Col. _____

Signature Spencer Bengé

Subscribed and sworn to before me this 21st day of May.
20 26.

Notary Public Sandy Duka
My commissioner expires 9-12-29

Obituaries

Peggy Sue Edwards

Peggy Sue Edwards, 67, departed this life on Monday, March 16, 2026, at her residence in Brodhead. Peggy was born June 22, 1958, a daughter to the late Millard and Betty Miller Sutton. On December 19, 1982, she married David Edwards and they were married for 43 years, from that union came one child, Daniel Edwards.



Peggy retired from the Public Works Dept. in the town of Mooresville, IN. She attended Mt. Zion Baptist Church, and she enjoyed fishing, birdwatching, but most of all she enjoyed spending time with family and friends. Peggy was a woman of strong opinions, and of strong heart, those who knew her felt this deeply, she will be dearly missed.

Those left to celebrate her life are: her husband, David Edwards; her son, Daniel Edwards; her granddaughter, Bailey Edwards; and her sisters, Tanagene Blanton of Brodhead, and Judy Stevens of CA.

Besides her parents she was preceded in death by her brother, Tony Michael Sutton.

A private graveside service was held at Piney Grove Cemetery on Thursday, March 19, 2026, with Bro. Nathan Deleon officiating.

Marvin E. Owens Home for Funerals is honored to serve the Peggy Edwards family.

Ruby Thompson

Ruby Mae Thompson, 90, of Brodhead, died Sunday, March 22, 2026.

Funeral services were conducted Wednesday, March 25, 2026 at Dowell & Martin Funeral Home. Burial was in Fairview Cemetery.

A complete obituary will appear in next week's Signal.

Please visit www.DowellMartin.com or Dowell & Martin Funeral Home's Facebook page to view online obituary.

Let the Bible Speak

Tune in to "Let the Bible Speak," with Brett Hickey, on Sunday mornings at 6:30 a.m. on WDKY Fox TV.

KING'S EYE CARE

Dr. Sarah King
Dr. Kevin Skidmore
Dr. Ashley Lane
Dr. Gary King
Dr. Taylor Waggoner
—Optometrists—

854 Ridgewood Dr. • Berea, KY 40403
www.eyedoctorberea.net
859-986-7027

Notice

APC Towers, LLC is proposing to construct a 250-foot tall (overall height) guyed telecommunications structure near Dysart Way, Crab Orchard, Rockcastle County, Kentucky (37° 25' 50.0" N, 84° 27' 34.8" W). The proposed tower is anticipated to utilize FAA Style E (medium intensity, dual red/white strobes) lighting.

APC Towers, LLC invites comments from any interested party on the impact the proposed undertaking may have on any districts, sites, buildings, structures, or objects significant in American history, archaeology, engineering, or culture that are listed or determined eligible for listing in the National Register of Historic Places. Comments may be sent to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. Comments must be received within 30 days of the date of this notice.

In addition, any interested party may also request further environmental review of the proposed action under the FCC's National Environmental Policy Act rules, 47 CFR §1.1307, by notifying the FCC of the specific reasons that the action may have a significant impact on the quality of the human environment. This request must only raise environmental concerns and can be filed online using the FCC pleadings system at www.fcc.gov or mailed to FCC Requests for Environmental Review, Attn: Ramon Williams, 45 L Street NE, Washington, DC 20554 within 30 days of the date that notice of this proposed action is published on the FCC's website. Refer to File No. A1378777 when submitting the request and to view the specific information about the proposed action. 26-000456/ARC

“Thinking History”

by Jerry Hopkins

God made us to think. That is why He gave us minds and bodies with which to relate to the world in which He placed us and where He wants to meet us. Thinking is good for the soul; it is good for society and the many elements it involves—groups, institutions, organizations, families, schools and governments. One of the most important facets of this intellectual exercise is history.

My wife and I have been reading a book titled The Daniel Plan about the biblical character Daniel and how he responded to the crisis situation in which he found himself. He trusted God, but he also responded in important ways, acting and thinking. He was conscious of history and truth as he sought to live for God in a godly and good manner. He fasted and prayed. He read God's Word and he worshipped God in one of the most worldly and wicked societies. The authors of this exceptional book said, "Thoughts are automatic. They just happen. They are based on complex chemical reactions and information from the past. And what most people don't know is that thoughts are sneaky and they lie. They lie a lot. It is often these uninvestigated thoughts that provide the emotional fuel for anger, anxiety, depression, and unhealthy behaviors"

Thoughts are more than the creation of our body chemistry. I do not believe they are "automatic" because we can question and change our thinking. This is why I have combined these two words "thinking history," so as to engage all of those who read and think with me about acting on what we learn and how we live that we might obey God and honor the Lord Jesus Christ. This process is addressed in The Daniel Plan whose authors say, "If you never question your erroneous negative thoughts, you believe them 100 percent and then you act as if the lies in your head are true. For example, if you think your husband never listens to you, even though he has on many occasions, you act as if he doesn't, and you feel justified in yelling at him. If you think you are a failure, even though you have had many successes, you are more likely to give up easily." We need to think about our history and what is really, actually, factually true. Much of what we are hearing and seeing today is NOT TRUE. We are intentionally deceived and led astray. Our history is being rewritten so as to make us embrace lies. For this reason we must consider that learning involves both reading and thinking. As one engages in both these exercises a result is the recording and expression in writing the thoughts that emerge. Thus, John Piper argues in his great book on "thinking" about this exercise in pursuing a knowledge and relationship with God. He says, echoing both Calvin and Augustine, "I count myself one of the number of those who write as they learn and learn as they write." So must you and I in this effort of thinking history.

History has often been equated with kingdoms—earthly powers, powerful personalities, persuasive ideologies, fateful decisions and political resolutions. It has been about communities, families, groups, societies, nations and all they entail.

This is true of the Christian faith—the family of faith, the community of the committed, the society of the saved. History is about the story of these relationships coming under the term ecclesia. The fact of the ecclesiastical cannot be ignored. It is a reality. It is part of God's kingdom and comes directly under His sovereignty and authority.

For this reason Hebrews

12:28-29 becomes very important historically—"Therefore, since we are receiving a kingdom which cannot be shaken, let us have grace, by which we may serve God acceptably with reverence and godly fear. For our God is a consuming fire." "We are receiving a kingdom" with power, persuasion. It is continuing, consuming, engaging and irresistible.

History is also about memory, manners and a Master. "Looking unto Jesus the author and finisher of our faith; who for the joy that was set before Him endured the cross, despising the shame, and is set down at the right hand of the throne of God. For consider Him that endured such contradictions of sinners against Himself, lest ye be wearied and faint in your minds" (Hebrews 13:2-3). Often we falter and faint in our thinking and acting, fighting and resisting the lies.

This is why we need to remember who we are, kingdom citizens, representatives of God in a flawed and failing world. We are what Paul said, "Ambassadors of Christ" (2 Corinthians 5:20). Manners are about remembering and about conduct, about our behavior in community. We must not forget sometimes we entertain strangers as angels unaware and that many are in bonds and suffering adversity and hardship. Not only must we know and understand the Master as a representative leader as the Hebrews writer says, "Remember them which have the rule over you, who have spoken unto you the word of God: whose faith follow, considering the end of their conversation" (Hebrews 13:7). That word "conversation" in this text is not just about talking, it is about the manner of living and leading. Leadership is important, but as important is followship. This verse is about followship. Paul reminds us that we "have a Master in heaven" (Colossians 4:1).

At the heart of all history is the reality of God—Who He is and how He has manifest Himself in each present moment. History and time are coursing through our veins and our relationships, but they do not limit God. God transcends both history and time. He exists outside time and oversees all his-

tory from beginning to end.

History is about what God has done. It is about what He is doing right now in us and for us, even through us. Consider the past and how God has worked. This is why we have history, the text of experience, the real testi-

mony, the verbal story of God's work in His true and timely Word. So let us "think history" as we face our trials and troubles now.

There is so much more that can be said and shared about "thinking history."

What Shall It Profit a Man? Mark 8:36

In a world driven by success, wealth, and achievement, the words of Jesus still stand as a powerful question: "What shall it profit a man, if he shall gain the whole world, and lose his own soul?"

Every day, people invest their time and energy, chasing things that will not last: money, recognition, and possessions. While these may bring temporary satisfaction, they cannot meet our deepest needs. Jesus reminds us that the soul is of greater value than anything this world can offer. A person may gain everything outwardly and still be empty within. No amount of success can replace a lost relationship with God.

The truth is simple and sobering: eternity is more important than the present moment.

One day, each of us will stand before God. What will matter then is not what we gained in this life, but whether we were faithful to Him.

The question remains, what are we gaining, and what might we be losing?

Everyone Welcome

Robby Cable - 606-305-8452

109 Providence Cemetery Rd. • Brodhead

Providence
CHURCH of CHRIST

Come Worship With Us! Sunday Morning Bible Study: 9:30
Sunday Morning Worship: 10:20- Sunday Evening Worship: 6:00
Wednesday Evening Bible Study: 7:00

The David M. Smith Veterans Center/ Rockcastle Veterans Memorial Park

Vietnam Veterans Remembrance Day 2026

Everyone is invited to our annual Vietnam Veterans Remembrance Day

This year's ceremony will be held on

March 28, 2026

11:00 a.m. to 1 p.m.

We encourage everyone to reach out to their friends, family, neighbors, co-workers and anyone else who may have served in Vietnam, and invite them to this event.

Let us give them the welcome home they deserved 50 years ago.

There will be speeches, military honors & other activities.

Those running for political office are invited but this is strictly a Remembrance Day event. There is no campaigning at this event. We appreciate your cooperation in this.

Pie Auction & Soup Dinner Benefit!

Saturday, April 4th 2026 • 6PM

Featuring

The Medley Boys

Enjoy Delicious Homemade Soups & Bid on Tasty Pies!

Proceeds Will Go Toward

The "Livingston Homecoming"

@ The Depot
9174 Main Street
Livingston

Bid on Pie!

**FCC Form 854
Main Form**

Approved by OMD – 3060-0139
See instructions for public burden estimate

Application for Antenna Structure Registration

Purpose of Filing

1) Enter the application purpose: (NE)	
AM – Amendment of a Pending Application AU – Administrative Update CA – Cancellation of an Antenna Structure Registration DI – Notification of an Antenna Structure Dismantlement MD – Modification of a Antenna Structure Registration	NE – Registration of a New Antenna Structure NT – Required Construction/Alteration Notification OC – Ownership Change RE – Registration of a Replacement Antenna Structure WD – Withdrawal of a Pending Application
2a) If the answer to 1 is AU, CA, DI, MD, NT, OC or RE, provide the FCC Antenna Structure Registration (ASR) Number.	FCC ASR Number:
2b) If the answer to 1 is AM or WD, provide the File Number of the pending application on file.	File Number:
2c) If the answer to 1 is MD or NT, provide the date the Antenna Structure was constructed or the date it was last altered (mm/dd/yyyy).	Date:
2d) If the answer to 1 is DI, provide the date the Antenna Structure was dismantled (mm/dd/yyyy).	Date:

Antenna Structure Ownership Information

3) Select one of the entity types:			
() Individual	() Unincorporated Association	() Trust	() Government Entity
() Corporation	(X) Limited Liability Company	() General Partnership	() Limited Partnership
() Consortium	() Limited Liability Partnership	() Other: _____	
4) FCC Registration Number (FRN): 0023897788		5) Assignor FCC Registration Number (FRN):	
6) First Name (if individual):	MI:	Last Name:	Suffix:
7) Legal Entity Name (if not an individual): APC Towers IV, LLC			
8) Attention To: Jonathan Greene		9) P.O. Box:	And/Or
10a) Street Address 1: 8601 Six Forks Road		10b) Street Address 2: Suite 250	
11) City: RALEIGH	12) State: NC	13) Zip Code: 27615	
14) Telephone Number (xxx-xxx-xxxx): (919) 948-4788		15) Fax Number: (xxx-xxx-xxxx):	
16) E-mail Address: jgreene@apctowers.com			

Contact Representative Information

17) First Name (if individual): Eric	MI:	Last Name: Johnson	Suffix:
18) Business Name: ECA-USA			
19) Attention To: Eric Johnson	20) P.O. Box		And/Or
21a) Street Address 1: 1375 Union Hill Industrial Court		21b) Street Address 2: Suite A	
22) City: Alpharetta	23) State: GA	24) Zip Code: 30004	
25) Telephone Number (xxx-xxx-xxxx): (770) 667-2040		26) Fax Number: (xxx-xxx-xxxx):	
27) E-mail Address: eric.johnson@eca-usa.com			

Antenna Structure Information

28a) Latitude (DD-MM-SS.S): 37- 25- 50.0		28b) North or South: North	
29a) Longitude (DDD-MM-SS.S): 084- 27- 34.8		29b) East or West: West	
30) Street Address or Geographic Location: Dysart Way		31) City: Crab Orchard	
32) County: ROCKCASTLE	33) State: KENTUCKY	34) Zip Code: 40419	
35) Elevation of site above mean sea level (meters):			281.6 meters
36) Overall height above ground level (AGL) of the supporting structure without appurtenances:			74.7 meters
37) Overall height above ground level (AGL) of the antenna structure including all appurtenances:			76.2 meters
38) Overall height above mean sea level (add items 35 and 37 together):			357.8 meters
39a) Enter the type of structure on which the antenna will be mounted: (GTOWER) B – Building BANT – Building with Antenna on Top BMAST – Building with Mast BPIPE – Building with Pipe BPOLE – Building with Pole BRIDG – Bridge BTWR – Building with Tower GTOWER – Guyed Structure Used For Communication Purposes LTOWER – Lattice Tower MAST – Mast MTOWER – Monopole NNGTANN – Guyed Tower Array NNLTANN – Lattice Tower Array NNMTANN – Monopole Array PIPE – Any type of Pipe POLE – Any type of Pole RIG – Oil or Other Type of Rig SIGN – Any type of Sign or Billboard SILO – Any type of Silo STACK – Smoke Stack TANK – Any type of Tank (water, gas, etc.) TREE – When used as a support for an antenna UPOLE – Utility Pole/Tower used to provide service (electric, telephone, etc.)			
39b) Number of Towers in Array:		39c) Position of this Tower in the Array:	
40a) Array Center Latitude (DD-MM-SS.S):		40b) North or South	
41a) Array Center Longitude (DDD-MM-SS.S):		41b) East or West:	

Proposed Marking and/or Lighting

42) Enter the proposed marking and/or lighting: (7)
See Form 854 Item 42 Instructions for detailed tier and lighting information.

- | | | |
|----------------|----------------|-----------------|
| 1) None | 4) FAA Style B | 7) FAA Style E |
| 2) Paint Only | 5) FAA Style D | 8) FAA Style F |
| 3) Other _____ | 6) FAA Style C | 9) FAA Style A |
| | | 10) FAA Style G |

FAA Notification

43) FAA Study Number:	44) Date Issued:
-----------------------	------------------

Environmental Compliance

45) Does the applicant request a waiver of the Commission's rules for environmental notice prior to construction due to an emergency situation?	(No) Yes or No
46a) If the answer to 45 is No, is another federal agency taking responsibility for environmental review of the Antenna Structure?	(No) Yes or No
46b) If the answer to 46a is Yes, indicate why: 1) The Antenna Structure is on Federal Land and the landholding agency is taking responsibility for the environmental review of the Antenna Structure. 2) Another federal agency has agreed with the FCC in writing to take responsibility for the environmental review of the Antenna Structure.	() 1 or 2
46c) If the answer to 46a is Yes, provide the name of the federal agency taking responsibility for the environmental review of the Antenna Structure.	Name:
47) If the answers to 45 and 46a are No, provide the National Notice Date for the application to be posted on the FCC's website (mm/dd/yyyy).	Date: 04/02/2026
48) Is the applicant submitting an environmental assessment?	(No) Yes or No
49) Does the applicant certify that grant of Authorizations at this location would not have a significant environmental effect pursuant to Section 1.1307 of the FCC's rules?	() Yes or No
50) If the answer to 49 is Yes, select the basis for this certification. 1) The construction is exempt from environmental notification (other than due to another agency's review) and it does not fall within one of the categories in Section 1.1307(a) or (b) of the FCC's rules? 2) The construction is exempt from environmental notification due to another agency's review, and the other agency has issued a Finding of No Significant Impact. 3) The environmental notification has been completed, and the FCC has notified the applicant that an Environmental Assessment is not required under Section 1.1307(c) or (d) of the FCC's rules, and the Construction does not fall within one of the categories in Section 1.1307(a) or (b) of the FCC's rules. 4) The FCC has issued a Finding of No Significant Impact.	() 1, 2, 3, 4
51) If the answer to 50 is 3 or 4, enter the date that Local Notice was provided (mm/dd/yyyy).	Date:

Certification Statements

- 1) The applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
- 2) The applicant certifies that neither the applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.

Signature (Typed or Printed Name of Party Authorized to Sign) (For OC Applications, to be completed by Assignee)

52) First Name: Sierra	MI:	Last Name: Webster	Suffix:
53) Title: Project Manager			
54) Signature: Sierra Webster			55) Date: Mar 05, 2026

Signature (Typed or Printed Name of Party Authorized to Sign) (For OC Applications, to be completed by Assignor)

56) First Name:	MI:	Last Name:	Suffix:
57) Title:			
58) Signature:			59) Date: