

Sumter City-County Board of Zoning Appeals

October 14, 2026

BOA-26-29, 7056 Camden Hwy. (County)

The Board of Zoning Appeals will consider a request from Harmoni Gateway Towers, LLC to establish a 279 ft. tall telecommunications tower on the property. The Zoning Administrator has referred this request to the Board of Zoning Appeals consistent with *Article 5.b.4: Communication Towers and Antenne of the Sumter County Zoning & Development Standards Ordinance*. The property is located at 7056 Camden Hwy., is zoned Agricultural Conservation (AC), and is identified as TMS# 088-00-03-028.



Appeals - Variance - Special Exception

Sumter City-County Zoning Board of Appeals

October 14, 2026

BOA-26-29, 7056 Camden Hwy. (County)

I. THE REQUEST

Applicant(s): Harmoni Gateway Towers, LLC

Status of the Applicant: Authorized Agent (Leaseholder)

Request: Request to establish a 279 ft. tall telecommunications tower on the property.

County Council District: 1

Location: 7056 Camden Hwy.

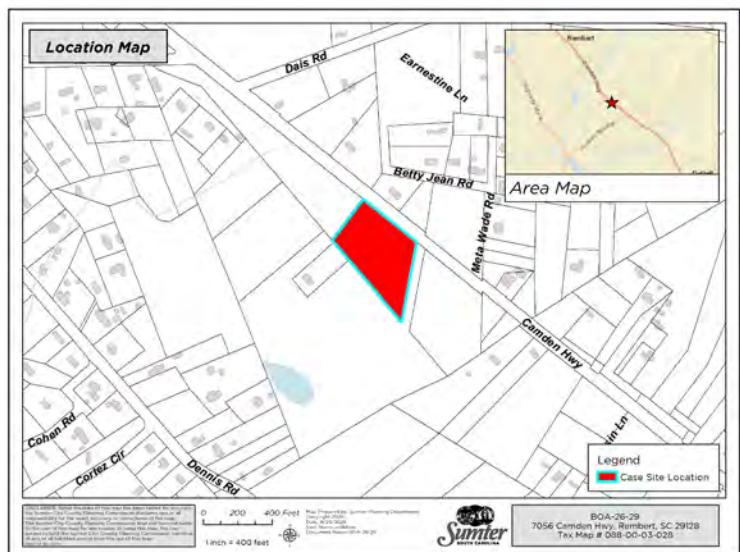
Zoning: Agricultural Conservation (AC)

Tax Map Reference: 088-00-03-028

II. BACKGROUND

Communications towers and/or antenna may be treated as Conditional Uses in Sumter County without further review by the Sumter City-County Board of Zoning Appeals *if* the Zoning Administrator determines all applicable conditions in the Ordinance are met. The Zoning Administrator has referred the request by Harmoni Gateway Towers, LLC to construct a 279 ft. self-supported telecommunications tower at 7056 Camden Hwy. for decision by the Board of Zoning Appeals consistent with *Article 5.b.4: Communication Towers and Antennae*.

The property is zoned Agricultural Conservation (AC) and is located on Camden Hwy (US-521).



A copy of the overall property boundary with the proposed tower lease area identified, the proposed site development plan, and elevation drawing of the tower are included as Exhibit 1.

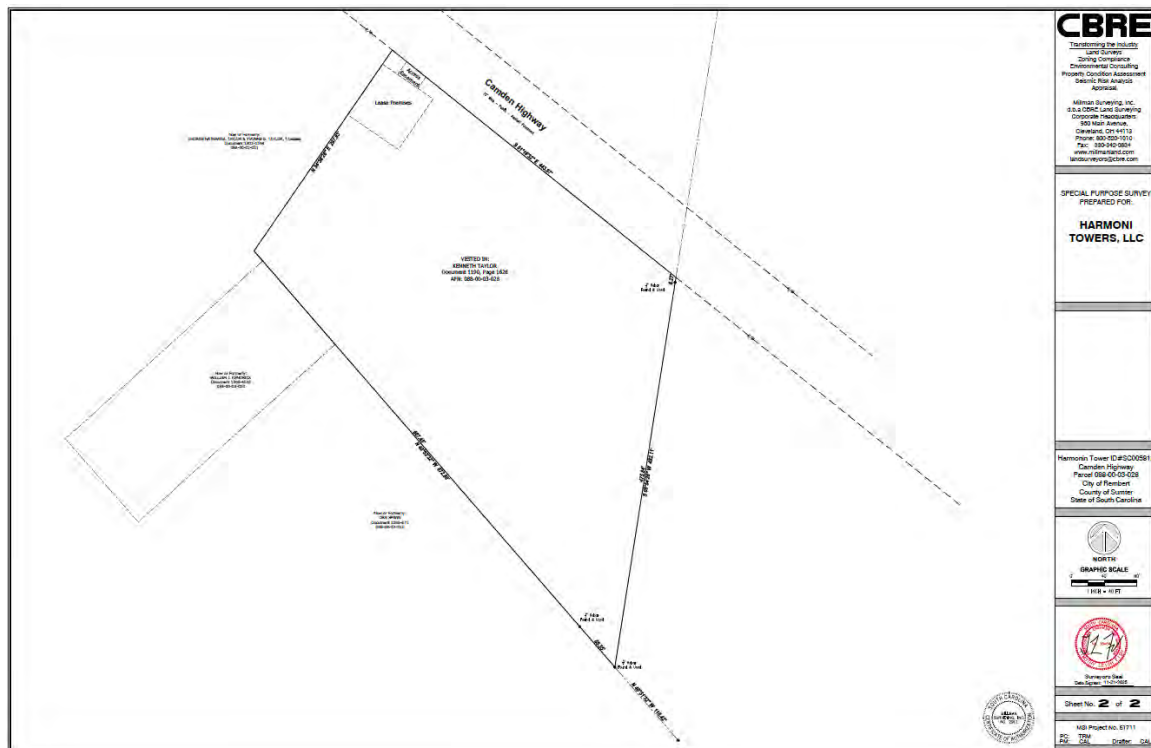


Figure 1 - Property boundary with proposed tower lease area identified in the northwest corner

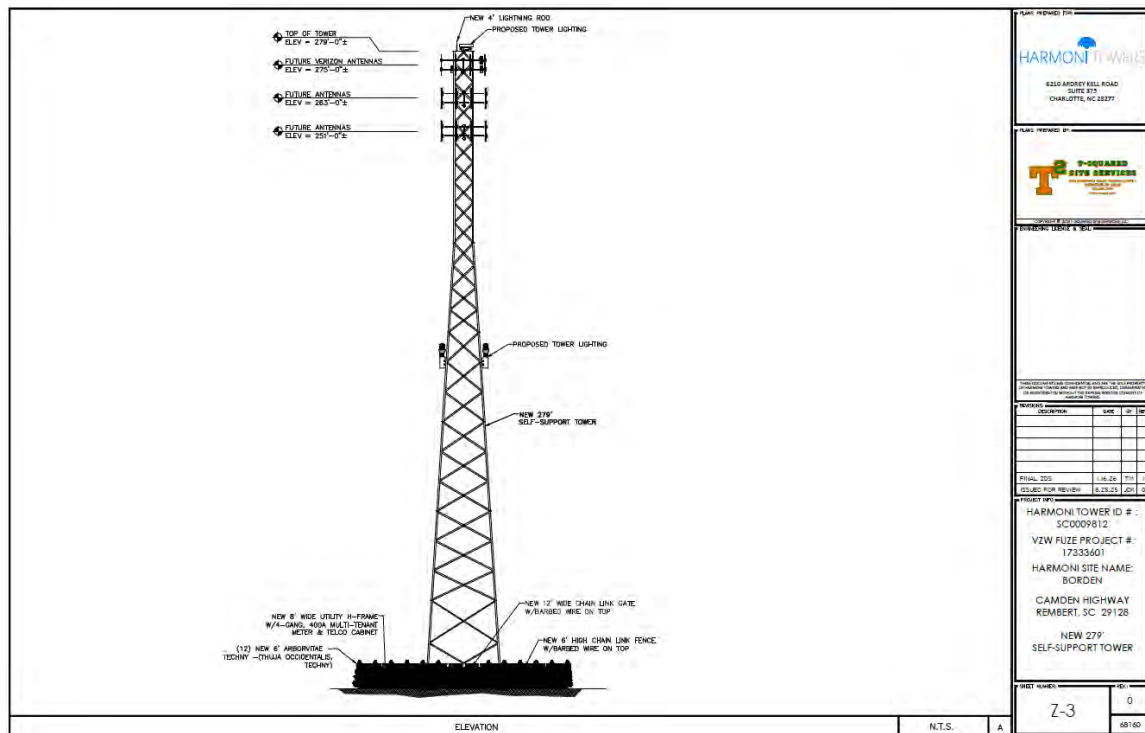
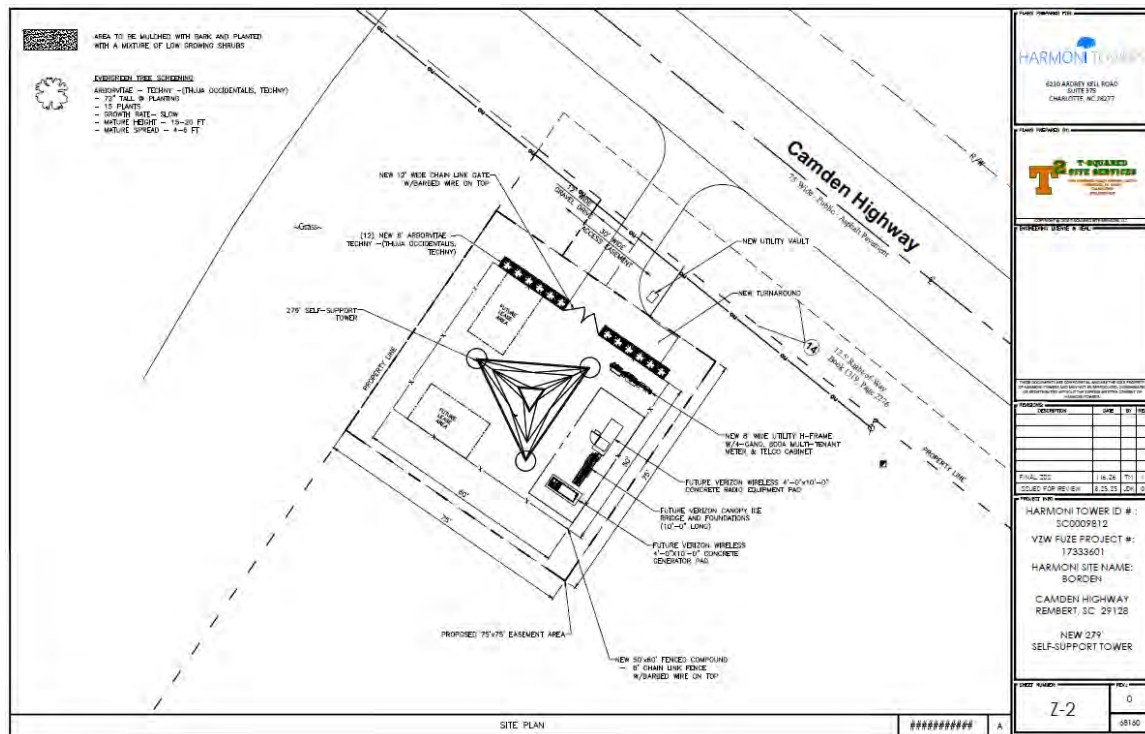




Figure 4 - Photo Simulation of Proposed Tower from Camden Hwy (US-521) Looking South



Figure 5 - Photo Simulation of Proposed Tower from Camden Hwy (US-521) Looking North

Below is a list of exhibits pertaining to this case:

Exhibit #	Description
1	Site Plans titled “Harmoni Tower ID SC0009812”, sheets T-1, Survey, Z-1, Z-2, and Z-3, last revised January 16, 2026
2	Structural Design Report for 279’ S3TL Series HD2 Self-Supporting Tower, Site: Borden, SC, Site Number: SC0009812, Dated January 21, 2026.
3	NEPA Report for Site, Prepared by Trileaf Environmental Architecture and Engineering, Dated January 23, 2026
4	Signed Unrecorded Memorandum of Easement Agreement, executed by buyer and seller on February 2, 2026
5	ASR Registration Search Record for Registration 1332844, retrieved September 3, 2026
6	ULS License, PCS Broadband License – KNLH718 – Cellco Partnership, retrieved June 11, 2026
7	Tower Removal Agreement Letter Dated June 8, 2026
8	Letter from Harmoni Towers Gateway, LLC certifying that facilities will comply with government rules and regulations and will maintain general liability insurance, Dated April 1, 2026
9	Certificate of Liability Insurance, Dated March 20, 2026
10	Photo-simulation images depicting proposed tower visual impact (2 images, one facing north on US-521 and one facing south on US-521)
11	Tower Fall Radius Letter – Nello 280’ NSX Lattice Self Support Tower, Dated June 5, 2026
12	Tower Fall Radius Letter – Nello 280’ NSX Lattice Self Support Tower, Dated July 10, 2026
13	Letter from Applicant Attorney to County Attorney, and attached plans dated October 5, 2026

III. SPECIAL EXCEPTION REVIEW CRITERIA

In the AC zoning district under *Article 3, Exhibit 3-5*, telecommunications towers are special exception uses requiring the review and approval of the BZA, unless the Zoning Administrator determines all applicable conditions in the Ordinance are met. Special exception requests for telecommunications towers are evaluated in accordance with *Article 1.h.4.c.* and *Article 5.b.4.* as contained in the *Sumter County Zoning & Development Standards Ordinance*.

Article 1.h.4.c: Special Exceptions

Permits for Special Exceptions shall be evaluated by the Board of Zoning Appeals on the basis of the following criteria:

1. *That the Special Exception complies with all applicable development standards contained elsewhere in this Ordinance, including landscaping and bufferyards, off-street parking, and dimensional requirements;*

Case Facts:

1. Telecommunications tower development standards are discussed later in this report. There are no general Ordinance-specified development standards applicable to this site that have not been addressed.
2. *That the special exception will be in substantial harmony with the area in which it is located;*

Case Facts:

1. The subject property and parcels immediately adjacent on all sides are zoned Agricultural Conservation (AC).
 2. The parcel on which the tower is proposed is undeveloped and is currently an open field.
 3. There is a single-family residence located +/- 500 ft. to the southwest of the proposed tower location and a single-family home located +/- 150 ft. the north across Camden Hwy.
 4. The proposed 279 ft. self-support telecommunications tower is approximately 55 ft. from the edge of the existing public road right-of-way.
3. *That the special exception will not discourage or negate the use of surrounding property for use(s) permitted by right.*

Case Facts:

1. The subject property and parcels immediately adjacent on all sides are zoned Agricultural Conservation (AC).
2. There is a single-family residence located +/- 500 ft. to the southwest of the proposed tower location and a single-family home located +/- 150 ft. the north across Camden Hwy.
3. The proposed 279 ft. self-support telecommunications tower approximately 55 ft. from the edge of the existing public road right-of-way

Article 5.b.4. Communication Towers and Antennae:

Application Requirements: The applicant for a permit for construction of a communications tower or the placement of a communications antenna on an existing structure other than a tower previously permitted must file with the Zoning Administrator an application accompanied by a fee of \$500.00 and the following documents:

1. *Specifications*
2. *Site Plan*
3. *Tower Location Map*
4. *Antenna Capacity – Wind Load*
5. *Antenna Owners*
6. *Owner Authorization*
7. *FCC License*
8. *Visual Impact Analysis*
9. *Removal Agreement*

Case Facts:

- The applicant has submitted all aforementioned documents via Minor Site Plan #MSP-26-24.

Conditions: Applicant must show that all of the following conditions are met:

1. ***Location and Visual Impact:*** *The proposed tower, antenna or accessory structure will be placed on site in such a manner that it will minimize the visual impact on the surrounding properties;*

Case Facts:

- The applicant is proposing to install a 279 ft. self-support telecommunications tower approximately 55 ft. from the edge of the existing public road right-of-way.
- Figures #4 and #5 as submitted by the applicant represent photo simulation of the proposed tower as viewed from Camden Hwy.

2. ***Inability to locate on existing structures:*** *The applicant must show that a proposed antenna and equipment cannot be accommodated and function as required by applicable regulations and the applicants' technical design requirements without unreasonable modifications on any existing structure or tower under control of applicant, or to locate on an available and suitable nearby tower at reasonable costs (i.e., at or below local area rent average);*

Case Facts:

- There are no known telecommunications towers within the immediate area of the site.

3. ***Necessity for location in residential district:*** *The applicant must show that the portion of the county intended to receive coverage cannot be adequately served by a*

communications tower or antenna placed in a non-residential district for valid technical reasons;

Case Facts:

- The proposed site is not in a residential zoning district.

4. ***Public property or other private property not suitable:*** *Prior to consideration of a permit for location on private property which must be acquired, the applicant must show that available publicly owned sites, and available privately owned sites occupied by a compatible use, are unsuitable for operation of the facility under applicable communications regulations and the applicant's technical design requirements;*

Case Facts:

- There are no suitable publicly-owned sites within the vicinity of the proposed site.

5. ***Design for multiple use:*** *Applicants must show that a new tower is designed to accommodate additional antennae equal to applicant's present and future requirements;*

Case Facts:

- The applicant's design plans indicate three separate antenna arrays. The top array is identified for future Verizon antennas, and the two additional arrays are unspecified as to future users.

6. ***Safety Codes Met:*** *Applicant must show that all applicable health, nuisance, fire, building, and life safety code requirements are met;*

Case Facts:

- The project is subject to Sumter County building permit requirements. The Building Department has not completed review of the application to date,
- All code requirements must be addressed by the applicant as a condition of any building permit issuance.

7. ***Paint and illumination:*** *A communications tower must not be painted or illuminated unless otherwise required by state or federal regulations;*

Case Facts:

- The tower is not proposed to be painted or illuminated, except for required safety beacons at the top and midpoint of the tower.

8. ***Distance from existing tower:*** *A permit for a proposed tower site within 1,000 ft. of an existing tower shall not be issued unless the applicant certifies that the existing tower does not meet the applicant's structural specifications and design requirements, or that a co-location agreement could not be obtained;*

Case Facts:

- There is a Verizon Wireless tower located +/- 1,900 linear feet to the northwest of the site. There are no towers within 1,000 ft. of the proposed site.

9. ***Indemnity and claims resolution:*** *The applicant must show by certification from a registered professional engineer that the proposed facility will contain only equipment meeting FCC rules, and must file with the Zoning Administrator a written indemnification of Sumter County and proof of liability insurance or financial ability to respond to claims up to \$1,000,000.00 dollars in the aggregate which may arise from the operation of the facilities during its life, at no cost to the county and in a form approved by the County Attorney.*

Case Facts:

- The applicant has submitted a written indemnification of Sumter County and proof of liability insurance.

10. ***Minimum Setback:***

Non-Residential Zoning: *Towers located on non-residentially zoned properties must be set back from all lot lines by distances equal to the district setback requirement or the tower's fall zone, whichever is greater. Fall zones less than the full height of the tower shall be determined by an engineer licensed in the state of South Carolina in a letter that includes the engineer's signature and seal.*

Case Facts:

- The applicant submitted a fall radius letter signed and sealed by South Carolina-licensed professional engineer Jason Mark Lambert dated June 5, 2026. In the letter, Mr. Lambert states that the tower has been designed using 119 mph 3-second gust wind with no ice and a 30 mph 3-second wind gust with 1 inch of ice.
In the letter, Mr. Lambert stated "Although we cannot guarantee exactly how a tower would fall if it were to fail, the most likely mode of failure would be a buckling failure of one of the tower sections due to excessive wind loading. The tower leg with the highest stress ratio is located at the 220' – 240' level. The stress ratio in that leg is calculated to be 91% of the code-permitted design loading. Given that the tower section with the highest stress ratio will most likely fail first, the proposed tower would fail at the 220' level with the top 60' of the tower collapsing. Depending on the conditions at the time of failure and the stress levels in structural material below, the top 60' of the tower would likely fall within a 60' fall radius". (Exhibit 11)
- After staff questioned the stated fall zone of 60' as being inclusive of a portion of the right-of-way for US-521, the applicant submitted a revised fall radius letter signed and sealed by South Carolina-licensed professional engineer Adam N. Howe dated July 10, 2026. In the letter, Mr. Howe states that the

tower has been designed using 119 mph 3-second gust wind with no ice and a 30 mph 3-second wind gust with 1 inch of ice.

In the letter, Mr. Howe stated “Although we cannot guarantee exactly how a tower would fall if it were to fail, the most likely mode of failure would be a buckling failure of one of the tower sections due to excessive wind loading. The tower leg with the highest stress ratio is located at the 220’ – 240’ level. The stress ratio in that leg is calculated to be 91% of the code-permitted design loading. Given that the tower section with the highest stress ratio will most likely fail first, the proposed tower would fail at the 220’ level with the top 60’ of the tower collapsing. Depending on the conditions at the time of failure and the stress levels in structural material below, the top 60’ of the tower would likely fall within a 37.5’ fall radius”. (Exhibit 12)

- 11. Technical Assistance:** *Prior to issuing a permit, the Zoning Administrator may make use of professional technical services to determine if the standards in Article 5.b.4.d. are met;*

Case Facts:

- The Zoning Administrator has not utilized any outside professional technical services in the consideration of this request.

- 12. Maintenance:** *The communications tower shall be maintained by common corrosion control procedures so it continuously maintains a minimum visual impact on surrounding properties*

Case Facts:

- All code requirements must be addressed by the applicant as a condition of any building permit issuance.

Special Exception: *A tower, pole, or antenna may be permitted by Special Exception together with the findings considered in Section 1.h.4.c. after a public hearing along with the following criteria:*

1. *All application requirements and conditions imposed by 5.b.4.d. and 5.b.4.e. are met except height limitations and setbacks;*

Case Facts:

1. All application materials required by Article 5.b.4.d. have been submitted by the applicant.
2. *If additional tower height is required, the total tower height will not exceed one hundred-fifty (150%) percent of the maximum height permitted in the district. In unincorporated portions of Sumter County, radio and television towers are exempt at the Board of Appeals from tower height limits (this rule does not apply within the corporate limits of the City of Sumter);*

Case Facts:

1. N/A, No additional tower height is required beyond the maximum height permitted.
3. *The applicant has demonstrated that additional height above that permitted by the regulations is necessary for service to occupants of an area within the City or County of Sumter;*

Case Facts:

1. N/A, No additional tower height is required beyond the maximum height permitted.
4. *Setback requirements and additional conditions are established by the Zoning Board of Appeals as it deems necessary to remove dangers to public health and safety and to protect adjacent property;*

Case Facts:

1. 279 ft. self-support telecommunications tower is proposed to be placed 55 ft. from the edge of the existing public road right-of-way.
5. *Prior to approving a permit by Special Exception or on appeal from the Zoning Administrator, the Board may make use of professional technical services to determine that the standards in 5.b.4.d and 5.b.4.e. are met.*

IV. STAFF RECOMMENDATION

The proposed tower's placement close to Camden Hwy (US-521) carries significant risk to the Sumter community. Camden Hwy. is a principal arterial roadway, and functions as a critical link within Sumter County and between Sumter and areas to the north. Introducing a facility which, in the event of failure, would potentially block this critical corridor is a hazard mitigation risk.

While engineers can design telecommunications towers to buckle or fold over on themselves, the proposed fall zone represents only 13.4% of the tower's total height. Expecting a freestanding structure of this size to collapse so perfectly that no part of it lands beyond that distance is highly unrealistic and outside standard engineering safety margins. Where manufacturers provide certified "fall zone letters" utilizing advanced hinge-point calculations, the legal and physical minimum limit typically stops at 33% to 50% of the total height.

If the board makes the necessary findings to approve this request, then staff recommends the following conditions be applied:

1. If the foundation design used in association with this tower is performed by a third party, Nello (the entity that prepared the fall zone letter) must review the design in order to confirm the fall radius remains satisfactory. A report shall be provided concerning this condition prior to building permit approval for any component of the project.

V. DRAFT MOTIONS FOR BOA-26-29

- A. I move the Zoning Board of Appeals **approve** BOA-26-29, subject to the findings of fact and conclusions developed by the BZA and so stated:
[reference specific findings as developed based on facts presented in the staff report, exhibits, and/or during the public hearing.]
- B. I move the Zoning Board of Appeals **deny** BOA-26-29, subject to the following findings of fact and conclusions developed by the BZA and so stated:
[reference specific findings as developed based on facts presented in the staff report, exhibits, and/or during the public hearing.]
- C. I move the Zoning Board of Appeals enter an alternative motion for BOA-26-29.

VII. BOARD OF APPEALS – September 9, 2026

The Sumter City-County Board of Appeals at its meeting on Wednesday, September 9, 2026, deferred the request referenced above until the next Board of Zoning Appeals meeting on Wednesday, October 14, 2026.

VII. BOARD OF APPEALS –October 14, 2026

Exhibit 1



E-911 ADDRESS: ###

6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY: —



**T-SQUARED
SITE SERVICES**
2501 SHENANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
www.t-sqrd.com

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ENGINEERING LICENSE & SEAL: _____

THESE DOCUMENTS ARE CONFIDENTIAL AND ARE THE SOLE PROPERTY OF HARMONI TOWERS AND MAY NOT BE REPRODUCED, DISSEMINATED OR REDISTRIBUTED WITHOUT THE EXPRESS WRITTEN CONSENT OF HARMONI TOWERS.

REVISIONS:			
DESCRIPTION	DATE	BY	REV
FINAL ZDS	1.16.26	TM	1
ISSUED FOR REVIEW	8.25.25	JDK	0

PROJECT INFO

HARMONI TOWER ID # :
SC0009812

VZW FUZE PROJECT #:
17333601

HARMONI SITE NAME:
BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER: —

T-1

EV.: _____

0

68160

SITE INFORMATION

HARMONI TOWER ID:	BORDEN
AT&T SITE NAME:	17333601
SITE ADDRESS:	CAMDEN HIGHWAY REMBERT, SC 29128
COUNTY:	SUMTER COUNTY
E-911 ADDRESS:	TBD
AREA OF CONSTRUCTION:	RAWLAND
LATITUDE:	34.067385°
LONGITUDE:	-80.509680°
LAT/LONG TYPE:	NAD83
JURISDICTION:	SUMTER COUNTY
ZONING:	AF - AGRICULTURAL/FORESTRY
OCCUPANCY CLASSIFICATION:	AGRE 4
TYPE OF CONSTRUCTION:	II-B
A.D.A. COMPLIANCE:	FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION
LAND OWNER:	JOSEPH AND JOANN TAYLOR LIFE ESTATE 1479 LONGFELLOW AVE BRONX NY 10460 KENNETH TAYLOR (803) 968-0732 copsandteens@aol.com
TOWER OWNER:	HARMONI TOWERS, LLC 6210 ARDREY KELL ROAD CHARLOTTE, NC 28277
ELECTRICAL SERVICE PROVIDER:	BLACK RIVER ELECTRIC COOPERATIVE INC. 803-469-8060
TELCO PROVIDER:	WINDSTREAM XXX-XXX-XXXX

DRAWING INDEX

[illegible]

ALL DRAWINGS CONTAINED HEREIN ARE FORMATTED FOR 11X17 CONTRACTOR SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS AND CONDITIONS ON THE JOB SITE AND SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.

PROJECT TEAM

PROJECT MANAGERS: T-SQUARED SITE SERVICES, LLC
2501 SHENANGO VALLEY FREEWAY
SUITE 3
HERMITAGE, PA. 16148
(724) 308-7855

CONTACT: MARK THOMPSON

A&E FIRM: T-SQUARED SITE SERVICES, LLC
2501 SHENANGO VALLEY FREEWAY
SUITE 3
HERMITAGE, PA. 16148
(724) 308-7855

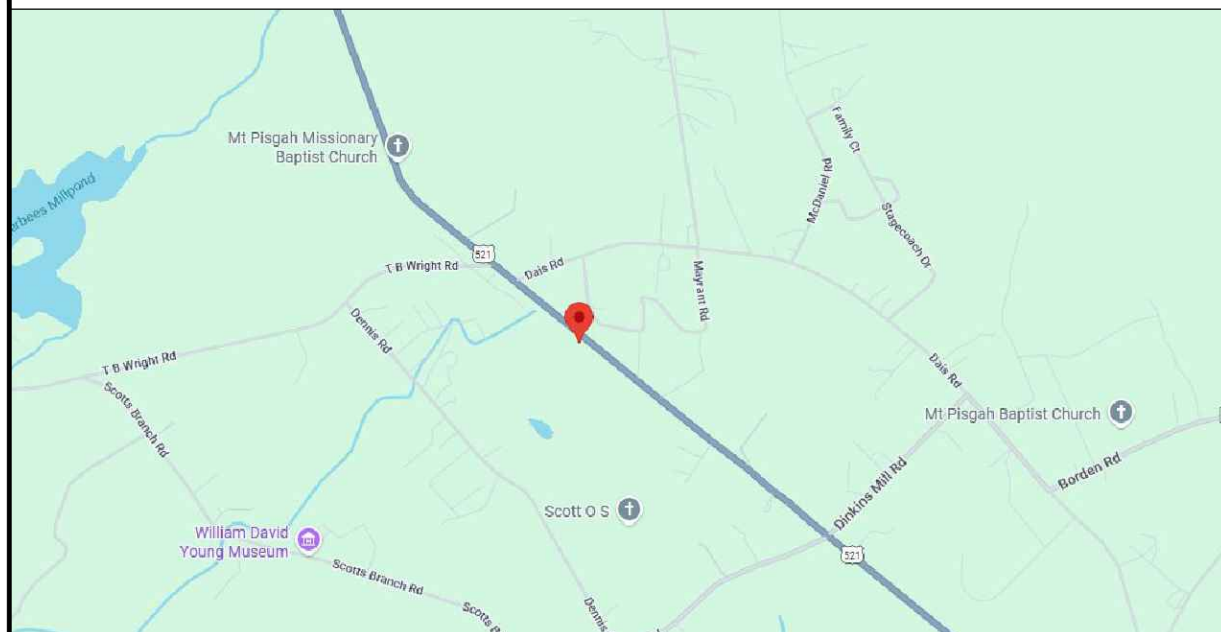
PROJECT DESCRIPTION

THE PURPOSE OF THIS PROJECT IS TO ENHANCE BROADBAND CONNECTIVITY AND CAPACITY TO THE EXISTING ELIGIBLE WIRELESS FACILITY.

- INSTALL 279' SELF-SUPPORT TOWER
- INSTALL CHAIN LINK FENCING
- INSTALL (1) UTILITY H-FRAME
- INSTALL (2) FIBER VAULTS
- INSTALL ACCESS ROAD

THE PARTIES ABOVE HEREBY APPROVE AND ACCEPT THESE DOCUMENTS AND
 AUTHORIZE THE CONTRACTOR TO PROCEED WITH THE CONSTRUCTION
 DESCRIBED HEREIN. ALL CONSTRUCTION DOCUMENTS ARE SUBJECT TO REVIEW
 BY THE LOCAL BUILDING DEPARTMENT AND ANY CHANGES AND
 MODIFICATIONS THE MAY IMPOSE.

LOCATION MAP



DIRECTIONS:



APPLICABLE CODES / REFERENCE DOCUMENTS

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THE LATEST EDITIONS OF THE FOLLOWING CODES.

- 2021 INTERNATIONAL BUILDING CODE
- 2023 NATIONAL ELECTRIC CODE
- 2009 INTERNATIONAL ENERGY CONSERVATION CODE
- 2018 INTERNATIONAL EXISTING BUILDING CODE
- 2021 INTERNATIONAL FIRE CODE
- 2021 INTERNATIONAL MECHANICAL CODE
- 2021 INTERNATIONAL RESIDENTIAL CODE



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OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY
COMMITMENT NO. 01-25025513-01T- SCHEDULE A:

Schedule A Description

Being a portion of:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, containing 4.92 acres, more or less, and being the remaining portion of a 7.01 acre tract, shown as Tract 1 on a plat by H. S. Willson, RLS dated February 18, 1981 and recorded in the Office of the RMC for Sumter County in Plat Book Z-45 at page 94; said parcel of land being situate on both sides of U. S. Highway 521 leasing from: Sumter to Camden, South Carolina and having such shape, metes, bounds, and measurements as shown on said plat; said parcel of land being bounded on the North by a neighborhood and possibly lands of Maggie Peay and the Estate of James Peay and measuring thereon 304 feet; on the East by lands of heirs of Samuel Alston, Highway No. 521 and land of heirs of Elizabeth Alston; on the South by lands of Freddie Dennis and on the West by lands of George Taylor, U. S. Highway 521 and tract 2 as shown on said plat.

Tax ID: 088-00-03-028

Being The Same Property Conveyed To Kenneth Taylor, While Reserving Unto Joseph H. Taylor And Joann Taylor, A Life Estate, Grantee, From Joseph H. Taylor And Joann Taylor, Grantor, By Title to Real Estate Deed Recorded 07/12/2013, in Book 1190, Page 1626, Of The Sumter County Records.

OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY
COMMITMENT NO. 01-25025513-01T- SCHEDULE B, SECTION II:

Numbers correspond with survey-related Schedule B exception items contained in the above referenced Title Commitment.

7. Subject to covenants, conditions, restrictions, reservations, set back lines, easements and rights of ways, if any, set forth on the Plat, recorded 01/10/1901, in Book G-5, Page 2, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY CONTAINS NO PLOTTABLE SURVEY ITEMS)

8. Subject to covenants, conditions, restrictions, reservations, set back lines, easements and rights of ways, if any, set forth on the Plat, recorded 08/16/1957, in Book Z-14, Page 125, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY CONTAINS NO PLOTTABLE SURVEY ITEMS)

9. Right of Way Easement in favor of The Farmers Telephone Cooperative, Inc., recorded 08/27/1979, in Book L-10, Page 925, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY AMBIGUOUS AND BLANKET IN NATURE UNABLE TO PLOT THEREFORE NOT SHOWN HEREON)

10. Subject to covenants, conditions, restrictions, reservations, set back lines, easements and rights of ways, if any, set forth on the Plat, recorded 02/23/1981, in Book Z-45, Page 94, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY CONTAINS NO PLOTTABLE SURVEY ITEMS)

11. Easement in favor of The Black River Electric Cooperative, Inc., recorded 02/04/1982, in Book 304, Page 463, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY AMBIGUOUS AND BLANKET IN NATURE UNABLE TO PLOT THEREFORE NOT SHOWN HEREON)

14. Subject to the Easement conveyed in the Deed recorded 10/02/2023, in Book 1319, Page 2276, of the Sumter County Records.

(AFFECTS THE SUBJECT PROPERTY CONTAINS NO PLOTTABLE SURVEY ITEMS)

75'X75' LEASED PREMISES:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, being a 75'x75' Lease Premises part of Kenneth Taylor parcel as recorded in Document 1190, Page 1626 in the Sumter County Records, part of parcel # 088-00-03-028 and being further bound and described as follows:

Commencing northwest corner of Parent parcel on the Southerly right-of-way line of Camden Highway (75' Wide), Thence leaving the said Southerly right-of-way of Camden Highway and along the westerly line of said Parent Parcel, South 34°30'28" West a distance of 20.93 feet to the point of beginning;

Thence through the tract of which this description is a part the following three (3) courses;

South 55°59'32" East, a distance of 75.00 feet to a point;

South 34°30'28" West, a distance of 75.00 feet to a point;

North 55°29'32" West, a distance of 75.00 feet to a point;

North 34°30'28" East a distance of 75.00 feet to the POINT OF BEGINNING and containing a total of 5625 sq ft, 0.1291 acres of land.

MISCELLANEOUS NOTES:

- This is a specific purpose survey for the stated purpose of surveying a proposed telecommunication tower compound as requested by the client. It is not a boundary survey of the parent parcel.
- The locations of all utilities shown on the survey are from visible surface evidence only.
- No Wetlands Areas have been investigated by this Survey.
- All coordinates shown hereon are referenced to the South Carolina Plane Coordinate System, in the North American Datum of 1983 (2011 Adjustment).
- Vertical Datum referenced to NAVD88.
- Date of fieldwork: July 22, 2025.
- Both access and utility easements shown hereon lie entirely within the parent parcel.
- The Leased Premises is contiguous along its common boundaries to the Access and Utility Easement, which in turn is contiguous along its common boundaries to the (Camden Highway) right-of-way, and there are no gaps, gores, spaces or overlaps between or among any of said parcels of land

FLOOD ZONE:

According to Federal Emergency Management Agency Maps, the proposed Telecommunications site is located in Zone X, Community Panel No. 45085C0100C, dated September 28, 2018.

30' ACCESS AND UTILITIES EASEMENT:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, being a 30' wide Access and Utility Easement part of Kenneth Taylor parcel as recorded in Document 1190, Page 1626 in the Sumter County Records, part of parcel # 088-00-03-028 and being further bound and described as follows:

Commencing northwest corner of said Parent parcel on the Southerly right-of-way line of Camden Highway (75' Wide), Thence along the southerly right-of-way line, South 51°16'32" East a distance of 22.56 feet to the point of beginning;

Thence, continuing along the said southerly right-of-way of Camden Highway, South 51°16'32" East a distance of 30.08 feet to a point;

Thence leaving the said southerly right-of-way of Camden Highway and through the tract of which this description is a part the following three (3) courses;

South 34°30'28" West, a distance of 17.06 feet to a point;

North 55°29'32" West, a distance of 30.00 feet to a point;

North 34°30'28" East, a distance of 19.27 feet to the POINT OF BEGINNING, and containing a total of 545 sq ft, 0.0125 acres of land.



VICINITY MAP
NOT TO SCALE

SYMBOL LEGEND	
R/W	Right-of-Way
P/L	Adjoiner Property Line
E	Centerline
⊙	Utility Pole
⊠	Telecommunication Pedestal
●	Monumentation Found as Noted
⊗	Schedule B-Section II Item

CERTIFICATION:

To: Harmoni Towers AssetCo LLC, a Delaware limited liability company; its successors, assigns and/or designees, and Old Republic National Title Insurance Company;

I, Timothy L. Fish, a South Carolina Professional Land Surveyor, Professional Land Surveyor, certify that the information shown hereon was compiled using data from an actual field survey made under my direct supervision and that the field survey and the compilation of information shown herein were conducted in accordance with the South Carolina State Standards;

Latitude and Longitude values for the center of the above referenced tower are accurate to within +/- 20 feet horizontally;

Horizontal Datum: NAD83

Latitude: 34 degrees 04 minutes 02.586856 seconds North
Longitude: 80 degrees 30 minutes 34.846689 seconds West

The field work was completed on July 22, 2025.

Date of Plat or Map: August 22, 2025

Timothy L. Fish, PLS
South Carolina Professional Land Surveyor No. 33464
Certificate of Authorization No. 2912



REVISION HISTORY		
BY:	DATE:	COMMENT:
CAL	11-19-2025	CLIENT COMMENTS

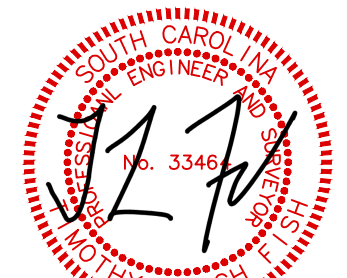
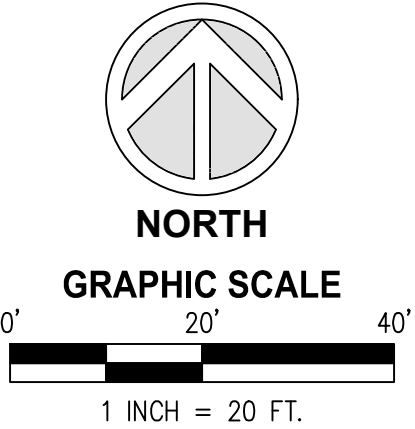
CBRE
Transforming the Industry
Land Surveys
Zoning Compliance
Environmental Consulting
Property Condition Assessment
Seismic Risk Analysis
Appraisal

Millman Surveying, Inc.
d.b.a CBRE Land Surveying
Corporate Headquarters
950 Main Avenue,
Cleveland, OH 44113
Phone: 800-520-1010
Fax: 330-342-0834
www.millmanland.com
landsurveyors@cbre.com

SPECIAL PURPOSE SURVEY
PREPARED FOR:

**HARMONI
TOWERS, LLC**

Harmonin Tower ID#SC009812
Camden Highway
Parcel 088-00-03-028
City of Rembert
County of Sumter
State of South Carolina



Surveyor's Seal
Date Signed: 11-21-2025

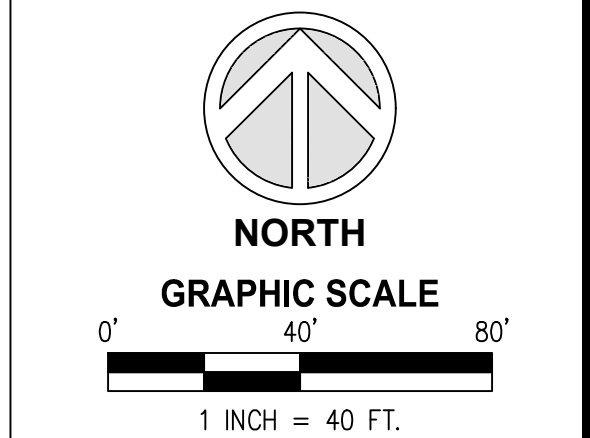
Sheet No. **1** of **2**

MSI Project No. 61711
PC: TRM
PM: CAL Drafter: CAL

SPECIAL PURPOSE SURVEY
PREPARED FOR:

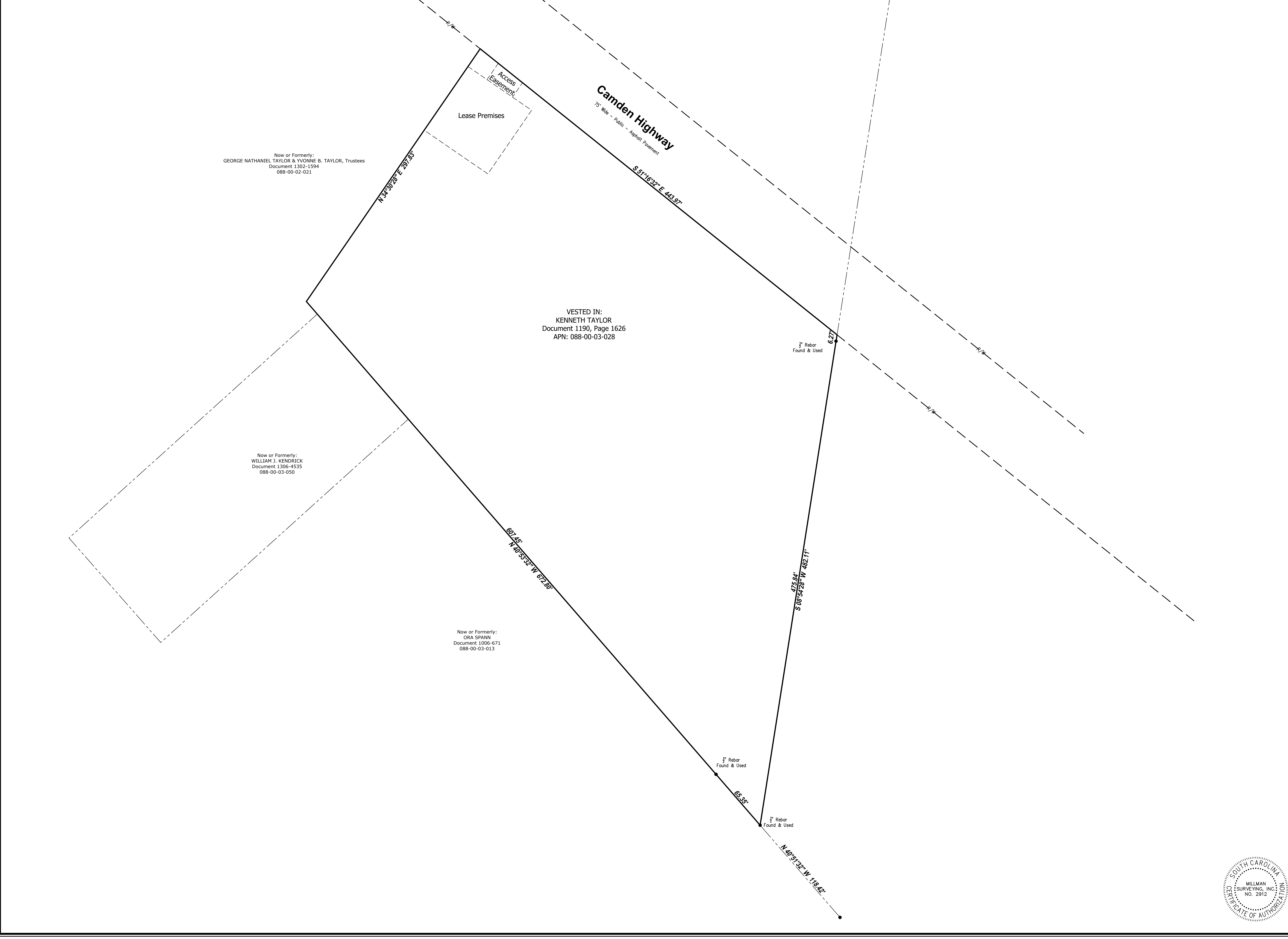
HARMONI
TOWERS, LLC

Harmonin Tower ID#SC009812
Camden Highway
Parcel 088-00-03-028
City of Rembert
County of Sumter
State of South Carolina



Sheet No. **2** of **2**

MSI Project No. 61711
PC: TRM
PM: CAL Drafter: CAL

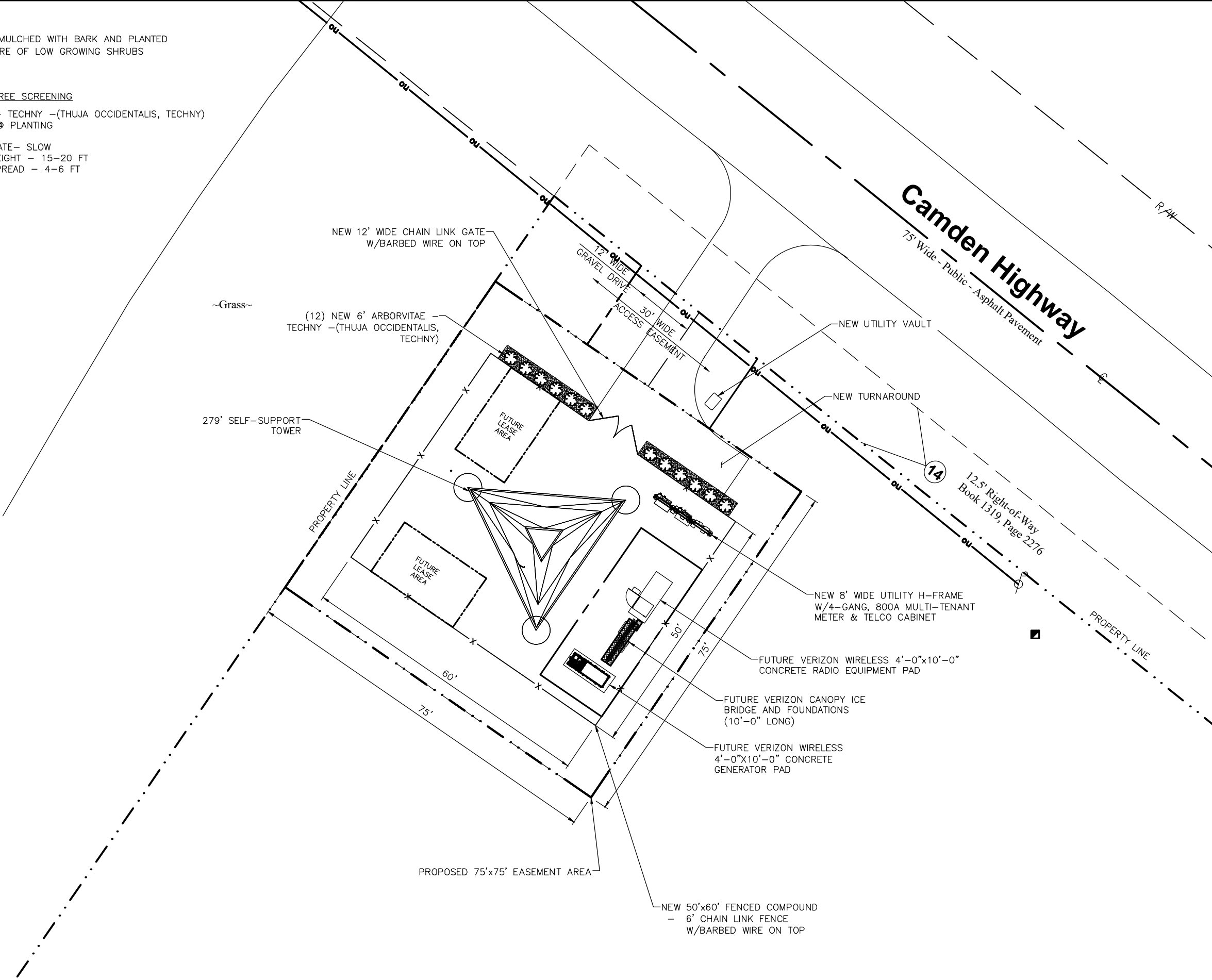




AREA TO BE MULCHED WITH BARK AND PLANTED WITH A MIXTURE OF LOW GROWING SHRUBS



EVERGREEN TREE SCREENING
ARBORVITAE – TECHNÝ –(THUJA OCCIDENTALIS, TECHNÝ)
– 72” TALL @ PLANTING
– 15 PLANTS
– GROWTH RATE– SLOW
– MATURE HEIGHT – 15–20 FT
– MATURE SPREAD – 4–6 FT



PLANS PREPARED FOR:

HARMONI TOWERS

6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY:

T-SQUARED SITE SERVICES

2501 SHENANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
www.t-sqr.com

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REVISIONS:				
DESCRIPTION	DATE	BY	REV	
FINAL ZDS	1.16.26	TM	I	
ISSUED FOR REVIEW	8.25.25	JDK	0	

PROJECT INFO

HARMONI TOWER ID # : SC0009812

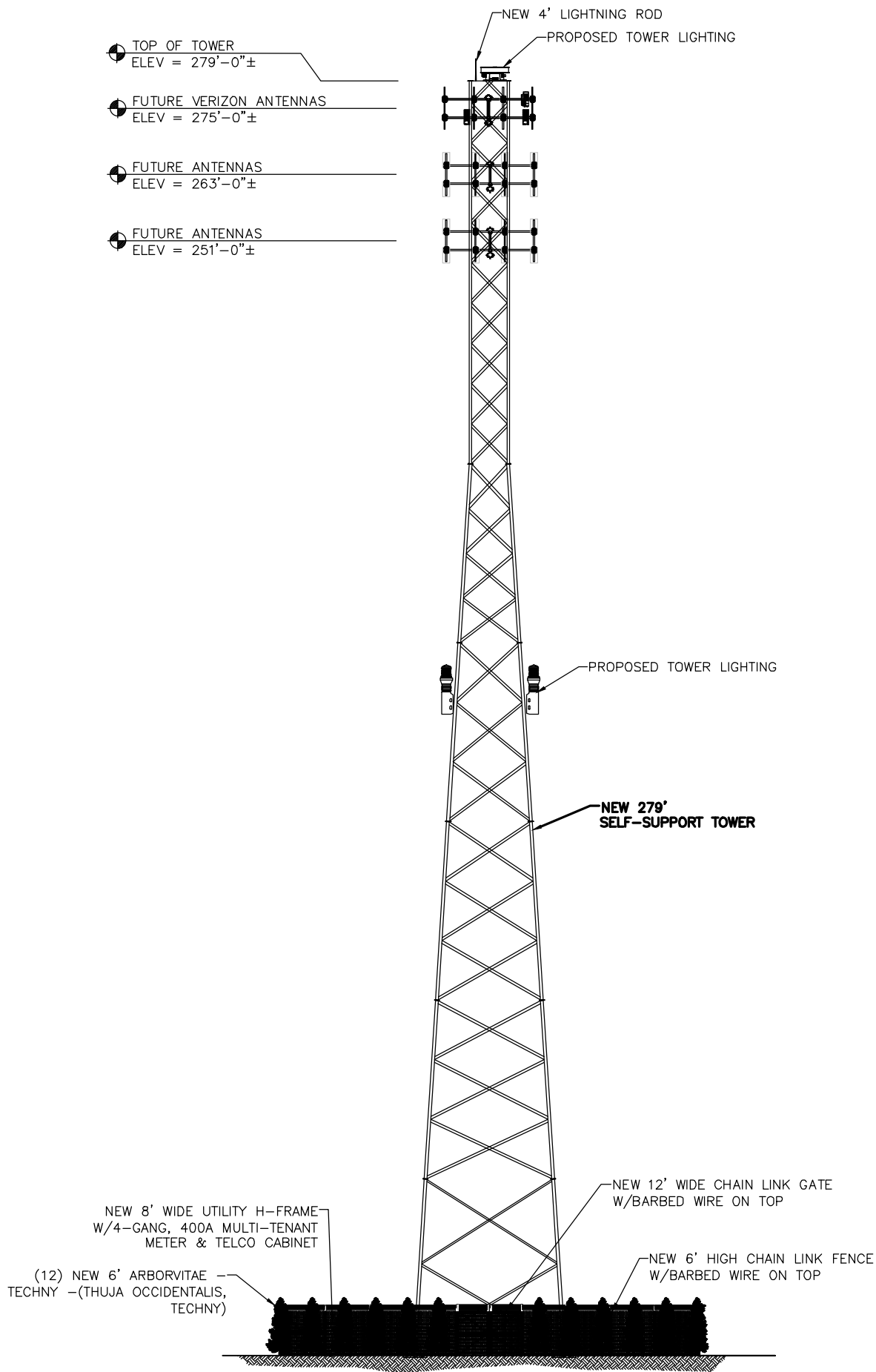
VZW FUZE PROJECT # : 17333601

HARMONI SITE NAME: BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER:	REV.:
Z-2	0
68160	



ELEVATION

PLANS PREPARED FOR:



6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY:



2501 SHENANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
www.t-sqrld.com

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REVISIONS:

DESCRIPTION	DATE	BY	REV
FINAL ZDS	1.16.26	TM	1
ISSUED FOR REVIEW	8.25.25	JDK	0

PROJECT INFO

HARMONI TOWER ID # :
SC0009812

VZW FUZE PROJECT #:
17333601

HARMONI SITE NAME:
BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER:

Z-3

REV.:

0

68160

N.T.S.

A

Exhibit 2



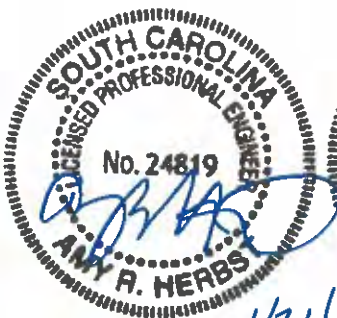
Structural Design Report
279' S3TL Series HD2 Self-Supporting Tower
Site: Borden, SC
Site Number: SC0009812

Prepared for: HARMONI TOWERS
by: Sabre Industries™

Job Number: 26-3550-JDS

January 21, 2026

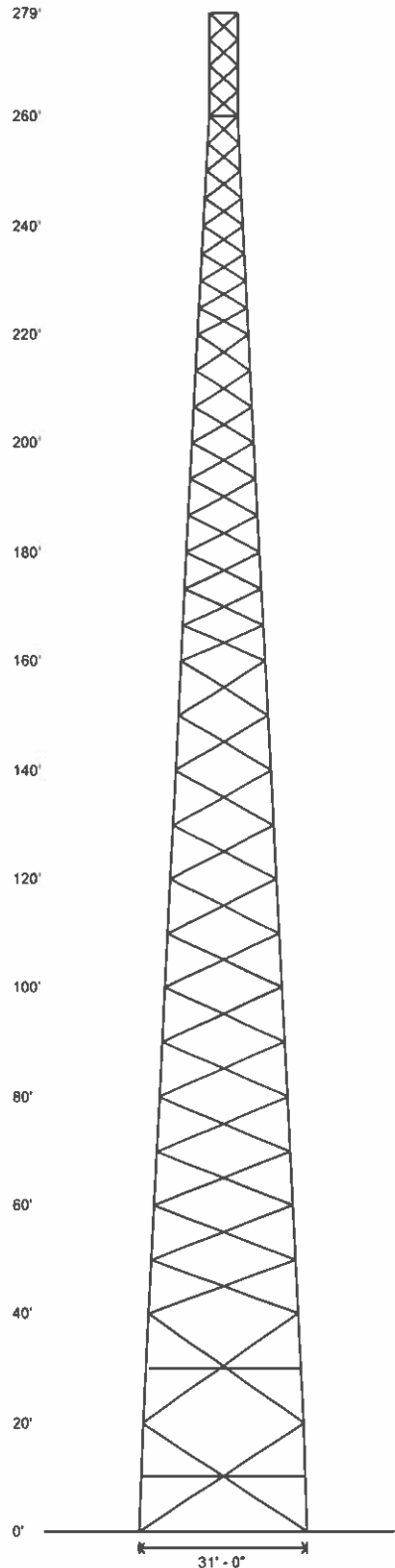
Tower Profile.....	1-2
Maximum Leg Loads.....	3
Maximum Diagonal Loads.....	4
Maximum Foundation Loads.....	5
Calculations.....	6-28



Digitally Signed By Amy R. Herbst
DN:
C=US,SERIALNUMBER=MAS20
250205984400,ST=Texas,L=Alva
rado,2.5.4.97=NTRUS\+DE-
4349737,O=SABRE
INDUSTRIES\, INC.,CN=Amy R.
Herbst Date: 2026.01.21 15:27:49

1/21/26

Legs	12.75 OD X .375	8.625 OD X .500	L 3 X 3 X 1/4	A	5.563 OD X .500	B	C	D	E
Diagonals	L 5 X 5 X 5/16	L 3 1/2 X 3 1/2 X 1/4	L 3 1/2 X 3 1/2 X 1/4	NONE	L 3 X 3 X 3/16	L 2 1/2 X 2 1/2 X 3/16	L 2 X 2 X 3/16		
Horizontals		L 4 X 4 X 1/4		NONE					
Sub-Horizontals	L 3 1/2 X 3 1/2 X 1/4			NONE					
Brace Bolts	(2) 3/4"	(2) 5/8"	(1) 3/4"				(1) 5/8"		
Top Face Width	29'	25'	23'	21'	19'	17'	15'	11'	7'
Panel Count/Height	2 @ 20'			12 @ 10'			9 @ 6.6667'	8 @ 5'	4 @ 4.75'
Section Weight	6725	6461	6030	5562	5013	4654	4518	3274	3145
								2699	2211
								1768	1561
									1105



Designed Appurtenance Loading

Elev	Description	Tx-Line
275	(1) 40,000 Sq. Inches (10,000 lbs) (below top)	(15) 1 5/8"
263	(1) 30,000 Sq. Inches 8,000# (below top)	(15) 1 5/8"
251	(1) 30,000 Sq. Inches 8,000# (below top)	(3) 1 5/8"
110	Leg Dish Mount	
110	(1) 10" H.P. Dish	(1) 1 5/8"

Design Criteria - ANSI/TIA-222-H

Wind Speed (No Ice)	119 mph
Wind Speed (Ice)	30 mph
Design Ice Thickness	1.00 in
Risk Category	II
Exposure Category	C
Topographic Factor Procedure	Method 1 (Simplified)
Topographic Category	1
Ground Elevation	240 ft
Seismic Importance Factor, Ie	1.00
0.2-sec Spectral Response, Ss	0.345 g
1-sec Spectral Response, S1	0.116 g
Site Class	D (DEFAULT)
Seismic Design Category	C
Basic Seismic Force-Resisting System	Telecommunication Tower (Truss: Steel)

Base Reactions - Wind/Ice

Total Foundation		Individual Footing	
Shear (kips)	94.05	Shear (kips)	56.77
Axial (kips)	197.91	Compression (kips)	603
Moment (ft-kips)	15273	Uplift (kips)	520

Base Reactions - Seismic

Total Foundation		Individual Footing	
Shear (kips)	5.13	Shear (kips)	6.04
Axial (kips)	118.95	Compression (kips)	82
Moment (ft-kips)	1126	Uplift (kips)	16

Notes

- 1) All legs are A500 (50 ksi Min. Yield).
- 2) All braces are A572 Grade 50.
- 3) All brace bolts are A325-X.
- 4) The tower model is S3TL Series HD2.
- 5) Transmission lines are to be attached to standard 12 hole waveguide ladders with stackable hangers.
- 6) Azimuths are relative (not based on true north).
- 7) Foundation loads shown are maximums.
- 8) (6) 1 3/4" dia. x 87"-long F1554 grade 105 anchor bolts per leg on a 18" bolt circle w/ 10.5" max. projection above concrete.
- 9) All unequal angles are oriented with the short leg vertical.
- 10) Weights shown are estimates. Final weights may vary.
- 11) Tower Rating: 99.04%
- 12) No grout is required under the base plates.
- 13) For face widths between 27' and 37', diagonal members are continuous and sub-horizontal members are split.

sabre

Sabre Industries
7101 Southbridge Drive
P.O. Box 658
Sioux City, IA 51102-0658
Phone (712) 258-6690
Fax (712) 279-0614

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Job: 26-3550-JDS
Customer: HARMONI TOWERS
Site Name: Borden, SC SC0009812
Description: 279' S3TL
Date: 1/21/2026 By: ARH

Material List

Display	Value
A	8.825 OD X .322
B	5.563 OD X .375
C	4.500 OD X .337
D	4.000 OD X .318

Display	Value
E	2.875 OD X .203
F	L 2 X 2 X 3/16
G	L 2 X 2 X 1/8

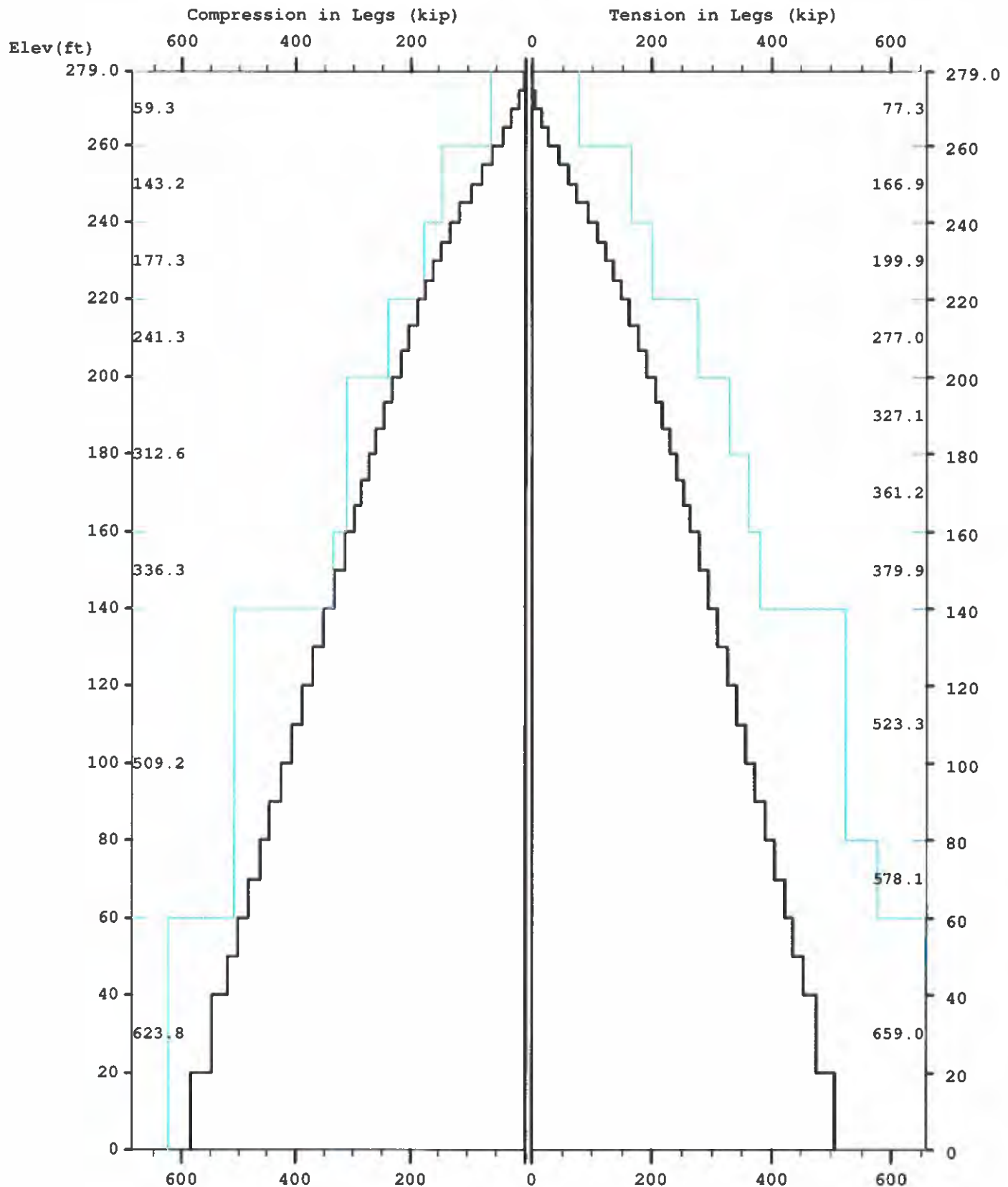


Sabre Industries
 7101 Southbridge Drive
 P.O. Box 658
 Sioux City, IA 51102-0658
 Phone: (712) 258-8800
 Fax: (712) 278-0814

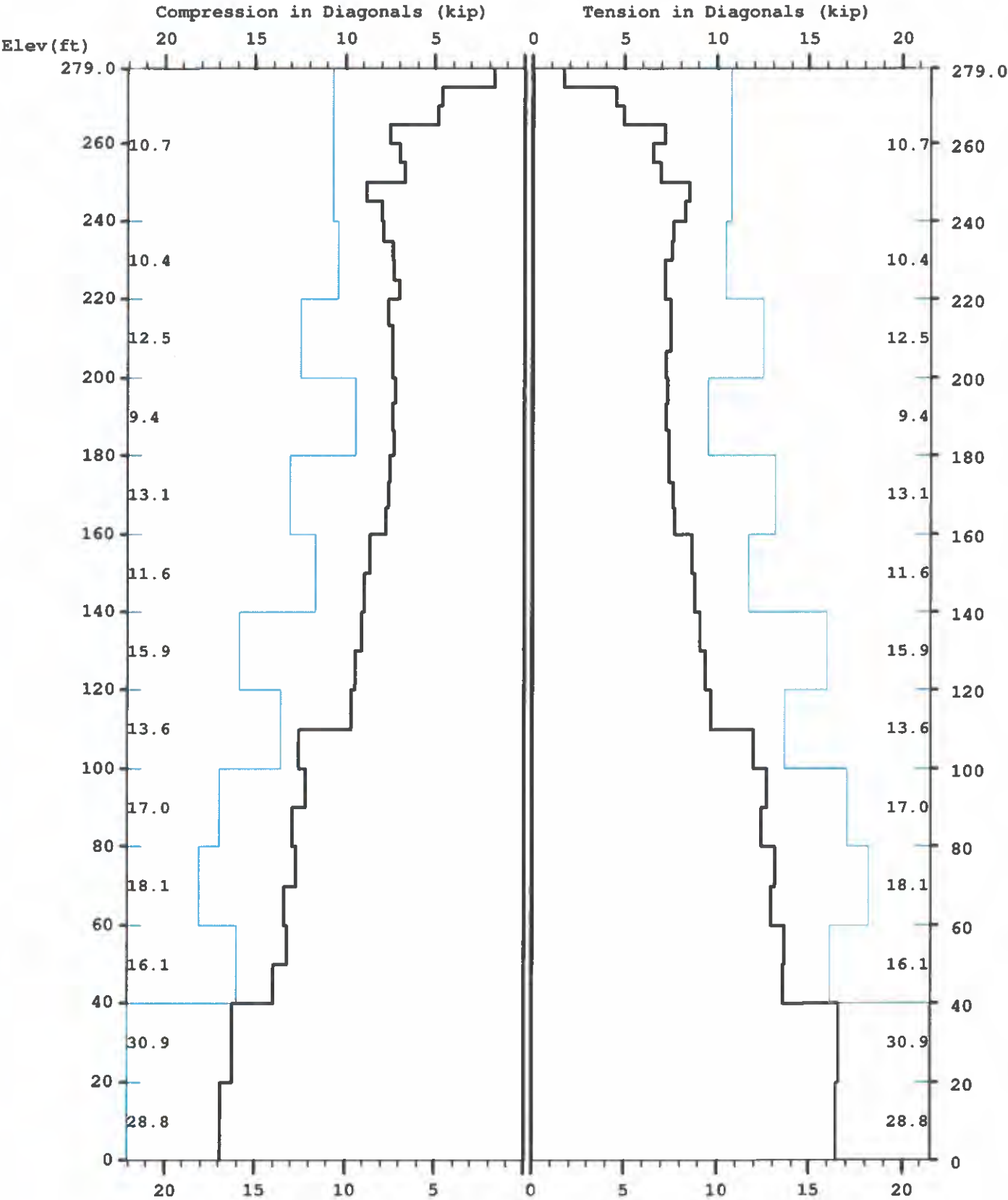
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Job: 26-3550-JDS
 Customer: HARMONI TOWERS
 Site Name: Borden, SC SC0009812
 Description: 279' S3TL
 Date: 1/21/2026 By: ARH

Maximum

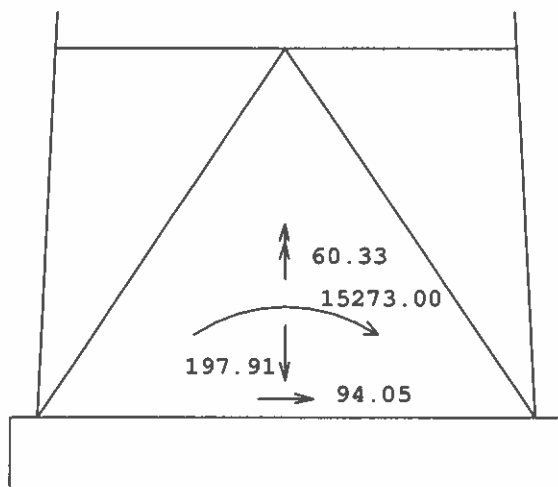


Maximum

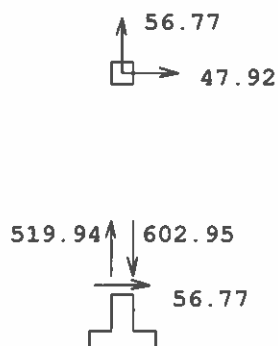


Maximum

TOTAL FOUNDATION LOADS (kip, ft-kip)



INDIVIDUAL FOOTING LOADS (kip)



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Latticed Tower Analysis (Unguyed)          (c)2024 Guymast Inc. 416-736-7453
Processed under license at:

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Sabre Towers and Poles                      on: 21 jan 2026   at: 15:16:19
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MAST GEOMETRY (ft)

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PANEL TYPE	NO.OF LEGS	ELEV.AT BOTTOM	ELEV.AT TOP	F.W..AT BOTTOM	F.W..AT TOP	TYPICAL PANEL HEIGHT
X	3	274.25	279.00	5.00	5.00	4.75
X	3	260.00	274.25	5.00	5.00	4.75
X	3	255.00	260.00	5.50	5.00	5.00
X	3	240.00	255.00	7.00	5.50	5.00
X	3	220.00	240.00	9.00	7.00	5.00
X	3	200.00	220.00	11.00	9.00	6.67
X	3	180.00	200.00	13.00	11.00	6.67
X	3	160.00	180.00	15.00	13.00	6.67
X	3	140.00	160.00	17.00	15.00	10.00
X	3	120.00	140.00	19.00	17.00	10.00
X	3	100.00	120.00	21.00	19.00	10.00
X	3	80.00	100.00	23.00	21.00	10.00
X	3	60.00	80.00	25.00	23.00	10.00
X	3	40.00	60.00	27.00	25.00	10.00
X	3	20.00	40.00	29.00	27.00	20.00
X	3	0.00	20.00	31.00	29.00	20.00

MEMBER PROPERTIES

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MEMBER TYPE	BOTTOM ELEV ft	TOP ELEV ft	X-SECTN AREA in.sq	RADIUS OF GYRAT in	ELASTIC MODULUS ksi	THERMAL EXPANSN /deg
LE	260.00	279.00	1.704	0.947	29000.	0.0000117
LE	240.00	260.00	3.678	0.947	29000.	0.0000117
LE	220.00	240.00	4.407	0.947	29000.	0.0000117
LE	200.00	220.00	6.111	0.947	29000.	0.0000117
LE	160.00	200.00	7.952	0.947	29000.	0.0000117
LE	140.00	160.00	8.399	0.947	29000.	0.0000117
LE	60.00	140.00	12.763	0.947	29000.	0.0000117
LE	0.00	60.00	14.579	0.947	29000.	0.0000117
DI	220.00	279.00	0.715	0.617	29000.	0.0000117
DI	180.00	220.00	0.902	0.617	29000.	0.0000117
DI	160.00	180.00	1.090	0.617	29000.	0.0000117
DI	140.00	160.00	1.438	0.617	29000.	0.0000117
DI	100.00	140.00	1.688	0.617	29000.	0.0000117
DI	40.00	100.00	1.938	0.617	29000.	0.0000117
DI	0.00	40.00	3.027	0.617	29000.	0.0000117
HO	274.25	279.00	0.484	0.626	29000.	0.0000117
HO	255.00	260.00	0.715	0.626	29000.	0.0000117

FACTORED MEMBER RESISTANCES

BOTTOM ELEV ft	TOP ELEV ft	LEGS		DIAGONALS		HORIZONTALS		INT BRACING	
		COMP kip	TENS kip	COMP kip	TENS kip	COMP kip	TENS kip	COMP kip	TENS kip
274.2	279.0	59.29	77.27	10.74	10.74	7.16	7.16	0.00	0.00
260.0	274.2	59.29	77.27	10.74	10.74	0.00	0.00	0.00	0.00
255.0	260.0	143.18	166.92	10.74	10.74	10.72	10.72	0.00	0.00
240.0	255.0	143.18	166.92	10.74	10.74	0.00	0.00	0.00	0.00
220.0	240.0	177.29	199.92	10.38	10.38	0.00	0.00	0.00	0.00
200.0	220.0	241.28	277.05	12.47	12.47	0.00	0.00	0.00	0.00
180.0	200.0	312.59	327.10	9.45	9.45	0.00	0.00	0.00	0.00
160.0	180.0	312.59	361.16	13.10	13.10	0.00	0.00	0.00	0.00
140.0	160.0	336.31	379.88	11.64	11.64	0.00	0.00	0.00	0.00
120.0	140.0	509.22	523.32	15.88	15.88	0.00	0.00	0.00	0.00
100.0	120.0	509.22	523.32	13.59	13.59	0.00	0.00	0.00	0.00
80.0	100.0	509.22	523.32	17.02	17.02	0.00	0.00	0.00	0.00
60.0	80.0	509.22	578.14	18.13	18.13	0.00	0.00	0.00	0.00
40.0	60.0	623.79	658.98	16.06	16.06	0.00	0.00	0.00	0.00
20.0	40.0	623.79	658.98	30.91	30.91	0.00	0.00	0.00	0.00
0.0	20.0	623.79	658.98	28.77	28.77	0.00	0.00	0.00	0.00

 * Only 5 condition(s) shown in full

LOADING CONDITION A *****

119 mph wind with no ice. Wind Azimuth: 0° (1.2 D + 1.0 Wo)

MAST LOADING

LOAD TYPE	ELEV ft	APPLY... RADIUS ft	LOAD...AT AZI	LOAD AZI	FORCES.....		MOMENTS.....	
					HORIZ kip	DOWN kip	VERTICAL ft-kip	TORSNAL ft-kip
C	275.0	0.00	0.0	0.0	9.04	12.00	0.00	0.00
C	263.0	0.00	0.0	0.0	6.71	9.60	0.00	0.00
C	251.0	0.00	0.0	0.0	6.65	9.60	0.00	0.00
D	279.0	0.00	318.0	0.0	0.09	0.06	0.01	-0.02
D	274.2	0.00	318.0	0.0	0.09	0.06	0.01	-0.02
D	274.2	0.00	318.0	0.0	0.15	0.07	0.05	-0.11
D	264.7	0.00	318.0	0.0	0.15	0.07	0.05	-0.11
D	264.7	0.00	332.1	0.0	0.17	0.08	0.06	-0.07
D	260.0	0.00	332.1	0.0	0.17	0.08	0.06	-0.07
D	260.0	0.00	341.6	0.0	0.20	0.13	0.07	-0.05
D	250.0	0.00	342.7	0.0	0.19	0.12	0.07	-0.05
D	250.0	0.00	352.9	0.0	0.19	0.12	0.07	-0.04
D	240.0	0.00	350.9	0.0	0.20	0.13	0.07	-0.04
D	240.0	0.00	359.6	0.0	0.20	0.14	0.09	-0.02
D	220.0	0.00	355.0	0.0	0.21	0.14	0.08	-0.03
D	220.0	0.00	3.9	0.0	0.21	0.16	0.10	-0.01
D	200.0	0.00	1.1	0.0	0.22	0.17	0.09	-0.02
D	200.0	0.00	7.3	0.0	0.22	0.19	0.12	0.01

D	180.0	0.00	5.2	0.0	0.23	0.20	0.11	0.00
D	180.0	0.00	9.8	0.0	0.24	0.21	0.14	0.02
D	160.0	0.00	8.2	0.0	0.25	0.21	0.13	0.01
D	160.0	0.00	11.6	0.0	0.23	0.22	0.15	0.04
D	140.0	0.00	10.7	0.0	0.24	0.22	0.14	0.03
D	140.0	0.00	13.3	0.0	0.24	0.29	0.17	0.05
D	120.0	0.00	12.5	0.0	0.25	0.29	0.16	0.04
D	120.0	0.00	14.0	0.0	0.25	0.30	0.18	0.05
D	110.0	0.00	14.0	0.0	0.25	0.30	0.18	0.05
D	110.0	0.00	17.0	0.0	0.25	0.30	0.18	0.06
D	100.0	0.00	17.0	0.0	0.25	0.30	0.18	0.06
D	100.0	0.00	18.1	0.0	0.26	0.32	0.20	0.07
D	80.0	0.00	17.5	0.0	0.26	0.33	0.19	0.07
D	80.0	0.00	19.0	0.0	0.25	0.33	0.22	0.08
D	60.0	0.00	18.5	0.0	0.26	0.33	0.21	0.07
D	60.0	0.00	19.8	0.0	0.26	0.36	0.24	0.08
D	40.0	0.00	19.4	0.0	0.26	0.37	0.23	0.08
D	40.0	0.00	20.3	0.0	0.24	0.39	0.25	0.08
D	20.0	0.00	20.3	0.0	0.24	0.39	0.25	0.08
D	20.0	0.00	20.9	0.0	0.21	0.40	0.27	0.08
D	0.0	0.00	20.9	0.0	0.21	0.40	0.27	0.08

ANTENNA LOADING

=====

.....ANTENNA.....	ATTACHMENT				ANTENNA FORCES.....			
TYPE	ELEV	AZI	RAD	AZI	AXIAL	SHEAR	GRAVITY	TORSION
	ft		ft		kip	kip	kip	ft-kip
HP	110.0	0.0	13.1	0.0	3.32	0.00	0.65	0.00

=====

LOADING CONDITION M =====

119 mph wind with no ice. Wind Azimuth: 0° (0.9 D + 1.0 Wo)

MAST LOADING

=====

LOAD	ELEV	APPLY..LOAD..AT	LOAD	FORCES.....		MOMENTS.....	
TYPE	ft	RADIUS	AZI	AZI	HORIZ	DOWN	VERTICAL
		ft			kip	kip	ft-kip
C	275.0	0.00	0.0	0.0	9.04	9.00	0.00
C	263.0	0.00	0.0	0.0	6.71	7.20	0.00
C	251.0	0.00	0.0	0.0	6.65	7.20	0.00
D	279.0	0.00	318.0	0.0	0.09	0.04	0.01
D	274.2	0.00	318.0	0.0	0.09	0.04	0.01
D	274.2	0.00	318.0	0.0	0.15	0.05	0.04
D	264.7	0.00	318.0	0.0	0.15	0.05	0.04
D	264.7	0.00	332.1	0.0	0.17	0.06	0.04
D	260.0	0.00	332.1	0.0	0.17	0.06	0.04
D	260.0	0.00	341.6	0.0	0.20	0.09	0.05
D	250.0	0.00	342.7	0.0	0.19	0.09	0.05
D	250.0	0.00	352.9	0.0	0.19	0.09	0.05
D	240.0	0.00	350.9	0.0	0.20	0.09	0.05
D	240.0	0.00	359.6	0.0	0.20	0.10	0.07
D	220.0	0.00	355.0	0.0	0.21	0.11	0.06

D	220.0	0.00	3.9	0.0	0.21	0.12	0.08	-0.01
D	200.0	0.00	1.1	0.0	0.22	0.13	0.07	-0.02
D	200.0	0.00	7.3	0.0	0.22	0.14	0.09	0.01
D	180.0	0.00	5.2	0.0	0.23	0.15	0.08	0.00
D	180.0	0.00	9.8	0.0	0.24	0.16	0.10	0.02
D	160.0	0.00	8.2	0.0	0.25	0.16	0.09	0.01
D	160.0	0.00	11.6	0.0	0.23	0.16	0.11	0.04
D	140.0	0.00	10.7	0.0	0.24	0.17	0.11	0.03
D	140.0	0.00	13.3	0.0	0.24	0.22	0.13	0.05
D	120.0	0.00	12.5	0.0	0.25	0.22	0.12	0.04
D	120.0	0.00	14.0	0.0	0.25	0.22	0.13	0.05
D	100.0	0.00	17.0	0.0	0.25	0.23	0.14	0.06
D	100.0	0.00	18.1	0.0	0.26	0.24	0.15	0.07
D	80.0	0.00	17.5	0.0	0.26	0.24	0.15	0.07
D	80.0	0.00	19.0	0.0	0.25	0.25	0.16	0.08
D	60.0	0.00	18.5	0.0	0.26	0.25	0.16	0.07
D	60.0	0.00	19.8	0.0	0.26	0.27	0.18	0.08
D	40.0	0.00	19.4	0.0	0.26	0.27	0.17	0.08
D	40.0	0.00	20.3	0.0	0.24	0.29	0.19	0.08
D	20.0	0.00	20.3	0.0	0.24	0.29	0.19	0.08
D	20.0	0.00	20.9	0.0	0.21	0.30	0.20	0.08
D	0.0	0.00	20.9	0.0	0.21	0.30	0.20	0.08

ANTENNA LOADING

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.....ANTENNA.....	ATTACHMENT				ANTENNA FORCES.....			
TYPE	ELEV	AZI	RAD	AZI	AXIAL	SHEAR	GRAVITY	TORSION
	ft		ft		kip	kip	kip	ft-kip
HP	110.0	0.0	13.1	0.0	3.32	0.00	0.49	0.00

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LOADING CONDITION Y =====

30 mph wind with 1 ice. Wind Azimuth: 0° (1.2 D + 1.0 Di + 1.0 Wi)

MAST LOADING

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LOAD	ELEV	APPLY..	LOAD..	AT	LOAD	FORCES.....		MOMENTS.....	
TYPE	ft	RADIUS	AZI	AZI	AZI	HORIZ	DOWN	VERTICAL	TORSNAL
		ft				kip	kip	ft-kip	ft-kip
C	275.0	0.00	0.0	0.0	0.0	0.86	24.36	0.00	0.00
C	263.0	0.00	0.0	0.0	0.0	0.64	19.45	0.00	0.00
C	251.0	0.00	0.0	0.0	0.0	0.63	19.40	0.00	0.00
D	279.0	0.00	318.0	0.0	0.0	0.01	0.15	0.02	0.00
D	274.2	0.00	318.0	0.0	0.0	0.01	0.15	0.02	0.00
D	274.2	0.00	318.0	0.0	0.0	0.01	0.19	0.16	-0.01
D	264.7	0.00	318.0	0.0	0.0	0.01	0.19	0.16	-0.01
D	264.7	0.00	334.6	0.0	0.0	0.01	0.23	0.16	0.00
D	260.0	0.00	334.6	0.0	0.0	0.01	0.23	0.16	0.00
D	260.0	0.00	346.3	0.0	0.0	0.02	0.31	0.19	0.00
D	255.0	0.00	346.3	0.0	0.0	0.02	0.31	0.19	0.00
D	255.0	0.00	347.7	0.0	0.0	0.02	0.29	0.18	0.00
D	250.0	0.00	347.7	0.0	0.0	0.02	0.29	0.18	0.00
D	250.0	0.00	358.5	0.0	0.0	0.02	0.30	0.21	0.00

D	245.0	0.00	358.5	0.0	0.02	0.30	0.21	0.00
D	245.0	0.00	356.5	0.0	0.02	0.31	0.20	0.00
D	240.0	0.00	356.5	0.0	0.02	0.31	0.20	0.00
D	240.0	0.00	5.0	0.0	0.02	0.32	0.25	0.00
D	220.0	0.00	0.6	0.0	0.02	0.34	0.22	0.00
D	220.0	0.00	9.3	0.0	0.02	0.36	0.29	0.00
D	206.7	0.00	7.9	0.0	0.02	0.37	0.28	0.00
D	206.7	0.00	6.5	0.0	0.02	0.37	0.26	0.00
D	200.0	0.00	6.5	0.0	0.02	0.37	0.26	0.00
D	200.0	0.00	12.6	0.0	0.02	0.40	0.33	0.00
D	180.0	0.00	10.5	0.0	0.02	0.41	0.31	0.00
D	180.0	0.00	15.0	0.0	0.02	0.44	0.38	0.00
D	160.0	0.00	13.5	0.0	0.02	0.45	0.35	0.00
D	160.0	0.00	16.8	0.0	0.02	0.44	0.42	0.00
D	150.0	0.00	16.8	0.0	0.02	0.44	0.42	0.00
D	150.0	0.00	15.9	0.0	0.02	0.45	0.40	0.00
D	140.0	0.00	15.9	0.0	0.02	0.45	0.40	0.00
D	140.0	0.00	18.3	0.0	0.02	0.53	0.46	0.00
D	130.0	0.00	18.3	0.0	0.02	0.53	0.46	0.00
D	130.0	0.00	17.6	0.0	0.02	0.53	0.44	0.00
D	120.0	0.00	17.6	0.0	0.02	0.53	0.44	0.00
D	120.0	0.00	18.9	0.0	0.02	0.54	0.48	0.00
D	110.0	0.00	18.9	0.0	0.02	0.54	0.48	0.00
D	110.0	0.00	22.1	0.0	0.02	0.55	0.51	0.00
D	100.0	0.00	22.1	0.0	0.02	0.55	0.51	0.00
D	100.0	0.00	23.0	0.0	0.02	0.58	0.55	0.01
D	90.0	0.00	23.0	0.0	0.02	0.58	0.55	0.01
D	90.0	0.00	22.6	0.0	0.02	0.59	0.53	0.00
D	80.0	0.00	22.6	0.0	0.02	0.59	0.53	0.00
D	80.0	0.00	23.8	0.0	0.02	0.59	0.59	0.01
D	60.0	0.00	23.4	0.0	0.02	0.60	0.57	0.01
D	60.0	0.00	24.3	0.0	0.02	0.64	0.62	0.01
D	40.0	0.00	24.1	0.0	0.02	0.65	0.61	0.01
D	40.0	0.00	24.5	0.0	0.02	0.65	0.65	0.01
D	20.0	0.00	24.5	0.0	0.02	0.65	0.65	0.01
D	20.0	0.00	23.8	0.0	0.02	0.60	0.47	0.01
D	0.0	0.00	23.8	0.0	0.02	0.60	0.47	0.01

ANTENNA LOADING

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.....ANTENNA.....	ATTACHMENT				ANTENNA FORCES.....			
TYPE	ELEV	AZI	RAD	AZI	AXIAL	SHEAR	GRAVITY	TORSION
	ft		ft		kip	kip	kip	ft-kip
HP	110.0	0.0	13.1	0.0	0.22	0.00	2.22	0.00

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LOADING CONDITION k =====

Seismic - Azimuth: 0° (1.2 D + 1.0 Ev + 1.0 Eh)

MAST LOADING

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LOAD	ELEV	APPLY..LOAD..AT	LOAD	FORCES.....		MOMENTS.....	
TYPE	ft	RADIUS	AZI	HORIZ	DOWN	VERTICAL	TORSNAL
		ft		kip	kip	ft-kip	ft-kip

C	275.0	0.00	0.0	0.0	1.11	12.70	0.00	0.00
C	269.5	0.00	0.0	0.0	0.12	1.40	0.00	0.00
C	269.0	0.00	0.0	0.0	0.03	0.30	0.00	0.00
C	263.0	0.00	0.0	0.0	0.84	10.16	0.00	0.00
C	261.5	0.00	0.0	0.0	0.01	0.11	0.00	0.00
C	261.5	0.00	0.0	0.0	0.00	0.04	0.00	0.00
C	255.5	0.00	0.0	0.0	0.03	0.33	0.00	0.00
C	255.5	0.00	0.0	0.0	0.01	0.12	0.00	0.00
C	251.0	0.00	0.0	0.0	0.79	10.16	0.00	0.00
C	250.0	0.00	0.0	0.0	0.15	1.98	0.00	0.00
C	245.5	0.00	0.0	0.0	0.01	0.19	0.00	0.00
C	245.5	0.00	0.0	0.0	0.03	0.40	0.00	0.00
C	230.0	0.00	0.0	0.0	0.02	0.34	0.00	0.00
C	230.0	0.00	0.0	0.0	0.05	0.74	0.00	0.00
C	230.0	0.00	0.0	0.0	0.16	2.25	0.00	0.00
C	210.0	0.00	0.0	0.0	0.02	0.34	0.00	0.00
C	210.0	0.00	0.0	0.0	0.05	0.74	0.00	0.00
C	210.0	0.00	0.0	0.0	0.17	2.81	0.00	0.00
C	190.0	0.00	0.0	0.0	0.18	3.43	0.00	0.00
C	190.0	0.00	0.0	0.0	0.04	0.74	0.00	0.00
C	190.0	0.00	0.0	0.0	0.02	0.34	0.00	0.00
C	170.0	0.00	0.0	0.0	0.02	0.34	0.00	0.00
C	170.0	0.00	0.0	0.0	0.19	3.99	0.00	0.00
C	170.0	0.00	0.0	0.0	0.03	0.74	0.00	0.00
C	150.0	0.00	0.0	0.0	0.03	0.74	0.00	0.00
C	150.0	0.00	0.0	0.0	0.01	0.34	0.00	0.00
C	150.0	0.00	0.0	0.0	0.16	4.16	0.00	0.00
C	130.0	0.00	0.0	0.0	0.02	0.74	0.00	0.00
C	130.0	0.00	0.0	0.0	0.01	0.34	0.00	0.00
C	130.0	0.00	0.0	0.0	0.19	5.74	0.00	0.00
C	115.0	0.00	0.0	0.0	0.00	0.17	0.00	0.00
C	115.0	0.00	0.0	0.0	0.01	0.37	0.00	0.00
C	110.0	0.00	0.0	0.0	0.02	0.88	0.00	0.00
C	110.0	0.00	0.0	0.0	0.00	0.06	0.00	0.00
C	110.0	0.00	0.0	0.0	0.02	0.94	0.00	0.00
C	110.0	0.00	0.0	0.0	0.16	5.91	0.00	0.00
C	105.0	0.00	0.0	0.0	0.00	0.18	0.00	0.00
C	105.0	0.00	0.0	0.0	0.01	0.37	0.00	0.00
C	90.0	0.00	0.0	0.0	0.13	6.37	0.00	0.00
C	90.0	0.00	0.0	0.0	0.01	0.37	0.00	0.00
C	90.0	0.00	0.0	0.0	0.01	0.74	0.00	0.00
C	70.0	0.00	0.0	0.0	0.01	0.37	0.00	0.00
C	70.0	0.00	0.0	0.0	0.01	0.74	0.00	0.00
C	70.0	0.00	0.0	0.0	0.10	7.06	0.00	0.00
C	50.0	0.00	0.0	0.0	0.07	7.66	0.00	0.00
C	50.0	0.00	0.0	0.0	0.00	0.37	0.00	0.00
C	50.0	0.00	0.0	0.0	0.01	0.74	0.00	0.00
C	30.0	0.00	0.0	0.0	0.00	0.74	0.00	0.00
C	30.0	0.00	0.0	0.0	0.00	0.37	0.00	0.00
C	30.0	0.00	0.0	0.0	0.04	8.21	0.00	0.00
C	10.0	0.00	0.0	0.0	0.01	8.54	0.00	0.00
C	10.0	0.00	0.0	0.0	0.00	0.74	0.00	0.00
C	10.0	0.00	0.0	0.0	0.00	0.37	0.00	0.00
D	279.0	0.00	180.0	180.0	0.00	0.00	0.00	0.00
D	0.0	0.00	180.0	180.0	0.00	0.00	0.00	0.00

ANTENNA LOADING

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.....ANTENNA..... ATTACHMENTANTENNA FORCES.....

TYPE	ELEV ft	AZI	RAD ft	AZI	AXIAL kip	SHEAR kip	GRAVITY kip	TORSION ft-kip
HP	110.0	0.0	13.1	0.0	0.00	0.00	0.00	0.00

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LOADING CONDITION n =====

Seismic - Azimuth: 00 (0.9 D - 1.0 Ev + 1.0 Eh)

MAST LOADING

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LOAD TYPE	ELEV ft	APPLY..LOAD..AT RADIUS ft	AT AZI	LOAD AZI	FORCES..... HORIZ kip	DOWN kip	MOMENTS..... VERTICAL ft-kip	TORSNAL ft-kip
C	275.0	0.00	0.0	0.0	1.11	8.30	0.00	0.00
C	269.5	0.00	0.0	0.0	0.12	0.92	0.00	0.00
C	269.0	0.00	0.0	0.0	0.03	0.20	0.00	0.00
C	263.0	0.00	0.0	0.0	0.84	6.64	0.00	0.00
C	261.5	0.00	0.0	0.0	0.01	0.07	0.00	0.00
C	261.5	0.00	0.0	0.0	0.00	0.03	0.00	0.00
C	255.5	0.00	0.0	0.0	0.03	0.22	0.00	0.00
C	255.5	0.00	0.0	0.0	0.01	0.08	0.00	0.00
C	251.0	0.00	0.0	0.0	0.79	6.64	0.00	0.00
C	250.0	0.00	0.0	0.0	0.15	1.30	0.00	0.00
C	245.5	0.00	0.0	0.0	0.01	0.12	0.00	0.00
C	245.5	0.00	0.0	0.0	0.03	0.26	0.00	0.00
C	230.0	0.00	0.0	0.0	0.02	0.22	0.00	0.00
C	230.0	0.00	0.0	0.0	0.05	0.48	0.00	0.00
C	230.0	0.00	0.0	0.0	0.16	1.47	0.00	0.00
C	210.0	0.00	0.0	0.0	0.02	0.22	0.00	0.00
C	210.0	0.00	0.0	0.0	0.05	0.48	0.00	0.00
C	210.0	0.00	0.0	0.0	0.17	1.83	0.00	0.00
C	190.0	0.00	0.0	0.0	0.18	2.24	0.00	0.00
C	190.0	0.00	0.0	0.0	0.04	0.48	0.00	0.00
C	190.0	0.00	0.0	0.0	0.02	0.22	0.00	0.00
C	170.0	0.00	0.0	0.0	0.02	0.22	0.00	0.00
C	170.0	0.00	0.0	0.0	0.19	2.61	0.00	0.00
C	170.0	0.00	0.0	0.0	0.03	0.48	0.00	0.00
C	150.0	0.00	0.0	0.0	0.03	0.48	0.00	0.00
C	150.0	0.00	0.0	0.0	0.01	0.22	0.00	0.00
C	150.0	0.00	0.0	0.0	0.16	2.72	0.00	0.00
C	130.0	0.00	0.0	0.0	0.02	0.48	0.00	0.00
C	130.0	0.00	0.0	0.0	0.01	0.22	0.00	0.00
C	130.0	0.00	0.0	0.0	0.19	3.75	0.00	0.00
C	115.0	0.00	0.0	0.0	0.00	0.11	0.00	0.00
C	115.0	0.00	0.0	0.0	0.01	0.24	0.00	0.00
C	110.0	0.00	0.0	0.0	0.02	0.57	0.00	0.00
C	110.0	0.00	0.0	0.0	0.00	0.04	0.00	0.00
C	110.0	0.00	0.0	0.0	0.02	0.61	0.00	0.00
C	110.0	0.00	0.0	0.0	0.16	3.86	0.00	0.00
C	105.0	0.00	0.0	0.0	0.00	0.12	0.00	0.00
C	105.0	0.00	0.0	0.0	0.01	0.24	0.00	0.00
C	90.0	0.00	0.0	0.0	0.13	4.16	0.00	0.00
C	90.0	0.00	0.0	0.0	0.01	0.24	0.00	0.00
C	90.0	0.00	0.0	0.0	0.01	0.48	0.00	0.00
C	70.0	0.00	0.0	0.0	0.01	0.24	0.00	0.00

C	70.0	0.00	0.0	0.0	0.01	0.48	0.00	0.00
C	70.0	0.00	0.0	0.0	0.10	4.62	0.00	0.00
C	50.0	0.00	0.0	0.0	0.07	5.00	0.00	0.00
C	50.0	0.00	0.0	0.0	0.00	0.24	0.00	0.00
C	50.0	0.00	0.0	0.0	0.01	0.48	0.00	0.00
C	30.0	0.00	0.0	0.0	0.00	0.48	0.00	0.00
C	30.0	0.00	0.0	0.0	0.00	0.24	0.00	0.00
C	30.0	0.00	0.0	0.0	0.04	5.36	0.00	0.00
C	10.0	0.00	0.0	0.0	0.01	5.58	0.00	0.00
C	10.0	0.00	0.0	0.0	0.00	0.48	0.00	0.00
C	10.0	0.00	0.0	0.0	0.00	0.24	0.00	0.00
D	279.0	0.00	180.0	180.0	0.00	0.00	0.00	0.00
D	0.0	0.00	180.0	180.0	0.00	0.00	0.00	0.00

ANTENNA LOADING

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.....ANTENNA.....			ATTACHMENT		ANTENNA FORCES.....			
TYPE	ELEV ft	AZI	RAD ft	AZI	AXIAL kip	SHEAR kip	GRAVITY kip	TORSION ft-kip
HP	110.0	0.0	13.1	0.0	0.00	0.00	0.00	0.00

MAXIMUM ANTENNA AND REFLECTOR ROTATIONS:

ELEV ft	AZI deg	TYPE *	BEAM DEFLECTIONS (deg).....			
			ROLL	YAW	PITCH	TOTAL
110.0	0.0	HP	-0.496 G	0.037 F	0.442 D	0.442 D

MAXIMUM TENSION IN MAST MEMBERS (kip)

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ELEV ft	LEGS	DIAG	HORIZ	BRACE
279.0	-----		0.81 A	0.00 A
	0.00 A	1.70 N		
274.2	-----		0.11 i	0.00 A
	3.75 M	4.51 R		
269.5	-----		0.06 Q	0.00 A
	15.40 M	4.93 L		
264.7	-----		0.13 Y	0.00 A
	26.89 M	7.17 M		
260.0	-----		0.60 A	0.00 A
	43.33 M	6.52 R		
255.0	-----		0.28 A	0.00 A
	58.65 M	6.97 F		
250.0	-----		0.03 C	0.00 A
	73.44 M	8.44 R		
245.0	-----		0.28 A	0.00 A
	92.09 M	8.26 L		
240.0	-----		0.04 A	0.00 A
	107.47 M	7.62 R		
235.0	-----		0.20 A	0.00 A
	122.69 M	7.53 L		
230.0	-----		0.09 A	0.00 A

	135.87 M	7.14 R		
225.0	-----		0.16 A	0.00 A
	148.92 M	7.13 F		
220.0	-----		0.10 A	0.00 A
	162.34 M	7.46 R		
213.3	-----		0.14 A	0.00 A
	177.52 M	7.43 F		
206.7	-----		0.10 A	0.00 A
	191.24 M	7.25 X		
200.0	-----		0.12 A	0.00 A
	204.75 M	7.33 F		
193.3	-----		0.06 A	0.00 A
	217.25 M	7.25 R		
186.7	-----		0.10 A	0.00 A
	229.62 M	7.37 F		
180.0	-----		0.06 A	0.00 A
	241.31 M	7.40 R		
173.3	-----		0.16 A	0.00 A
	252.92 M	7.57 F		
166.7	-----		0.06 A	0.00 A
	264.15 M	7.69 X		
160.0	-----		0.10 A	0.00 A
	277.89 M	8.64 F		
150.0	-----		0.13 A	0.00 A
	294.01 M	8.78 X		
140.0	-----		0.08 A	0.00 A
	309.82 M	9.04 F		
130.0	-----		0.07 A	0.00 A
	325.16 M	9.30 X		
120.0	-----		0.08 J	0.00 A
	340.47 M	9.64 F		
110.0	-----		0.07 F	0.00 A
	356.77 M	11.93 R		
100.0	-----		0.08 D	0.00 A
	371.81 M	12.69 L		
90.0	-----		0.07 F	0.00 A
	389.64 M	12.37 R		
80.0	-----		0.07 J	0.00 A
	404.55 M	13.12 L		
70.0	-----		0.06 F	0.00 A
	421.67 M	12.90 R		
60.0	-----		0.18 A	0.00 A
	436.43 M	13.61 L		
50.0	-----		0.04 F	0.00 A
	453.04 M	13.54 R		
40.0	-----		0.02 K	0.00 A
	474.69 M	16.55 L		
20.0	-----		0.18 A	0.00 A
	506.31 M	16.45 R		
0.0	-----		0.00 A	0.00 A

MAXIMUM COMPRESSION IN MAST MEMBERS (kip)

=====

ELEV	LEGS	DIAG	HORIZ	BRACE
ft				

279.0	-----	-0.78 S	0.00 A
	-1.34 c -1.74 H		
274.2	-----	0.00 Q	0.00 A
	-10.98 G -4.59 L		
269.5	-----	-0.07 K	0.00 A
	-23.20 G -4.83 R		
264.7	-----	-0.03 S	0.00 A
	-38.16 G -7.49 G		
260.0	-----	-0.51 O	0.00 A
	-56.85 G -7.01 L		
255.0	-----	-0.18 S	0.00 A
	-74.87 G -6.72 R		
250.0	-----	-0.03 U	0.00 A
	-93.90 G -8.86 F		
245.0	-----	-0.19 S	0.00 A
	-113.99 G -8.00 R		
240.0	-----	-0.03 S	0.00 A
	-129.40 G -7.88 L		
235.0	-----	-0.14 S	0.00 A
	-145.78 G -7.36 R		
230.0	-----	-0.07 S	0.00 A
	-159.26 G -7.33 F		
225.0	-----	-0.12 S	0.00 A
	-173.33 G -7.01 R		
220.0	-----	-0.08 S	0.00 A
	-187.32 G -7.63 F		
213.3	-----	-0.11 S	0.00 A
	-203.86 G -7.34 R		
206.7	-----	-0.08 S	0.00 A
	-218.44 G -7.38 F		
200.0	-----	-0.09 S	0.00 A
	-233.32 G -7.26 R		
193.3	-----	-0.05 S	0.00 A
	-246.90 G -7.35 F		
186.7	-----	-0.08 S	0.00 A
	-260.67 G -7.32 R		
180.0	-----	-0.05 S	0.00 A
	-273.56 G -7.49 F		
173.3	-----	-0.13 S	0.00 A
	-286.63 G -7.56 L		
166.7	-----	-0.05 S	0.00 A
	-299.21 G -7.74 F		
160.0	-----	-0.08 S	0.00 A
	-314.80 G -8.65 L		
150.0	-----	-0.11 S	0.00 A
	-333.09 G -8.93 K		
140.0	-----	-0.07 S	0.00 A
	-351.42 G -9.07 K		
130.0	-----	-0.06 W	0.00 A
	-369.41 G -9.46 K		
120.0	-----	-0.07 V	0.00 A
	-387.51 G -9.68 L		
110.0	-----	-0.07 X	0.00 A
	-407.25 G -12.58 L		
100.0	-----	-0.07 P	0.00 A
	-425.30 G -12.16 R		
90.0	-----	-0.06 X	0.00 A
	-445.34 G -12.93 L		
80.0	-----	-0.06 P	0.00 A
	-463.47 G -12.67 R		

70.0	-----			-0.06 X	0.00 A
	-483.09 G	-13.39 L			
60.0	-----			-0.15 S	0.00 A
	-501.19 G	-13.25 F			
50.0	-----			-0.04 X	0.00 A
	-520.72 G	-13.96 L			
40.0	-----			-0.02 P	0.00 A
	-547.58 G	-16.25 F			
20.0	-----			-0.15 S	0.00 A
	-585.61 G	-16.95 L			
0.0	-----			0.00 A	0.00 A

FORCE/RESISTANCE RATIO IN LEGS

=====

MAST ELEV ft	-- LEG COMPRESSION --			---- LEG TENSION ----		
	MAX COMP	COMP RESIST	FORCE/ RESIST RATIO	MAX TENS	TENS RESIST	FORCE/ RESIST RATIO
279.00	-----					
	1.34	59.29	0.02	0.00	77.27	0.00
274.25	-----					
	10.98	59.29	0.19	3.75	77.27	0.05
269.50	-----					
	23.20	59.29	0.39	15.40	77.27	0.20
264.75	-----					
	38.16	59.29	0.64	26.89	77.27	0.35
260.00	-----					
	56.85	143.18	0.40	43.33	166.92	0.26
255.00	-----					
	74.87	143.18	0.52	58.65	166.92	0.35
250.00	-----					
	93.90	143.18	0.66	73.44	166.92	0.44
245.00	-----					
	113.99	143.18	0.80	92.09	166.92	0.55
240.00	-----					
	129.40	177.29	0.73	107.47	199.92	0.54
235.00	-----					
	145.78	177.29	0.82	122.69	199.92	0.61
230.00	-----					
	159.26	177.29	0.90	135.87	199.92	0.68
225.00	-----					
	173.33	177.29	0.98	148.92	199.92	0.74
220.00	-----					
	187.32	241.28	0.78	162.34	277.05	0.59
213.33	-----					
	203.86	241.28	0.84	177.52	277.05	0.64
206.67	-----					
	218.44	241.28	0.91	191.24	277.05	0.69
200.00	-----					
	233.32	312.59	0.75	204.75	327.10	0.63
193.33	-----					
	246.90	312.59	0.79	217.25	327.10	0.66
186.67	-----					
	260.67	312.59	0.83	229.62	327.10	0.70
180.00	-----					
	273.56	312.59	0.88	241.31	361.16	0.67
173.33	-----					
	286.63	312.59	0.92	252.92	361.16	0.70

166.67	-----					
	299.21	312.59	0.96	264.15	361.16	0.73
160.00	-----					
	314.80	336.31	0.94	277.89	379.88	0.73
150.00	-----					
	333.09	336.31	0.99	294.01	379.88	0.77
140.00	-----					
	351.42	509.22	0.69	309.82	523.32	0.59
130.00	-----					
	369.41	509.22	0.73	325.16	523.32	0.62
120.00	-----					
	387.51	509.22	0.76	340.47	523.32	0.65
110.00	-----					
	407.25	509.22	0.80	356.77	523.32	0.68
100.00	-----					
	425.30	509.22	0.84	371.81	523.32	0.71
90.00	-----					
	445.34	509.22	0.87	389.64	523.32	0.74
80.00	-----					
	463.47	509.22	0.91	404.55	578.14	0.70
70.00	-----					
	483.09	509.22	0.95	421.67	578.14	0.73
60.00	-----					
	501.19	623.79	0.80	436.43	658.98	0.66
50.00	-----					
	520.72	623.79	0.83	453.04	658.98	0.69
40.00	-----					
	547.58	623.79	0.88	474.69	658.98	0.72
20.00	-----					
	585.61	623.79	0.94	506.31	658.98	0.77
0.00	-----					

FORCE/RESISTANCE RATIO IN DIAGONALS

=====

MAST ELEV ft	- DIAG COMPRESSION -			--- DIAG TENSION ---		
	MAX COMP	COMP RESIST	FORCE/ RESIST RATIO	MAX TENS	TENS RESIST	FORCE/ RESIST RATIO
279.00	-----					
	1.74	10.74	0.16	1.70	10.74	0.16
274.25	-----					
	4.59	10.74	0.43	4.51	10.74	0.42
269.50	-----					
	4.83	10.74	0.45	4.93	10.74	0.46
264.75	-----					
	7.49	10.74	0.70	7.17	10.74	0.67
260.00	-----					
	7.01	10.74	0.65	6.52	10.74	0.61
255.00	-----					
	6.72	10.74	0.63	6.97	10.74	0.65
250.00	-----					
	8.86	10.74	0.82	8.44	10.74	0.79
245.00	-----					
	8.00	10.74	0.74	8.26	10.74	0.77
240.00	-----					
	7.88	10.38	0.76	7.62	10.38	0.73
235.00	-----					
	7.36	10.38	0.71	7.53	10.38	0.73
230.00	-----					

	7.33	10.38	0.71	7.14	10.38	0.69
225.00	-----					
	7.01	10.38	0.68	7.13	10.38	0.69
220.00	-----					
	7.63	12.47	0.61	7.46	12.47	0.60
213.33	-----					
	7.34	12.47	0.59	7.43	12.47	0.60
206.67	-----					
	7.38	12.47	0.59	7.25	12.47	0.58
200.00	-----					
	7.26	9.45	0.77	7.33	9.45	0.78
193.33	-----					
	7.35	9.45	0.78	7.25	9.45	0.77
186.67	-----					
	7.32	9.45	0.77	7.37	9.45	0.78
180.00	-----					
	7.49	13.10	0.57	7.40	13.10	0.56
173.33	-----					
	7.56	13.10	0.58	7.57	13.10	0.58
166.67	-----					
	7.74	13.10	0.59	7.69	13.10	0.59
160.00	-----					
	8.65	11.64	0.74	8.64	11.64	0.74
150.00	-----					
	8.93	11.64	0.77	8.78	11.64	0.75
140.00	-----					
	9.07	15.88	0.57	9.04	15.88	0.57
130.00	-----					
	9.46	15.88	0.60	9.30	15.88	0.59
120.00	-----					
	9.68	13.59	0.71	9.64	13.59	0.71
110.00	-----					
	12.58	13.59	0.93	11.93	13.59	0.88
100.00	-----					
	12.16	17.02	0.71	12.69	17.02	0.75
90.00	-----					
	12.93	17.02	0.76	12.37	17.02	0.73
80.00	-----					
	12.67	18.13	0.70	13.12	18.13	0.72
70.00	-----					
	13.39	18.13	0.74	12.90	18.13	0.71
60.00	-----					
	13.25	16.06	0.83	13.61	16.06	0.85
50.00	-----					
	13.96	16.06	0.87	13.54	16.06	0.84
40.00	-----					
	16.25	30.91	0.53	16.55	30.91	0.54
20.00	-----					
	16.95	28.77	0.59	16.45	28.77	0.57
0.00	-----					

MAXIMUM INDIVIDUAL FOUNDATION LOADS: (kip)

=====

-----LOAD-----	COMPONENTS-----			TOTAL
NORTH	EAST	DOWN	UPLIFT	SHEAR
56.77 G	47.92 K	602.95 G	-519.94 M	56.77 G

MAXIMUM TOTAL LOADS ON FOUNDATION : (kip & kip-ft)

-----HORIZONTAL-----			DOWN	-----OVERTURNING-----			TORSION
NORTH	EAST	TOTAL		NORTH	EAST	TOTAL	
		@ 0.0				@ 0.0	
94.1	-81.2	94.1	197.9	15273.0	-13446.4	15273.0	60.3
G	P	G	e	G	D	G	X

Latticed Tower Analysis (Unguyed) (c)2024 Guymast Inc. 416-736-7453
 Processed under license at:
 Sabre Towers and Poles on: 21 jan 2026 at: 15:16:39

 ***** Service Load Condition *****

=====
 * Only 1 condition(s) shown in full

=====
 LOADING CONDITION A =====

60 mph wind with no ice. Wind Azimuth: 0° (1.0 D + 1.0 Wo)

MAST LOADING =====

LOAD TYPE	ELEV ft	APPLY..LOAD..AT		LOAD AZI	FORCES.....		MOMENTS.....	
		RADIUS ft	AZI		HORIZ kip	DOWN kip	VERTICAL ft-kip	TORSNAL ft-kip
C	275.0	0.00	0.0	0.0	2.30	10.00	0.00	0.00
C	263.0	0.00	0.0	0.0	1.71	8.00	0.00	0.00
C	251.0	0.00	0.0	0.0	1.69	8.00	0.00	0.00
D	279.0	0.00	318.0	0.0	0.02	0.05	0.01	0.00
D	274.2	0.00	318.0	0.0	0.02	0.05	0.01	0.00
D	274.2	0.00	318.0	0.0	0.04	0.06	0.04	-0.03
D	264.7	0.00	318.0	0.0	0.04	0.06	0.04	-0.03
D	264.7	0.00	332.1	0.0	0.04	0.07	0.05	-0.02
D	260.0	0.00	332.1	0.0	0.04	0.07	0.05	-0.02
D	260.0	0.00	339.5	0.0	0.05	0.10	0.05	-0.01
D	245.0	0.00	352.0	0.0	0.05	0.10	0.06	-0.01
D	245.0	0.00	350.9	0.0	0.05	0.10	0.06	-0.01
D	240.0	0.00	350.9	0.0	0.05	0.10	0.06	-0.01
D	240.0	0.00	359.6	0.0	0.05	0.11	0.07	-0.01

D	220.0	0.00	355.0	0.0	0.05	0.12	0.06	-0.01
D	220.0	0.00	3.9	0.0	0.06	0.14	0.09	0.00
D	200.0	0.00	1.1	0.0	0.06	0.14	0.08	0.00
D	200.0	0.00	7.3	0.0	0.06	0.16	0.10	0.00
D	180.0	0.00	5.2	0.0	0.06	0.16	0.09	0.00
D	180.0	0.00	9.8	0.0	0.06	0.17	0.11	0.01
D	160.0	0.00	8.2	0.0	0.06	0.18	0.10	0.00
D	160.0	0.00	11.6	0.0	0.06	0.18	0.13	0.01
D	140.0	0.00	10.7	0.0	0.06	0.18	0.12	0.01
D	140.0	0.00	13.3	0.0	0.07	0.24	0.14	0.01
D	120.0	0.00	12.5	0.0	0.07	0.25	0.13	0.01
D	120.0	0.00	14.0	0.0	0.07	0.25	0.15	0.01
D	100.0	0.00	17.0	0.0	0.07	0.25	0.15	0.02
D	100.0	0.00	18.1	0.0	0.07	0.27	0.17	0.02
D	80.0	0.00	17.5	0.0	0.07	0.27	0.16	0.02
D	80.0	0.00	19.0	0.0	0.07	0.28	0.18	0.02
D	60.0	0.00	18.5	0.0	0.07	0.28	0.18	0.02
D	60.0	0.00	19.8	0.0	0.07	0.30	0.20	0.02
D	40.0	0.00	19.4	0.0	0.07	0.30	0.19	0.02
D	40.0	0.00	20.3	0.0	0.06	0.32	0.21	0.02
D	20.0	0.00	20.3	0.0	0.06	0.32	0.21	0.02
D	20.0	0.00	20.9	0.0	0.06	0.33	0.22	0.02
D	0.0	0.00	20.9	0.0	0.06	0.33	0.22	0.02

ANTENNA LOADING

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.....ANTENNA.....				ATTACHMENT		ANTENNA FORCES.....			
TYPE	ELEV	AZI	RAD	AZI	AXIAL	SHEAR	GRAVITY	TORSION	
	ft		ft		kip	kip	kip	ft-kip	
HP	110.0	0.0	13.1	0.0	0.85	0.00	0.54	0.00	

=====

MAXIMUM MAST DISPLACEMENTS:

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ELEV ft	-----DEFLECTIONS (ft)-----			--TILTS (DEG)---		TWIST DEG
	NORTH	EAST	DOWN	NORTH	EAST	
279.0	1.024 G	0.929 J	0.019 G	0.490 G	0.453 J	-0.039 B
274.2	0.984 G	0.891 J	0.018 G	0.490 G	0.453 J	-0.039 B
269.5	0.942 G	0.853 J	0.018 G	0.487 G	0.449 J	-0.038 B
264.7	0.902 G	0.816 J	0.017 G	0.478 G	0.440 J	-0.038 B
260.0	0.862 G	0.779 J	0.017 G	0.462 G	0.425 J	-0.036 B
255.0	0.821 G	0.742 J	0.016 G	0.452 G	0.415 J	-0.035 B
250.0	0.782 G	0.706 J	0.016 G	0.439 G	0.403 J	-0.033 B
245.0	0.743 G	0.670 J	0.015 G	0.424 G	0.389 J	-0.032 B
240.0	0.706 G	0.636 J	0.015 G	0.407 G	0.373 J	0.030 L
235.0	0.670 G	0.603 J	0.014 G	0.392 G	0.359 J	0.030 L
230.0	0.636 G	0.572 J	0.014 G	0.376 G	0.343 J	0.029 L
225.0	0.603 G	0.542 J	0.013 G	0.359 G	0.327 J	0.028 L
220.0	0.572 G	0.513 J	0.013 G	0.341 G	0.311 J	0.027 L
213.3	0.532 G	0.477 J	0.012 G	0.324 G	0.295 J	0.026 L
206.7	0.495 G	0.443 J	0.012 G	0.306 G	0.278 J	0.025 L
200.0	0.459 G	0.411 J	0.011 G	0.289 G	0.262 J	0.023 L
193.3	0.426 G	0.380 J	0.011 G	0.275 G	0.249 J	0.022 L
186.7	0.393 G	0.351 J	0.010 G	0.261 G	0.236 J	0.021 L
180.0	0.363 G	0.323 J	0.010 G	0.248 G	0.224 J	0.019 L
173.3	0.334 G	0.297 J	0.010 G	0.234 G	0.211 J	0.018 L
166.7	0.307 G	0.273 J	0.009 G	0.220 G	0.198 J	0.017 L

160.0	0.281 G	0.250 J	0.009 G	0.207 G	0.186 J	0.016 L
150.0	0.245 G	0.218 J	0.008 G	0.187 G	0.168 J	0.014 L
140.0	0.214 G	0.190 J	0.008 G	0.167 G	0.150 J	0.013 L
130.0	0.185 G	0.164 J	0.007 L	0.155 G	0.138 J	0.012 L
120.0	0.158 G	0.139 J	0.007 G	0.142 G	0.127 J	0.010 L
110.0	0.133 G	0.118 J	0.006 L	0.129 G	0.115 J	0.009 L
100.0	0.110 G	0.097 J	0.006 G	0.117 G	0.104 J	0.008 L
90.0	0.090 G	0.079 J	0.005 L	0.104 G	0.093 J	0.007 L
80.0	0.071 G	0.063 J	0.005 G	0.091 G	0.081 J	0.006 L
70.0	0.055 G	0.049 J	0.004 L	0.079 G	0.070 J	0.005 L
60.0	0.041 G	0.036 J	0.003 G	0.066 G	0.059 J	0.004 L
50.0	0.030 G	0.027 J	0.003 A	0.056 G	0.049 J	0.003 L
40.0	0.020 G	0.017 J	0.002 G	0.045 G	0.039 J	0.002 L
20.0	0.005 G	0.004 J	0.001 G	0.022 G	0.019 J	0.001 L
0.0	0.000 A	0.000 A	0.000 A	0.000 A	0.000 A	0.000 A

MAXIMUM ANTENNA AND REFLECTOR ROTATIONS:

=====

ELEV	AZI	TYPE	BEAM DEFLECTIONS (deg).....			
ft	deg	*	ROLL	YAW	PITCH	TOTAL
110.0	0.0	HP	-0.129 G	0.009 L	-0.115 J	0.115 J

MAXIMUM TENSION IN MAST MEMBERS (kip)

=====

ELEV	LEGS	DIAG	HORIZ	BRACE
ft				
279.0	-----		0.22 A	0.00 A
	0.00 A	0.42 B		
274.2	-----		0.05 K	0.00 A
	0.00 A	1.13 L		
269.5	-----		0.01 E	0.00 A
	1.19 A	1.30 L		
264.7	-----		0.07 A	0.00 A
	2.93 A	1.75 A		
260.0	-----		0.18 A	0.00 A
	6.40 A	1.49 F		
255.0	-----		0.10 A	0.00 A
	9.43 A	1.86 L		
250.0	-----		0.01 C	0.00 A
	11.75 A	2.01 F		
245.0	-----		0.10 A	0.00 A
	16.08 A	2.20 F		
240.0	-----		0.01 A	0.00 A
	20.11 A	1.86 F		
235.0	-----		0.07 A	0.00 A
	23.70 A	1.99 L		
230.0	-----		0.03 A	0.00 A
	27.07 A	1.76 F		
225.0	-----		0.05 A	0.00 A
	30.16 A	1.87 F		
220.0	-----		0.03 A	0.00 A
	33.53 A	1.87 F		
213.3	-----		0.05 A	0.00 A
	37.12 A	1.95 F		
206.7	-----		0.03 A	0.00 A

200.0	40.51 A	1.84 L		
	-----		0.04 A	0.00 A
	43.70 A	1.93 F		
193.3	-----		0.02 A	0.00 A
	46.74 A	1.86 L		
186.7	-----		0.03 A	0.00 A
	49.64 A	1.94 F		
180.0	-----		0.02 A	0.00 A
	52.44 A	1.91 L		
173.3	-----		0.05 A	0.00 A
	55.16 A	1.99 F		
166.7	-----		0.02 A	0.00 A
	57.82 A	2.00 L		
160.0	-----		0.03 A	0.00 A
	61.03 A	2.27 F		
150.0	-----		0.04 A	0.00 A
	64.84 A	2.30 L		
140.0	-----		0.03 A	0.00 A
	68.46 A	2.39 F		
130.0	-----		0.02 A	0.00 A
	71.93 A	2.45 L		
120.0	-----		0.03 D	0.00 A
	75.35 A	2.56 F		
110.0	-----		0.02 F	0.00 A
	78.69 A	3.09 F		
100.0	-----		0.03 D	0.00 A
	82.00 A	3.40 L		
90.0	-----		0.02 F	0.00 A
	86.14 A	3.23 F		
80.0	-----		0.02 J	0.00 A
	89.37 A	3.52 L		
70.0	-----		0.02 A	0.00 A
	93.30 A	3.39 F		
60.0	-----		0.06 A	0.00 A
	96.48 A	3.64 L		
50.0	-----		0.01 F	0.00 A
	100.19 A	3.57 F		
40.0	-----		0.01 K	0.00 A
	104.76 A	4.41 L		
20.0	-----		0.06 A	0.00 A
	111.62 A	4.32 F		
0.0	-----		0.00 A	0.00 A

MAXIMUM COMPRESSION IN MAST MEMBERS (kip)

=====

ELEV ft	LEGS	DIAG	HORIZ	BRACE
279.0	-----		-0.19 G	0.00 A
	-0.57 E	-0.46 H		
274.2	-----		0.00 A	0.00 A
	-5.18 G	-1.21 L		
269.5	-----		-0.02 K	0.00 A
	-8.45 G	-1.21 L		
264.7	-----		0.00 A	0.00 A

	-13.38 G	-2.00 G		
260.0	-----		-0.10 G	0.00 A
	-18.84 G	-1.96 F		
255.0	-----		-0.01 G	0.00 A
	-24.27 G	-1.64 F		
250.0	-----		-0.01 I	0.00 A
	-30.47 G	-2.40 L		
245.0	-----		-0.02 G	0.00 A
	-36.00 G	-1.95 F		
240.0	-----		0.00 G	0.00 A
	-39.87 G	-2.11 L		
235.0	-----		-0.02 G	0.00 A
	-44.36 G	-1.83 F		
230.0	-----		-0.01 G	0.00 A
	-47.83 G	-1.94 F		
225.0	-----		-0.02 G	0.00 A
	-51.67 G	-1.76 F		
220.0	-----		-0.01 G	0.00 A
	-55.35 G	-2.02 F		
213.3	-----		-0.02 G	0.00 A
	-59.92 G	-1.87 F		
206.7	-----		-0.01 G	0.00 A
	-63.83 G	-1.95 F		
200.0	-----		-0.01 G	0.00 A
	-67.97 G	-1.87 L		
193.3	-----		-0.01 G	0.00 A
	-71.70 G	-1.95 F		
186.7	-----		-0.01 G	0.00 A
	-75.58 G	-1.90 L		
180.0	-----		-0.01 G	0.00 A
	-79.16 G	-1.99 F		
173.3	-----		-0.02 G	0.00 A
	-82.87 G	-1.98 L		
166.7	-----		-0.01 G	0.00 A
	-86.42 G	-2.05 F		
160.0	-----		-0.01 G	0.00 A
	-90.85 G	-2.28 L		
150.0	-----		-0.02 G	0.00 A
	-96.07 G	-2.37 K		
140.0	-----		-0.01 G	0.00 A
	-101.40 G	-2.41 L		
130.0	-----		-0.01 K	0.00 A
	-106.70 G	-2.52 K		
120.0	-----		-0.01 D	0.00 A
	-112.07 G	-2.59 L		
110.0	-----		-0.02 L	0.00 A
	-118.19 G	-3.39 L		
100.0	-----		-0.01 D	0.00 A
	-123.61 G	-3.20 F		
90.0	-----		-0.01 L	0.00 A
	-129.47 G	-3.49 L		
80.0	-----		-0.01 D	0.00 A
	-134.97 G	-3.35 F		
70.0	-----		-0.01 L	0.00 A
	-140.76 G	-3.62 L		
60.0	-----		-0.03 G	0.00 A
	-146.27 G	-3.53 F		
50.0	-----		-0.01 L	0.00 A
	-152.12 G	-3.76 L		
40.0	-----		0.00 D	0.00 A
	-160.36 G	-4.34 F		

20.0	-----		-0.03 G	0.00 A
	-171.88 G	-4.59 L		
0.0	-----		0.00 A	0.00 A

MAXIMUM INDIVIDUAL FOUNDATION LOADS: (kip)
=====

-----LOAD---COMPONENTS-----				TOTAL
NORTH	EAST	DOWN	UPLIFT	SHEAR
16.07 G	13.58 K	177.28 G	-114.39 A	16.07 G

MAXIMUM TOTAL LOADS ON FOUNDATION : (kip & kip-ft)
=====

-----HORIZONTAL-----			DOWN	-----OVERTURNING-----			TORSION
NORTH	EAST	TOTAL		NORTH	EAST	TOTAL	
		@ 0.0				@ 0.0	
24.6	21.4	24.6	85.1	3997.6	3529.9	3997.6	15.3
G	J	G	G	G	J	G	L

=====

Seismic Load Effects
Equivalent Lateral Force Procedure
ANSI/TIA-222-H

Parameters	Risk Category	Description	h _i (ft.)	w _i (kips)	W _e (kips)	Vertical Distribution of Seismic Forces			
						w _i h _i ^{1.0}	F _{vx} or E _{hx} (kips)	1.2 D + 1.0 E _v (kips)	0.9 D - 1.0 E _v (kips)
Risk Category II	3.000	Antenna Load	275.00	10.0000	10.0000	15,908.3142	1.1125	0.7020	8.2980
		Structure - Section 1	269.50	1.1050	0.8113	1,711.8695	0.1197	0.0776	0.9169
		Ladder/Line	269.00	0.2352	0.2352	363.4856	0.0254	0.0165	0.1952
		Antenna Load	263.00	8.0000	0.0000	12,002.7817	0.8394	0.5616	6.6384
		Ladder/Line	261.50	0.0869	0.0000	129.4051	0.0090	0.0061	0.0721
		Ladder/Line	261.50	0.0307	0.0000	45.7162	0.0032	0.0022	0.0254
		Ladder/Line	255.50	0.2606	0.0000	376.4220	0.0263	0.0183	0.2162
		Ladder/Line	255.50	0.0922	0.0000	133.1777	0.0093	0.0065	0.0765
		Antenna Load	251.00	8.0000	0.0000	11,289.1631	0.7895	0.5616	6.6384
		Structure - Section 2	250.00	1.5610	0.0000	2,191.2865	0.1532	0.1096	1.2953
Risk Category D (default)	8.000	Ladder/Line	245.50	0.1470	0.0000	201.4930	0.0141	0.0103	0.1220
		Ladder/Line	245.50	0.3186	0.0000	436.7052	0.0305	0.0224	0.2643
		Ladder/Line	230.00	0.2672	0.0000	336.2051	0.0235	0.0188	0.2217
		Ladder/Line	230.00	0.5792	0.0000	728.7798	0.0510	0.0407	0.4806
		Structure - Section 3	230.00	1.7680	0.0000	2,224.5903	0.1556	0.1241	1.4671
		Ladder/Line	210.00	0.2672	0.0000	298.3660	0.0209	0.0188	0.2217
		Ladder/Line	210.00	0.5792	0.0000	646.7574	0.0452	0.0407	0.4806
		Structure - Section 4	210.00	2.2110	0.0000	2,468.8890	0.1727	0.1552	1.8347
		Ladder/Line	190.00	0.5792	0.0000	567.1431	0.0397	0.0407	0.4806
		Ladder/Line	190.00	0.2672	0.0000	261.6378	0.0183	0.0188	0.2217
Risk Category 31.00	93.648	Structure - Section 5	190.00	2.6990	0.0000	2,642.8164	0.1848	0.1895	2.2396
		Ladder/Line	170.00	0.5792	0.0000	490.1091	0.0343	0.0407	0.4806
		Ladder/Line	170.00	0.2672	0.0000	226.1001	0.0158	0.0188	0.2217
		Structure - Section 6	170.00	3.1450	0.0000	2,661.2450	0.1861	0.2208	2.6097
		Ladder/Line	150.00	0.2672	0.0000	191.8475	0.0134	0.0188	0.2217
		Ladder/Line	150.00	0.5792	0.0000	415.8611	0.0291	0.0407	0.4806
		Structure - Section 7	150.00	3.2740	0.0000	2,350.7067	0.1644	0.2298	2.7168
		Ladder/Line	130.00	0.5792	0.0000	344.6507	0.0241	0.0407	0.4806
		Ladder/Line	130.00	0.2672	0.0000	158.9963	0.0111	0.0188	0.2217
		Structure - Section 8	130.00	4.5180	0.0000	2,688.4185	0.1880	0.3172	3.7490
Risk Category C	5.151	Ladder/Line	115.00	0.1336	0.0000	67.6819	0.0047	0.0094	0.1108
		Ladder/Line	115.00	0.2896	0.0000	146.7116	0.0103	0.0203	0.2403
		Antenna Load	110.00	0.6900	0.0000	329.7441	0.0231	0.0484	0.5726
		Mount Load	110.00	0.0500	0.0000	23.8945	0.0017	0.0035	0.0415
		Mount/Antenna Load	110.00	0.7400	0.0000	353.6386	0.0247	0.0519	0.6141

Seismic Load Effects
Equivalent Lateral Force Procedure
ANSI/TIA-222-H

Description	h _i (ft.)	w _i (kips)	W ₂ (kips)	Vertical Distribution of Seismic Forces			
				$\frac{w_i h_i}{\sum w_i h_i}$	F_u or E_u (kips)	E_u (kips)	$1.2 D + 1.0 E_u$ (kips) $0.9 D - 1.0 E_u$ (kips)
Structure - Section 9	110.00	4.6540	0.0000	2,224.0998	0.1555	0.3267	5.9115 3.8619
Ladder/Line	105.00	0.1440	0.0000	64.7401	0.0045	0.0101	0.1829 0.1195
Ladder/Line	105.00	0.2896	0.0000	130.1996	0.0091	0.0203	0.3678 0.2403
Ladder/Line	90.00	0.2880	0.0000	105.7635	0.0074	0.0202	0.3658 0.2390
Ladder/Line	90.00	0.5792	0.0000	212.7021	0.0149	0.0407	0.7357 0.4806
Structure - Section 10	90.00	5.0130	0.0000	1,840.9458	0.1287	0.3519	6.3675 4.1598
Ladder/Line	70.00	0.2880	0.0000	76.0473	0.0053	0.0202	0.3658 0.2390
Ladder/Line	70.00	0.5792	0.0000	152.9395	0.0107	0.0407	0.7357 0.4806
Structure - Section 11	70.00	5.5620	0.0000	1,468.6630	0.1027	0.3905	7.0649 4.6153
Ladder/Line	50.00	0.2880	0.0000	48.8979	0.0034	0.0202	0.3658 0.2390
Ladder/Line	50.00	0.5792	0.0000	98.3392	0.0069	0.0407	0.7357 0.4806
Structure - Section 12	50.00	6.0300	0.0000	1,023.8007	0.0716	0.4233	7.6593 5.0037
Ladder/Line	30.00	0.5792	0.0000	50.2979	0.0035	0.0407	0.7357 0.4806
Ladder/Line	30.00	0.2880	0.0000	25.0100	0.0017	0.0202	0.3658 0.2390
Structure - Section 13	30.00	6.4610	0.0000	561.0756	0.0392	0.4536	8.2068 5.3613
Ladder/Line	10.00	0.2880	0.0000	5.9142	0.0004	0.0202	0.3658 0.2390
Ladder/Line	10.00	0.5792	0.0000	11.8940	0.0008	0.0407	0.7357 0.4806
Structure - Section 14	10.00	6.7250	0.0000	138.0996	0.0097	0.4721	8.5421 5.5804
Σ		93.65	11.0465	73,654.04	5.15	6.57	118.95 77.71

Leg Connection Details												
Bottom Elevation (ft)	Top Elevation (ft)	Pipe Dimensions	Top Splice				Bottom Splice/Base					
			Bolt Qty.	Bolt Dia. (in)	Bolt Circle (in)	Plate Thickness (in)	Plate Dia. (in)	Bolt Qty.	Bolt Dia. (in)	Bolt Circle (in)	Plate Thickness (in)	Plate Dia. (in)
260	279	2.875 OD X .203						6	1.00	9.00	1.25	11.50
240	260	4.000 OD X .318	6	1.00	9.00	1.25	11.50	6	1.00	9.00	1.25	11.50
220	240	4.500 OD X .337	6	1.00	9.00	1.25	11.50	6	1.00	9.00	1.25	11.50
200	220	5.563 OD X .375	6	1.00	9.00	1.25	11.50	6	1.00	9.00	1.25	11.50
180	200	5.563 OD X .500	6	1.00	9.00	1.25	11.50	6	1.00	9.00	1.25	11.50
160	180	5.563 OD X .500	6	1.00	9.00	1.25	11.50	6	1.25	12.50	1.75	15.75
140	160	8.625 OD X .322	6	1.25	12.50	1.50	15.75	6	1.25	12.50	1.50	15.75
120	140	8.625 OD X .500	6	1.25	12.50	1.50	15.75	6	1.25	12.50	1.50	15.75
100	120	8.625 OD X .500	6	1.25	12.50	1.50	15.75	6	1.25	12.50	1.50	15.75
80	100	8.625 OD X .500	6	1.25	12.50	1.50	15.75	6	1.25	12.50	1.50	15.75
60	80	8.625 OD X .500	6	1.25	12.50	1.50	15.75	8	1.50	17.25	2.00	21.00
40	60	12.75 OD X .375	8	1.50	17.25	1.75	21.00	8	1.50	17.25	1.75	21.00
20	40	12.75 OD X .375	8	1.50	17.25	1.75	21.00	8	1.50	17.25	1.75	21.00
0	20	12.75 OD X .375	8	1.50	17.25	1.75	21.00	6	1.75	18.00	2.00	22.50

Diagonal Bracing Connection Details								
Bottom Elevation (ft)	Top Elevation (ft)	Angle Shape	Bolt Qty.	Bolt Dia. (in)	Bolt End Distance (in)	Bolt Spacing (in)	Gage Distance From Heel (in)	Gusset Plate Thickness (in)
260	279	L 2 X 2 X 3/16	1	0.625	1.500		1.125	0.375
240	260	L 2 X 2 X 3/16	1	0.625	1.500		1.125	0.375
220	240	L 2 X 2 X 3/16	1	0.625	1.500		1.125	0.375
200	220	L 2 1/2 X 2 1/2 X 3/16	1	0.625	1.500		1.375	0.375
180	200	L 2 1/2 X 2 1/2 X 3/16	1	0.625	1.500		1.375	0.375
160	180	L 3 X 3 X 3/16	1	0.750	1.500		1.750	0.375
140	160	L 3 X 3 X 1/4	1	0.750	1.625		1.750	0.375
120	140	L 3 1/2 X 3 1/2 X 1/4	1	0.750	1.625		1.750	0.375
100	120	L 3 1/2 X 3 1/2 X 1/4	1	0.750	1.625		1.750	0.375
80	100	L 4 X 4 X 1/4	1	0.750	1.625		2.000	0.375
60	80	L 4 X 4 X 1/4	2	0.625	1.625	2.1250	2.000	0.500
40	60	L 4 X 4 X 1/4	2	0.625	1.625	2.1250	2.000	0.500
20	40	L 5 X 5 X 5/16	2	0.750	1.000	2.3750	2.500	0.500
0	20	L 5 X 5 X 5/16	2	0.750	1.000	2.3125	2.500	0.500

Exhibit 3



NEPA Report

January 23, 2026



Borden

Client #SC0009812

Camden Highway

Rembert, Sumter County, South Carolina 29128

Trileaf # 772867

Prepared For:

Harmoni Towers LLC

10801 Executive Center Dr
Little Rock, AR 72211

Prepared By:

Trileaf Corporation

1775 The Exchange SE, Suite 525
Atlanta, GA 30339

NEPA Report Summary

Site Name/Location:

Borden / Client #SC0009812 / Trileaf #772867
Camden Highway, Rembert, Sumter County, South Carolina 29128
Latitude: 34° 4' 2.5869" N, Longitude: 80° 30' 34.8467" W

Project Description:

Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway.

1. Is the facility located in an officially designated wilderness area? [47 CFR 1.1307 (a)(1)]

Yes	No	Data Sources:	Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) National Wilderness Preservation System Website (www.wilderness.net)
☐	☒		

2. Is the facility located in an officially designated wildlife preserve? [47 CFR 1.1307 (a)(2)]

Yes	No	Data Sources:	Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) US Fish & Wildlife Service National Wildlife Refuge System Map (Appendix B)
☐	☒		

3. Will the facility: (i) affect listed threatened or endangered species or designated critical habitats; or (ii) jeopardize the continued existence of any proposed endangered or threatened species; or is it likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973? [47 CFR 1.1307 (a)(3)]

Yes	No	Data Sources:	Site Reconnaissance Review of US Fish & Wildlife Service Critical Habitat and Federally Listed Endangered Species (Appendix D) Informal Biological Assessment (Appendix D) South Carolina Department of Natural Resources
☐	☒		

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing on the State or National Registers of Historic Places? [47 CFR 1.1307 (a)(4)]

Yes	No	Data Sources:	Site Reconnaissance Cultural Resource Investigation (Appendix E) State Historic Preservation Office Section 106 Review (Appendix E)
☐	☒		

5. Will the facility affect an Indian religious site? [47 CFR 1.1307 (a)(5)]

Yes	No	Data Sources:	Site Reconnaissance Correspondence with Native American Tribes via FCC TCNS (Appendix F) Review of Bureau of Indian Affairs Indian Reservation Map (Appendix B)
☐	☒		

6. Will the facility be located in a "floodplain", and not be placed at least one (1) foot above the base flood elevation of the floodplain? [47 CFR 1.1307 (a)(6)]

Yes	No	Data Sources:	Review of FEMA Flood Map (Appendix B)
☐	☒		

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)? [47 CFR 1.1307 (a)(7)]

Yes	No	Data Sources:	Site Reconnaissance Review of 7.5-Minute USGS Topographic Map (Appendix B) Review of US Fish & Wildlife Service National Wetlands Inventory Map (Appendix B) Review of USDA NRCS Web Soil Survey Map (Appendix B)
☐	☒		

8. Will the antenna tower or supporting structure be equipped with high intensity white lights and located in a residential neighborhood, as defined by the applicable zoning law?

Yes	No	Data Sources:	Construction Drawings (Appendix A) It is assumed that clients will not utilize high intensity white lights in residential areas
☐	☒		

9. Will the facility cause human exposure to levels of radiofrequency radiation in excess of Commission-adopted guidelines?

Yes	No	Data Sources:	Construction Drawings (Appendix A) and/or interviews with clients Clients will comply with the established criteria regarding radio frequency exposure limits, as established at the time of this report
☐	☒		

Hannah Dill

Signature

January 23, 2026

Date

Hannah Dell

Name

Trileaf Corporation

Company



NEPA Report

Introduction

Trileaf Corporation (Trileaf) completed a NEPA Review for the above-referenced Harmoni Towers LLC (Harmoni Towers) site. The purpose of a NEPA Review is to comply with the National Environmental Policy Act (NEPA) of 1969. Trileaf performed extensive research by consulting with appropriate state and federal agencies and reviewing readily available published lists, files, data, and maps to provide our clients with a complete NEPA document. The following summarizes the scope of work Trileaf performed in accordance with the Federal Communications Commission's (FCC's) rules implementing NEPA (47 CFR Section 1.1307 (a) (1) through (8) to determine whether any of the below listed FCC special interest items would be affected by the proposed action. Referenced materials are included as attachments, where applicable and available.

Harmoni Towers proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed project site is located at approximately Camden Highway, Rembert, Sumter County, South Carolina 29128 at 34° 4' 2.5869" North latitude and 80° 30' 34.8467" West longitude.

During Trileaf's site reconnaissance, it was observed that the site is currently located within an agricultural field, and the areas surrounding the site are currently agricultural development and wooded land.

1. Will the facility be located in an officially designated wilderness area?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Rembert" Quadrangle, South Carolina and information from the National Wilderness Preservation System (NWPS) (<http://www.wilderness.net>) to determine if the site is located within an officially designated wilderness area.

There are currently seven (7) officially designated wilderness areas in the State of South Carolina. The closest wilderness area to the project site is the Congaree National Park Wilderness Area, which is located approximately 22 miles southwest of the project site.

Based on this review, the project site is not located within an officially designated wilderness area.

2. Will the facility be located in an officially designated wildlife preserve?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Rembert" Quadrangle, South Carolina, and information from the National Wildlife Refuge (NWR) System (<http://www.fws.gov/refuges>) to determine if the site is located within an officially designated wildlife preserve or refuge.

Based on this review, the project site is not located within an officially designated wildlife preserve or refuge. A copy of the NWR System map is located in Appendix B.

3. Will the facility (i) affect listed threatened or endangered species or designated critical habitat; or (ii) likely jeopardize the continued existence of any proposed endangered or threatened species or likely result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973?

The Endangered Species Act (ESA) of 1973 (16 U.S.C. §§ 1536), as amended, protects endangered and threatened species and the ecosystems upon which they depend. As interpreted and implemented by 50 CFR 402, Section 7 of the ESA directs Federal agencies, in consultation with and with the assistance of the Secretary of the Interior, to utilize their authorities to further the purposes of the ESA. It also requires every Federal agency to ensure that any action it authorizes, funds or carries out, is not likely to jeopardize the continued existence of any endangered or threatened species or results in the destruction or adverse modification of critical habitat.

On September 26, 2025, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). In addition, Trileaf reviewed the United States Fish and Wildlife Service (USFWS) critical habitat information and determined that the site is not located within designated critical habitat. Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or critical habitats resulting from the proposed action are not anticipated. Therefore, Trileaf determined that the proposed project site will have “no effect” on the species, their habitats, or designated critical habitats. Copies of the IBA and critical habitat review are located in Appendix D.

FEDERAL

On October 17, 2025, Trileaf reviewed the Section 7 Consultation guidance set forth by the USFWS – South Carolina Ecological Services Field Office. According to guidance dated January 3, 2023, “for all sites with potential projects that have no effect or impact upon federally protected species or designated critical habitat, no further coordination with the Service is necessary at this time”. Therefore, as Trileaf determined the project would have no effect on listed or proposed threatened or endangered species or critical habitats, no further consultation with the USFWS was required. A copy of the USFWS’ Section 7 guidance is located in Appendix D.

STATE

On October 17, 2025, Trileaf submitted project information to the South Carolina Department of Natural Resources (SCDNR) through the online portal. An automated project analysis was generated which indicated there are no records for species of concern within the project area. Therefore, no further consultation with the SCDNR was required. A copy of the SCDNR project analysis is located in Appendix D.

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or are eligible for listing, in the National Register of Historic Places?

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is contained in, on, or within the viewshed of a building, site, district, structure, or object, significant in American history, architecture, archaeology, engineering, or culture, that is listed, or eligible for listing on the National Registers of Historic Places, or located in or on an Indian Religious Site.

A search of the *National Historic Landmarks* (NHL), *National Register of Historic Places* (NRHP), *State Historic Preservation Office* (SHPO) files, and a field survey was conducted by Mr. Jason Flay, Secretary of Interior-qualified Archaeologist contracted by Trileaf through Archeulean Consulting, to identify any cultural resources within the area of direct effects and within a 0.75-mile radius for visual effects.

It was determined that there were no historic properties identified within the Area of Potential Effects (APE) for direct effects, and no historic properties identified within the APE for visual effects. Additionally, the identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to the SHPO via Form 620 on November 26, 2025. The SHPO concurred that the proposed undertaking would have no direct or visual effects on historic properties in a response letter dated December 28, 2025. A copy of the SHPO concurrence letter, Form 620, and associated documents are located in Appendix E.

On September 22, 2025, the Sumter County Planning Department and the Sumter County Genealogical Society were notified of the proposed project and invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. Additionally, a legal notice regarding the proposed telecommunications tower construction was posted in *The Sumter Item* on September 24, 2025. No comments from the local government, historical society, or legal notice have been received by Trileaf. Copies of the correspondence and legal notice are located in Appendix E.

NATIONAL SCENIC TRAILS

On October 5, 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System created by the National Trails System Act of 1968.

Based on this review, the project site is not located within 1 mile of a National Scenic Trail. A copy of the trails map is located in Appendix B.

5. Will the facility affect any Indian religious sites?

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is located in or on an Indian Religious Site.

On September 16, 2025, Trileaf submitted project information through the Tower Construction Notification System (TCNS) to the FCC who initiated contact with the tribes on September 19, 2025. As of January 23, 2026, all tribes have confirmed clearance either directly or by default via the FCC referral process. Trileaf determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that the client stop construction and notify our office immediately. Tribal consultation documentation and associated correspondence is located in Appendix F.

6. Will the facility be located in a floodplain and not be placed at least one (1) foot above the base flood elevation of the floodplain?

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel #45085C0100E, dated September 28, 2018, to determine if the project was located within the 100-year floodplain.

Trileaf determined that the property is located in Zone X, areas determined to be outside the 500-year floodplain. Therefore, the project site is not located within a 100-year floodplain. A copy of the FEMA FIRM showing the project site location is located in Appendix B.

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)?

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5-minute topographic map titled “Rembert” Quadrangle, South Carolina, and review of the relevant USFWS National Wetlands Inventory Map (<http://www.fws.gov/wetlands/Data/Mapper.html>) that there are no federally designated wetlands on or in the immediate vicinity of the proposed project site.

Trileaf’s site assessment did not reveal any evidence of potential wetlands or hydrophytic vegetation located on or in the immediate vicinity of the project site. Additionally, a review of the United States Department of Agriculture (USDA) Soil Survey (<http://websoilsurvey.sc.egov.usda.gov>) did not indicate hydric soils at the project site.

Based on this review, no designated wetland areas were located within the vicinity of this project and no significant changes in surface features resulting from the proposed undertaking are anticipated. Copies of the soil map and wetlands map are located in Appendix B.

8. Zoning/High Intensity White Lights/Radio Frequency

As a standard practice, Harmoni Towers does not construct facilities requiring high intensity white lights that are to be located in residentially zoned neighborhoods. According to Harmoni Towers, high intensity white lights will not be used for towers less than 500 feet in height.

9. Radio Frequency

FCC licensees transmitting from antennas mounted on Harmoni Towers owned antenna structures will comply with the established criteria regarding radio frequency exposure limits in accordance with the *Second Report and Order*, as well as the FCC Code of Federal Regulations [47 CFR § 1.1307, § 1.1310] published at the time of this report.

Conclusion

A NEPA Review of the proposed undertaking was performed by Trileaf Corporation in conformance with the FCC rules and regulations for implementing NEPA; 47 CFR 1.1301 to 1.1319.

Based on data obtained during the Site visit, consultation with government agencies, and a review of readily available information from other sources, the preparation and filing of an Environmental Assessment will not be required and no further NEPA-related action is required for the proposed undertaking.

Qualifications



Hannah Dell
Assistant Project Manager



Laura Elston
Quality Assurance

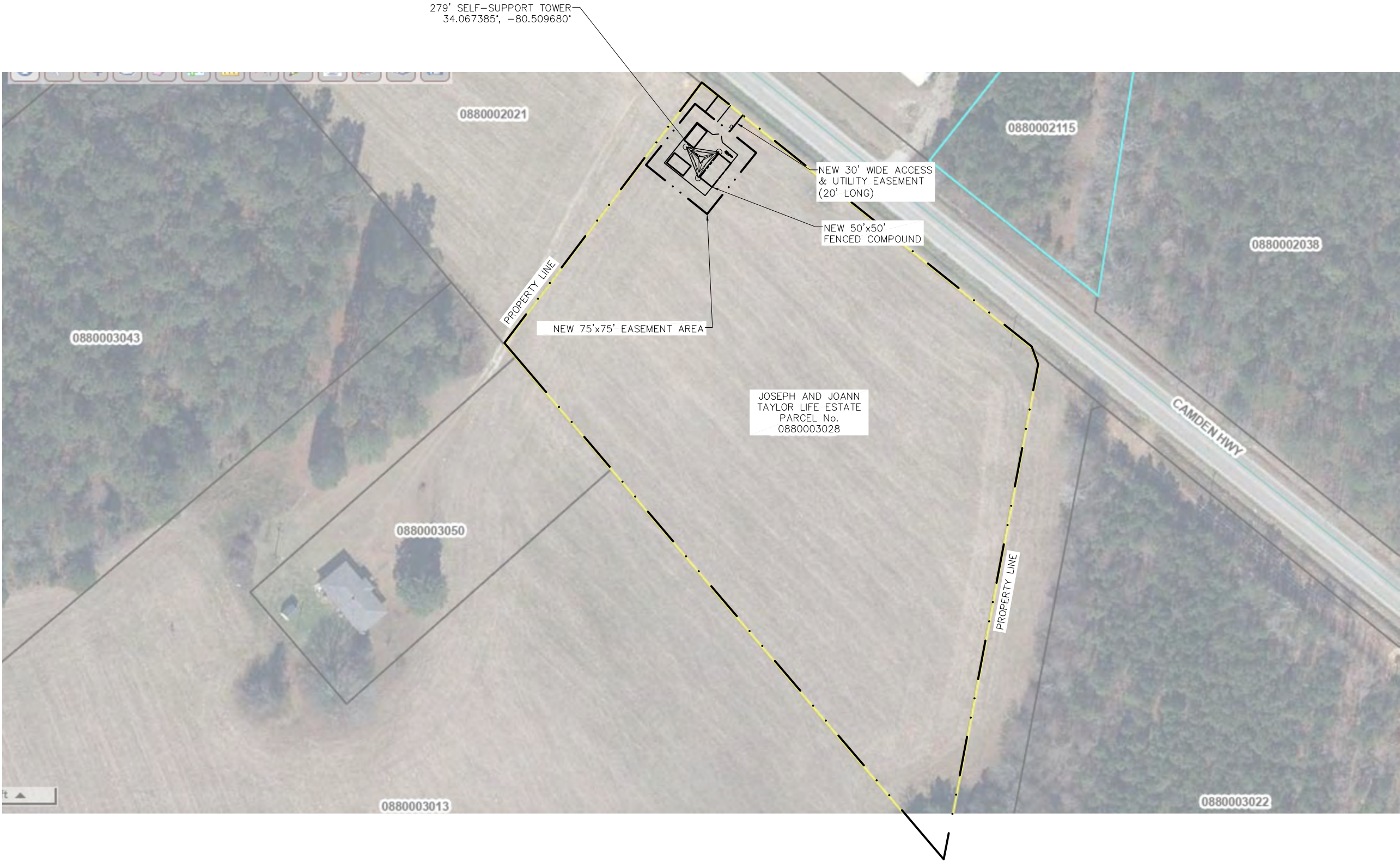


Morgan Rasmussen
Senior Project Manager

Appendix A

Site Plans





PLANS PREPARED FOR:



6210 ARDREY KELL ROAD
SUITE 450
CHJARLOTTE, NC 28277

PLANS PREPARED BY:



2501 SHERMANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
www.t-squared.com

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REVISIONS:				
DESCRIPTION	DATE	BY	REV	
ISSUED FOR REVIEW	4.29.25	TJT	0	

PROJECT INFO

HARMONI TOWER ID # :
SC0009812

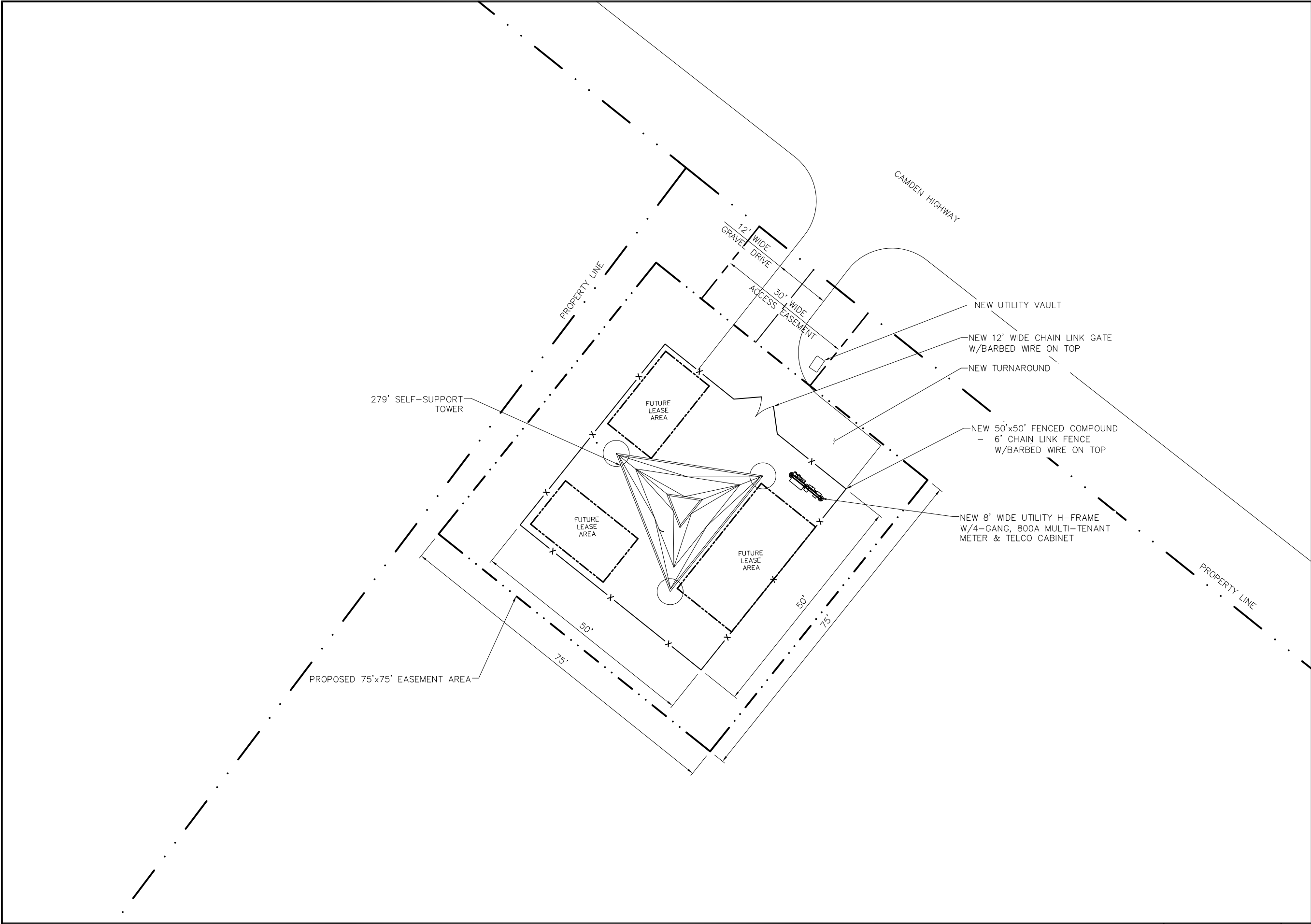
VZW FUZE PROJECT #:
17333601

HARMONI SITE NAME:
BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER:	REV.:
LE-1	0
	68160



PLANS PREPARED FOR:



6210 ARDREY KELL ROAD
SUITE 450
CHJARLOTTE, NC 28277

PLANS PREPARED BY:



2501 SHERMANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
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REVISIONS:				
DESCRIPTION	DATE	BY	REV	
ISSUED FOR REVIEW	4.29.25	TJT	0	

PROJECT INFO:

HARMONI TOWER ID # : SC0009812

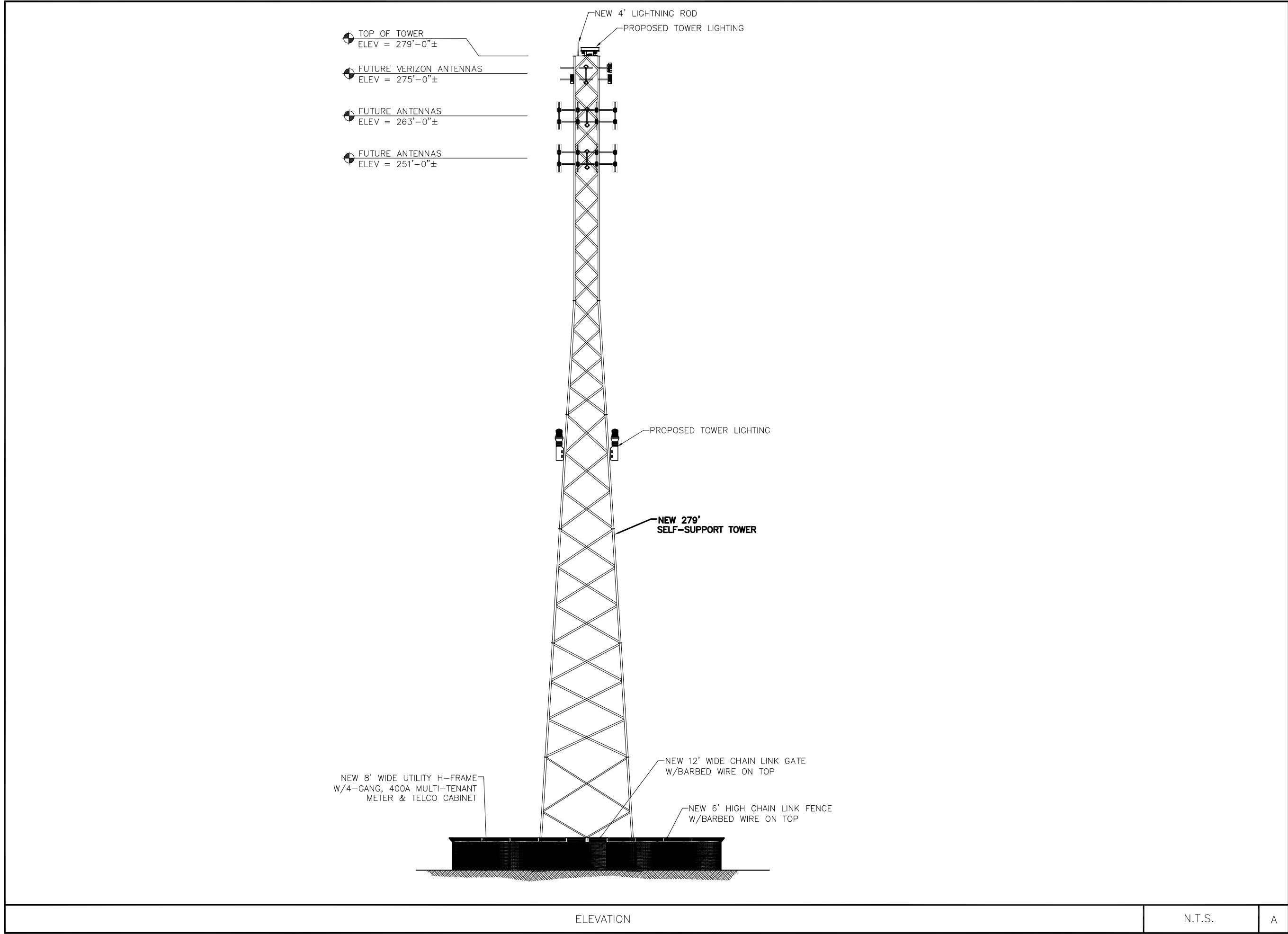
VZW FUZE PROJECT # : 17333601

HARMONI SITE NAME: BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER:	REV.:
LE-2	0
	68160



PLANS PREPARED FOR:



6210 ARDREY KELL ROAD
SUITE 450
CHJARLOTTE, NC 28277

PLANS PREPARED BY:



2501 SHEMANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
www.t-sqr.com

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REVISIONS:

DESCRIPTION	DATE	BY	REV
ISSUED FOR REVIEW	4.29.25	TJT	0

PROJECT INFO

HARMONI TOWER ID # :
SC0009812

VZW FUZE PROJECT #:
17333601

HARMONI SITE NAME:
BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW 279'
SELF-SUPPORT TOWER

SHEET NUMBER:

LE-3

REV.:

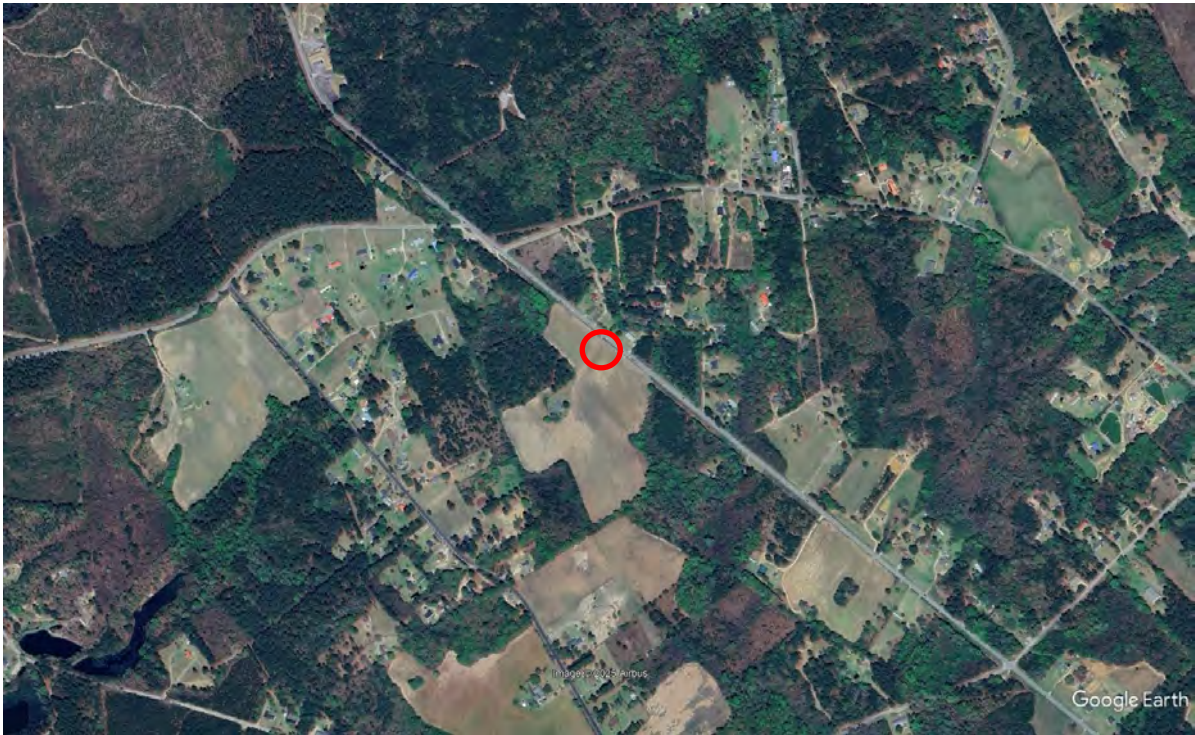
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68160

Appendix B

Site Maps





Site Location & Surrounding Properties



Site Location



Easement

Aerial Photographs (2024)

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128



Rembert Quadrangle, South Carolina (2018)

Contour Interval = 10 Feet

Scale 1 Inch = ~2,000 Feet

Latitude: 34° 4' 2.5868" N, Longitude: 80° 30' 34.8467" W



North



Site Vicinity Map

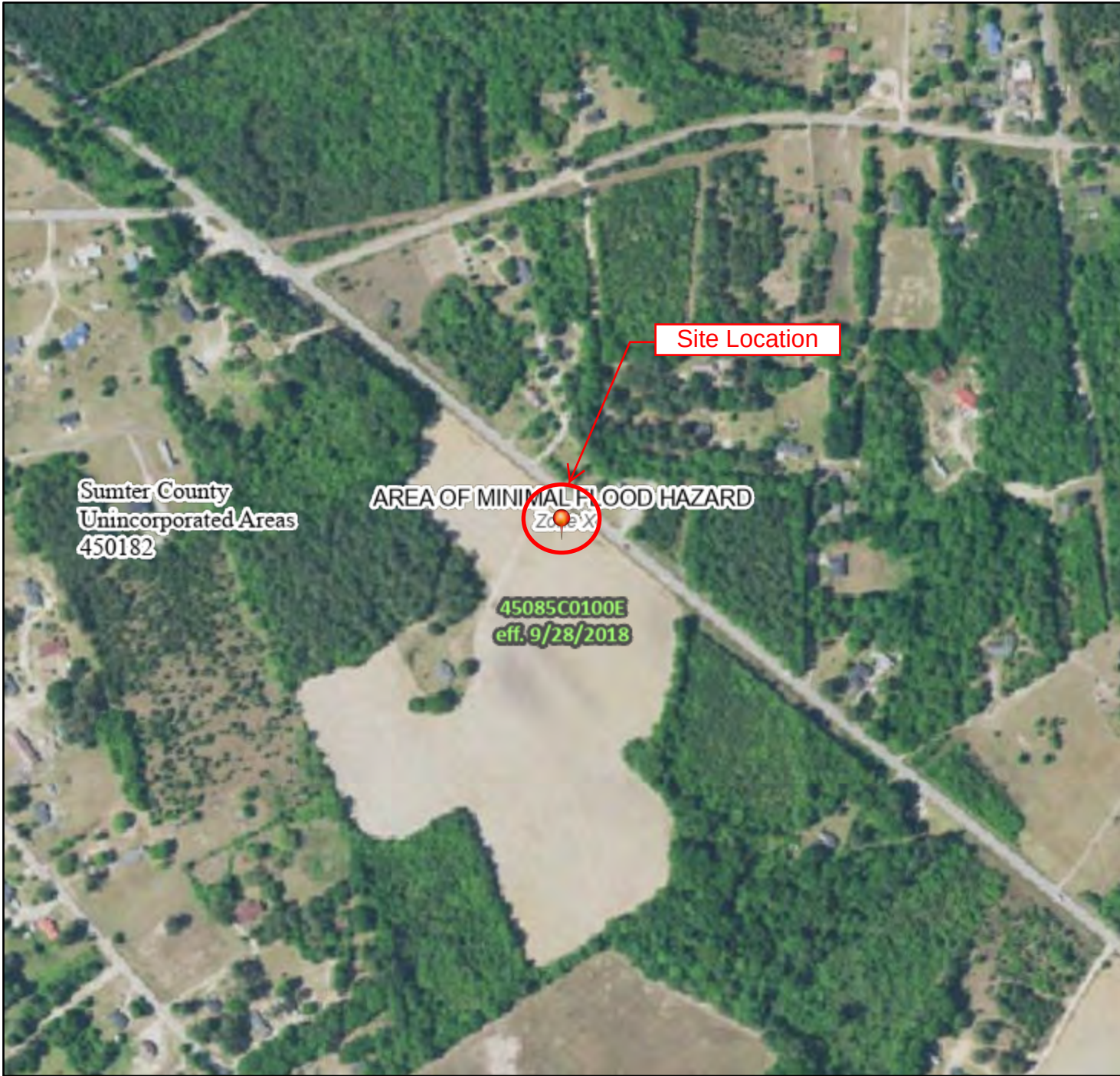
Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

 **TRILEAF**
environmental architecture engineering

National Flood Hazard Layer FIRMMette



80°30'54"W 34°4'17"N



Legend

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

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



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 9/9/2025 at 3:29 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

0 250 500 1,000 1,500 2,000 Feet

1:6,000

80°30'16"W 34°3'48"N

Basemap Imagery Source: USGS National Map 2023



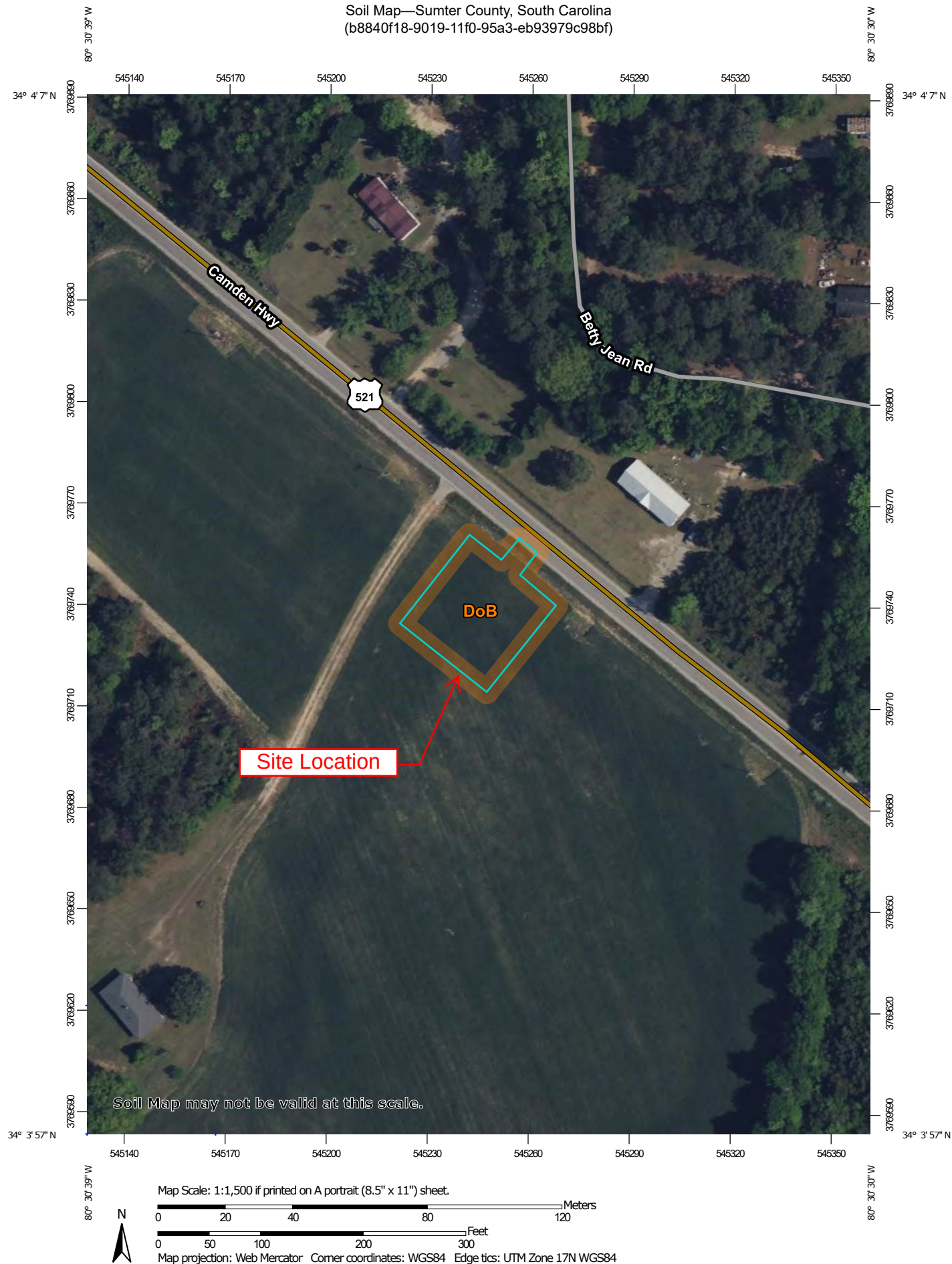
September 9, 2025

Wetlands

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

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

Soil Map—Sumter County, South Carolina
(b8840f18-9019-11f0-95a3-eb93979c98bf)



MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

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

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

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

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

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

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

Soil Survey Area: Sumter County, South Carolina

Survey Area Data: Version 22, Aug 29, 2024

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

Date(s) aerial images were photographed: Apr 15, 2022—May 10, 2022

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
DoB	Dothan-Norfolk complex, 2 to 6 percent slopes	0.3	100.0%
Totals for Area of Interest		0.3	100.0%

U.S. Fish and Wildlife Service
National Wildlife Refuge System Map



North



USFWS – Wildlife Refuge Map

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128



North American Migration Flyways



North



Migratory Bird Flyways – Location Map

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128



National Park Service
National Historic Trails and Scenic Routes



North



National Park Service – Trails and Routes Map

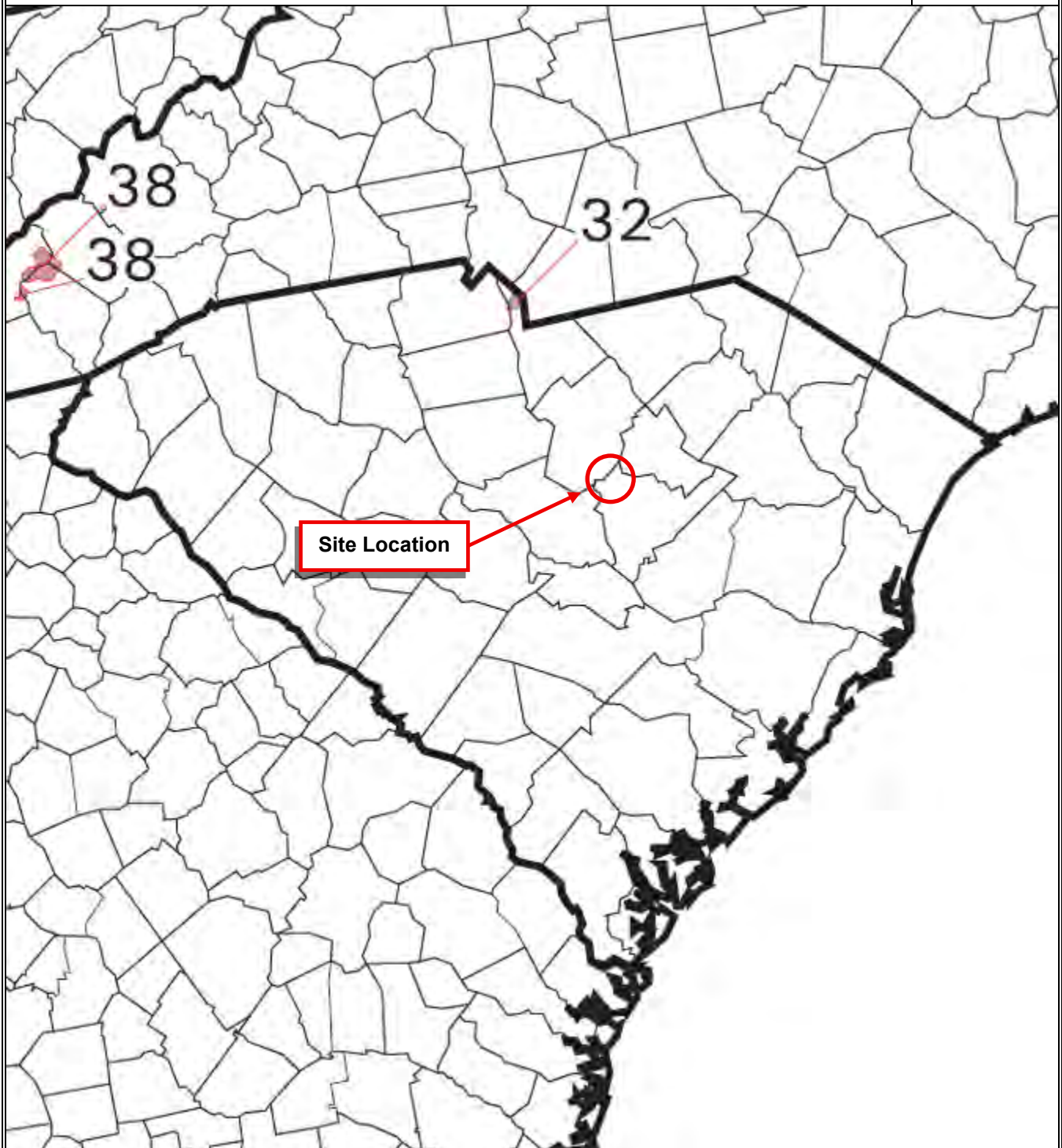
Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128



Bureau of Indian Affairs
Indian Reservation Map



North



Bureau of Indian Affairs – Reservation Map

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128



Appendix C

Site Photographs





Site Photograph 1 – Looking north at the Site



Site Photograph 2 – Looking south at the Site

Site Photographs

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

Photographed:
September 26, 2025



Site Photograph 3 – Looking east at the Site



Site Photograph 4 – Looking west at the Site

Site Photographs

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

Photographed:
September 26, 2025



Site Photograph 5 – Looking north away from the Site



Site Photograph 6 – Looking south away from the Site

Site Photographs

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

Photographed:
September 26, 2025



Site Photograph 7 – Looking east away from the Site



Site Photograph 8 – Looking west away from the Site

Site Photographs

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

Photographed:
September 26, 2025



Site Photograph 9 – Looking south along the access/utility easement



Site Photograph 10 – Looking northeast away from the access/utility easement

Site Photographs

Harmoni Towers LLC – Borden
Camden Highway
Rembert, South Carolina 29128

Photographed:
September 26, 2025

Appendix D

Documentation of Officially Designated Wilderness Areas, Wildlife Preserves and Endangered Species





United States Department of the Interior

FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407



U.S. Fish and Wildlife Service Clearance Letter for Species and Habitat Assessments

Updated: January 3, 2023

The U.S. Fish and Wildlife Service (Service) is one of two lead Federal Agencies mandated with the protection and conservation of Federal trust resources, including threatened and endangered (T&E) species and designated critical habitat as listed under the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*) (ESA). Development of lands in South Carolina have the potential to impact federally protected species. Accordingly, obligations under the ESA, National Environmental Policy Act (NEPA), Clean Water Act (CWA), Federal Power Act (FPA), and other laws, require project proponents to perform an environmental impact review prior to performing work on the site. These projects may include a wide variety of activities including, but not limited to, residential or commercial developments, energy production, power transmission, transportation, infrastructure repair, maintenance, or reconstruction of existing facilities on previously developed land.

Project applicants, or their designated representatives, may perform initial species assessments in advance of specific development proposals to determine the presence of T&E species and designated critical habitat that are protected under the ESA. These reviews are purposely speculative and do not include specific project or site development plans. Many of these speculative proposals are for previously developed or disturbed lands such as pasture lands, agricultural fields, or abandoned industrial facilities. Due to historical uses and existing conditions, these sites often do not contain suitable habitat to support T&E species. Therefore, an assessment may conclude that any future development of the site would have no effect to T&E species or adversely modify designated critical habitat. If the applicant, or their designee, determines there is no effect or impact to federally protected species or designated critical habitat, no further action is required under the ESA.

Clearance to Proceed

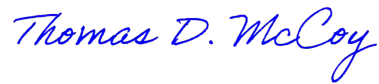
For all sites with potential projects that have no effect or impact upon federally protected species or designated critical habitat, no further coordination with the Service is necessary at this time. This letter may be downloaded and serve as the Service's concurrence or agreement to the conclusions of the species assessment. Any protected species survey or assessment conducted for the property should be included with this letter when submitting the project to Federal permitting agencies. Due to obligations under the ESA potential impacts must be reconsidered if: (1) new information reveals impacts of this identified action may affect any listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner which was not considered in this assessment; or (3) a new species is listed or critical habitat is designated that may be affected by the identified action.

Please note this Clearance Letter applies only to assessments in South Carolina and may not be used to satisfy section 7 requirements for projects that have already been completed or currently under construction.

If suitable habitat for T&E species or designated critical habitat occurs on, or nearby, the project site, a determination of no effect/impact may not be appropriate. In these cases, direct consultation requests with the Service should be initiated by the Federal action agency. Additional coordination with the Service may also be required if the potential project requires an evaluation under another resource law such as, but not limited to, NEPA, CWA, FPA, and the Coastal Zone Management Act.

The Service appreciates your cooperation in the protection of federally listed species and their habitats in South Carolina.

Sincerely,



Thomas D. McCoy
Field Supervisor

Informal Biological Assessment

Harmoni Towers, LLC

Project Name: Borden / Client #SC0009812 - Trileaf #772867

Latitude: 34° 4' 2.5869" N, Longitude: 80° 30' 34.8467" W

Trileaf performed an Informal Biological Assessment for the subject site. The purpose is to document whether the proposed undertaking will affect listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds. A project description, site photographs, topographical maps, wetland maps, and soil maps are included in this report.

Proposed Project Description:

The Site is located at Camden Highway, Rembert, Sumter County, South Carolina 29128, and consists of the construction of a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field. The proposed structure site is approximately 241.79 feet above mean sea level.

Site and Surrounding Habitat:

The Site is currently located within an agricultural field. During the area reconnaissance, no trees along the access road, and generally throughout the area were identified to be removed.

The surrounding habitat within a 0.5-mile radius of the proposed site consists predominantly of agricultural development and wooded land. To the north is Camden Highway, followed by wooded land interspersed with rural residences, followed by Dais Road, followed by additional wooded land. To the east is Camden Highway, followed by wooded land interspersed with rural residences, followed by additional wooded land. To the south is agricultural development interspersed with rural residences. To the west is an agricultural field, followed by wooded land, followed by residential development, followed by Dennis Road, followed by additional wooded land. The current habitat is not mapped as critical habitat, nor does it qualify as sufficient habitat for Federal or State listed species.

Wetlands:

Trileaf has reviewed the topographic map, soil composition, as well as the National Wetlands Inventory Map to determine if the proposed lease area and easements would have an impact on any wetlands or require significant amounts of fill or grading. Trileaf determined that the site is not located in a recognized national wetland area.

Trileaf performed a field visit and identified surface water bodies. Using local maps in combination with an area reconnaissance the following water bodies have been identified in the table below:

Water Body Type	Water Body Name	Direction from Structure	Distance from Structure
Freshwater Forested Shrub Wetland	Unnamed	WNW	0.10 miles
Stream	Unnamed	WNW	0.16 miles
Stream	Unnamed	ESE	0.18 miles
Freshwater Forested Shrub Wetland	Unnamed	SW	0.19 miles
Freshwater Forested Shrub Wetland	Unnamed	N	0.42 miles
Stream	Unnamed	ESE	0.49 miles
Freshwater Forested Shrub Wetland	Unnamed	E	0.49 miles

Migratory Birds:

The proposed Site and design process for this project could not conform to all the USFWS recommendations to decrease potential effects on migratory birds. Therefore, it has included mitigating factors such as structure placement within minimally sensitive areas, avoiding placement near wetlands and large water bodies, and eliminating the need for guy wires. While the proposed Site is located near the Atlantic flyway, our site investigation has determined that the project area is not located in an NWI mapped wetland, waterway, wildlife refuge, national wilderness area, native grassland or forest area, ridgeline, mountain top, coastline or area commonly known to have high incidences of fog or low clouds, where migratory birds may be found. Based upon the efforts undertaken during this IBA as well as the current data made available, we have concluded that this project will not have a significant effect on migratory birds; however, the presence of migratory birds cannot be ruled out.

Soils:

According to the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey of Sumter County, South Carolina, the Site is underlain by Dothan-Norfolk complex, 2 to 6 percent slopes. Dothan soils consist of well drained soils that are formed from loamy fluviomarine deposits and are found in marine terraces. The depth to the most restrictive feature is 32 to 55 inches to plinthite. The depth to the water table is about 40 to 58 inches. A typical profile of Dothan soil consists of a surface layer of loamy sand extending from 0 to 8 inches and two (2) distinct subsurface layers of sandy clay loam extending from 8 to 80 inches. Dothan soils have no frequency of flooding or ponding.

Norfolk soils consist of well drained soils that are formed from loamy fluviomarine deposits and are found in marine terraces. The depth to the most restrictive feature is 61 to 69 inches to plinthite. The depth to the water table is about 40 to 68 inches. A typical profile of Norfolk soil consists of a surface layer of loamy sand extending from 0 to 9 inches, subsurface layers of loamy sand extending from 9 to 11 inches, and two (2) distinct layers of sandy clay loam extending from 11 to 80 inches. Norfolk soils have no frequency of flooding or ponding.

Dothan-Norfolk complex, 2 to 6 percent slopes, is not considered a hydric soil, and no hydrophytic vegetation or surface water was observed.

Threatened or Endangered Species:

Trileaf has researched the listed or proposed threatened or endangered species and designated critical habitat for the project area. This includes any such species that have been reported to exist within the action area where the project is located. The list of federally threatened or endangered species was acquired through the U.S. Fish and Wildlife Service's Information, Planning, and Consultation system (IPaC) and is site specific. The state list of threatened or endangered species was acquired from The South Carolina Department of Natural Resources (SCDNR). The lease area is not located within an aquatic environment; therefore, any obligate aquatic species should not be directly impacted by this project and are not included in the table below. A list of remaining species and site observations are summarized in the following table:

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Tricolored Bat (<i>Perimyotis subflavus</i>)	Federal-Proposed Endangered	Foliage or in high tree cavities and crevices preferring edge habitats near areas of mixed agricultural use	No effect	Habitat assessment indicated no potential habitat present
Red-cockaded Woodpecker (<i>Picoides borealis</i>)	Federal-Threatened State-Endangered	Open pine forest maintained by frequent fires, especially mature longleaf pine forests	No effect	Habitat assessment indicated no potential habitat present
Southern Hognose Snake (<i>Heterodon simus</i>)	Federal-Proposed Threatened State-Threatened	Sandhills, fallow fields, and longleaf pine-turkey oak; xeric sandy habitats such as pine flatwoods, sand ridges, and coastal dunes; may persist in agricultural or suburban areas with suitable sandy soils	No effect	Habitat assessment indicated no potential habitat present
Monarch Butterfly (<i>Danaus plexippus</i>)	Federal-Proposed Threatened	Breeding habitat must contain milkweeds. Adults can be found in a variety of sunny, open spaces, both natural and disturbed	No effect	Habitat assessment indicated no potential habitat present

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
American Chaffseed (<i>Schwalbea americana</i>)	Federal-Endangered	Open, moist pine flatwoods; fire-maintained savannas, ecotonal areas between peaty wetlands; xeric sandy soils	No effect	Habitat assessment indicated no potential habitat present
Canby's Dropwort (<i>Oxypolis canbyi</i>)	Federal-Endangered	Wetlands with acidic organic soils and patchy or no canopy cover	No effect	Habitat assessment indicated no potential habitat present
Spotted Turtle (<i>Clemmys guttata</i>)	State-Threatened	Heavily vegetated, shallow wetlands with standing or slowly flowing water; bays, bogs, swamps, marshes, wet meadows, and even tidally-influenced brackish streams	No effect	Habitat assessment indicated no potential habitat present
Rafinesque's Big-eared Bat (<i>Corynorhinus rafinesquii</i>)	State-Endangered	Mature forests, including bottomland and upland hardwoods and pine flatwoods with water nearby; roosting sites are usually dimly lit sheltered areas, such as dilapidated buildings, bridges, hollow trees, loose bark, rock shelters, and the entrance zones of caves and mines	No effect	Habitat assessment indicated no potential habitat present
Swallow-tailed Kite (<i>Elanoides forficatus</i>)	State-Endangered	Breed in swamps, lowland forests, and marshes; nesting and foraging habitat includes slash pine wetlands, edges of pine forest, cypress swamps, wet prairies, freshwater and brackish marshes, hardwood hammocks, and mangrove forests	No effect	Habitat assessment indicated no potential habitat present

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	State-Threatened	Areas close to coastal areas, bays, rivers, lakes; nest in tall trees (mostly pine) that provide clear view of surrounding area	No effect	Habitat assessment indicated no potential habitat present
Carolina Gopher Frog (<i>Lithobates capito</i>)	State-Endangered	Burrows of the gopher tortoise (<i>Gopherus polyphemus</i>), stump holes, root tunnels and mammal and crayfish burrows; breeding sites are upland ephemeral ponds in longleaf pine savannas	No effect	Habitat assessment indicated no potential habitat present
Least Tern (<i>Sternula antillarum</i>)	State-Threatened	Nest in colonies on sandy, shelly beaches or islands on coastlines and rivers; sometimes also nest in gravel pits, on dredge spoil, on flat gravel rooftops, or on dry mudflats	No effect	Habitat assessment indicated no potential habitat present

Conclusions:

Based on the efforts undertaken during our IBA, project specifications, and the current data made available, we have concluded that there is no potential for the proposed project to have a significant effect on listed or proposed, threatened and endangered species, their designated critical habitat, or migratory birds.

It should be noted that this informal biological assessment was conducted in accordance with the Scope of Work and does not constitute a Section 7 Biological Assessment under the Endangered Species Act (50 CFR Part 402.01).



Hannah Dell
Natural Resource Specialist

Please refer to Appendix B for Site Maps



Please refer to Appendix C for Site Photographs



Please refer to Appendix B for Site Maps



Sumter County, South Carolina

DoB—Dothan-Norfolk complex, 2 to 6 percent slopes

Map Unit Setting

National map unit symbol: 2pfs7

Elevation: 180 to 300 feet

Mean annual precipitation: 42 to 55 inches

Mean annual air temperature: 51 to 75 degrees F

Frost-free period: 202 to 253 days

Farmland classification: All areas are prime farmland

Map Unit Composition

Dothan and similar soils: 59 percent

Norfolk and similar soils: 41 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Dothan

Setting

Landform: Marine terraces

Landform position (two-dimensional): Summit, shoulder, backslope

Landform position (three-dimensional): Interfluve

Down-slope shape: Convex, linear

Across-slope shape: Convex, linear

Parent material: Loamy fluviomarine deposits

Typical profile

Ap - 0 to 8 inches: loamy sand

Bt - 8 to 37 inches: sandy clay loam

Btv - 37 to 80 inches: sandy clay loam

Properties and qualities

Slope: 2 to 6 percent

Depth to restrictive feature: 32 to 55 inches to plinthite

Drainage class: Well drained

Runoff class: Medium

Capacity of the most limiting layer to transmit water

(Ksat): Moderately high (0.20 to 0.57 in/hr)

Depth to water table: About 40 to 58 inches

Frequency of flooding: None

Frequency of ponding: None

Available water supply, 0 to 60 inches: Low (about 4.9 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 2e

Hydrologic Soil Group: C

Hydric soil rating: No

Description of Norfolk

Setting

Landform: Marine terraces
Landform position (two-dimensional): Summit, shoulder, backslope
Landform position (three-dimensional): Interfluve
Down-slope shape: Linear
Across-slope shape: Convex
Parent material: Loamy fluviomarine deposits

Typical profile

Ap - 0 to 9 inches: loamy sand
E - 9 to 11 inches: loamy sand
Bt - 11 to 61 inches: sandy clay loam
Btv - 61 to 80 inches: sandy clay loam

Properties and qualities

Slope: 2 to 6 percent
Depth to restrictive feature: 61 to 69 inches to plinthite
Drainage class: Well drained
Runoff class: Medium
Capacity of the most limiting layer to transmit water (Ksat): Moderately high (0.20 to 0.57 in/hr)
Depth to water table: About 40 to 68 inches
Frequency of flooding: None
Frequency of ponding: None
Available water supply, 0 to 60 inches: Moderate (about 7.8 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 2e
Hydrologic Soil Group: B
Hydric soil rating: No

Data Source Information

Soil Survey Area: Sumter County, South Carolina
Survey Area Data: Version 22, Aug 29, 2024



United States Department of the Interior

FISH AND WILDLIFE SERVICE

South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218



In Reply Refer To:
Project Code: 2025-0157205
Project Name: Borden

09/30/2025 22:22:01 UTC

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

To Whom It May Concern:

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

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

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

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

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

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

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

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

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

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

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

Attachment(s):

- Official Species List

- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds

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:

South Carolina Ecological Services

176 Croghan Spur Road, Suite 200

Charleston, SC 29407-7558

(843) 727-4707

PROJECT SUMMARY

Project Code: 2025-0157205

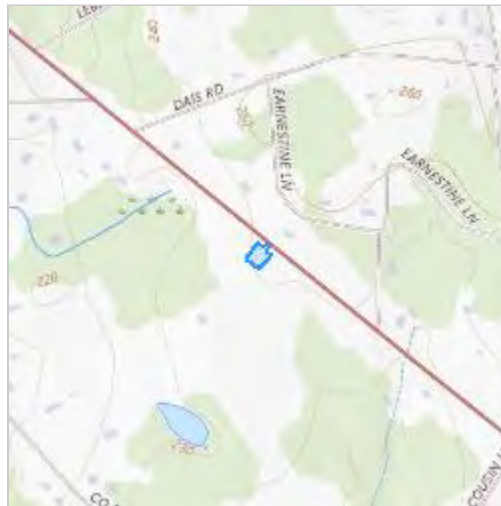
Project Name: Borden

Project Type: Communication Tower New Construction

Project Description: Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located within an agricultural field.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.0674004,-80.5096757,5061141,14z>



Counties: Sumter County, South Carolina

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA 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
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9721.pdf	Proposed Endangered

BIRDS

NAME	STATUS
Red-cockaded Woodpecker <i>Dryobates borealis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7614	Threatened

REPTILES

NAME	STATUS
Southern Hognose Snake <i>Heterodon simus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3248	Proposed Threatened

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
American Chaffseed <i>Schwalbea americana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1286 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9753.pdf	Endangered
Canby's Dropwort <i>Oxypolis canbyi</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7738 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9753.pdf	Endangered

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

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

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

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing

appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel <i>Falco sparverius paulus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9587	Breeds Apr 1 to Aug 31
Painted Bunting <i>Passerina ciris</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9511	Breeds Apr 25 to Aug 15

PROBABILITY OF PRESENCE SUMMARY

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

Probability of Presence (■)

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

Breeding Season (■)

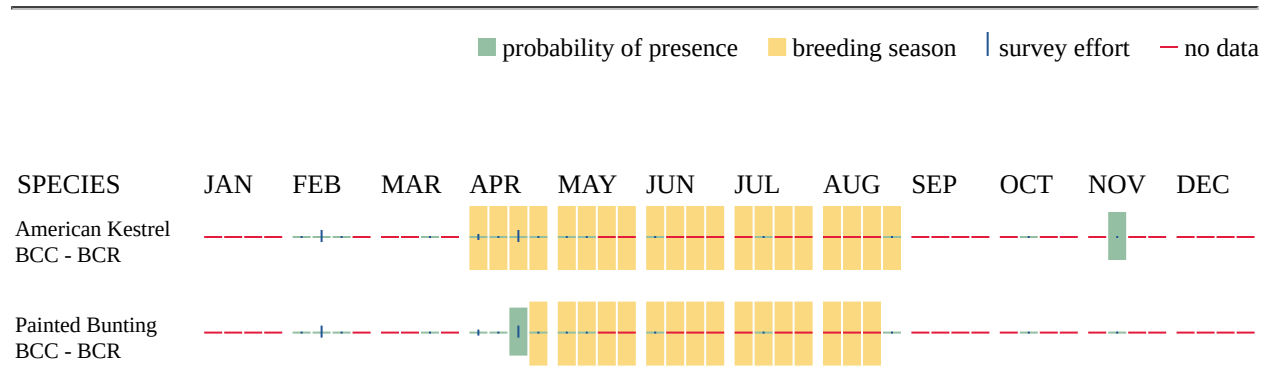
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

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

No Data (—)

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



Additional information can be found using the following links:

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

IPAC USER CONTACT INFORMATION

Agency: Trileaf Corporation
Name: Hannah Dell
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Address Line 2: Suite 525
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State: GA
Zip: 30339
Email: h.dell@trileaf.com
Phone: 7063621745



United States Department of the Interior

FISH AND WILDLIFE SERVICE

South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218



In Reply Refer To:
Project Code: 2025-0157205
Project Name: Borden

01/22/2026 13:32:54 UTC

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.

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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>

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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>.

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

Attachment(s):

- Official Species List

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

OFFICIAL SPECIES LIST

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This species list is provided by:

South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
(843) 727-4707

PROJECT SUMMARY

Project Code: 2025-0157205

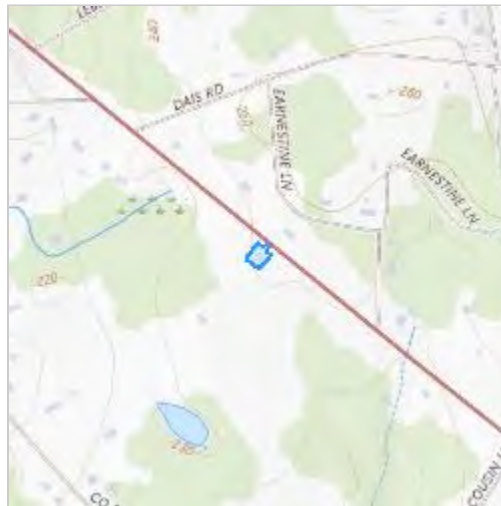
Project Name: Borden

Project Type: Communication Tower New Construction

Project Description: Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.0673977,-80.50967833432742,14z>



Counties: Sumter County, South Carolina

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

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

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9721.pdf	Proposed Endangered

BIRDS

NAME	STATUS
Red-cockaded Woodpecker <i>Dryobates borealis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7614	Threatened

REPTILES

NAME	STATUS
Southern Hognose Snake <i>Heterodon simus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3248	Proposed Threatened

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
American Chaffseed <i>Schwalbea americana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1286 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9753.pdf	Endangered
Canby's Dropwort <i>Oxypolis canbyi</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7738 General project design guidelines: https://ipac.ecosphere.fws.gov/project/L2PX35QZ2ZFS3OZ6FSMH3GM65A/documents/generated/9753.pdf	Endangered

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

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

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

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing

appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Kestrel <i>Falco sparverius paulus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9587	Breeds Apr 1 to Aug 31
Painted Bunting <i>Passerina ciris</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9511	Breeds Apr 25 to Aug 15

PROBABILITY OF PRESENCE SUMMARY

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

Probability of Presence (■)

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

Breeding Season (■)

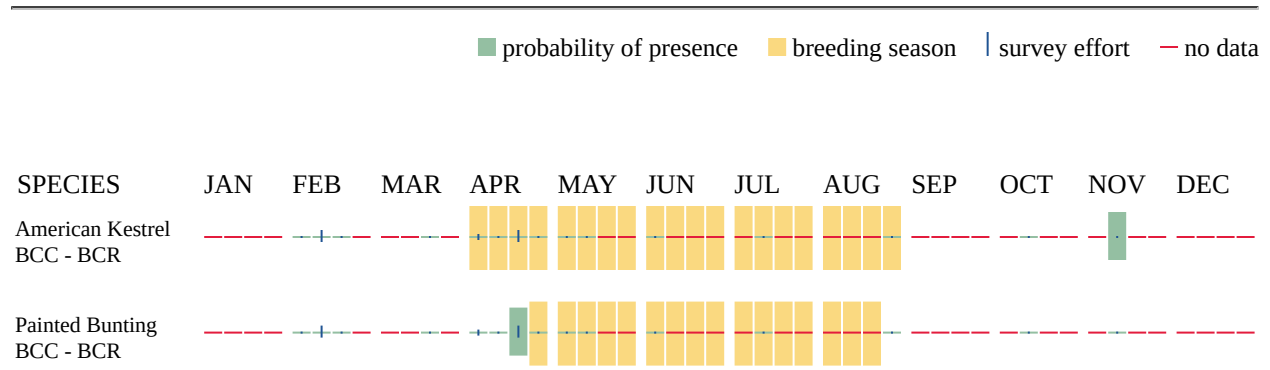
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

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

No Data (—)

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



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

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

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

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

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Trileaf Corporation
Name: Hannah Dell
Address: 1775 The Exchange SE
Address Line 2: Suite 525
City: Marietta
State: GA
Zip: 30339
Email: h.dell@trileaf.com
Phone: 7063621745

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE

South Carolina Ecological Services
176 Croghan Spur Road, Suite 200
Charleston, SC 29407-7558
Phone: (843) 727-4707 Fax: (843) 727-4218



In Reply Refer To:
Project code: 2025-0157205
Project Name: Borden

01/22/2026 13:42:24 UTC

Federal Nexus: yes
Federal Action Agency (if applicable): Federal Communications Commission

Subject: Record of project representative's no effect determination for 'Borden'

Dear Hannah Dell:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on January 22, 2026, for 'Borden' (here forward, Project). This project has been assigned Project Code 2025-0157205 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

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

Failure to accurately represent or implement the Project as detailed in IPaC or the **Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey)**, invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat and/or Tricolored Bat

Based upon your IPaC submission and a standing analysis, your project has reached the following effect determinations:

Species	Listing Status	Determination
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed Endangered	No effect

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

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

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

- American Chaffseed *Schwalbea americana* Endangered
- Canby's Dropwort *Oxypolis canbyi* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Red-cockaded Woodpecker *Dryobates borealis* Threatened
- Southern Hognose Snake *Heterodon simus* Proposed Threatened

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the species covered by this key. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location

of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally 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 coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the South Carolina Ecological Services and reference Project Code 2025-0157205 associated with this Project.

Action Description

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

1. Name

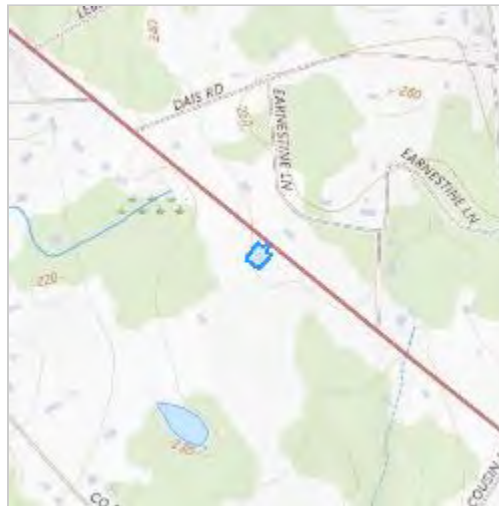
Borden

2. Description

The following description was provided for the project 'Borden':

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located within an agricultural field.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.0673977,-80.50967833432742,14z>



DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the species covered by this determination key. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

QUALIFICATION INTERVIEW

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

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

No

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

Automatically answered

No

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

Automatically answered

Yes

4. Your project overlaps with an area where northern long-eared bats or tricolored bats may be present and roosting in trees year-round.

Do you understand that your project may impact bats roosting in trees at any time during the year?

Yes

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

No

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

Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer 'yes' to this question.

Yes

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

No

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

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

Yes

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

Yes

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

Automatically answered

No

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

No

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

No

13. Will the action cause effects to a bridge?

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

No

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

No

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

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

Yes

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

No

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

No

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

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

No

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

No

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

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

No

21. 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

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

No

23. Will the action include drilling or blasting?

No

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

No

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

No

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

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

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

No

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

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

No

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

No

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

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

No

30. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

31. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

Automatically answered

No

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

Automatically answered

No

33. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Has a presence/probable absence survey for the tricolored bat following the Service's [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#) been conducted within the project area? If unsure, answer "No."

No

34. Your project overlaps with an area where tricolored bats may be present and roosting in trees year-round.

Is suitable tricolored bat habitat present within 1000 feet of project activities? Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer "Yes." Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

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

No

PROJECT QUESTIONNAIRE

IPAC USER CONTACT INFORMATION

Agency: Trileaf Corporation
Name: Hannah Dell
Address: 1775 The Exchange SE
Address Line 2: Suite 525
City: Marietta
State: GA
Zip: 30339
Email: h.dell@trileaf.com
Phone: 7063621745

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission

County	Scientific Name	Common Name	G Rank	S Rank	Federal Status	State Status	Group Type
Sumter	<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	G3	S3	LE: Federally Endangered	SE: State Endangered	Zoological
Sumter	<i>Clemmys guttata</i>	Spotted Turtle	G5	S2	ARS: At-Risk Species	ST: State Threatened	Zoological
Sumter	<i>Corynorhinus rafinesquii</i>	Rafinesque's Big-eared Bat	G3G4	S2	Not Applicable	SE: State Endangered	Zoological
Sumter	<i>Dryobates borealis</i>	Red-cockaded Woodpecker	G3	S2	LT: Federally Threatend	SE: State Endangered	Zoological
Sumter	<i>Elanoides forficatus</i>	Swallow-tailed Kite	G5	S2	MBTA: Migratory Bird Treaty Act	SE: State Endangered	Zoological
Sumter	<i>Elassoma boehlkei</i>	Carolina Pygmy Sunfish	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Eurycea chamberlaini</i>	Chamberlain's Dwarf Salamander	G4	S3	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Haliaeetus leucocephalus</i>	Bald Eagle	G5	S3B,S3N	Bald & Golden Eagle Protection Act	ST: State Threatened	Zoological
Sumter	<i>Heterodon simus</i>	Southern Hog-nosed Snake	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Lasiurus cinereus</i>	Hoary Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Lithobates capito</i>	Carolina Gopher Frog	G2G3	S1	ARS: At-Risk Species	SE: State Endangered	Zoological
Sumter	<i>Lobelia boykinii</i>	Boykin's Lobelia	G1G2	S2?	ARS: At-Risk Species	Not Applicable	Botanical
Sumter	<i>Myotis lucifugus</i>	Little Brown Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Noturus sp. 2</i>	Broadtail Madtom	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Perimyotis subflavus</i>	Tricolored Bat	G3G4	S3	LEP: Federally Endangered (Proposed)	Not Applicable	Zoological
Sumter	<i>Schwalbea americana</i>	Chaffseed	G2	S2	LE: Federally Endangered	Not Applicable	Botanical
Sumter	<i>Sternula antillarum</i>	Least Tern	G4	S2B	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Sumter	<i>Tiedemannia canbyi</i>	Canby's Cowbane	G2	S2	LE: Federally Endangered	Not Applicable	Botanical



Professional Resume

HANNAH DELL

ASSISTANT PROJECT MANAGER

Education

Biology, B. S.
University of North Georgia / Gainesville, GA

Areas of Expertise

Ms. Dell has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Dell has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person
Basic Wetland Delineation (2023)

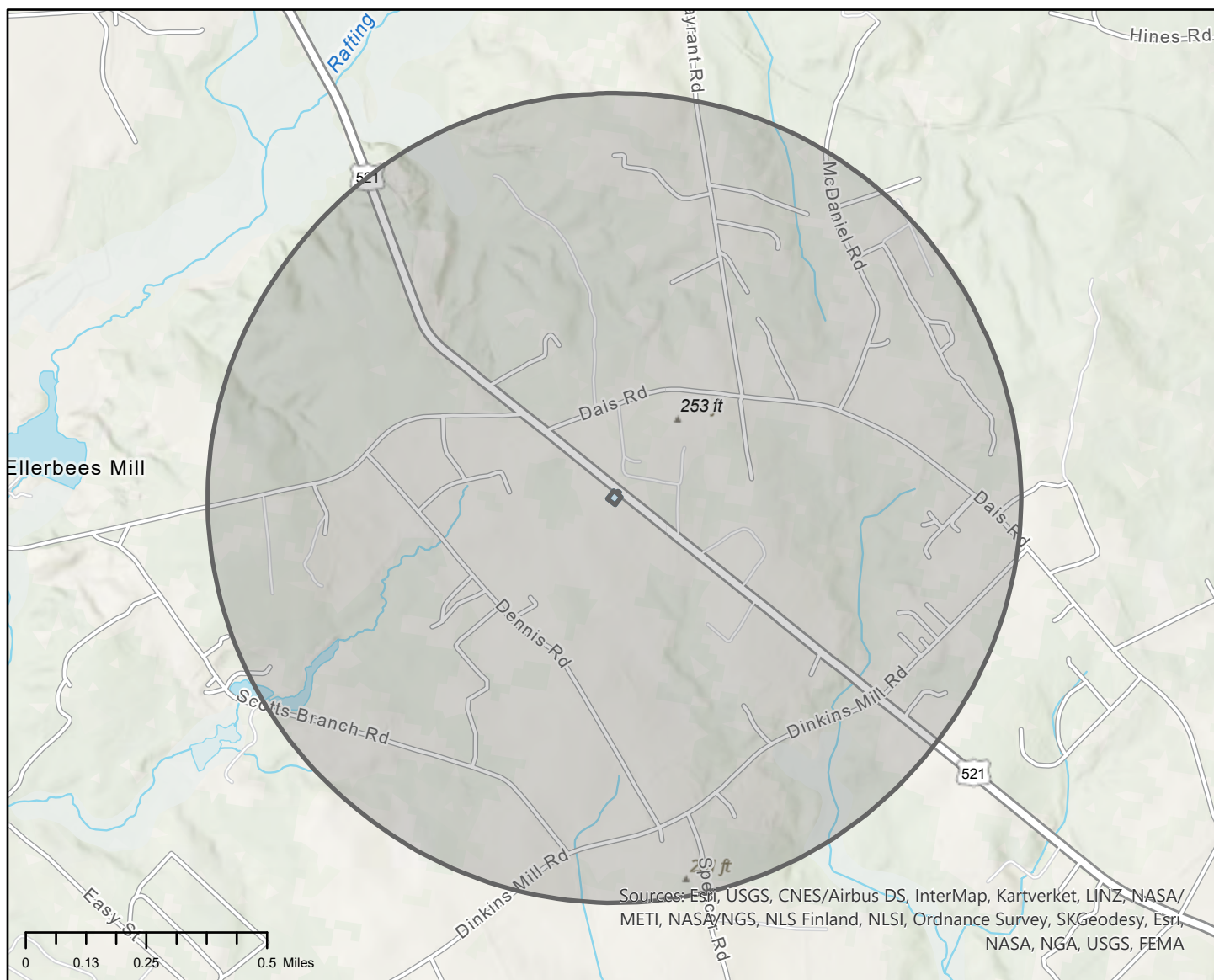


PO Box 167
Columbia, SC 29202
(803) 734-1396
speciesreview@dnr.sc.gov

Requested on Friday, October 17, 2025 by Hannah Dell.

Re: Request for Threatened and Endangered Species Consultation
Hannah Dell - Borden - Communication/Cell Tower - Sumter County, South Carolina

The South Carolina Department of Natural Resources (SCDNR) has received your request for threatened and endangered species consultation of the above named project in Sumter County, South Carolina. The following map depicts the project area and a 1 mile buffer surrounding:





This report includes the following items:

- A - A report for species which intersect the project area
- B - A report for species which intersect the buffer around the project area
- C - A list of best management practices relevant to species near to or within the project area
- D - A list of best management practices relevant to the project type
- E - A list of state & federally listed species within the county of the project area
- F - Other important information on conservation status, listed species, and how to submit observations to the program.

Please be advised:

The contents of this report, including all tables, maps, recommendations, and various other text, are produced as a direct result of the information a user provides at the time of submission. The SCDNR assumes that all information submitted by the user represents the project scope as proposed, and recommends that additional reports be requested should the scope deviate from how the project was initially represented to the SCDNR.

The technical comments outlined in this report are submitted to speak to the general impacts of the activities as described through inquiry by parties outside the South Carolina Department of Natural Resources. These technical comments are submitted as guidance to be considered and are not submitted as final agency comments that might be related to any unspecified local, state or federal permit, certification or license applications that may be needed by any applicant or their contractors, consultants or agents presently under review or not yet made available for public review. In accordance with its policy 600.01, Comments on Projects Under Department Review, the South Carolina Department of Natural Resources, reserves the right to comment on any permit, certification or license application that may be published by any regulatory agency which may incorporate, directly or by reference, these technical comments.

Interested parties are to understand that SCDNR may provide a final agency position to regulatory agencies if any local, state or federal permit, certification or license applications may be needed by any applicant or their contractors, consultants or agents. For further information regarding comments and input from SCDNR on your project, please contact our Office of Environmental Programs by emailing environmental@dnr.sc.gov or by visiting www.dnr.sc.gov/environmental. Pursuant to Section 7 of the Endangered Species Act, requests for formal letters of concurrence with regards to federally listed species should be directed to the USFWS.

Should you have any questions or need more information, please do not hesitate to contact our office by email at speciesreview@dnr.sc.gov or by phone at 803-734-4080.

Sincerely,

A handwritten signature in cursive script that reads "Megan Levinson".

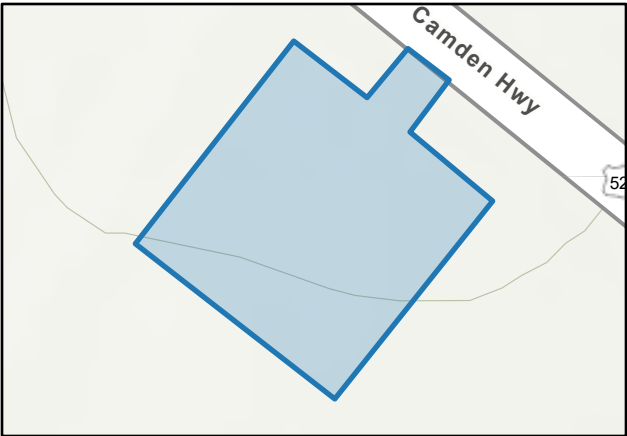
Megan Levinson
Heritage Trust Program
SC Department of Natural Resources

A. Project Area - Species Report

There are 0 tracked species records found within the project foot print. The following table outlines occurrences found within the project footprint (if any), sorted by listing status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found on site may be listed in this table but are not represented on the map. Please contact speciesreview@dnr.sc.gov should you have further questions related to sensitive species found within the project area.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the



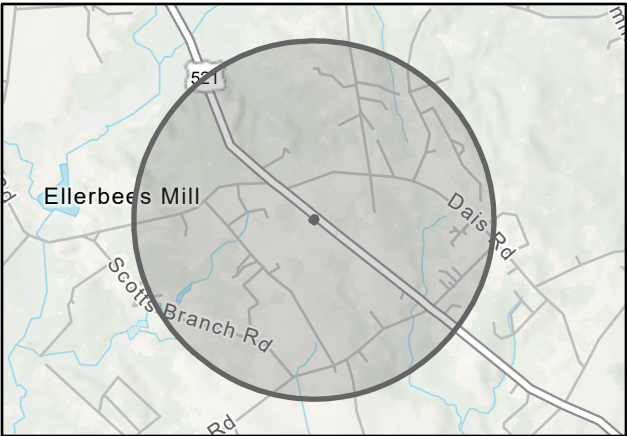
No records for species of concern are found within the project area

B. Buffer Area - Species Report

The following table outlines rare, threatened or endangered species found within 1 miles of the project footprint, arranged in order of protection status and species name. Please keep in mind that this information is derived from existing databases and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. You can find more information about global and state rank status definitions by visiting Natureserve's web page. Please note that certain sensitive species found within the buffer area may be listed in this table but are not represented on the map.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Esri, NASA, NGA, USGS, FEMA



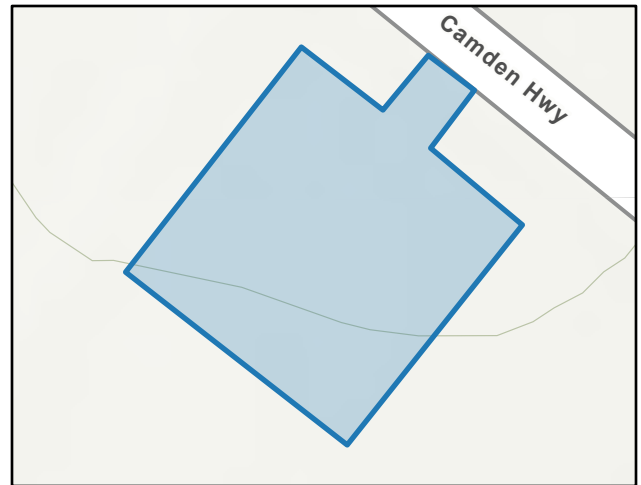
No records for species of concern are found within the buffered search distance area

C. Species Best Management Practices (1 of 1)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to species of concern which may be found on or near to the project area. Please contact speciesreview@dnr.sc.gov should you have further questions with regard to survey methods, consultation, or other species-related concerns.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SK Geodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS



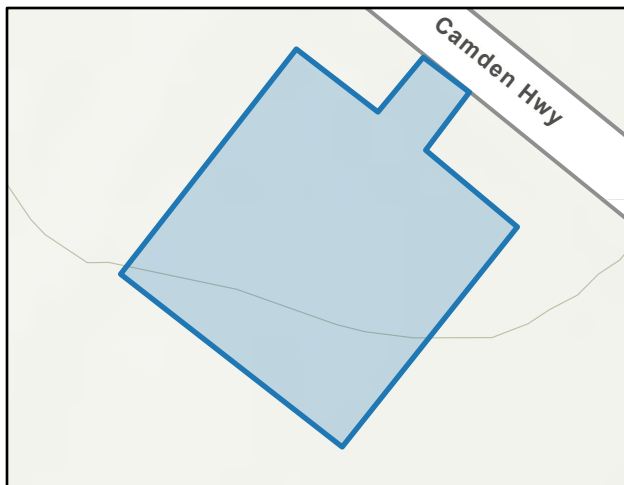
Three listed species of bats have been known to occur in the coastal plain ecoregions of South Carolina, including the state-endangered Rafinesque's big-eared bat (*Corynorhinus rafinesquii*); the federally endangered northern long-eared bat (NLEB) (*Myotis septentrionalis*); and the federally at-risk & proposed endangered tricolored bat (*Perimyotis subflavus*). Please note that take of a state endangered species is prohibited under S.C. Code of Laws §50-15-30. Prior to any land-clearing activities in the proposed project area, the SCDNR recommends a threatened and endangered species assessment be conducted to identify suitable habitat and provided to SCDNR for review.

Regarding Rafinesque's big-eared bat (1 of 2): Suitable habitat for Rafinesque's big-eared bat is defined as swamp forests, hardwood or mixed mature bottomlands, maritime forests and black gum (*Nyssa sylvatica*) and water tupelo (*Nyssa aquatic*) stands (Cochran 1999, Hofmann et al. 1999, Lance et al. 2001, Gooding and Langford 2004, Trousdale and Beckett 2005). If suitable habitat exists within the project, the SCDNR recommends assumption of presence of Rafinesque's big-eared bat within areas of forested wetlands and to further protect these areas, surround them with a 1000-foot buffers and avoid tree clearing from May 1st to July 31st to minimize disturbance and destruction of habitat that may be used by females during gestation or maternal care for pups. All other tree clearing outside of the forested wetlands and its associated buffer may occur in areas that are not wetlands or other aquatic resources in non-Rafinesque's big-eared bat maternity roosting habitat anytime. Where wetlands occur that are not Rafinesque's big-eared bat habitat, but they are spotted turtle habitat, tree clearing should only occur August to December to prevent impacts to spotted turtles during reproduction. However, if wetlands are dry January to June, they may be cleared, but they must be completely dry (no surface water present). For future right-of-way management (if applicable), use heavy equipment and herbicide treatment for right-of-way vegetation management in wetlands only during the months of July to November. If wetlands are completely dry (no surface water present), heavy equipment may be used January to June, but the wetlands must be completely dry.

Please note that tricolored bat was proposed for listing by the U.S. Fish and Wildlife Service on September 13, 2022. Therefore, due to the conservation concerns surrounding this species, the SCDNR strongly suggests acoustic surveys be conducted by a qualified individual during the summer months to assess the use of the area to be cleared by tricolored bats. Should the species occur in the proposed area slated for clearing, coordination should occur with SCDNR and USFWS regarding avoidance and minimization measures. Tricolored bat utilize caves, rock crevices, tree foliage and basal cavities, Spanish moss and man-made structures, such as houses, barns and culverts, as maternity roosts during the summer months and they will use more than one roost location. If this species are found on-site, please contact the U.S. Fish & Wildlife Service and SCDNR. The SCDNR recommends the assumption of presence of the the species and abide by a clearing moratorium from May 1st to July 31st if suitable habitat for the species is likely or are explicitly identified within the project footprint.

D. Project Best Management Practices (1 of 2)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.

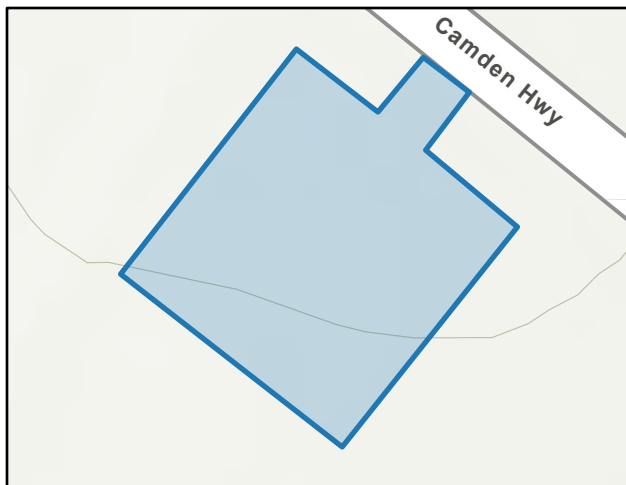


Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SK Geodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS

- All necessary measures must be taken to prevent oil, tar, trash and other pollutants from entering the adjacent offsite areas/wetlands/water.
- Once the project is initiated, it must be carried to completion in an expeditious manner to minimize the period of disturbance to the environment.
- Upon project completion, all disturbed areas must be permanently stabilized with vegetative cover (preferable), riprap or other erosion control methods as appropriate.
- The project must be in compliance with any applicable floodplain, stormwater, land disturbance, shoreline management guidance or riparian buffer ordinances.
- Prior to beginning any land disturbing activity, appropriate erosion and siltation control measures (e.g. silt fences or barriers) must be in place and maintained in a functioning capacity until the area is permanently stabilized.
- Materials used for erosion control (e.g., hay bales or straw mulch) will be certified as weed free by the supplier.
- Inspecting and ensuring the maintenance of temporary erosion control measures at least:
 - a. on a daily basis in areas of active construction or equipment operation;
 - b. on a weekly basis in areas with no construction or equipment operation; and
 - c. within 24 hours of each 0.5 inch of rainfall.
- Ensuring the repair of all ineffective temporary erosion control measures within 24 hours of identification, or as soon as conditions allow if compliance with this time frame would result in greater environmental impacts.
- Land disturbing activities must avoid encroachment into any wetland areas (outside the permitted impact area). Wetlands that are unavoidably impacted must be appropriately mitigated.
- Your project may require a Stormwater Permit from the SC Department of Health & Environmental Control, please visit <https://www.scdhec.gov/environment/water-quality/stormwater>

D. Project Best Management Practices (2 of 2)

SCDNR offers the following comments and best management practices (BMPs) regarding this project's potential impacts to natural resources within or surrounding the project area. Please contact our Office of Environmental Programs at environmental@dnr.sc.gov should you have further questions with regard to best management practices related to this project area.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SK Geodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS

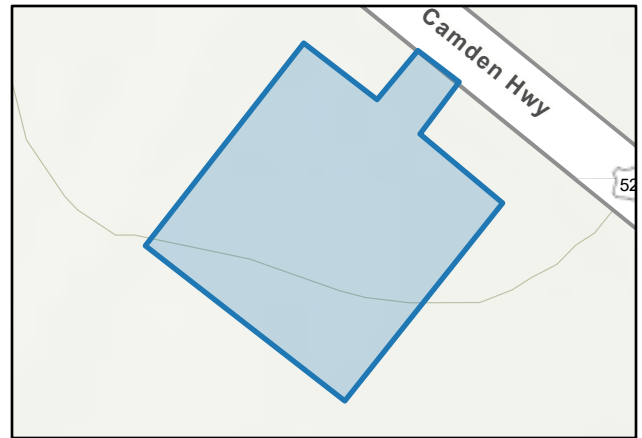
- Maintenance clearing or mowing of rights-of-way should not occur between April 15 and August 1 of a given year to avoid nesting season for a majority of migratory birds. The mower deck should be set no lower than 6 inches high so native herbaceous vegetation will not be damaged.
- The SCDNR recommends you follow the current guidelines outlined in the US Fish and Wildlife Service's Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning (<https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>)
- Pertinent suggestions discussed in the guidelines that effect birds include using flashing lights only, not situating the tower near wetlands, reducing or eliminating tension wires which are impact hazards, and that vegetation removal be done outside of the nesting season to avoid mortality to eggs and chicks. Migrating bats such as hoary bats sometimes do hit wires and tall structures so reducing guy wires or using a lattice instead per these guidelines might help. Additional tower guidelines for federally protected Northern long-eared bat conservation can be found in the Federal Communications Commission's Tower Construction Guidance for Protection of Northern Long-Eared Bat Under the Endangered Species Act (<https://www.fcc.gov/document/tower-guidance-northern-long-eared-bat>.)

E. State & Federally Listed Species in Sumter County

The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area.



Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SKGeodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS

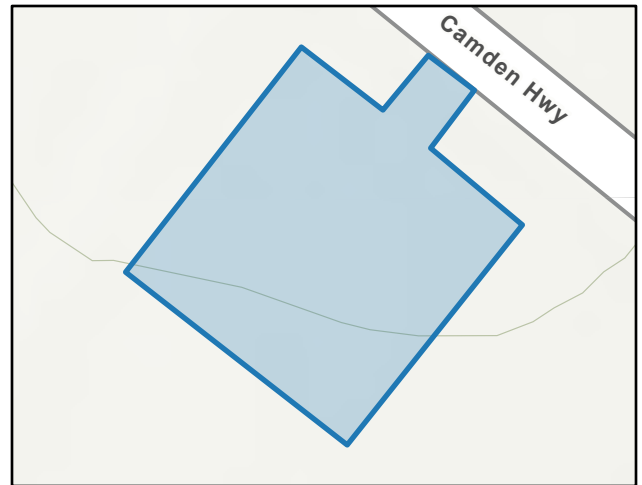


County	Scientific Name	Common Name	G Rank	S Rank	Federal Status	State Status	Group Type
Sumter	<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	G3	S3	LE: Federally Endangered	SE: State Endangered	Zoological
Sumter	<i>Clemmys guttata</i>	Spotted Turtle	G5	S2	ARS: At-Risk Species	ST: State Threatened	Zoological
Sumter	<i>Corynorhinus rafinesquii</i>	Rafinesque's Big-eared Bat	G3G4	S2	Not Applicable	SE: State Endangered	Zoological
Sumter	<i>Dryobates borealis</i>	Red-cockaded Woodpecker	G3	S2	LT: Federally Threatend	SE: State Endangered	Zoological
Sumter	<i>Elanoides forficatus</i>	Swallow-tailed Kite	G5	S2	MBTA: Migratory Bird Treaty Act	SE: State Endangered	Zoological
Sumter	<i>Elassoma boehlkei</i>	Carolina Pygmy Sunfish	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Eurycea chamberlaini</i>	Chamberlain's Dwarf Salamander	G4	S3	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Haliaeetus leucocephalus</i>	Bald Eagle	G5	S3B,S3N	Bald & Golden Eagle Protection Act	ST: State Threatened	Zoological
Sumter	<i>Heterodon simus</i>	Southern Hog-nosed Snake	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Lasiurus cinereus</i>	Hoary Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Lithobates capito</i>	Carolina Gopher Frog	G2G3	S1	ARS: At-Risk Species	SE: State Endangered	Zoological
Sumter	<i>Lobelia boykinii</i>	Boykin's Lobelia	G1G2	S2?	ARS: At-Risk Species	Not Applicable	Botanical
Sumter	<i>Myotis lucifugus</i>	Little Brown Bat	G3G4	S2	ARS: At-Risk Species	Not Applicable	Zoological
Sumter	<i>Noturus sp. 2</i>	Broadtail Madtom	G2	S1	Not Applicable	ST: State Threatened	Zoological
Sumter	<i>Perimyotis subflavus</i>	Tricolored Bat	G3G4	S3	LEP: Federally Endangered (Proposed)	Not Applicable	Zoological
Sumter	<i>Schwalbea americana</i>	Chaffseed	G2	S2	LE: Federally Endangered	Not Applicable	Botanical
Sumter	<i>Sternula antillarum</i>	Least Tern	G4	S2B	MBTA: Migratory Bird Treaty Act	ST: State Threatened	Zoological
Sumter	<i>Tiedemannia canbyi</i>	Canby's Cowbane	G2	S2	LE: Federally Endangered	Not Applicable	Botanical

F. Important Information & Instructions for Submitting Species Observations

The SC Natural Heritage Dataset relies on continuous monitoring and surveying for species of concern throughout the state. Any records of species of concern found within this project area would greatly benefit the quality and comprehensiveness of the statewide dataset for rare, threatened and endangered species. Below are instructions for how to download the SC Natural Heritage Occurrence Reporting Form through the Survey123 App.

Map Credits: Sources: Esri, USGS, CNES/Airbus DS, InterMap, Kartverket, LINZ, NASA/METI, NASA/NGS, NLS Finland, NLSI, Ordnance Survey, SK Geodesy, Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS



Conservation Ranks & SWAP Priority Status

The SC Natural Heritage Program assigns S Ranks for species tracked within the state of South Carolina based on ranking methodology developed by NatureServe and its state program network. For information conservation rank definitions, please visit <https://explorer.natureserve.org/AboutTheData/Statuses>

The SCDNR maintains and updates its State Wildlife Action Plan (SWAP) every 10 years. This plan categorizes species of concern by Moderate, High, and Highest Priority. Please visit <https://www.dnr.sc.gov/swap/index.html> for more information about the SC SWAP.

Important Information Regarding Element Occurrence Data:

The South Carolina Department of Natural Resources' Heritage Trust Program organizes a database that captures and tracks element of occurrence data for rare, threatened and endangered species, both federal and state. Please keep in mind that this information included within this report is derived from existing databases, and do not assume that it is complete. Areas not yet inventoried may contain significant species or communities. If your project requires the assessment of potential threatened or endangered species that could be within the project area, the SCDNR asks that you include a review of the state listed species within the county or watershed in addition to those that may be within the report as being within the project footprint or within 1-mile of the proposed project area. Consideration should be given to the occurrence of suitable habitat onsite, species movement and connectivity of habitat when assessing the likelihood of a state listed species on the project area. To view these lists please visit our county and watershed dashboards at our website: <https://natural-heritage-program-scdnr.hub.arcgis.com/#track>

State-listed Species Guidance

The South Carolina Department of Natural Resources has released a document to provide clarity for the avoidance of a take of a state listed species and what may be needed from permit applicants, for each species listed as threatened or endangered under SC Code of Regulations 123-150 and 123-150.2. Please review this document for information on species-habitat requirements, survey protocol, and other information regarding environmental review: <https://dnr.sc.gov/environmental/docs/SCDNRStateListedSpeciesProtectionGuidance.pdf>

Instructions for accessing the SC Natural Heritage Occurrence Reporting Form

- 1) Follow <https://arcg.is/1a0jzC0> or use the QR code here.
- 2) Select 'Open in browser' or 'Open in the Survey123 field app' depending on your preference. The browser option will only work when connected to the internet.
- 3) If using in the Survey123 field app, be sure to download the app from your app store beforehand.



Appendix E
Section 106 Review





1775 The Exchange SE, Suite 525, Atlanta, GA 30339 - 678-653-8673 - www.trileaf.com

November 26, 2025

South Carolina Department of Archives and History

8301 Parklane Road
Columbia, SC 29223
Phone: 803-896-6196

RE: **Harmoni Towers LLC – Borden – Client #SC0009812 – Trileaf Project #772867**
Camden Highway, Rembert, South Carolina 29128
Sumter County, Rembert Quadrangle (USGS)
Latitude: 34° 4' 2.5869" N, Longitude: 80° 30' 34.8467" W

To Whom It May Concern,

Trileaf Corporation is in the process of completing a NEPA review at the referenced property. Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field. The antenna will be licensed by the Federal Communications Commission (FCC).

In accordance with the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission*, dated September 2004, a cultural resource investigation has been conducted. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Summary reports of this investigation, maps, photographs and other information are provided in the attached Form 620. As noted in Attachment 5, there are **No Historic Properties in the APE for Direct Effects and No Historic Properties in the APE for Visual Effects**. Therefore, it is recommended that the proposed undertaking proceed without further archaeological review.

We appreciate your cooperation in this regard and anticipate your concurrence with these findings. Please call me at (706) 362-1745 or email h.dell@trileaf.com if you need any additional information or have any questions. Thank you for your assistance.

Sincerely,

Hannah Dell
Assistant Project Manager

Notification Date: 7AM EST 11/28/2025

New Tower ("NT") Submission Packet

See instructions for

File Number: 0011798220

public burden estimates

General Information

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

Applicant Information

3) FCC Registration Number (FRN): 0025999053
4) Name: Harmoni Towers, LLC

Contact Name

5) First Name: Jennifer	6) MI:	7) Last Name: Brown	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 10801 Executive Center Drive	
12) City: Little Rock		13) State: AR	14) Zip Code: 72211
15) Telephone Number: (501)799-6390		16) Fax Number:	
17) E-mail Address: Jennifer.Brown@harmonitowers.com			

Consultant Information

18) FCC Registration Number (FRN): 0011724176
19) Name: Acheulean Consulting on behalf of Trileaf Corporation

Principal Investigator

20) First Name: Jason	21) MI:	22) Last Name: Flay	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 1503 Cypress Street	
27) City: Paris		28) State: KY	29) Zip Code: 40361
30) Telephone Number: (678)653-8673		31) Fax Number:	
32) E-mail Address: h.dell@trileaf.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:	37) MI:	38) Last Name:	39) Suffix:
40) Title:			
41) Areas of Professional Qualification: () Archaeologist () Architectural Historian () Historian () Architect () Other (Specify) _____			

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **301523**

Site Information

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

3) Site Name: **Borden**

4) Site Address: **Camden Highway**

5) Detailed Description of Project:

Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

6) City: **Rembert**

7) State: **SC**

8) Zip Code: **29128**

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

10) Nearest Crossroads: **Camden Highway and Dais Road**

11) **NAD 83** Latitude (DD-MM-SS.S): **34-04-02.6** (**X**) N or () S

12) **NAD 83** Longitude (DD-MM-SS.S): **080-30-34.8** () E or (**X**) W

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **86.3** () Feet (**X**) Meters

14) Tower Type (Select One):

() Guyed lattice tower

(**X**) Self-supporting lattice

() Monopole

() Other (Describe):

Project Status

15) Current Project Status (Select One):

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

() Construction has commenced, but is not completed

Construction commenced on: _____

() Construction has been completed

Construction commenced on: _____

Construction completed on: _____

Determination of Effect

14) Direct Effects (Select One):

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

15) Visual Effects (Select One):

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

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		(☒) <u>Y</u> es () <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>301523</u>		Number of Tribes/NHOs: <u>6</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: Catawba Indian Nation

Contact Name

5) First Name: Dr. Wenonah	6) MI: G	7) Last Name: Haire	8) Suffix: DMD
9) Title: THPO and Executive Director			

Dates & Response

10) Date Contacted <u>09/18/2025</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>09/17/2025</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>301523</u>		Number of Tribes/NHOs: <u>6</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 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>09/18/2025</u>	11) Date Replied <u>09/18/2025</u>
(☐) No Reply	
(☒) Replied/No Interest	
(☐) Replied/Have Interest	
(☐) Replied/Other	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: Prairie Island Indian Community

Contact Name

5) First Name: Noah	6) MI: C	7) Last Name: White	8) Suffix: III
9) Title: THPO			

Dates & Response

10) Date Contacted <u>09/17/2025</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>301523</u>		Number of Tribes/NHOs: <u>6</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: Thlopthlocco Tribal Town

Contact Name

5) First Name: Ryan	6) MI:	7) Last Name: Morrow	8) Suffix:
9) Title: Mekko			

Dates & Response

10) Date Contacted <u>09/17/2025</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: Tuscarora Nation

Contact Name

5) First Name: Bryan	6) MI:	7) Last Name: Printup	8) Suffix:
9) Title: TCNS Rep			

Dates & Response

10) Date Contacted <u>09/17/2025</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: Sumter County Planning Department

Contact Name

3) First Name: To Whom	4) MI:	5) Last Name: It May Concern	6) Suffix:
7) Title:			

Contact Information

8) P.O. Box:	And /Or	9) Street Address: 12 West Liberty Street	
10) City: Sumter		11) State: SC	12) Zip Code: 29150
13) Telephone Number: (803)774-1660		14) Fax Number:	
15) E-mail Address: planningdepartment@sumtersc.gov			
16) Preferred means of communication: () E-mail () Letter (X) Both			

Dates & Response

17) Date Contacted 09/22/2025	18) Date Replied _____
(X) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	(☒) <u>Yes</u> () <u>No</u>
--	---

Consulting Party

2) FCC Registration Number (FRN):
3) Name: Sumter County Genealogical Society

Contact Name

4) First Name: To Whom	5) MI:	6) Last Name: It May Concern	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: 122 N Washington St.	
11) City: Sumter		12) State: SC	13) Zip Code: 29150
14) Telephone Number: (803)774-3901		15) Fax Number:	
16) E-mail Address: genealogy@ftc-i.net			
17) Preferred means of communication: () E-mail () Letter (☒) Both			

Dates & Response

18) Date Contacted 09/22/2025	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: **Department of Archives and History**

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: **Hannah**

MI:

Last Name: **Dell**

Suffix:

Signature: **Hannah Dell**

Date: **11/26/2025**

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

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

Attachments :

Type	Description	Date Entered
Other	SHPO Cover Letter	11/26/2025
Resumes/Vitae	Attach1 - Resumes	11/26/2025
Photographs	Attach2 - Photos	11/26/2025
Map Documents	Attach3 - Maps	11/26/2025
Additional Site Information	Attach4 - Site Info	11/26/2025
Area of Potential Effects	Attach5 - APE	11/26/2025
Tribal/NHO Involvement	Attach6 - Tribes	11/26/2025
Historic Properties for Direct Effects	Attach7 - Direct APE	11/26/2025
Historic Properties for Visual Effects	Attach8 - Visual APE	11/26/2025
Local Government Involvement	Attach9 - Local Gov	11/26/2025
Public Involvement	Attach10 - PN	11/26/2025
State-Specific Forms	Attach11 - SHPO Specific Forms	11/26/2025



ATTACHMENT 1. CONSULTANT INFORMATION

Provide a current copy of the resume or curriculum vitae for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.

A current copy of the resume for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing, or conclusions presented in this filing.



Jason C. Flay, MA, RPA
Senior Archaeologist

Education

MA, Archaeology and Heritage Management, 2011, University of Leicester

BA, Anthropology, 2005 University of Kansas

Archaeology and Ancient History, 2004, University of Leicester

Permits

Exceeds the Secretary of the Interior's standards for professional qualifications
Register of Professional Archaeologists

Experience

20+ years' experience in Phase I, II, and III archaeological field projects of prehistoric and historic components within various geographic regions throughout the Northeast, Mid-Atlantic, Mid-West, New England, Intermountain West, and Caribbean regions. During that time have been involved in NAGPRA-compliant repatriation of remains as an acting agent of the Federal Government. Flay has 10+ years' of experience in a supervisory capacity overseeing the completion of archaeological projects.

Related Current and Past Projects

NUCOR Apple Grove Phase II, Mason County, WV (09/2022-06/2023). Principal investigator. Assisted with 4 phase II sites. Ran field operations and wrote management summaries on 9 phase II sites along the Ohio River. Sites ranged from Archaic through 20th century.

Portsmith Connector 1.5-mi Waterline Ph I, Greenup County, KY (11/2023-Present). Principal investigator on municipal waterline project in eastern KY that bisects a Native American earthwork.

Town Branch Trail Arch Monitoring and Ph II survey, Fayette County, KY 03/2020-Present. Principal Investigator – Conducted principally an archaeological monitoring project, but as part of that conducted three Phase II investigations on historic sites (1790s-1840s, 1830s- 1880s, 1870s-1930s) throughout the city of Lexington, KY, Project funded through KYTC and FHWA funding sources.

West TN Gas Line, Phase I archaeology, Historic Resource Survey, Weakly County, TN 05/2018. Principal investigator oversaw the cultural resources study along a 44-mile gas pipeline that followed in road right of ways. 200+ structures were recorded as part of the project. Agencies involved in the project was TDOT and FHWA,

Phase I Arch and Historic Resources Survey, Great Stage Rd. Sidewalk, Blountville, TN, 06/2019. Oversaw the archaeology and Historic Resources project for a 1.61 -km sidewalk project in road right-of-way. The project was funded by a grant from the FHWA and reviewed by TDOT.

Phase I Survey, 128742.00, Island Rd expansion, Kingsport, TN, 02/2020. Principal Investigator for a Phase I road expansion project along a 3-mile road expansion project.



Jason C. Flay, MA, RPA
Senior Archaeologist

Saluda Cell Survey, Polk County, NC, 03/2019. Conducted a Phase I archaeological reconnaissance investigation for the placement of a new cell tower.

McManus Cell Survey, Cabarrus County, NC, 02/2019. Conducted a Phase I archaeological reconnaissance investigation for the placement of a new cell tower.

Various Telecommunication Assessment Studies, Alachua, Bay, Bradford, Brevard, Broward, Calhoun, Charlotte, Duval, Gulf, Jackson, Lafayette, Lee, Marion, Martin, Miami-Dade, Monroe, Nassau, Okaloosa, Okeechobee, Orange, Palm Beach, Pinellas, Polk, Putnam, St. John's, Sarasota, Seminole, Sumter, Union, Volusia, Counties, FL 11/2017-Present. Principal Investigator – Conducts Archaeological probability assessments for the construction of new and expansion of existing telecommunication sites.

Tennessee Wetland Mitigation Association. Phase I archaeological investigation of acquired land for proposed wetland mitigation project, Henderson County, TN 08/2017. Field Supervisor – Conducted a phase I archaeological investigation on land slated to be used for wetland mitigation and restoration.

USFS. Delta and Bienville National Forest Road improvement Projects, Yazoo, Sharkey, Smith, and Scott Counties, MS. Conducted Phase I investigation for several road projects for the National Forest 07-09/2016. Principal Investigator: Conducted archaeological investigation of approx. 4.5 miles of linear road projects throughout MS.

Pennsylvania National Guard. Phase I Ft. Indiantown Gap Improvement Project, Ft. Indiantown Gap, PA – Recorded mid-20th century military resources, late-early 20th-century farmstead, early-mid 19th-century foundry 06/2016-10/2016. Principal Investigator: Surveyed 45 acres, recording a new historic site and delineated a previously recorded site.

Chipola Drainage SW, Calhoun County, FL – Monitor monitored site for cultural deposits, identified early 20th-century bridge abutments

AECOM. Phase I Town Creek Solar Farm. 2015. Principal Investigator: Conducted a Phase I investigation before constructing a solar farm. Identified several mid-late 19th-century structure foundations and an early woodland site in Tipton County, Tennessee.

ACEOM. Phase I/II White Oak Solar. 2015. Principal Investigator: Conducted a Phase I and Phase II survey for a solar farm. Identified several 19th-century structure locations and several prehistoric sites of indeterminate age in Louisville, Georgia.

Enhanced Phase I Archeological Investigation for the Proposed Thacker Cell Site Mount Vernon, Rockcastle County, Kentucky. 2015 Principal Investigator: Conducted an extended Phase I investigation on a cell phone tower site. Identified an early Archaic as well as a late 18th/ early 19th century site.

Phase I – Hopewell Cultural National Historical Park, Hopeton Earthworks Trail Survey, Chillicothe, OH 2014, Principal Investigator: Conducted a Phase I survey as part of a management plan for the creation of recreation trails, a viewing platform, and a parking area at the Hopeton Earthworks. Several resources, primarily Woodland Period, and 19th century Agricultural materials were identified during the survey.

Phase I Linear pipeline survey Carroll County, OH, 2013 Principal Investigator: Served as part of a team that conducted Phase I investigations of a linear pipeline in southeastern OH in according to fulfill USACE, FERC regulations to USACE and FERC guidelines.

(revised 11/2023)



Professional Resume

HANNAH DELL

ASSISTANT PROJECT MANAGER

Education

Biology, B. S.
University of North Georgia / Gainesville, GA

Areas of Expertise

Ms. Dell has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Dell has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person
Basic Wetland Delineation (2023)



ATTACHMENT 2.SITE INFORMATION – PHOTOGRAPHS

You are required to provide photographs and maps as part of this filing. Additional site information can be provided in an optional attachment.

Photograph Requirements:

Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map or text, and dated; the focal length of the lens and the height of the camera should be noted. The source of any photograph included but not taken by the Applicant or its consultant (including copies of historic images) should be identified on the photograph.

- a. **Photographs taken from the site should show views from the proposed location in all directions. The direction (e.g., north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed site.**

Please reference the following directional photographs of the project area, which were taken by Jason C. Flay on October 07, 2025, unless otherwise noted.

- b. **If any listed or eligible properties are visible from the proposed site, photographs looking at the site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included. If any listed or eligible properties are within the APE, photos looking at each historic property should be included.**

N/A

- c. **Photographs of all listed in and eligible properties within the Areas of Potential Effects.**

Aerial photographs of the site were obtained via Google Earth, imagery is dated to 2024.



View west, of APE-DE



View north from APE



View east from APE



View south from APE



View west from APE

Please refer to Appendix B for Site Maps





ATTACHMENT 3. SITE INFORMATION – MAP REQUIREMENTS

Include one or more 7.5-minute quad USGS topographical maps that:

- a. Identify the Areas of Potential Effects for both Direct and Visual Effects. If a map is copied from the original, include a key with the name of quad and date.
- b. Show the location of the proposed site and any access roads or other easements including excavations.
- c. Show the locations of each property listed.
- d. Include keys for any symbols, colors, or other identifiers.
- e. Submit color maps whenever possible.

The following maps have been attached to this report:

- Site Vicinity Map
- 7.5-min Topographic Quad Map with Project Location, 2025
- Aerial Map
- Modern Soil Map with Project Location
- Historic Resources Buffer Map

Please refer to Appendix B for Site Maps





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consulting

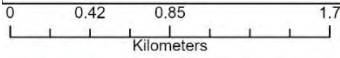
Borden Project Location Map

Camden Highway
Rembert, SC 29128
Sumter County

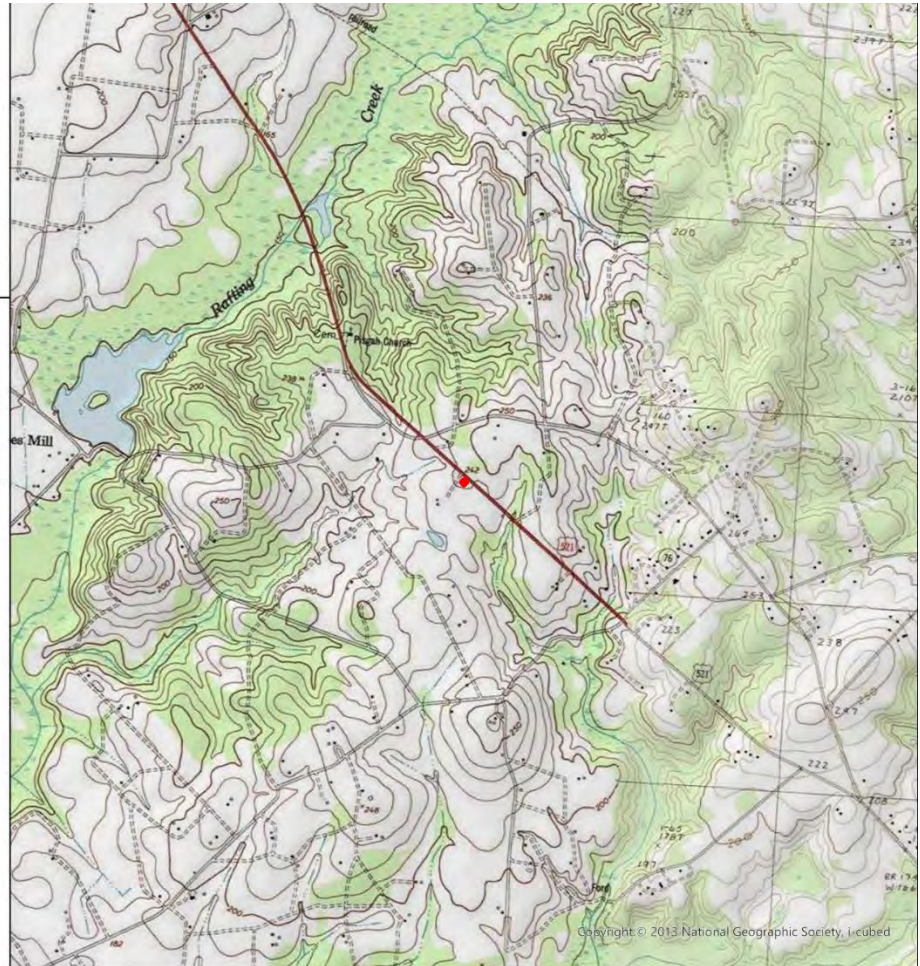
34.067385, -80.509680
34° 4' 2.5868" N, 80° 30' 34.8467" W

Rembert, SC 1:24,000 2024

J. Flay 10/08/2025



Legend



7.5-min Topographic Quad Map with Project Location, 2025

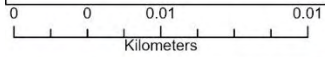
Borden Aerial Map

Camden Highway
Rembert, SC 29128
Sumter County

34.067385, -80.509680
34° 4' 2.5868" N, 80° 30' 34.8467" W

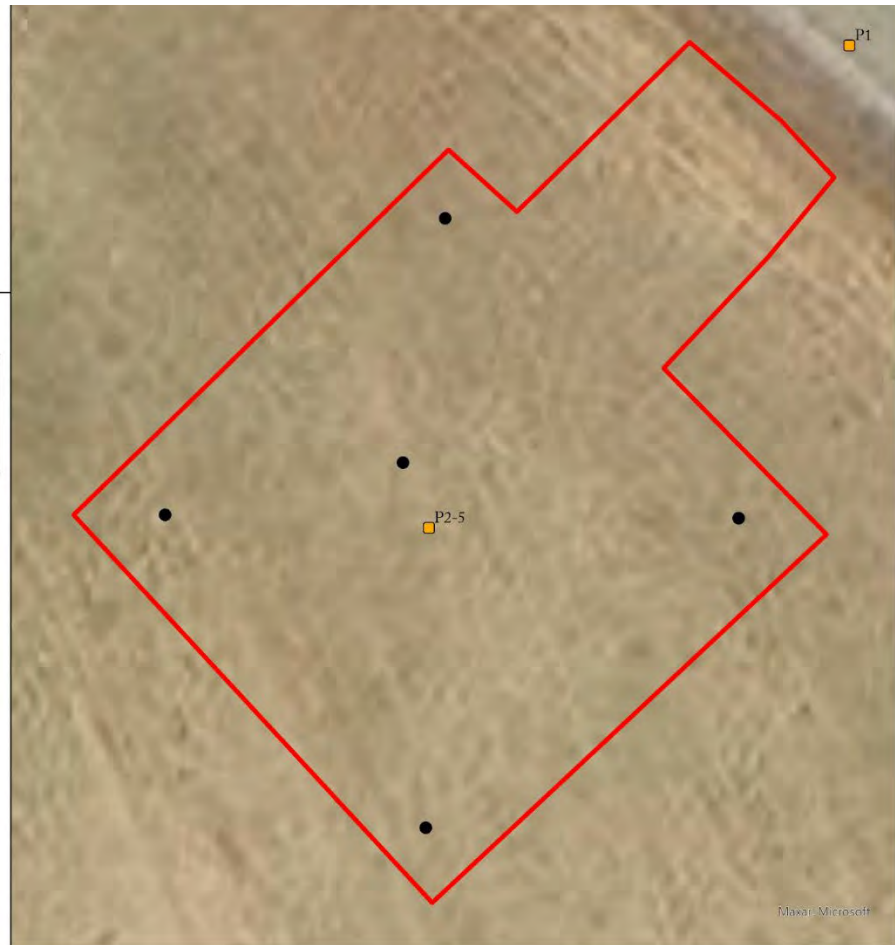
Rembert, SC 1:24,000 2024

J. Flay 10/08/2025



Legend

- APE
- Photo Location
- STP



Aerial Map



Modern Soil Map with Project Location



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Borden

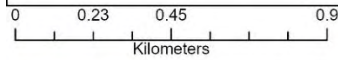
0.75-mi HR Buffer Map

Camden Highway
Rembert, SC 29128
Sumter County

34.067385, -80.509680
34° 4' 2.5868" N, 80° 30' 34.8467" W

Rembert, SC 1:24,000 2024

J. Flay 10/08/2025



Legend

 APE



Historic Resources Map



ATTACHMENT 4. SITE INFORMATION – ADDITIONAL SITE INFORMATION

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site.

The project consists of construction of a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The project area is located in an agricultural field covered in crops. The total area of disturbance is 0.14 acre (0.0567 hectares).

Please refer to Appendix A for Site Plans





ATTACHMENT 5. AREA OF POTENTIAL EFFECTS

You are required to provide two attachments regarding the Determination of Effect: Areas of Potential Effect and Mitigation of Effect (if applicable).

AREAS OF POTENTIAL EFFECT GUIDELINES:

a. Describe the APE for direct effects and explain how this APE was determined.

Under the NPA for FCC Projects, the Direct APE (APE-DE) "is defined as the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the undertaking" (FCC 2004). On November 24, 2008, the FCC further clarified that the APE-DE is limited to the tower or non-tower structure on which the collocation will be mounted and the lease area, including the access route and utility corridor. The APE -DE is located in a previously undeveloped area. The APE -DE comprises the lease parcel for the construction of the proposed cellular tower, the turnaround area, and access road. The proposed ground disturbance should be restricted to the lease parcel.

b. Describe the APE for visual effects and explain how this APE was determined.

Per the NPA, the Visual APE (APE-VE) is the "geographic area in which the project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP)" (FCC 2004). The presumed APE-VE for construction of new facilities is the area from where the tower will be visible: a. Within a ½ mile from the tower site if the proposed tower is 200 feet or less; b. Within ¾ of a mile from the tower site if the proposed tower is more than 200 but no more than 400 feet in overall height; or c. Within 1½ miles from the tower site if the proposed tower is more than 400 feet in overall height.

Taking into consideration the maximum height of the proposed undertaking (283 feet) and the minimal scale of the installation, Acheulean determined that the current project's APE for visual effects will encompass a 0.75-mile radius from the subject property.



ATTACHMENT 5. CONTINUED

MITIGATION OF EFFECT GUIDELINES:

In the case of where an Adverse Visual Effect or Adverse Direct Effect has been determined you must provide the following:

- a. Copies of any correspondence and summaries of any oral communication with the SHPO/THPO and any consulting parties.

N/A

- b. Describe any alternatives that have been considered that might avoid, minimize, or mitigate any adverse effects. Explain the Applicant's conclusion regarding the feasibility of each alternative.

N/A

For each property identified as a Historic Property in the online e-106 form:

- a. **Indicate whether the Applicant believes the proposed undertaking would have a) no effect; b) no adverse effect; or, c) an adverse effect. Explain how each such assessment was made. Provide supporting documentation where necessary.**

Acheulean Principal Investigator Jason Flay performed this survey in response to the planned use of the above-described parcel and the potential impacts of such use on any archaeological and architectural cultural resources within the project area. Jason Flay meets the Secretary of the Interior's Historic Preservation Professional Qualifications Standards for Archaeology.

Background research, including a review of archival sources, was conducted for the current project location prior to the initiation of field investigations. The aim of this research was to determine the likelihood of encountering sensitive historic properties within the current project area. A review of previously recorded archaeological sites and surveys was conducted using the South Carolina ArchSite system on October 05, 2025. This study identified any previous archaeological investigations, previously recorded archaeological sites within a 1-mile buffer, and previously recorded historic resources within a 0.75-mile buffer of the APE-DE.



ATTACHMENT 5. CONTINUED

A review of the South Carolina ArcSite Historic Resources Inventory Map, and through the National Register Information System website (<http://www.nr.nps.gov/>) was conducted on October 05, 2025.

There are 0 Historic Districts and 0 individual property within the 0.75-mile buffer of the APE-DE. Of the resources, 0 districts and 0 individual properties are **NRHP-eligible or -listed.**

There is **1 Below-Ground** resources identified in the 1-mile buffer, **0 are NRHP eligible or listed.**

It is determined that there are **No Historic Properties** in the APE-DE or APE-VE.

Please see the attached Cultural Resources Survey Report for additional information.

OCTOBER 11, 2025

A PHASE I CULTURAL RESOURCE
INVESTIGATION
FOR BORDEN,
REMBERT, SUMTER COUNTY, SC

TRILEAF NUMBER: 772867

APN: CR-2025-084



ACHEULEAN

consulting

Ph. 315-292-0563
www.acheuleanconsulting.com

JASON C. FLAY, MA, RPA

ACHEULEAN CONSULTING
1503 Cypress St. Paris, KY 40361

**A Phase I Cultural Resource Investigation
For Borden,
Rembert, Sumter County, SC**

Submitted by:
Acheulean Consulting
1503 Cypress St.
Paris, KY 40361

Prepared for:
Trileaf
1775 The Exchange SE, Suite 525
Atlanta, GA 30339

Lead Agency:
Federal Communications Commission

October 11, 2025



Jason C. Flay, MA, RPA
Principal Investigator

Contact
AcheuleanConsulting@gmail.com
315-292-0563
www.acheuleanconsulting.com

Trileaf: 772867
APN: CR-2025-084

ABSTRACT

This is an abbreviated technical report describing a no-find survey from a Phase I archaeological investigation conducted on October 7, 2025.

Trileaf contacted Archeulean Consulting (Archeulean) to conduct a Phase I archaeological survey for a proposed cellular tower project in Rembert, SC 34.067385, -80.509680 (34° 4' 2.5869" N, 80° 30' 34.8467" W)). The project is Borden, Project Number 772867, located at Camden Highway, Rembert, Sumter County, South Carolina. The proposed ground disturbance should be restricted to the lease parcels. The total acreage of the new construction area is approximately 0.14 acre (0.0567 hectares) (**Fig. 1.1**).

The archaeological survey involved a visual inspection of the entire APE-DE for prehistoric or historic features or materials. Archeulean determined that five shovel tests within the lease area would efficiently cover the project area (**Fig. 3.2**). Each STP was excavated no less than 35 cm in diameter to a depth of no less than 20 cm into the subsoil. All soils were screened through a ¼" mesh. Photographs and GPS points were taken.

No further archaeological work is recommended within the APE-DE, and construction may proceed as planned.

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1.0 INTRODUCTION

This is an abbreviated technical report describing a no-find survey from a Phase I archaeological investigation conducted on October 07, 2025.

Trileaf contacted Archeulean Consulting (Archeulean) to conduct a Phase I archaeological survey for a proposed cellular tower project in Rembert, SC (34.067385, -80.509680 (34° 4' 2.5869" N, 80° 30' 34.8467" W)). The project is Borden, Project Number 772867, located at Camden Highway, Rembert, Sumter County, SC 29128 (Fig. 1.1).

Per Section VI.D.2 of the Federal Communications Commission's (FCC) 2004 Nationwide Programmatic Agreement, Archeulean conducted a field survey to identify any archaeological or historic properties that may lie within the Area of Potential Effects-Direct Effects (APE-DE). The FCC has defined the APE-DE as "the area of potential ground disturbance and any property, or any portion thereof, [which] will be physically altered or destroyed by the undertaking." Areas outside of the lease parcel, access, and utility easements, as shown on the project plans (buffer zones), were not surveyed because these areas are not part of the APE-DE, and the applicant does not have permission or legal or financial arrangement with the property owner to use and/or modify those areas.

The APE-DE is located in a previously undeveloped area. The APE-DE comprises the lease parcel for the construction of the proposed cellular tower, the turnaround area, and access road. The proposed ground disturbance should be restricted to the lease parcels.

1.1. Regulatory Authority

The Federal Agency overseeing the survey is the Federal Communications Commission (FCC). The survey was conducted in compliance with guidelines established by the South Carolina Institute of Archaeology and Anthropology (SCAII), various interested THPOs, the National Historic Preservation Act of 1966 (PL 89-655; 80 Stat. 915, 16 USC 470 et seq), the National Environmental Policy Act of 1969 (PL 910190; 83 Stat. 852, 42 USC 4321 et seq) Procedures of the Advisory Council on Historic Preservation (36CFR800), Executive Order 11593, Protection and Enhancement of the Cultural Environment (16 USC 470; sup. 1, 1971).

1.2 Purpose and Scope of Work

As technology progresses in telecommunications, more stress is put on wireless communications and wireless internet bandwidth. Towers and ancillary tower facilities must be maintained to fulfill the need. To facilitate this, the client intends to construct a new with attachments.

The archaeological field crew was tasked with performing a visual inspection and shovel testing areas of less than 15% slope that was not previously disturbed by construction activity and visually inspecting the entire

project area. The purpose of this work was to identify any archaeological resources which might have existed within the APE-DE and to record their extent, significance, and the potential impact of the proposed project on these cultural resources.

1.3 Project Area Description

The project is Borden, Project Number 772867, located at Camden Highway, Rembert, SC 39739 located on the Rembert, SC Quadrangle USGS 7.5' topographical map (34.067385, -80.509680 (34° 4' 2.5869" N, 80° 30' 34.8467" W)).

The project consists of building a 279-foot lattice tower with antenna extending to a height of 283-feet. The tower is located on a 75-foot x 75-foot lease area at the western end of an approximately 50'-foot by 30' access road extending west from Camden Highway in Borden, Sumter County, SC (34.067385, -80.509680 (34° 4' 2.5869" N, 80° 30' 34.8467" W)). The project area is located in an agricultural field covered in crops. The total area of disturbance is 0.14 acre (0.0567 hectares). (**Fig. 1.1-2**).

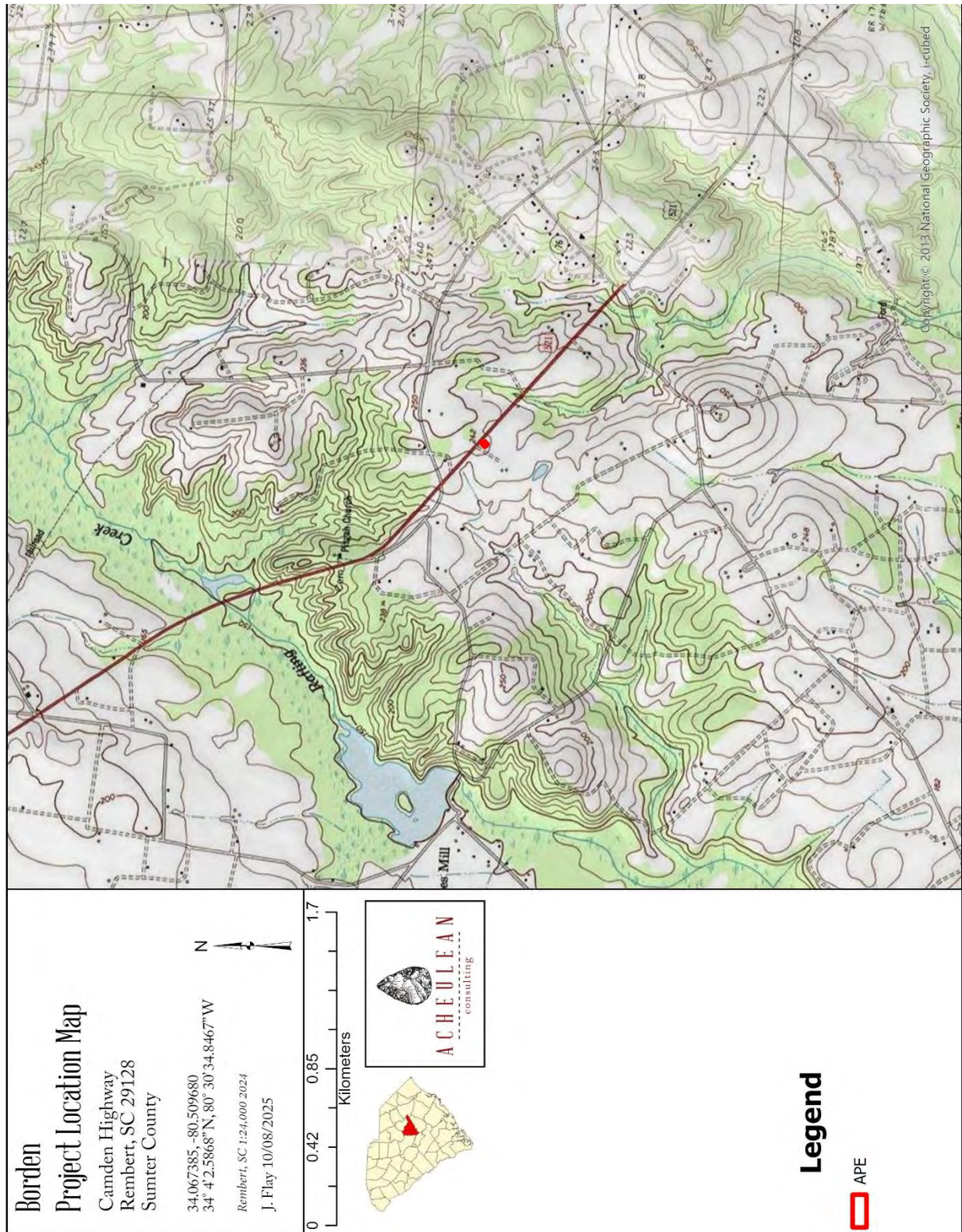


Fig. 1.1 - Project Location Map

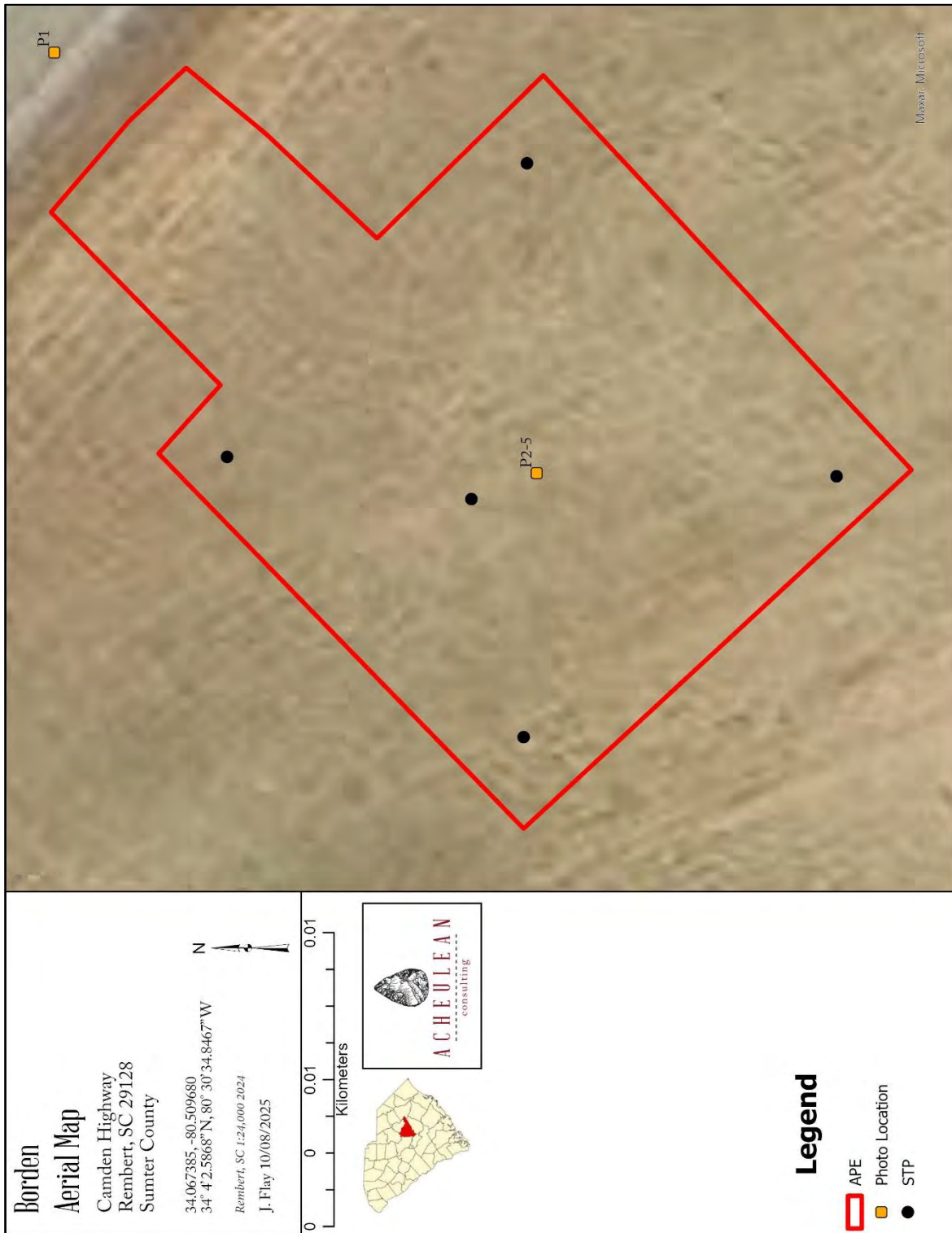


Fig. 1.2 – Project Aerial Map

1.4 Environmental Setting

The APE-DE is in the Sand Hills region of the Atlantic Plain physiographic zone. The Atlantic Plain is made up of sandy beaches, marshlands, bays, and barrier islands. It is the flattest of the U.S. physiographic divisions and stretches over 2,200 miles (3,500 km) in length from Cape Cod to the Mexican border and southward an additional 1,000 miles (1,600 km) to the Yucatán Peninsula. (NRCS 2025).

The predominate soils are DoB—Dothan-Norfolk complex, 2 to 6 percent slopes. “The Dothan series consists of very deep, well drained soils that formed in thick beds of unconsolidated, medium to fine-textured marine sediments. Dothan soils are on interfluvies. Slopes range from 0 to 15 percent. Mean annual temperature is about 18 degrees C (65 degrees F), and the mean annual precipitation is about 1360 millimeters (53 inches).” (NRCS 2025).



Fig. 1.3 – Soils within the APE-DE

1.5 Records Search

A review of the South Carolina ArcSite Historic Resources Inventory Map, and through the National Register Information System website (<http://www.nr.nps.gov/>) was conducted on October 05, 2025.

There are 0 Historic Districts and 0 individual property within the 0.5-mile buffer of the APE-DE. Of the resources, 0 districts and 0 individual properties are NRHP-eligible or -listed.

There is 1 Below-Ground resources identified in the 1-mile buffer, 0 are NRHP eligible or listed.

It is recommended that project will have No Effect on any Historic Properties in the APE-DE and APE-VE. This will be discussed further in **Section 2.3 Known Archaeological Sites**.

1.6 Project Staff and Principal Investigator

The Principal Investigator for this project is Jason C. Flay, MA, RPA. He holds an MA in Archaeology and Heritage from the University of Leicester and a BA in Anthropology from the University of Kansas. Jason C. Flay has conducted archaeological fieldwork for over 20 years and has been researching and writing archaeological reports for over 10 years.

1.7 Curation

There are no artifacts to curate. Field notes and a copy of this report will be filed at the office of Archeulean Consulting at 1503 Cypress Street, Paris, KY 40361.

2.0 PREVIOUS INVESTIGATIONS AND SUMMARY OF KNOWN SITES

2.1 Historical Documentation

A review of historic maps was conducted online, including: *Hagood, SC* 1:62,500 (1938), *Hagood, SC* 1:62,500 (1945), *Rembert, SC* 1:24,000 (1957) USGS topographic maps.

The area has been undeveloped throughout the 20th and 21st century.

2.2 Previous Archaeological Investigations

Report Number	Title	Author	Report Date
N/A	Cultural Resources Survey of a 10.22-Kilometer Section of US 521 for the South Carolina Department of Transportation's Rural Roads Safety Project	Baluha and Dantuma	2023

2.3 Known Archaeological Sites

Site_#	Site Name	Site Type	Date	NR Status
38SU1130	5260-4 (Mt. Pisgah MBC Cemetery)	African American Cemetery	1882-pres	Not Eligible

2.4 Historic Resources

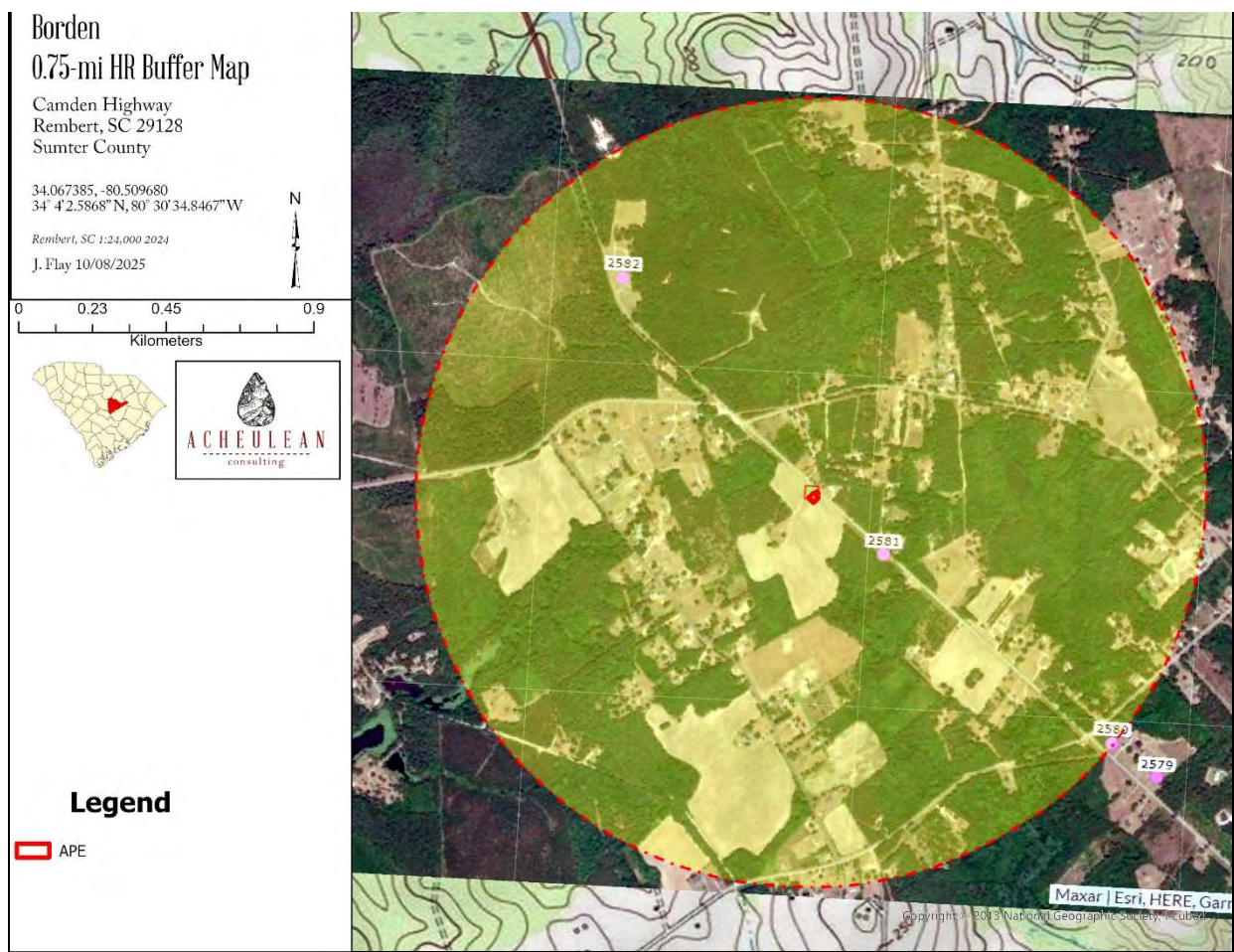


Fig. 2.1 – Historic Resources Inventory Map

Inventory ID	Address	National Register Status	Name	Resource Category	Date Built
N/A	N/A	N/A	N/A	N/A	N/A

Project # and Status of Subject Property	Photograph of Subject Property	Description of Subject Property	Summary of Effects on Subject Property
N/A	N/A	N/A	N/A

3.0 METHODS AND RESULTS

In this section, the field methods employed during this study are described. These methods include fieldwork activities, their application in different portions of the project, reflection upon conditions encountered, and an evaluation of their effectiveness.

Fieldwork was conducted on October 07, 2025.

3.1 Implemented Field Methods

Fieldwork was conducted per the guidelines established by the South Carolina Institute of Archaeology and Anthropology (SCIAA), and guidelines from Tribal Historic Preservation Offices (THPOs) interested in the conducted work.

Before conducting the survey, test points were plotted at 15-meter (50-foot) intervals throughout the APE-DE. Crews were prepared to excavate STPs on slopes less than 15%. A 1-in diameter soil probe was used in areas to determine the presence and extent of disturbed soils. The archaeological survey involved a visual inspection of the entire APE-DE for prehistoric or historic features or materials. Archeulean determined that five shovel tests within the lease area would efficiently cover the project area (**Fig. 3.2**). Each STP was excavated no less than 35 cm in diameter to a depth of no less than 20 cm into the subsoil. All soils were screened through a ¼" mesh. Photographs and GPS points were taken.

No cultural material or features were discovered during this archaeological survey. Total archaeological field time: 1 person, 2 hours.

Based on the findings of this survey, Archeulean is determined that there are No Historic Properties in the APE-DE or APE-VE. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area.

3.1.1 Shovel Testing/ Geomorphological Sampling

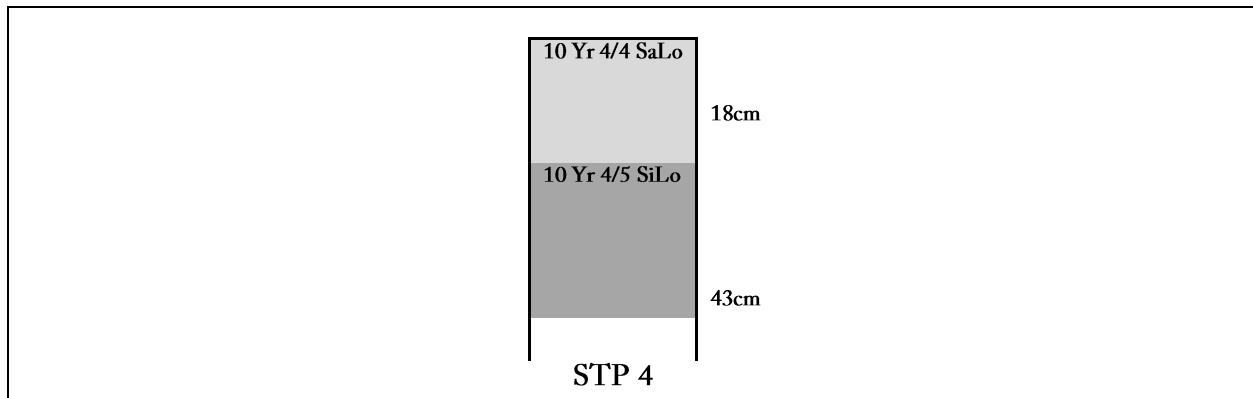


Fig. 3.1 – Representational STP Soil Drawing



Fig. 3.2 – Representational STP

3.1.2 Visual Inspection

The entire APE-DE was walked to identify the presence of archaeological materials and/or features; none were identified. Photographs of the surrounding areas were taken with corresponding GPS points.



Fig. 3.3 – View west, of APE-DE



Fig. 3.4 – View north from APE-DE



Fig. 3.5 - View east from APE-DE



Fig. 3.6 - View south from APE-DE



Fig. 3.7 - View west from APE-DE

3.2 Evaluation of Field Methods

South Carolina Institute of Archaeology and Anthropology (SCIAA), and guidelines from Tribal Historic Preservation Offices (THPOs) interested in the conducted work. The fieldwork did not identify any cultural material within the APE-DE.

4.0 SUMMARY AND RECOMMENDATIONS

4.1 Summary

This is an abbreviated technical report describing a no-find survey from a Phase I archaeological investigation conducted on October 07, 2025.

Trileaf contacted Archeulean Consulting (Archeulean) to conduct a Phase I archaeological survey for a proposed cellular tower project in Rembert, SC (34.067385, -80.509680 (34° 4' 2.5869" N, 80° 30' 34.8467"). The project is Borden, Project Number 772867, located at Camden Highway, Rembert, Sumter County, South Carolina (Fig. 1.1).

The archaeological survey involved a visual inspection of the entire APE-DE for prehistoric or historic features or materials. Archeulean determined that five shovel tests within the lease area would efficiently cover the project area (Fig. 3.2). Each STP was excavated no less than 35 cm in diameter to a depth of no less than 20 cm into the subsoil. All soils were screened through a ¼" mesh. Photographs and GPS points were taken. No archaeological materials or features were identified.

No further archaeological work is recommended within the APE-DE.

4.2 Recommendations

Based on the findings of this survey, Archeulean determined that the project will have no effect as there are **No Historic Properties** in the APE-DE and APE-VE. Due to the research and field data, it is therefore recommended that clearance be granted with no further investigation or evaluation of the project area.

5.0 REFERENCES

NRCS

2025. Natural Resources Conservation Service, *Web Soil Survey*, United States Department of Agriculture, <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey>.

Stewart, R.A.

2004, *South Carolina Physiographic Provinces*, United States Geological Society, Accessed 10/07/2025

USGSa.

2025. *Rembert, SC 1:24,000*, United States Geological Survey, Accessed 10/07/2025, <https://ngmdb.usgs.gov/topoview/viewer/#14/31.7105/-89.0932>

ENGINEERING PLANS





ATTACHMENT 6. TRIBAL AND NHO INVOLVEMENT

At an early stage in the planning process, the Nationwide Agreement requires the Applicant to gather information from appropriate Indian Tribes or Native Hawaiian Organizations ("NHOs") to assist in the identification of Historic Properties of religious and cultural significance to them. Describe measures taken to identify Indian tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the construction within the Areas of Potential Effects ("APE") for direct and visual effects. If such Indian tribes or NHOs were identified, list them and provide a summary of contacts by either the FCC, the Applicant, or the Applicant's representative. Provide copies of relevant documents, including correspondence. If no such Indian tribes or NHOs were identified, please explain.

Trileaf Corporation completed the Tower Construction Notification System (TCNS) on September 16, 2025, and received the notification of interested tribes on September 19, 2025. The attached FCC Notification email lists the Tribes identified through the TCNS process. A second notice will be sent to all interested tribes/organizations, after a period of 30 days and the consultation process will continue per the FCC's guidelines. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

Michael Romanoski

From: towernotifyinfo@fcc.gov
Sent: Friday, September 19, 2025 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9325921

Categories: Mike

CAUTION: This email originated from outside of the organiza. on. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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

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

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

2. THPO Noah C White III - Prairie Island Indian Community - 5636 Sturgeon Lake Road Welch, MN - celltower@piic.org - 651-385-4175 - electronic mail

If the applicant/tower builder receives no response from the Prairie Island Indian Community within 30 days after notification through TCNS, the Prairie Island Indian Community has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Prairie Island Indian Community in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

3. 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

4. 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.

5. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - 000-000-0000 - electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

6. THPO and Executive Director Dr. Wenonah G Haire DMD - Catawba Indian Nation - 1536 Tom Steven Road Catawba Cultural Center Rock Hill, SC - Wenonah.Haire@catawba.com; Caitlin.Rogers@catawba.com - 803-417-9057 - regular mail

Exclusions: Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation to address:

Dr. Wenonah G. Haire
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, SC 29730

Please submit by US Postal mail or other parcel carrier complete information for all telecommunication projects:

1. Please provide 1 page cover letter with following information

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

2. We also request photographs of project area, previous land use history and copy of SHPO Letter.

If you have any questions about our process or timeline of project notifications you can email Caitlin Rogers at Caitlinh@ccppcrafts.com

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.

7. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - 4617 Mail Service Center Raleigh, NC - renee.gledhill-earley@ncmail.net - 919-733-4763 - electronic mail

8. Deputy SHPO David Brook - Historic Preservation Office - 4610 Mail Service Center Raleigh, NC - david.brook@ncmail.net - 919-807-7283 - electronic mail

9. Project Review Coordinator John Sylvest - Department of Archives and History - 8301 Parklane Road Columbia, SC - jsylvest@scdah.sc.gov - 803-896-6129 - 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: 09/16/2025

Notification ID: 301523

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Harmoni Towers, LLC

Consultant Name: Michael Romanoski

Street Address: 1515 Des Peres Rd. Ste 200

Suite 200

City: St. Louis

State: MISSOURI

Zip Code: 63131

Phone: 314-997-6111

Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower

Latitude: 34 deg 4 min 2.6 sec N

Longitude: 80 deg 30 min 34.8 sec W

Location Description: Camden Highway

City: Rembert

State: SOUTH CAROLINA

County: SUMTER

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Ground Elevation: 73.7 meters

Support Structure: 85.0 meters above ground level

Overall Structure: 86.3 meters above ground level

Overall Height AMSL: 160.0 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://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwlFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUKHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=xuiZwBxPrrSZc80Qlv-s_t4MZ3-4W43LAQuZILpwSmamvP77ioLuOxWQSxov-Grt&s=7pP426Lnov_hso07F0PYDL9dZUmZSUhpCoajHchF3q4&e=

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 email has been scanned for spam and viruses by Proofpoint Essentials. Visit the following link to report this email as spam:

https://us1.proofpointessentials.com/app/report_spam.php?mod_id=11&mod_option=logitem&report=1&type=easyspam&k=k1&payload=53616c7465645f5f7c8c95c304975a1603a9de986fdea90adf0fbcd871dad7a98ec00c339035a5c34f7a76df77222347df7c3465237ab8fc46265ce14133d361f6cce50718162a0ea8c679559ccbc6ddf26aa1ed0f691d0e004979ce42de0733c4257e4c4cf71474817c8e1f4a74eddd5f580a008ac18bddd5d39f3afc95777642632cd41a6f10039b6f4b5b7aa3162e312a8e8b3c100c584719b434eced4789



ATTACHMENT 7. HISTORIC PROPERTIES DIRECT EFFECTS

a. List all Below-Ground Resources within the APE-DE.

Site #	Site Name	Site Type	Date	NR Status
38SU1130	5260-4 (Mt. Pisgah MBC Cemetery)	African American Cemetery	1882-pres	Not Eligible

- b. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for direct effects, not listed in part "a" (above), that the Applicant considers to be eligible for listing in the National Register because of the Applicant's research. For each such property, describe how it satisfies the criteria of eligibility (36 CFR Part 63). For each property that was specifically considered and determined not to be eligible, describe why it does not satisfy the criteria of eligibility.

There are no additional properties in the APE for direct effects not listed in part "a."



ATTACHMENT 7. CONTINUED

- a. Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.¹ If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.²

Fieldwork was conducted per the guidelines established by the South Carolina Department of Archives and History, and guidelines from Tribal Historic Preservation Offices (THPOs) interested in the conducted work.

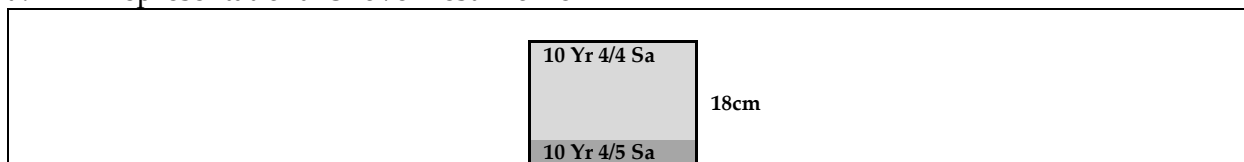
Before conducting the survey, test points were plotted at 15-meter (50-foot) intervals throughout the APE-DE. Crews were prepared to excavate STPs on slopes less than 15%. A 1 in-diameter soil probe was used in areas to determine the presence and extent of disturbed soils. The archaeological survey involved a visual inspection of the entire APE-DE for prehistoric or historic features or materials. Acheulean determined that five shovel tests within the lease area would efficiently cover the project area (Fig. 3.2). Each STP was excavated no less than 35 cm in diameter to a depth of no less than 20 cm into the subsoil. All soils were screened through a ¼" mesh. Photographs and GPS points were taken.

No cultural material was discovered during this archaeological survey. Total archaeological field time: 1 person, 1 hours.

Based on the findings of this survey, Acheulean recommends that there are **No Below-Ground Historic Properties** in the Direct APE. It is therefore recommended that project clearance be granted with no further investigation or evaluation of the project area related to those resources.

Please refer to the Cultural Resources Report provided in Attachment 5 for additional information.

a. Representational Shovel Test Profile



¹ Pursuant to Section VI.D.2.a. of the Nationwide Agreement, Applicants shall make a reasonable and good faith effort to identify above ground and archeological Historic Properties, including buildings, structures, and historic districts, that lie within the APE for direct effects. Such reasonable and good faith efforts may include a field survey where appropriate.

² Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if none of these conditions applies, if an Indian tribe or NHO provides evidence that supports a high probability of the presence of intact archeological Historic Properties within the APE for direct effects.

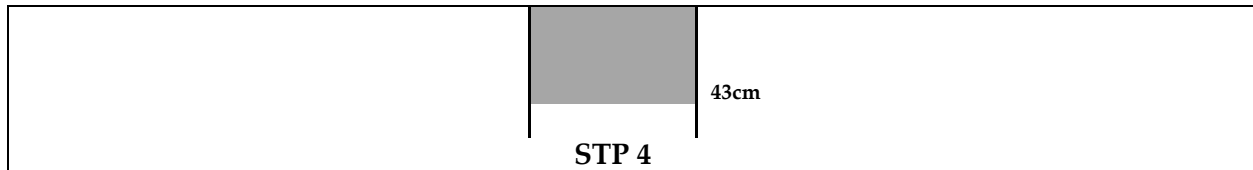


Fig 7.1 – Representational STP Soil Drawing



Fig 7.2 – Representational STP



ATTACHMENT 8. HISTORIC PROPERTIES VISUAL EFFECTS

Historic Properties Identified for Visual Effects Guidelines

- a. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.I.a. of the Nationwide Agreement.

A review of the SC ArchSite SHPO database of National Register Sites and Districts, Certified Local Districts and Architectural Surveys, Archaeology Viewer, National Register Information System website (<http://www.nr.nps.gov/>).

- b. Provide the name and address (including U.S. Postal Service ZIP Code) of each Historic Property in the APE for visual effects, not listed in part "a", identified through the comments of Indian Tribes, NHOs, local governments, or members of the public. Identify each individual or group whose comments led to the inclusion of a Historic Property in this attachment. For each such property, describe how it satisfies the criteria of eligibility (36 CFR Part 63).

N/A

- c. For any properties listed in the above Historic Properties list, that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

N/A

Inventory ID	Address	National Register Status	Name	Resource Category	Date Built
N/A	N/A	N/A	N/A	N/A	N/A
Project # and Status of Subject Property		Photograph of Subject Property			
N/A					
		N/A			
		N/A			



ATTACHMENT 9. LOCAL GOVERNMENT

- a. **If any local government has been contacted and invited to become a consulting party pursuant to Section VA of the Nationwide Programmatic Agreement, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (e.g., correspondence or notices).**

On September 22, 2025, the Sumter County Planning Department was notified of the proposed project. They have been invited to comment on the proposed project's potential effect on Historic Properties and to indicate whether they are interested in consulting further on the proposed project. A copy of Trileaf Corporation's correspondence with the Sumter County Planning Department is attached. As of this date, no response has been received from the Sumter County Planning Department. Should a response be received, a copy will be forwarded to all consulting parties as an addendum to this packet.

- b. **If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.**

N/A



1775 The Exchange SE, Suite 525, Atlanta, GA 30339 - 678-653-8673 - www.trileaf.com

September 22, 2025

Sumter County Planning Department

12 West Liberty Street

Sumter, South Carolina, 29150

Phone: (803) 774-1660

Email: planningdepartment@sumtersc.gov

RE: **Harmoni Towers LLC – Borden – Client #SC0009812 – Trileaf Project #772867**

Camden Highway, Rembert, South Carolina 29128

Sumter County, Rembert Quadrangle (USGS)

Latitude: 34° 4' 2.5869" N, Longitude: 80° 30' 34.8467" W

To Whom It May Concern,

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (706) 362-1745 or email h.dell@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Hannah Dell

Assistant Project Manager



ATTACHMENT 10. OTHER CONSULTING PARTIES AND PUBLIC NOTICE

List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.

On September 22, 2025, the Sumter County Genealogical Society was notified of the proposed project. They were invited to comment on the proposed project's potential effect on Historic Properties and to indicate whether they are interested in consulting further on the proposed project. A copy of Trileaf's correspondence with the Sumter County Genealogical Society is attached. As of this date, no response has been received from the Sumter County Genealogical Society. Should a response be received, a copy will be forwarded to all consulting parties as an addendum to this packet.

You are required to provide a Public Notice Attachment.

Attached, please find a copy of a legal notice regarding the proposed telecommunications tower construction that was posted in the *Item* on September 25, 2025. No responses have yet been received. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.



1775 The Exchange SE, Suite 525, Atlanta, GA 30339 - 678-653-8673 - www.trileaf.com

September 22, 2025

Sumter County Genealogical Society

122 N Washington St.
Sumter, South Carolina 29150
Phone: (803) 774-3901
Email: genealogy@ftc-i.net

RE: **Harmoni Towers LLC – Borden – Client #SC0009812 – Trileaf Project #772867**
Camden Highway, Rembert, South Carolina 29128
Sumter County, Rembert Quadrangle (USGS)
Latitude: 34° 4' 2.5869" N, Longitude: 80° 30' 34.8467" W

To Whom It May Concern,

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (706) 362-1745 or email h.dell@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Hannah Dell
Assistant Project Manager

the Sumter ITEM

Published daily by Osteen Publishing Co., Inc.

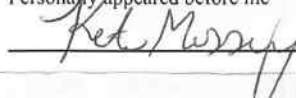
PO Box 1677 • 36 W. Liberty Street • Sumter, SC 29151 • (803) 774-1200

STATE OF SOUTH CAROLINA
COUNTY OF SUMTER

PRINTER AFFIDAVIT

INKLYNK, LLC
2300 BETHELVIEW RD # 110-302
CUMMING, GA 30040

Personally appeared before me



The Sumter Item, Legal Clerk

Who being duly sworn, says she is a
Bookkeeping clerk of the OSTEEN
PUBLISHING CO., Publisher of THE ITEM
A Newspaper published in said state and
county and the advertisement

Harmoni Towers LLC proposes to
build a 283-foot self-support
communications tower at the approx.
vicinity of Camden Highway,
Rembert, Sumter County, SC 29128
[Lat: 34-4-2.5869, Long:
-80-30-34.8467]. Public comments
regarding potential effects from this
site on historic properties may be
submitted within 30 days from the
date of this publication to: Trileaf
Corp, Hannah Dell, h.dell
@trileaf.com, 1775 The Exchange
SE, Suite 525, Atlanta, GA 30339,
706-362-1745.

Sort Text: Harmoni Towers, LLC

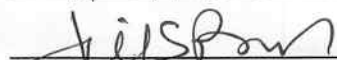
Ad Order ID: 362810

was published in said newspaper on
09/24/2025

and a copy of the advertisement is attached.

Sworn to before me on said date:





Notary Public for South Carolina

JILL S. BURRUS
Notary Public - State of South Carolina
My Commission Expires
May 31, 2026



ATTACHMENT 11. SHPO SPECIFIC FORMS

N/A

Hannah Dell

From: towernotifyinfo@fcc.gov
Sent: Sunday, December 28, 2025 11:46 PM
To: Hannah Dell
Subject: Section 106 Notification of SHPO/THPO Concurrence- Email ID #11966099

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is to notify you that the Lead SHPO/THPO has concurred with the following filing:

Date of Action: 12/28/2025

Direct Effect: No Historic Properties in Area of Potential Effects (APE)

Visual Effect: No Historic Properties in Area of Potential Effects (APE)

Comment Text: None

File Number: 0011798220

TCNS Number: 301523

Purpose: New Tower Submission Packet

Notification Date: 7AM EST 11/28/2025

Applicant: Harmoni Towers, LLC

Consultant: Acheulean Consulting on behalf of Trileaf Corporation

Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No

Site Name: Borden

Site Address: Camden Highway

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Site Coordinates: 34-4-2.6 N, 80-30-34.8 W

City: Rembert

County: SUMTER

State:SC

Lead SHPO/THPO: Department of Archives and History

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.

Hannah Dell

From: towernotifyinfo@fcc.gov
Sent: Wednesday, November 26, 2025 10:17 AM
To: Hannah Dell
Subject: Section 106 New Filing Submitted- Email ID #11823393

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The following new Section 106 filing has been submitted:

File Number: 0011798220
TCNS Number: 301523
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 11/28/2025

Applicant: Harmoni Towers, LLC
Consultant: Acheulean Consulting on behalf of Trileaf Corporation
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: Borden
Site Address: Camden Highway
Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.
Site Coordinates: 34-4-2.6 N, 80-30-34.8 W
City: Rembert
County: SUMTER
State: SC
Lead SHPO/THPO: Department of Archives and History

Consultant Contact Information:
Name: Acheulean Consulting on behalf of Trileaf Corporation
Title:
PO Box:
Address: 1503 Cypress Street
City: Paris
State: KY
Zip: 40361
Phone: 678-653-8673
Fax:
Email: h.dell@trileaf.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.

Appendix F

Native American Correspondence



Tribal Summary Table								
Site: Borden						Site ID: SC0009812		
TCNS Number: 301523						FCC Start: September 19, 2025		
Tribe	TCNS auto-reply	Follow Up Request from Tribe		Follow Up(s) to Tribe		Final Reply		FCC Referral
		Date	Requested Information	Date	Sent	Date	Comments	
Catawba Indian Nation				12/2/2025	Sent Letter & Form 620/621	12/30/2025	No immediate concerns with regard to traditional cultural properties, sacred sites or Native American archeological sites within the boundaries of the proposed project areas - Requests inadvertent discovery notification.	
Cherokee Nation				12/2/2025	Sent Letter & Form 620/621	1/8/2026	the Nation does not object to the project proceeding as long as the following mitigative procedures are followed: • The Nation requests that Trileaf re-contact this Office if there are any amendments or edits to this project; and • The Nation requests that Trileaf 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. - Requests scope change & inadvertent discovery notification.	
Eastern Shawnee Tribe of Oklahoma	30 days no interest Notify of inadvertent discovery					9/18/2025	We have no interest in this site. - Requests inadvertent discovery notification.	
Prairie Island Indian Community	30 days no interest Notify of inadvertent discovery			12/2/2025	Sent Letter & Form 620/621	1/1/2026	Cleared per NOO	
Thlopthlocco Tribal Town				12/2/2025	Sent Letter & Form 620/621	1/23/2026	Cleared by Referral	1/8/2026
Tuscarora Nation	30 days no interest Notify of inadvertent discovery			12/2/2025	Sent Letter & Form 620/621	1/1/2026	Cleared per NOO	

Michael Romanoski

From: towernotifyinfo@fcc.gov
Sent: Friday, September 19, 2025 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9325921

Categories: Mike

CAUTION: This email originated from outside of the organiza. on. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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

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

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

2. THPO Noah C White III - Prairie Island Indian Community - 5636 Sturgeon Lake Road Welch, MN -
celltower@piic.org - 651-385-4175 - electronic mail

If the applicant/tower builder receives no response from the Prairie Island Indian Community within 30 days after notification through TCNS, the Prairie Island Indian Community has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Prairie Island Indian Community in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

3. 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

4. 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.

5. Mekko Ryan Morrow - Thlopthlocco Tribal Town - P.O. Box 188 Okemah, OK - thpo@tttown.org - 000-000-0000 - electronic mail

Exclusions: Thlopthlocco Tribal Town requests that all initial review materials required by applicable law be submitted by email directly to thpo@tttown.org. In addition, in the event archeological or cultural materials or human remains are discovered at any time during this undertaking, please notify Thlopthlocco Tribal Town immediately.

6. THPO and Executive Director Dr. Wenonah G Haire DMD - Catawba Indian Nation - 1536 Tom Steven Road Catawba Cultural Center Rock Hill, SC - Wenonah.Haire@catawba.com; Caitlin.Rogers@catawba.com - 803-417-9057 - regular mail

Exclusions: Please do not email documentation; it will be deleted without being opened. Mail one printed color copy of all documentation to address:

Dr. Wenonah G. Haire
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, SC 29730

Please submit by US Postal mail or other parcel carrier complete information for all telecommunication projects:

1. Please provide 1 page cover letter with following information

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

2. We also request photographs of project area, previous land use history and copy of SHPO Letter.

If you have any questions about our process or timeline of project notifications you can email Caitlin Rogers at Caitlinh@ccppcrafts.com

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.

7. Environmental Review Coordinator Renee GledhillEarley - NC State Historic Preservation Office - 4617 Mail Service Center Raleigh, NC - renee.gledhill-earley@ncmail.net - 919-733-4763 - electronic mail

8. Deputy SHPO David Brook - Historic Preservation Office - 4610 Mail Service Center Raleigh, NC - david.brook@ncmail.net - 919-807-7283 - electronic mail

9. Project Review Coordinator John Sylvest - Department of Archives and History - 8301 Parklane Road Columbia, SC - jsylvest@scdah.sc.gov - 803-896-6129 - 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: 09/16/2025

Notification ID: 301523

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Harmoni Towers, LLC

Consultant Name: Michael Romanoski

Street Address: 1515 Des Peres Rd. Ste 200

Suite 200

City: St. Louis

State: MISSOURI

Zip Code: 63131

Phone: 314-997-6111

Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower

Latitude: 34 deg 4 min 2.6 sec N

Longitude: 80 deg 30 min 34.8 sec W

Location Description: Camden Highway

City: Rembert

State: SOUTH CAROLINA

County: SUMTER

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Ground Elevation: 73.7 meters

Support Structure: 85.0 meters above ground level

Overall Structure: 86.3 meters above ground level

Overall Height AMSL: 160.0 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://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwlFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUKHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=xuiZwBxPrrSZc80Qlv-s_t4MZ3-4W43LAQuZILpwSmamvP77ioLuOxWQSxov-Grt&s=7pP426Lnov_hso07F0PYDL9dZUmZSUhpCoajHchF3q4&e=

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 email has been scanned for spam and viruses by Proofpoint Essentials. Visit the following link to report this email as spam:

https://us1.proofpointessentials.com/app/report_spam.php?mod_id=11&mod_option=logitem&report=1&type=easyspam&k=k1&payload=53616c7465645f5f7c8c95c304975a1603a9de986fdea90adf0fbcd871dad7a98ec00c339035a5c34f7a76df77222347df7c3465237ab8fc46265ce14133d361f6cce50718162a0ea8c679559ccbc6ddf26aa1ed0f691d0e004979ce42de0733c4257e4c4cf71474817c8e1f4a74eddd5f580a008ac18bddd5d39f3afc95777642632cd41a6f10039b6f4b5b7aa3162e312a8e8b3c100c584719b434eced4789



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

December 2, 2025

Catawba Indian Nation

Dr. Wenonah G. Haire
1536 Tom Steven Road
Tribal Historic Preservation Office
Rock Hill, SC 29730

RE: Harmoni Towers LLC
Trileaf Project # 772867 / SC0009812 / Borden
Camden Highway, Rembert, Sumter County, SC 29128
Latitude: 34° 4' 2.59" N, Longitude: 80° 30' 34.85" W
TCNS # 301523

Dear Dr. Haire:

This project was originally submitted in TCNS on 9/19/2025. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

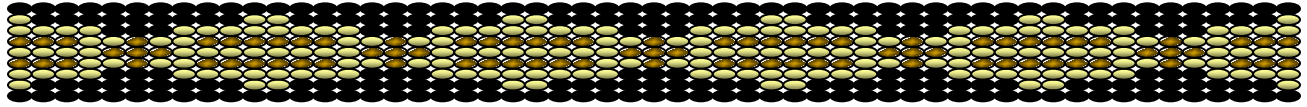
Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Romanoski".

Michael Romanoski
Tribal Consultation Manager

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427



December 30, 2025

Attention: Michael Romanoski
Trileaf
1515 Des Peres Road, Suite 200
Saint Louis, Missouri 63131

Re. THPO #	TCNS #	Project Description
2026-160-24	301523	Camden Highway, Rembert, Sumter Co., SC

Dear Mr. Romanoski,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions, please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

December 2, 2025

Cherokee Nation

Ms. Gwen Terrapin
P.O. Box 948
Tahlequah, OK 74465

RE: Harmoni Towers LLC
Trileaf Project # 772867 / SC0009812 / Borden
Camden Highway, Rembert, Sumter County, SC 29128
Latitude: 34° 4' 2.59" N, Longitude: 80° 30' 34.85" W
TCNS # 301523

Dear Ms. Terrapin:

This project was originally submitted in TCNS on 9/19/2025. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Romanoski", is written over a large, faint green leaf graphic that serves as a background for the signature area.

Michael Romanoski
Tribal Consultation Manager

From: towernotifyinfo@fcc.gov
Sent: Thursday, January 8, 2026 12:22 PM
To: Tribal
Cc: tcns.fccarchive@fcc.gov; historicpreservation@cherokee.org; gwen-terrapin@cherokee.org
Subject: Reply to Proposed Tower Structure (Notification ID: 301523) - Email ID #9410656

Categories:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Michael Romanoski,

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 #301523:

The Cherokee Nation (Nation) is in receipt of your correspondence for tower project, TCNS No. 301523 located in Sumter County, SC 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 Trileaf re-contact this Office if there are any amendments or edits to this project; and
- The Nation requests that Trileaf 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,
Cherokee Nation

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 09/16/2025
Notification ID: 301523
Tower Owner Individual or Entity Name: Harmoni Towers, LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower
Latitude: 34 deg 4 min 2.6 sec N
Longitude: 80 deg 30 min 34.8 sec W
Location Description: Camden Highway
City: Rembert
State: SOUTH CAROLINA
County: SUMTER

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Ground Elevation: 73.7 meters
Support Structure: 85.0 meters above ground level
Overall Structure: 86.3 meters above ground level
Overall Height AMSL: 160.0 meters above mean sea level

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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
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Bryan Warner
Deputy Principal Chief
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December 2, 2025

Trileaf
Attn: Michael Romanoski

VIA: Email: tribal@trileaf.com

Re: TCNS 301523

The Cherokee Nation (Nation) is in receipt of your correspondence about **TCNS 301523** 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

Michael Romanoski

From: towernotifyinfo@fcc.gov
Sent: Thursday, September 18, 2025 8:39 AM
To: Tribal
Cc: tcns.fccarchive@fcc.gov; celltower@estoo.net
Subject: Reply to Proposed Tower Structure (Notification ID: 301523) - Email ID #9329251

Categories: Mike, Responses to File

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Dear Michael Romanoski,

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 #301523:

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: 09/16/2025
Notification ID: 301523
Tower Owner Individual or Entity Name: Harmoni Towers, LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: LTOWER - Lattice Tower
Latitude: 34 deg 4 min 2.6 sec N
Longitude: 80 deg 30 min 34.8 sec W

Location Description: Camden Highway

City: Rembert

State: SOUTH CAROLINA

County: SUMTER

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Ground Elevation: 73.7 meters

Support Structure: 85.0 meters above ground level

Overall Structure: 86.3 meters above ground level

Overall Height AMSL: 160.0 meters above mean sea level

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1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

December 2, 2025

Prairie Island Indian Community

Mr. Noah White III
5636 Sturgeon Lake Road
Welch, MN 55089

RE: Harmoni Towers LLC
Trileaf Project # 772867 / SC0009812 / Borden
Camden Highway, Rembert, Sumter County, SC 29128
Latitude: 34° 4' 2.59" N, Longitude: 80° 30' 34.85" W
TCNS # 301523

Dear Mr. White III:

This project was originally submitted in TCNS on 9/19/2025. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Romanoski".

Michael Romanoski
Tribal Consultation Manager



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

December 2, 2025

Thlopthlocco Tribal Town

Mekko Ryan Morrow

P.O. Box 188

Okemah, OK 74859

RE: Harmoni Towers LLC

Trileaf Project # 772867 / SC0009812 / Borden

Camden Highway, Rembert, Sumter County, SC 29128

Latitude: 34° 4' 2.59" N, Longitude: 80° 30' 34.85" W

TCNS # 301523

Dear Mekko Morrow:

This project was originally submitted in TCNS on 9/19/2025. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Romanoski", is written over a large, faint green leaf graphic in the background.

Michael Romanoski
Tribal Consultation Manager

Lee Castile

From: towernotifyinfo@fcc.gov
Sent: Thursday, January 8, 2026 8:03 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #39087

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Michael Romanoski
1515 Des Peres Rd. Ste 200
Suite 200
St. Louis, MO 63131

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 01/01/2026 and 01/08/2026. Our contact with these Tribal Nations or NHOs was sent on 01/08/2026.

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 01/08/2026, 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

Tribe Name: Muscogee (Creek) Nation

TCNS# 301523 Referred Date: 01/07/2026 Location: Camden Highway, Rembert, SC

Detailed Description of Project: Harmoni Towers LLC proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 75-foot by 75-foot (5,625-square-foot) lease area.

Tribe Name: Thlopthlocco Tribal Town

TCNS# 301460 Referred Date: 01/07/2026 Location: W2655 US Highway 10, Granton, WI

Detailed Description of Project: New wireless communications antennas at centerline height of 165ft on a 180ft-tall self-support lattice communications tower with overall height of 189.3ft. Equipment will be installed in a 10ftx15ft lease area within the existing fenced compound.

Tribe Name: Chippewa Cree Tribe of the Rocky Boy's Reservation

Tribe Name: Ho-Chunk Nation

Tribe Name: Iowa Tribe of Oklahoma

Tribe Name: Keweenaw Bay Indian Community

Tribe Name: Kickapoo Tribe of Oklahoma

Tribe Name: Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin

Tribe Name: Lac Vieux Desert Band of Lake Superior Chippewa Indians

Tribe Name: Lower Brule Sioux Tribe

Tribe Name: Menominee Indian Tribe of Wisconsin

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: Santee Sioux Nation of Nebraska

Tribe Name: Sisseton-Wahpeton Oyate of the Lake Traverse Reservation

Tribe Name: Wyandotte Nation

TCNS# 301437 Referred Date: 01/07/2026 Location: Highway 89, Glen Canyon Rec Area, Greentown, AZ

Detailed Description of Project: Our client proposes to build a 99-ft. monopole in a 50-ft.x50-ft. lease area (LA). A 12-ft.-wide easement will run approx. 490 ft. E from the LA, then the fiber conduit will continue approx. 450 ft. NE. An existing 1,580-ft. power route will be used.

Tribe Name: Apache Tribe of Oklahoma

Tribe Name: Eastern Shoshone Tribe

Tribe Name: Havasupai Tribe

Tribe Name: Hualapai Tribe

Tribe Name: Mescalero Apache Tribe

Tribe Name: Navajo Nation

Tribe Name: Pueblo of Zuni

Tribe Name: San Carlos Apache Tribe

TCNS# 301235 Referred Date: 01/07/2026 Location: 4698A Costa Bravo Drive, Orlando, FL

Detailed Description of Project: Our client proposes to construct a 29ft pole and associated wireless communications antennas with an overall height of 35ft. Power/utilities will be routed approx. 138ft southwest to a new Duke pole mounted transformer.

Tribe Name: Coushatta Indian Tribe

Tribe Name: Seminole Tribe of Florida

Tribe Name: Thlopthlocco Tribal Town



1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

December 2, 2025

Tuscarora Nation

Mr. Bryan Printup
5226 Walmore Rd
Lewiston, NY 14092

RE: Harmoni Towers LLC
Trileaf Project # 772867 / SC0009812 / Borden
Camden Highway, Rembert, Sumter County, SC 29128
Latitude: 34° 4' 2.59" N, Longitude: 80° 30' 34.85" W
TCNS # 301523

Dear Mr. Printup:

This project was originally submitted in TCNS on 9/19/2025. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 279-foot Self-Support Communications Tower, with an overall height of 283 feet and associated equipment within a 50-foot by 50-foot fenced area within a 75-foot by 75-foot (5,625-square-foot) lease area. The project includes a 12-foot-wide gravel drive within an access/utility easement, measuring 30 feet wide, extending approximately 20 feet generally northeast away from the lease area towards Camden Highway. The proposed access/utility easement and tower compound lease area are located with an agricultural field.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Romanoski", is written over a large, faint green leaf graphic that serves as a background for the signature area.

Michael Romanoski
Tribal Consultation Manager

Appendix G

Resumes





Professional Resume

HANNAH DELL

ASSISTANT PROJECT MANAGER

Education

Biology, B. S.
University of North Georgia / Gainesville, GA

Areas of Expertise

Ms. Dell has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Dell has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person
Basic Wetland Delineation (2023)



Professional Resume

LAURA ELSTON

ASSISTANT PROJECT MANAGER II

Education

B.S. Marine Science
Jacksonville University / Jacksonville, FL

Areas of Expertise

Ms. Laura Elston has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects.

Ms. Elston has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Phase II Environmental Site Assessments
Historical City Directories
Indoor Air Quality Assessments
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

OSHA 40-Hour HAZWOPER
ANSI/FCC RF Radiation Safety Competent Person
Basic Wetland Delineation (2014) and Refresher Course (2019)
Member – The Wildlife Society



Professional Resume

MORGAN RASMUSSEN

SENIOR PROJECT MANAGER

Education

Environmental Science, B. S.
Georgia College & State University / Milledgeville, GA

Areas of Expertise

Ms. Rasmussen has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects. Additionally, Ms. Rasmussen has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects.

Environmental service expertise includes:

Phase I Environmental Site Assessments
Historical City Directories
Information Section 7 Consultation
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Archaeological and Architectural Impacts
Soil Characterization

Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Local Government Consultation
Native American Consultation
Land Use History

Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person

Exhibit 4

This Instrument Prepared by
and after recording return to:
Harmoni Towers AssetCo II, LLC
6210 Ardrey Kell Road, Suite 450
Charlotte, NC 28277-4864
Attn: Corporate Contracts Administrator

Site Name: Borden_REHLR
Site Number: SC0009812

(Space Above this Line for Recorder's Use)

MEMORANDUM OF EASEMENT AGREEMENT

This Memorandum of Easement Agreement (this "**Memorandum**") is made this ____ day of _____, 2025 (the "**Effective Date**"), by and between **Kenneth Winston Taylor, a single man ("Grantor")**, whose address is 1479 Longfellow Avenue, Bronx, New York 10460, and **Harmoni Towers AssetCo II, LLC**, a Delaware limited liability company ("**Grantee**"), whose address is 6210 Ardrey Kell Road, Suite 450, Charlotte, NC 28277-4864.

1. Grantor and Grantee entered into a ninety-nine (99) year Easement Agreement (the "**Agreement**") dated as of the Effective Date, the terms and provisions of which are incorporated herein by this reference, covering portions of that certain parcel of real property owned by Grantor and situated in **Sumter County, South Carolina**, which such parcel is more fully described in the legal description attached hereto as **EXHIBIT "1-A"** attached hereto and incorporated herein (the "**Property**").
2. Pursuant to the Agreement, Grantor (on Grantor's behalf and on behalf of Grantor's heirs, personal representatives, successors, and assigns) has granted, and by these presents does grant, to the Grantee and the Permitted Parties (as such term is defined in the Agreement): (i) a ninety-nine (99) year and exclusive easement in and to that portion of the Property more particularly described on **EXHIBIT "1-B"** attached hereto and made a part hereof (such portion, the "**Exclusive Easement Area**"); and (ii) a ninety-nine (99) year, nonexclusive easement for vehicular and pedestrian access, ingress, egress, utilities, fiber, "Fall Zone" (if applicable) in and to those portions of the Property more particularly described on **EXHIBIT "1-C"** attached hereto and made a part hereof (the "**Access and Utility Easement Area**," and together with the Exclusive Easement Area, collectively, the "**Premises**"), both for the purpose of installing, operating, and maintaining a communication facility and other improvements. The easement rights herein granted include the right and authority of Grantee to grant or assign to third parties all or some of the easement rights granted to Grantee over the Premises herein.
3. The Agreement provides for a ninety-nine (99) year term (the "**Term**"), which such Term commenced on _____ shall be ninety-nine (99) years, unless Grantee provides written, recordable notice of its intent to terminate the Agreement, in which event the Agreement and all obligations of Grantee hereunder shall terminate upon Grantee's recordation of any such notice. Grantor may not terminate the Agreement.
4. The Agreement provides that during the Term thereof:

- a. neither Grantor nor any tenant or person or entity claiming by or through Grantor, shall be allowed to install or operate a communications facility, including a telecommunications transmission tower, or operate an antenna site leasing business which competes directly or indirectly with Grantee on any lands owned by Grantor within a radius of five (5) miles of the Property;
- b. in the event that the Grantor receives and desires to accept a bona fide offer to sell, convey, assign, or transfer, any property interest in or related to the Premises, including without limitation any offer seeking an assignment or transfer of any financial payments or consideration associated with this agreement or an offer to purchase an easement with respect to the Exclusive Easement Area, then the Grantor shall first provide the Grantee with a written offer to sell and convey the offered property interest Premises to Grantee upon the same terms and conditions as the offer made by the third party, and Grantee shall have ninety (90) days in which to accept the offer; and
- c. Grantor shall not enter into a lease, license, easement, or other agreement whereby Grantor (i) transfers its beneficial rights in this Agreement to a third party without such third party purchasing Grantor's entire right, title and interest in the entirety of the Premises; (ii) transfers the rights to use or operate any portion of the Property to a third party for the operation of wireless telecommunications equipment; or (iii) authorizes the construction of any wireless telecommunications towers or structures on the Property, for Grantor's own use, or for the use of any unaffiliated third parties, and any such agreement entered into without Grantee's prior written consent shall be void.

5. Grantor hereby agrees that the legal descriptions of the Premises attached hereto as **EXHIBIT "1-B"** and/or **EXHIBIT "1-C"** may be amended, modified, altered, or updated from by Grantee at any time after the Effective Date, and further consents to Grantee's unilateral execution and filing or recording of an Amendment to this Memorandum (an "**Amendment to Memorandum**") to evidence such amendment, modification, alteration, or update to the legal descriptions of such Premises. The terms and conditions provided for in such Amendment to Memorandum shall be effective regardless of whether Grantor executes such Amendment to Memorandum.

6. The Agreement and this Memorandum shall be binding upon and shall inure to the benefit of the parties hereto and their respective heirs, legal representatives, successors, and assigns, and shall be governed by and construed in accordance with the laws of the state in which the Property is located. The Agreement and this Memorandum may be executed in multiple counterparts, all of which shall be considered one and the same agreement and shall become effective when one or more counterparts have been signed by each of the parties, it being understood that all parties need not sign the same counterpart. All of the terms and conditions of the Agreement are incorporated herein by reference. In the event of a conflict between the terms hereof and the terms of the Agreement, the terms of the Agreement shall govern.

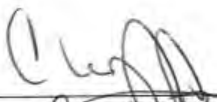
[SIGNATURE PAGES FOLLOW]

IN WITNESS WHEREOF, the Grantor has executed this Memorandum as of the date first written above.

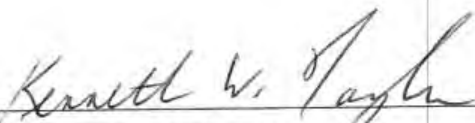
GRANTOR:

Kenneth Winston Taylor, a single man

Witness:


Print Name: Charles Powell


Print Name: Joyce Grant

By: 

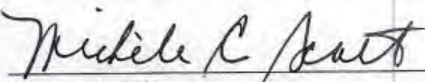
Print Name: Kenneth W. Taylor

Title: Owner

GRANTOR ACKNOWLEDGMENT

STATE OF New York)
COUNTY OF New York) ss:

BE IT REMEMBERED, that on this 2nd day of February, 202~~5~~⁶, before me, the subscriber, a person authorized to take oaths in the State of NEW YORK, personally appeared Kenneth W. Taylor who, being duly sworn on his/her/their oath, depose and made proof to my satisfaction that he/~~she/they~~^{is/are} the person(s) named in the within instrument; and I, having first made known to him the contents thereof, he did acknowledge that he signed, sealed and delivered the same as his voluntary act and deed for the purposes therein contained.


Notary Public: _____
My Commission Expires: 12/28/26

MICHELE C. SCOTT
NOTARY PUBLIC, State of New York
No. 31-4930923
Qualified in New York County
Commission Expires 12/28/26

IN WITNESS WHEREOF, the Grantee has executed this Memorandum as of the date first written above.

GRANTEE:

Harmoni Towers AssetCo II, LLC,
a Delaware limited liability company

Witness:

Print Name: _____

By: _____

Print Name: _____

Title: _____

Print Name: _____

STATE OF _____

COUNTY OF _____

I, _____ the undersigned Notary Public for said County and State, do hereby certify that _____, as _____ of **Harmoni Towers AssetCo II, LLC**, a Delaware limited liability company, personally appeared before me this day, and acknowledged the due execution of the foregoing instrument on behalf of said company. He/She is personally known to me or produced _____ as identification.

WITNESS my hand and notarial seal, this ____ day of _____, 202 ____.

Notary Public: _____

Print Name: _____

My Commission Expires: _____

(affix notary stamp/seal)

EXHIBIT "1-A"

LEGAL DESCRIPTION OF THE PROPERTY

Page 1 of 1

to the Memorandum of Easement Agreement dated _____, 2025, by and between **Kenneth Winston Taylor, a single man**, having a mailing address of 1479 Longfellow Avenue, Bronx, New York 10460 ("**Grantor**"), and **Harmoni Towers AssetCo II, LLC**, a Delaware limited liability company ("**Grantee**"), whose address is 6210 Ardrey Kell Road, Suite 450, Charlotte, NC 28277-4864.

The Property is legally described as follows:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, containing **4.92** acres, more or less, and being the remaining portion of a 7.01 acre tract, shown as Tract 1 on a plat by H. S. Willson, RLS dated February 18, 1981 and recorded in the Office of the RMC for Sumter County in Plat Book Z-45 at page 94; said parcel of land being situate on both sides of U. S. Highway 521 leasing from Sumter to Camden, South Carolina and having such shape, metes, bounds, and measurements as shown on said plat; said parcel of land being bounded on the North by a neighborhood and possibly lands of Maggie Peay and the Estate of James Peay and measuring thereon 304 feet; on the East by lands of heirs of Samuel Alston, Highway No. 521 and land of heirs of Elizabeth Alston; on the South by lands of Freddie Dennis and on the West by lands of George Taylor, U. S. Highway 521 and tract 2 as shown on said plat. TMS No.: 088-00-03-028

This being the remainder of the property conveyed to Joseph H. Taylor and Joann W. Taylor by deed of George Taylor, recorded March 4, 1981 in vol. 281 at page 913 in the Office of the RMC for Sumter County.

ALSO: All that certain piece, parcel or tract of land containing 0.79 acres, more or less designated as Lot No. 2 on a plat prepared by Ben J. Makela, RLS dated April 15, 1999 and recorded in Plat Book 99 at page 640 in the Office of the RMC for Sumter County. Aforesaid plat is specifically incorporated herein and referenced is craved thereto for a more complete and accurate description of the metes, bounds, courses and distances of the property concerned herein. This description is in lieu of the metes and bounds, as permitted by law under Section 30-5-250 of the 1976 Code of Laws of South Carolina, as amended. This being the property known as 7045 Camden Highway. TMS No.: 088-00-02-115

EXHIBIT "1-B"

LEGAL DESCRIPTION OF EXCLUSIVE EASEMENT AREA

Page 1 of 1

to the Memorandum of Easement Agreement dated _____, 2025, by and between **Kenneth Winston Taylor, a single man**, having a mailing address of 1479 Longfellow Avenue, Bronx, New York 10460 ("**Grantor**"), and **Harmoni Towers AssetCo II, LLC**, a Delaware limited liability company ("**Grantee**"), whose address is 6210 Ardrey Kell Road, Suite 450, Charlotte, NC 28277-4864.

The Exclusive Easement Area is described and/or depicted as follows:

75'X75' LEASED PREMISES:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, being a 75'x75' Lease Premises part of Kenneth Taylor parcel as recorded in Document 1190, Page 1626 in the Sumter County Records, part of parcel # 088-00-03-028 and being further bound and described as follows:

Commencing northwest corner of Parent parcel on the Southerly right-of-way line of Camden Highway (75' Wide), Thence leaving the said Southerly right-of-way of Camden Highway and along the westerly line of said Parent Parcel, South 34°30'28" West a distance of 20.93 feet to the point of beginning;

Thence through the tract of which this description is a part the following three (3) courses;

South 55°59'32" East, a distance of 75.00 feet to a point;

South 34°30'28" West, a distance of 75.00 feet to a point;

North 55°29'32" West, a distance of 75.00 feet to a point;

North 34°30'28" East a distance of 75.00 feet to the POINT OF BEGINNING and containing a total of 5625 sq ft, 0.1291 acres of land.

Notes:

1. THIS EXHIBIT MAY BE REPLACED BY A LAND SURVEY AND/OR CONSTRUCTION DRAWINGS OF THE PREMISES ONCE RECEIVED BY TENANT.
2. ANY SETBACK OF THE PREMISES FROM THE PROPERTY'S BOUNDARIES SHALL BE THE DISTANCE REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES.
3. WIDTH OF ACCESS ROAD SHALL BE THE WIDTH REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES, INCLUDING POLICE AND FIRE DEPARTMENTS.
4. THE TYPE, NUMBER AND MOUNTING POSITIONS AND LOCATIONS OF ANTENNAS AND TRANSMISSION LINES ARE ILLUSTRATIVE ONLY. ACTUAL TYPES, NUMBERS AND MOUNTING POSITIONS MAY VARY FROM WHAT IS SHOWN ABOVE.

EXHIBIT "1-C"

LEGAL DESCRIPTION OF ACCESS AND UTILITY EASEMENT AREA

Page 1 of 1

to the Memorandum of Easement Agreement dated _____, 2025, by and between **Kenneth Winston Taylor, a single man**, having a mailing address of 1479 Longfellow Avenue, Bronx, New York 10460 ("**Grantor**"), and **Harmoni Towers AssetCo II, LLC**, a Delaware limited liability company ("**Grantee**"), whose address is 6210 Ardrey Kell Road, Suite 450, Charlotte, NC 28277-4864 .

The Access and Utility Easement Area is described and/or depicted as follows:

30' ACCESS AND UTILITIES EASEMENT:

All that certain piece, parcel or tract of land situate, lying and being in the Rafting Creek Township, County of Sumter, State of South Carolina, being a 30' wide Access and Utility Easement part of Kenneth Taylor parcel as recorded in Document 1190, Page 1626 in the Sumter County Records, part of parcel # 088-00-03-028 and being further bound and described as follows:

Commencing northwest corner of said Parent parcel on the Southerly right-of-way line of Camden Highway (75' Wide), Thence along the southerly right-of-way line, South 51°16'32" East a distance of 22.56 feet to the point of beginning;

Thence, continuing along the said southerly right-of-way of Camden Highway, South 51°16'32" East a distance of 30.08 feet to a point;

Thence leaving the said southerly right-of-way of Camden Highway and through the tract of which this description is a part the following three (3) courses;

South 34°30'28" West, a distance of 17.06 feet to a point;

North 55°29'32" West, a distance of 30.00 feet to a point;

North 34°30'28" West, a distance of 19.27 feet to the POINT OF BEGINNING, and containing a total of 545 sq ft, 0.0125 acres of land.

Notes:

1. THIS EXHIBIT MAY BE REPLACED BY A LAND SURVEY AND/OR CONSTRUCTION DRAWINGS OF THE PREMISES ONCE RECEIVED BY TENANT.
2. ANY SETBACK OF THE PREMISES FROM THE PROPERTY'S BOUNDARIES SHALL BE THE DISTANCE REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES.
3. WIDTH OF ACCESS ROAD SHALL BE THE WIDTH REQUIRED BY THE APPLICABLE GOVERNMENT AUTHORITIES, INCLUDING POLICE AND FIRE DEPARTMENTS.
4. THE TYPE, NUMBER AND MOUNTING POSITIONS AND LOCATIONS OF ANTENNAS AND TRANSMISSION LINES ARE ILLUSTRATIVE ONLY. ACTUAL TYPES, NUMBERS AND MOUNTING POSITIONS MAY VARY FROM WHAT IS SHOWN ABOVE.

Exhibit 5

[ASR Registration Search](#)**Registration 1332844** [Map Registration](#)**Registration Detail**

Reg Number	1332844	Status	Granted
File Number	A1352612	Constructed	
EMI	No	Dismantled	
NEPA			

Antenna Structure

Structure Type LTower - Lattice Tower

Location (in NAD83 Coordinates)

Lat/Long	34-04-02.6 N 080-30-34.9 W	Address	Camden Highway
City, State	Sumter , SC		
Zip	29128	County	SUMTER
Center of AM Array		Position of Tower in Array	

Heights (meters)

Elevation of Site Above Mean Sea Level	Overall Height Above Ground (AGL)
73.8	86.3
Overall Height Above Mean Sea Level	Overall Height Above Ground w/o Appurtenances
160.1	85.0

Painting and Lighting Specifications

FAA Chapters 4, 8, 15

Paint and Light in Accordance with FAA Circular Number 70/7460-1M

FAA Notification

FAA Study	2025-ASO-18996-OE	FAA Issue Date	12/29/2025
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Owner & Contact Information

FRN	0025999053	Owner Entity Type	Limited Liability Company
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OwnerHarmoni Towers, LLC
Attention To: SC0009812
6210 Ardrey Kell Road
Suite 450
Charlotte , NC 28277P: (800)821-5825
F: (501)537-0769
E: regulatory@harmonitowers.com**Contact**Harmoni Towers, LLC
Charlotte , NC 28277P: (800)821-5825
F: (501)537-0769
E: regulatory@harmonitowers.com**Last Action Status**

Status	Granted	Received	03/09/2026
Purpose	Amendment	Entered	03/09/2026
Mode	Interactive		

Related Applications

03/09/2026 A1352612 - Amendment (AM)

Comments**Comments**

None

History**Date****Event**

None

Pleadings**Pleading Type****Filer Name****Description****Date Entered**

None

Automated Letters

None

CLOSE WINDOW

Exhibit 6

ULS License

PCS Broadband License - KNLH718 - Cellco Partnership

Call Sign	KNLH718	Radio Service	CW - PCS Broadband
Status	Active	Auth Type	Regular

Rural Service Provider Bidding Credit

Is the Applicant seeking a Rural Service Provider (RSP) bidding credit?

Reserved Spectrum

Reserved Spectrum

Market

Market	BTA436 - Sumter, SC	Channel Block	F
Submarket	0	Associated Frequencies (MHz)	001890.00000000- 001895.00000000 001970.00000000- 001975.00000000

3.7 GHz License Type

3.7 GHz Linked License

Dates

Grant	04/04/2017	Expiration	04/28/2027
Effective	04/04/2017	Cancellation	

Buildout Deadlines

1st	04/28/2002	2nd	
-----	------------	-----	--

Discontinuance Dates

1st		2nd	
-----	--	-----	--

Notification Dates

1st	11/16/2004	2nd	
-----	------------	-----	--

ECIP Information

ECIP Flag

Small Carrier or Tribal Nation Transaction

Rural-Focused Transaction

ECIP Dates

5-Year Holding Period Begins

5-Year Holding Period Ends

Required Operational Filing Dates

IORN Operation Begin Date	FORN Deadline Date	FORN Filed Date
---------------------------	--------------------	-----------------

Licensee

FRN	0003290673	Type	General Partnership
-----	------------	------	---------------------

Licensee

Cellco Partnership	P:(770)797-1070
5055 North Point Pkwy, NP2NE Network Engineering	F:(770)797-1036
Alpharetta, GA 30022	E:LicensingCompliance@VerizonWireless.com
ATTN Regulatory	

Contact

Cellco Partnership	P:(770)797-1070
Licensing Manager	F:(770)797-1036
5055 North Point Pkwy, NP2NE Network Engineering	E:LicensingCompliance@VerizonWireless.com
Alpharetta, GA 30022	
ATTN Regulatory	

Ownership and Qualifications

Radio Service Type Mobile

Regulatory Status Common Carrier Interconnected Yes

Alien Ownership

Is the applicant a foreign government or the representative of any foreign government? No

Is the applicant an alien or the representative of an alien? No

Is the applicant a corporation organized under the laws of any foreign government? No

Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country? No

Is the applicant directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? **Yes**If the answer to the above question is 'Yes', has the applicant received a ruling(s) under Section 310(b)(4) of the Communications Act with respect to the same radio service involved in this application? **Yes****Basic Qualifications**

The Applicant answered "No" to each of the Basic Qualification questions.

Tribal Land Bidding Credits

This license did not have tribal land bidding credits.

Demographics

Race

Ethnicity

Sex

Exhibit 7



June 8, 2026

Sumter City-County Planning
PO Box 1449
Sumter, SC 29151

RE: Harmoni Towers Gateway LLC (CELL TOWER) located at 7056 Camden Highway, REMBERT, SC 29128

Dear Planning Dept.

Harmoni Towers Gateway LLC, as the owner of the proposed communications tower to be located at the above referenced property, hereby affirms that if the tower is no longer being used it will be removed within 180 days of the cessation of operation.

Regards,

Evelyn Radowicz

Evelyn Radowicz, Director, Project Management
413-658-4815
Evelyn.radowicz@harmonitowers.com

Exhibit 8



April 1, 2026

Sumter County
13 East Canal Street
Sumter, S.C. 29150

To Whom it May Concern:

Harmoni Towers Gateway LLC, as applicant, and to the extent permitted by the law, shall at all times defend, indemnify, protect, save, hold harmless, and exempt Sumter County, and its officers, boards, employees, committee members, attorneys, agents, and consultants from any and all damages, costs, or charges arising out of any and all third party claims, suits, demands, causes of action or expenses arising there from, either at law or in equity, which might arise out of, or are caused by, the construction, use, operation, maintenance, replacement, removal, or restoration of the proposed telecommunications facility, excepting, however, any portion of such claims, suits, demands, causes of action or award of damages as may be attributable to the gross negligent or intentional acts or omissions of Sumter County, or its servants or agents.

Additionally, Harmoni Towers Gateway LLC warrants that the proposed telecommunications facility shall, at all times, comply with all applicable, local, state and governmental rules and regulations including all FCC rules and regulations. Moreover, Harmoni Towers Gateway LLC shall at all times maintain commercial general liability insurance with limits of not less than \$1,000,000 aggregate for the duration of the proposed telecommunications facility.

Harmoni Towers Gateway LLC

By: Riken Patel
Its: Assistant General Counsel
Dated: April 1, 2026

Exhibit 9

ACORDTM**CERTIFICATE OF LIABILITY INSURANCE**

DATE (MM/DD/YYYY)

3/20/2026

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an **ADDITIONAL INSURED**, the policy(ies) must have **ADDITIONAL INSURED** provisions or be endorsed. If **SUBROGATION** IS **WAIVED**, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer any rights to the certificate holder in lieu of such endorsement(s).

PRODUCER McGriff, a MMA LLC Company 5850 Waterloo Road, Suite 240 Columbia, MD 21045 410 480-4400	CONTACT NAME: PHONE (A/C, No, Ext): FAX (A/C, No): E-MAIL ADDRESS: mcg.coi@marshmma.com														
INSURED Harmoni Towers LLC 6210 Ardrey Kell Road Suite 375 Charlotte, NC 28277	<table border="1"> <thead> <tr> <th data-bbox="816 426 1433 453">INSURER(S) AFFORDING COVERAGE</th> <th data-bbox="1433 426 1568 453">NAIC #</th> </tr> </thead> <tbody> <tr> <td data-bbox="816 453 1433 483">INSURER A : Hanover Insurance Company</td> <td data-bbox="1433 453 1568 483">22292</td> </tr> <tr> <td data-bbox="816 483 1433 512">INSURER B : The Continental Insurance Company</td> <td data-bbox="1433 483 1568 512">35289</td> </tr> <tr> <td data-bbox="816 512 1433 541">INSURER C : Allmerica Financial Benefits</td> <td data-bbox="1433 512 1568 541">41840</td> </tr> <tr> <td data-bbox="816 541 1433 571">INSURER D :</td> <td data-bbox="1433 541 1568 571"></td> </tr> <tr> <td data-bbox="816 571 1433 600">INSURER E :</td> <td data-bbox="1433 571 1568 600"></td> </tr> <tr> <td data-bbox="816 600 1433 632">INSURER F :</td> <td data-bbox="1433 600 1568 632"></td> </tr> </tbody> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A : Hanover Insurance Company	22292	INSURER B : The Continental Insurance Company	35289	INSURER C : Allmerica Financial Benefits	41840	INSURER D :		INSURER E :		INSURER F :	
INSURER(S) AFFORDING COVERAGE	NAIC #														
INSURER A : Hanover Insurance Company	22292														
INSURER B : The Continental Insurance Company	35289														
INSURER C : Allmerica Financial Benefits	41840														
INSURER D :															
INSURER E :															
INSURER F :															

COVERAGES**CERTIFICATE NUMBER:****REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

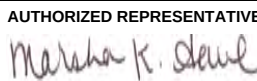
INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	☒ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☒ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: ☐ POLICY ☐ PRO-JECT ☒ LOC OTHER:	X		ZHQH39487607	12/02/2025	12/02/2026	EACH OCCURRENCE \$1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$1,000,000 MED EXP (Any one person) \$10,000 PERSONAL & ADV INJURY \$1,000,000 GENERAL AGGREGATE \$2,000,000 PRODUCTS - COMP/OP AGG \$2,000,000 \$
C	AUTOMOBILE LIABILITY ☐ ANY AUTO OWNED AUTOS ONLY ☒ HIRED AUTOS ONLY ☐ SCHEDULED AUTOS NON-OWNED AUTOS ONLY	X		AWQJ29289103	12/02/2025	12/02/2026	COMBINED SINGLE LIMIT (Ea accident) \$1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	☒ UMBRELLA LIAB ☒ EXCESS LIAB	X	X	UHQH39506406	12/02/2025	12/02/2026	EACH OCCURRENCE \$10,000,000 AGGREGATE \$10,000,000
B	☐ DED ☒ RETENTION \$0	X	X	7036404314	12/02/2025	12/02/2026	Ea Occ/Agg \$16,000,000
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? ☐ Y / ☒ N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/A					PER STATUTE ☐ OTH-ER ☐ E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Evidence of Coverage****ADDITIONAL NAMED INSUREDS****

Alpha Towers HoldCo III LLC
 Alpha Towers PropCo III LLC
 Harmoni Completed Towers, LLC
 Harmoni Network Services, LLC

CERTIFICATE HOLDER**CANCELLATION**

Harmoni Towers Gateway LLC 11101 Anderson Dr, Ste 200 Little Rock, AR 72212	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE 
--	--

DESCRIPTIONS (Continued from Page 1)

Harmoni Towers Assetco II, LLC
Harmoni Towers Assetco, LLC
Harmoni Towers Development Company Holdings I, LLC
Harmoni Towers Development Company Holdings II, LLC
Harmoni Towers Development Company, LLC
Harmoni Towers Gateway LLC
Harmoni Towers Holdings, LLC
Harmoni Towers Infrastructure, LLC
Harmoni Towers Management, LLC
Harmoni Towers, L.P.

Exhibit 10





Exhibit 11



1201 S Sheridan St
South Bend, IN 46619

Phone: 574-288-3632
Fax: 574-288-5860
www.nelloinc.com

June 5, 2026

Harmoni Towers, LLC
11101 Anderson Dr. Suite 200
Little Rock, AR 72212

Re: Nello Tower Fall Radius – Nello 280' NSX Lattice Self-Support Tower
Project Name: Borden
Nello Job #: SO35537
Tower Drawing #: 857811

To Whom It May Concern:

This letter is regarding your inquiry about the expected performance of your proposed tower designed by Nello based on site-specific criteria.

Our towers are designed to meet or exceed industry standards defined by TIA-222-H, "Structural Standards for Antenna Supporting Structures and Antennas" (TIA Standard). It is our opinion that the possibility of a tower collapse is very unlikely. The tower is designed using extreme wind and ice conditions. In fact, wind speeds specified by the TIA Standard are 50-year wind speeds. That is, they have only a 2% statistical chance of occurring in any given year.

This tower has been designed using the following wind conditions as a minimum: a 119 mph 3-second gust wind speed with no ice and a 30 mph 3-second gust wind with 1" ice. The TIA Standard specifies 119 mph as the wind speed required for this site in Sumter County, South Carolina. The "3-second gust wind speed" refers to a wind measured at 33 feet above the ground. Equations in the TIA Standard take into account that wind speed escalates with increasing height of the tower.

Although we cannot guarantee exactly how a tower would fall if it were to fail, the most likely mode of failure would be a buckling failure of one of the tower sections due to excessive wind loading. The tower leg with the highest stress ratio is located at the 220' – 240' level. The stress ratio in that leg is calculated to be 91% of the code-permitted design loading. Given that the tower section with the highest stress ratio will most likely fail first, the proposed tower would fail at the 220' level with the top 60' of the tower collapsing. Depending on the conditions at the time of failure and the stress levels in structural material below, the top 60' of the tower would likely fall within a 60' fall radius.

The fall radius statement above assumes proper foundation construction and tower installation. The foundation design should be reviewed to ensure that no foundation limit state governs the entire structural system and negates the fall radius design. The fall radius expectancy requires that the foundation be designed with a capacity greater than that of the tower capacity. If the foundation design used in association with this tower is performed by a third party, Nello must be provided the opportunity to review the design in order to confirm that the fall radius remains satisfactory. If for some reason Nello does not provide the tower design, or is not given the opportunity to design or review the foundation for this specific project, the content of this letter becomes void.

If you have any other questions or concerns regarding the design of your site-specific tower, please contact our engineering or sales department.

Sincerely,



06/09/2026

Exhibit 12



1201 S Sheridan St
South Bend, IN 46619

Phone: 574-288-3632
Fax: 574-288-5860
www.nelloinc.com

July 10, 2026

Harmoni Towers, LLC
11101 Anderson Dr. Suite 200
Little Rock, AR 72212

Re: Nello Tower Fall Radius – Nello 280' NSX Lattice Self-Support Tower
Project Name: Borden
Nello Job #: SO35537
Tower Drawing #: 857811

To Whom It May Concern:

This letter is regarding your inquiry about the expected performance of your proposed tower designed by Nello based on site-specific criteria.

Our towers are designed to meet or exceed industry standards defined by TIA-222-H, "Structural Standards for Antenna Supporting Structures and Antennas" (TIA Standard). It is our opinion that the possibility of a tower collapse is very unlikely. The tower is designed using extreme wind and ice conditions. In fact, wind speeds specified by the TIA Standard are 50-year wind speeds. That is, they have only a 2% statistical chance of occurring in any given year.

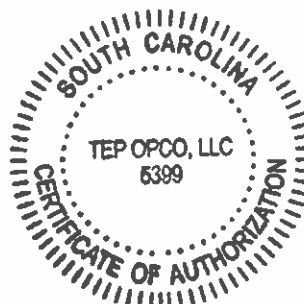
This tower has been designed using the following wind conditions as a minimum: a 119 mph 3-second gust wind speed with no ice and a 30 mph 3-second gust wind with 1" ice. The TIA Standard specifies 119 mph as the wind speed required for this site in Sumter County, South Carolina. The "3-second gust wind speed" refers to a wind measured at 33 feet above the ground. Equations in the TIA Standard take into account that wind speed escalates with increasing height of the tower.

Although we cannot guarantee exactly how a tower would fall if it were to fail, the most likely mode of failure would be a buckling failure of one of the tower sections due to excessive wind loading. The tower leg with the highest stress ratio is located at the 220' – 240' level. The stress ratio in that leg is calculated to be 91% of the code-permitted design loading. Given that the tower section with the highest stress ratio will most likely fail first, the proposed tower would fail at the 220' level with the top 60' of the tower collapsing. Depending on the conditions at the time of failure and the stress levels in structural material below, the top 60' of the tower would likely fall within a 37.5' fall radius.

The fall radius statement above assumes proper foundation construction and tower installation. The foundation design should be reviewed to ensure that no foundation limit state governs the entire structural system and negates the fall radius design. The fall radius expectancy requires that the foundation be designed with a capacity greater than that of the tower capacity. If the foundation design used in association with this tower is performed by a third party, Nello must be provided the opportunity to review the design in order to confirm that the fall radius remains satisfactory. If for some reason Nello does not provide the tower design, or is not given the opportunity to design or review the foundation for this specific project, the content of this letter becomes void.

If you have any other questions or concerns regarding the design of your site-specific tower, please contact our engineering or sales department.

Sincerely,



TEP

07-13-2026

Exhibit 13

October 5, 2026



Norton Rose Fulbright US LLP
8001 Forsyth Boulevard, Suite 800
St. Louis, Missouri 63105

Direct line +1 314 505 8871
sasha.riedisser@nortonrosefulbright.com

Tel +1 314 505 8800
Fax +1 314 505 8899
nortonrosefulbright.com

Re: BZA Case No. BOA-26-29

Dear Mr. Bryan:

Thank you very much for taking the time to speak with me on Friday. I appreciated your willingness to talk through the issues in advance of the next hearing. As we discussed, I am writing to set out our position regarding approval of Harmoni Gateway Towers, LLC's ("Harmoni") application for a communications facility at 7056 Camden Highway, which the Sumter City-County Board of Zoning Appeals deferred at its September 9, 2026 hearing. I want to be clear at the outset that our goal is not to create friction with the County. Our goal is to work cooperatively with you, the Zoning Administrator, and the Board to deliver reliable wireless coverage to this part of the County.

We understand that concerns have been raised about the proximity of the facility to the road, and that the deferral at the September hearing was prompted by questions about the engineered fall zone rather than by any staff finding of noncompliance. As we understand it, the underlying worry is that the structure could fall onto the highway during a storm, and that the highway serves as an evacuation route.

The County's ordinance sets the rule that both Harmoni and the County are bound to follow, and Harmoni meets it. Article 5.b.4.e.10 of the Sumter County Zoning and Development Standards Ordinance requires that a tower be set back from all lot lines by a distance equal to the district setback requirement or the tower's fall zone, whichever is greater, and it expressly provides that a fall zone less than the full height of the tower is to be determined by an engineer licensed in South Carolina in a letter bearing the engineer's signature and seal.

That is precisely the mechanism the ordinance contemplates for exactly this question, and it is the mechanism we have followed. Our fall-zone letter is signed and sealed by an engineer licensed in South Carolina and confirms the structural integrity of the structure and the radius within which it is designed to fall.

Moreover, a generalized concern of this kind is not a lawful basis for denying the application, particularly where the concern has been answered by a stamped engineering analysis. Under the Telecommunications Act of 1996, any decision denying a request to place or construct a personal wireless service facility must be in writing and supported by substantial evidence contained in a written record.

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The Fourth Circuit's decision in *Petersburg Cellular Partnership v. Board of Supervisors of Nottoway County*, 205 F.3d 688 (4th Cir. 2000), is closely on point and we believe it controls the analysis here. There, a county denied a permit for a 199-foot tower on a U.S. highway after a handful of residents voiced speculative safety fears, including the fear that the tower would collapse onto people or homes and that debris might land on the adjacent federal highway. The court held the denial was not supported by substantial evidence. It explained that where "the concerns expressed by a community are objectively unreasonable, such as concerns based upon conjecture or speculation, then they lack probative value and will not amount to substantial evidence," and that "[t]he number of persons expressing concerns, standing alone, does not make evidence substantial". On the collapse question specifically, the court found the fear was not rationally founded because the record contained no evidence of any reasonable likelihood of collapse: the tower was designed to withstand the highest winds ever recorded at the site, even when covered with a half inch of ice, and was designed to collapse in on itself. The court concluded that the possibility of a collapse causing harm in those circumstances was "so extremely remote as to pose only a speculative concern," and that a reasonable legislator would not base a decision on the irrational concerns of a few constituents.

The Fourth Circuit reached a similar result in *T-Mobile Northeast LLC v. City Council of the City of Newport News*, 674 F.3d 380 (4th Cir. 2012), affirming an order requiring the city to approve a tower permit. The court gave "little weight" to vague and uncorroborated citizen concerns, and specifically held that a speculative safety concern was "not something that a reasonable legislator would consider," noting that the bodies actually charged with safety had approved the application without raising it. The court also declined to presume a safety risk that the reviewing technical agency had not identified.

South Carolina law points the same direction. A board of zoning appeals is empowered to permit uses by special exception "subject to the terms and conditions for the uses set forth for such uses in the zoning ordinance." That is, the criteria for approval are the ones written in the Code. Its decision will be overturned if it is arbitrary, capricious, has no reasonable relation to a lawful purpose, or reflects an abuse of discretion, and its final decisions must separately state findings of fact and conclusions of law in writing.

In *Wyndham Enterprises, LLC v. City of North Augusta*, 401 S.C. 144 (Ct. App. 2012), the court reversed a special exception denial as arbitrary and capricious precisely because the testimony supporting it "was based on speculation and opinion" rather than competent evidence.

Conversely, in *Bevivino v. Town of Mount Pleasant Board of Zoning Appeals*, 402 S.C. 57 (Ct. App. 2013), the court held that statements from the manufacturer and a South Carolina licensed engineer that the tower would withstand a 130 mile-per-hour wind gust and was designed to fall on itself within a radius of its base constituted competent evidence that the tower would not endanger the health and safety of nearby residents. In other words, a signed and sealed engineering analysis of wind load and fall radius is the kind of evidence South Carolina courts credit on exactly this issue.

It is also worth noting that any number of other structures along this corridor (utility poles and mature trees among them) could in theory come down in a severe storm, and the ordinance does not impose heightened setbacks on them for that reason. To the contrary, minor support facilities for public utilities are subject to a minimum setback of five feet on all sides, and the ordinance expressly provides that nothing in it shall be construed as prohibiting the growth, construction, or maintenance of any tree or structure to a height of up to 35 feet above the surface of the land. Singling out this facility for a proximity requirement that is not written into the Code and is not applied to comparable structures is the sort of distinction that invites the arbitrary and capricious finding that *Wyndham* describes.

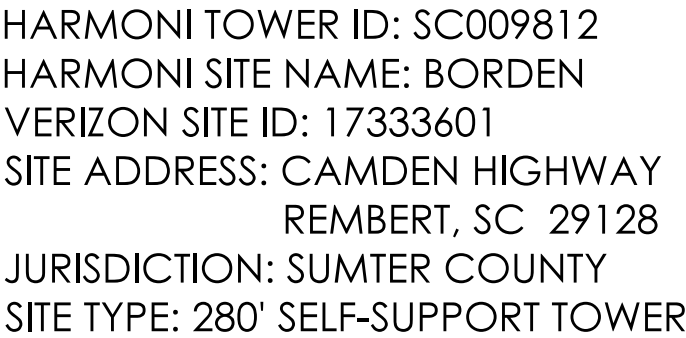
I want to close on the point where I think our interests are fully aligned. The County has identified this highway as an evacuation route. A storm is exactly the moment when residents, first responders, and evacuating motorists most need a wireless signal that works—to call 911, to receive emergency alerts, and to reach family. Approving this facility advances that interest rather than threatening it. Harmoni is also designing the structure to accommodate additional carriers, consistent with the ordinance's multiple-use requirement, so that the County gets the benefit of one structure rather than several.

Accordingly, we respectfully ask that the County support issuance of the permit at the October 14 hearing. Thank you again for your time on Friday and for your continued courtesy.

Sincerely,

Sasha Riedisser

SR/SR



E-911 ADDRESS: 7056 CAMDEN HIGHWAY, REMBERT, SC 29128

6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY:



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REVISIONS:				
DESCRIPTION	DATE	BY	REV	
FINAL ZDS--REV	10.5.26	TM	3	
FINAL ZDS--REV	4.21.26	TM	2	
FINAL ZDS	1.16.26	TM	1	
ISSUED FOR REVIEW	8.25.25	JDK	0	

PROJECT INFO

HARMONI TOWER ID # :
SC009812

VZW FUZE PROJECT #:
17333601

HARMONI SITE NAME:
BORDEN

CAMDEN HIGHWAY
REMBERT, SC 29128

NEW
280' SELF-SUPPORT TOWER

■ SHEET NUMBER: 1

T-1

EV.:

68160

SITE INFORMATION

HARMONI TOWER ID:	SC009812
HARMONI SITE NAME:	BORDEN
SITE ADDRESS:	CAMDEN HIGHWAY REMBERT, SC 29128
COUNTY:	SUMTER COUNTY
E-911 ADDRESS:	7056 CAMDEN HIGHWAY, REMBERT, SC 29128
AREA OF CONSTRUCTION:	RAWLAND
LATITUDE:	34.067385°
LONGITUDE:	-80.509680°
LAT/LONG TYPE:	NAD83
JURISDICTION:	SUMTER COUNTY
ZONING:	AF - AGRICULTURAL/FORESTRY
OCCUPANCY CLASSIFICATION:	U
TYPE OF CONSTRUCTION:	II-B
A.D.A. COMPLIANCE:	FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION
LAND OWNER:	JOSEPH AND JOANN TAYLOR LIFE ESTATE 1479 LONGFELLOW AVE BRONX NY 10460 KENNETH TAYLOR (803) 968-0732 copsandteens@aol.com
TOWER OWNER:	HARMONI TOWERS, LLC 6210 ARDREY KELL ROAD CHARLOTTE, NC 28277
ELECTRICAL SERVICE PROVIDER:	BLACK RIVER ELECTRIC COOPERATIVE INC. 803-469-8060
TELCO PROVIDER:	WINDSTREAM XXX-XXX-XXXX

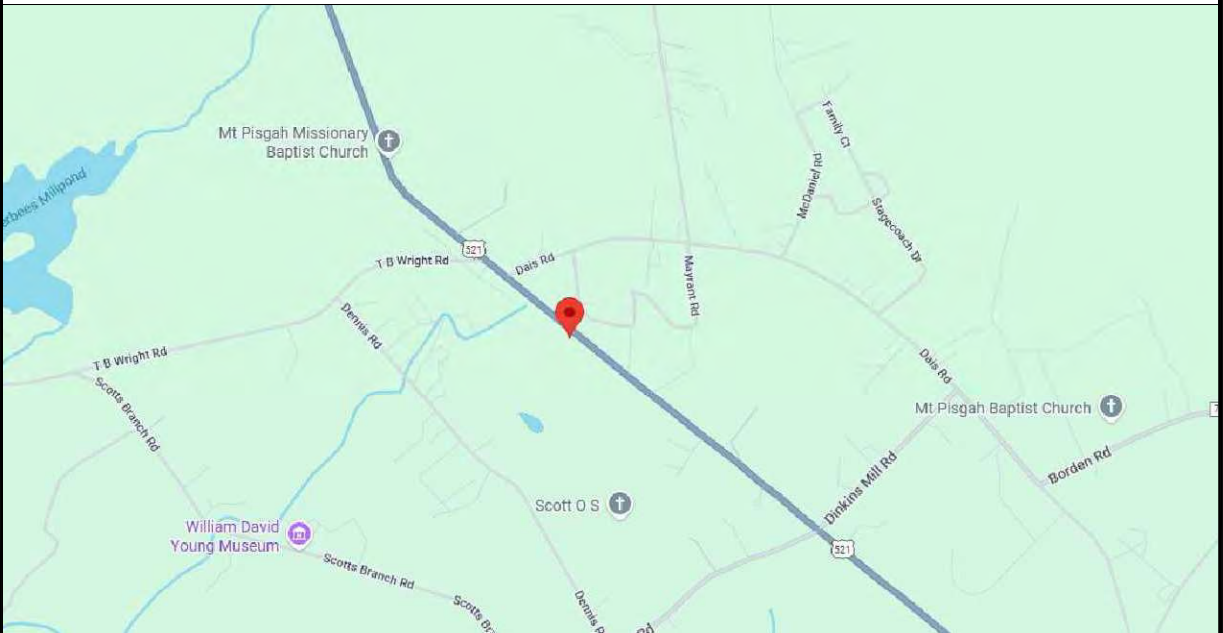
DRAWING INDEX

[illegible]

ALL DRAWINGS CONTAINED HEREIN ARE FORMATTED FOR 11X17 CONTRACTOR SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS AND CONDITIONS ON THE JOB SITE AND SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.

ZONING DRAWINGS

LOCATION MAP



DIRECTIONS:



PROJECT TEAM

PROJECT MANAGERS: T-SQUARED SITE SERVICES, LLC
2501 SHENANGO VALLEY FREEWAY
SUITE 3
HERMITAGE, PA. 16148
(724) 308-7855

CONTACT: MARK THOMPSON

A&E FIRM: T-SQUARED SITE SERVICES, LLC
2501 SHENANGO VALLEY FREEWAY
SUITE 3
HERMITAGE, PA. 16148
(724) 308-7855

PROJECT DESCRIPTION

THE PURPOSE OF THIS PROJECT IS TO ENHANCE BROADBAND CONNECTIVITY AND CAPACITY TO THE EXISTING ELIGIBLE WIRELESS FACILITY.

- INSTALL 280' SELF-SUPPORT TOWER
- INSTALL CHAIN LINK FENCING
- INSTALL (1) UTILITY H-FRAME
- INSTALL (2) FIBER VAULTS
- INSTALL ACCESS ROAD

THE PARTIES ABOVE HEREBY APPROVE AND ACCEPT THESE DOCUMENTS AND
 AUTHORIZE THE CONTRACTOR TO PROCEED WITH THE CONSTRUCTION
 DESCRIBED HEREIN. ALL CONSTRUCTION DOCUMENTS ARE SUBJECT TO REVIEW
 BY THE LOCAL BUILDING DEPARTMENT AND ANY CHANGES AND
 MODIFICATIONS THE MAY IMPOSE.

APPLICABLE CODES / REFERENCE DOCUMENTS

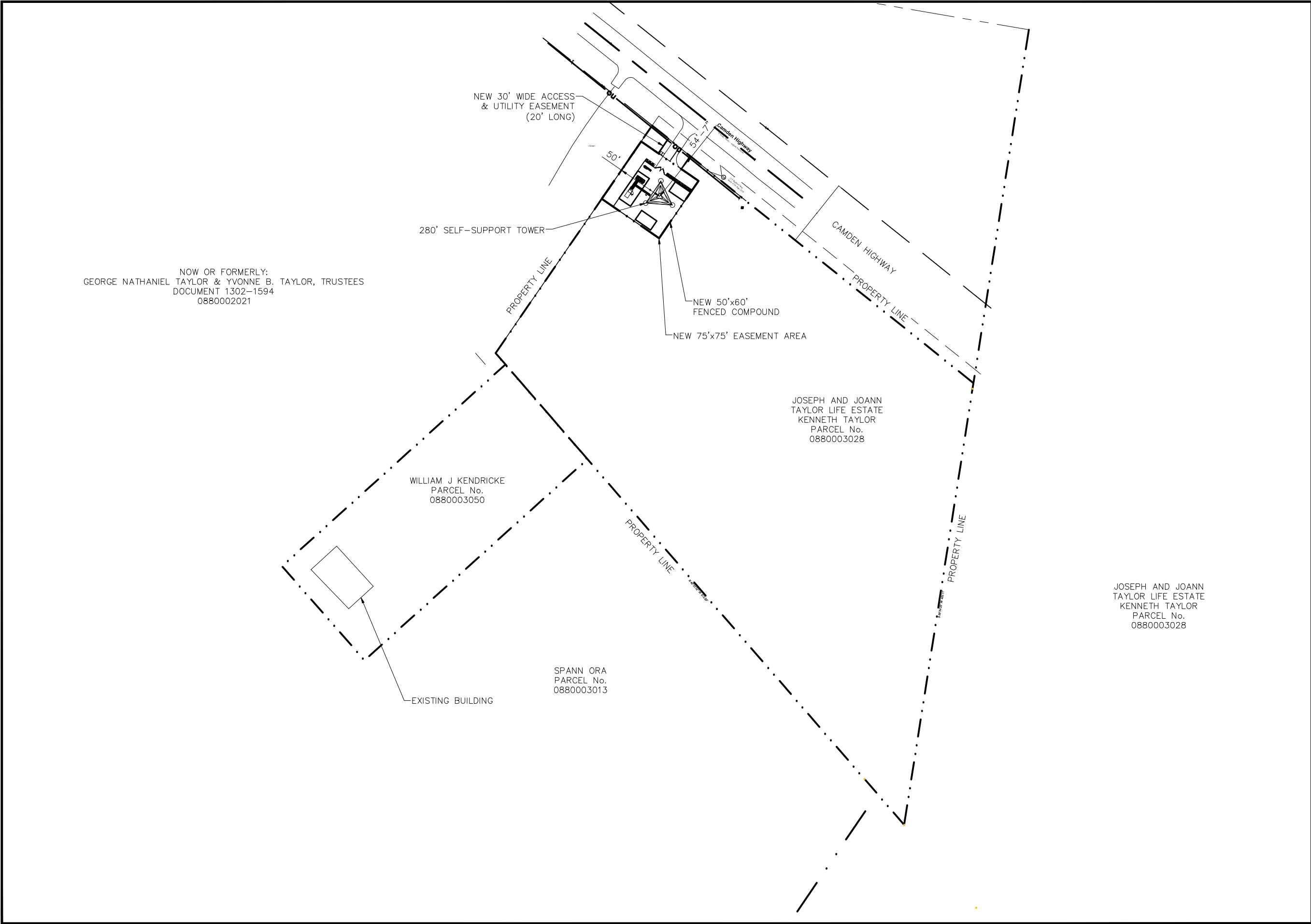
ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THE LATEST EDITIONS OF THE FOLLOWING CODES.

- 2021 INTERNATIONAL BUILDING CODE
- 2023 NATIONAL ELECTRIC CODE
- 2009 INTERNATIONAL ENERGY CONSERVATION CODE
- 2018 INTERNATIONAL EXISTING BUILDING CODE
- 2021 INTERNATIONAL FIRE CODE
- 2021 INTERNATIONAL MECHANICAL CODE
- 2021 INTERNATIONAL RESIDENTIAL CODE



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6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY:



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HERMITAGE, PA 16148
724.308.7855
www.t-sqr.d.com

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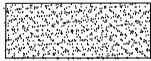
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HARMONI SITE NAME:
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CAMDEN HIGHWAY
REMBERT, SC 29128

NEW
280' SELF-SUPPORT TOWER

SHEET NUMBER:	REV.:
Z-1	3
	68160

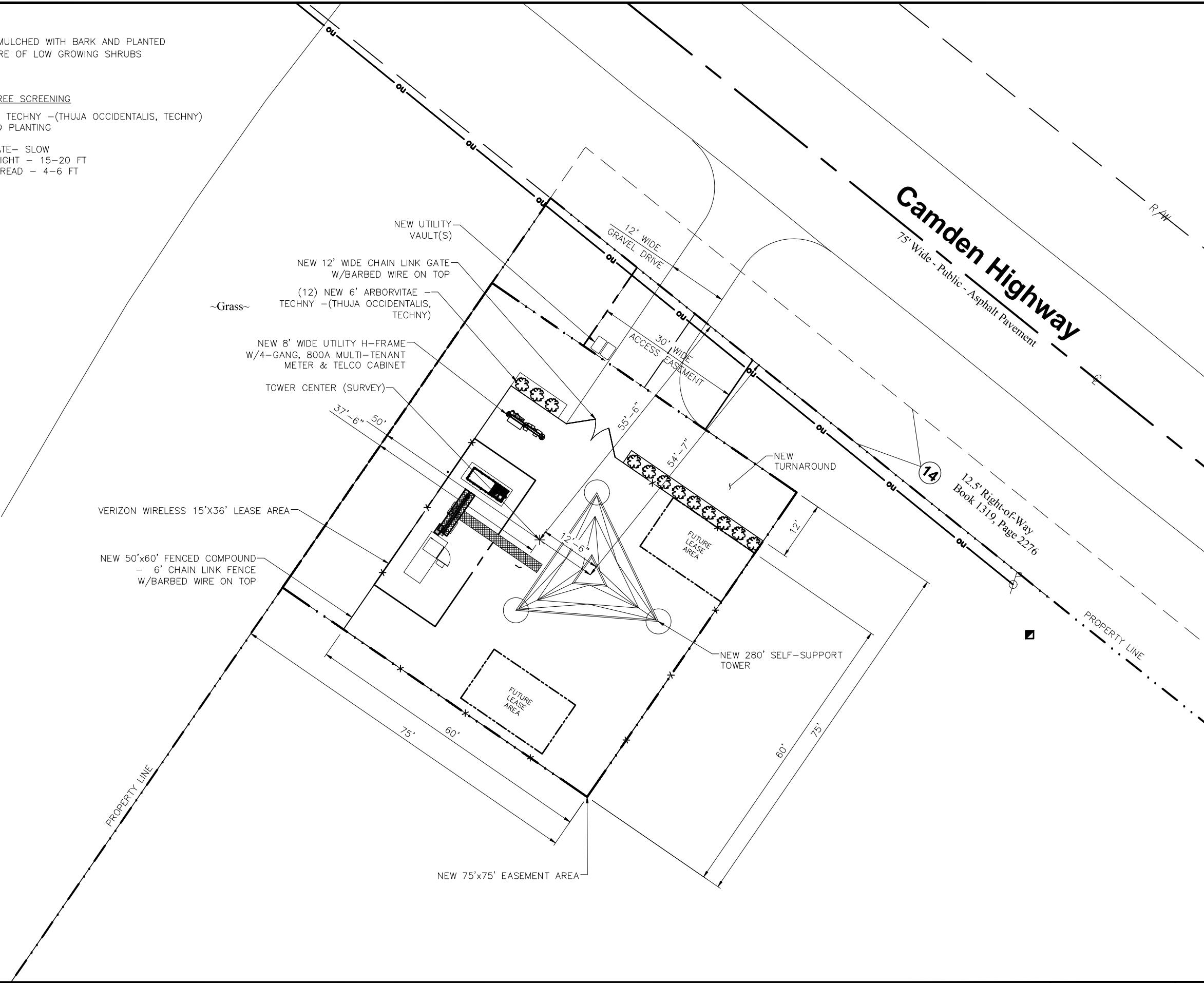


AREA TO BE MULCHED WITH BARK AND PLANTED
WITH A MIXTURE OF LOW GROWING SHRUBS



EVERGREEN TREE SCREENING

- ARBORVITAE – TECHNÝ –(THUJA OCCIDENTALIS, TECHNÝ)
– 72” TALL @ PLANTING
– 15 PLANTS
– GROWTH RATE– SLOW
– MATURE HEIGHT – 15–20 FT
– MATURE SPREAD – 4–6 FT



PLANS PREPARED FOR:

HARMONI TOWERS

6210 ARDREY KELL ROAD
SUITE 375
CHARLOTTE, NC 28277

PLANS PREPARED BY:

T² T-SQUARED
SITE SERVICES
2501 SHENANGO VALLEY FREEWAY, SUITE 3
HERMITAGE, PA 16148
724.308.7855
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REMBERT, SC 29128
NEW
280' SELF-SUPPORT TOWER

SHEET NUMBER: REV.:

Z-2

3

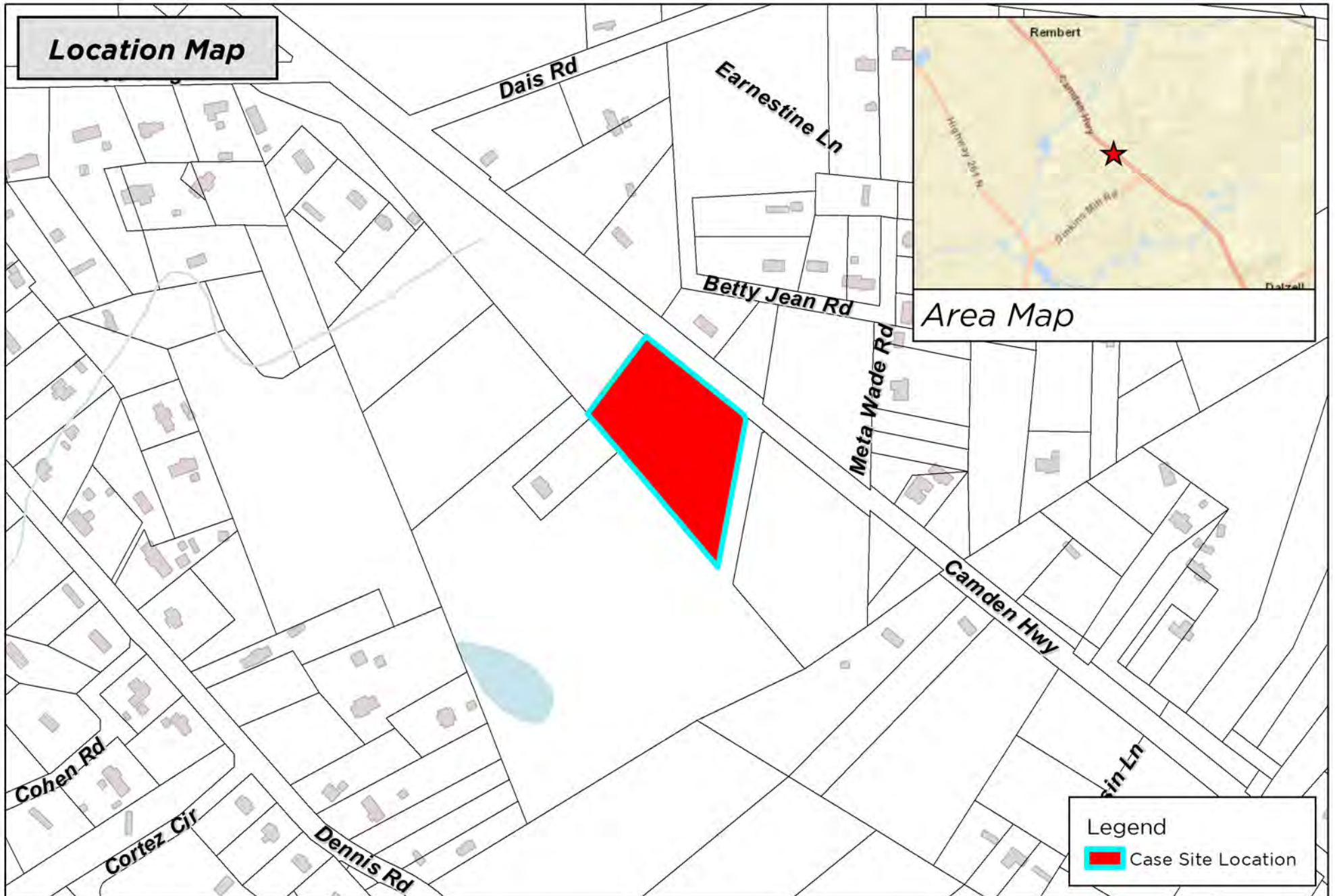
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SITE PLAN

1" = 20'-0"

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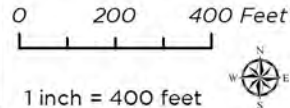
Location Map



Legend

 Case Site Location

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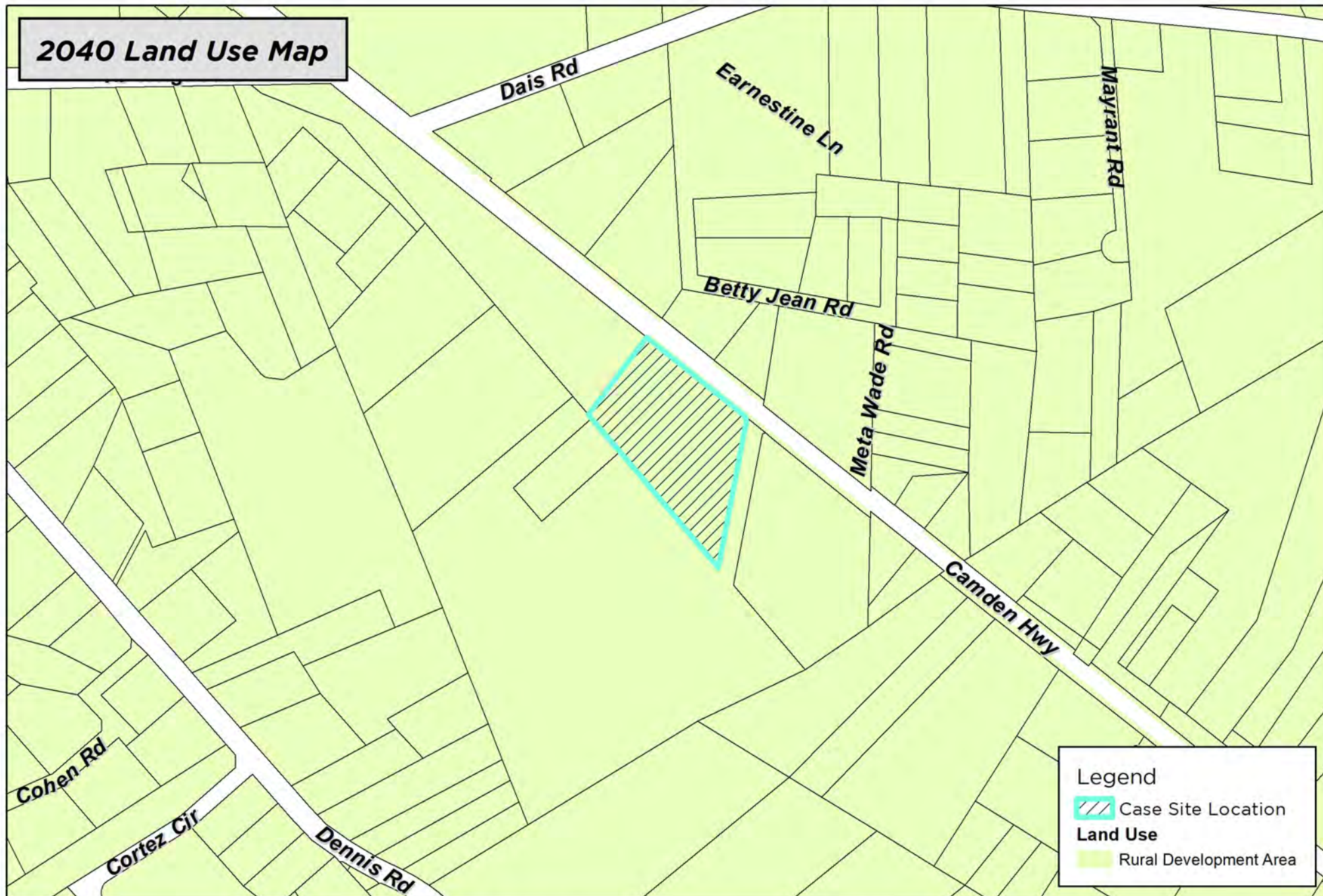


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2040 Land Use Map



Legend

 Case Site Location

Land Use

 Rural Development Area

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1 inch = 400 feet

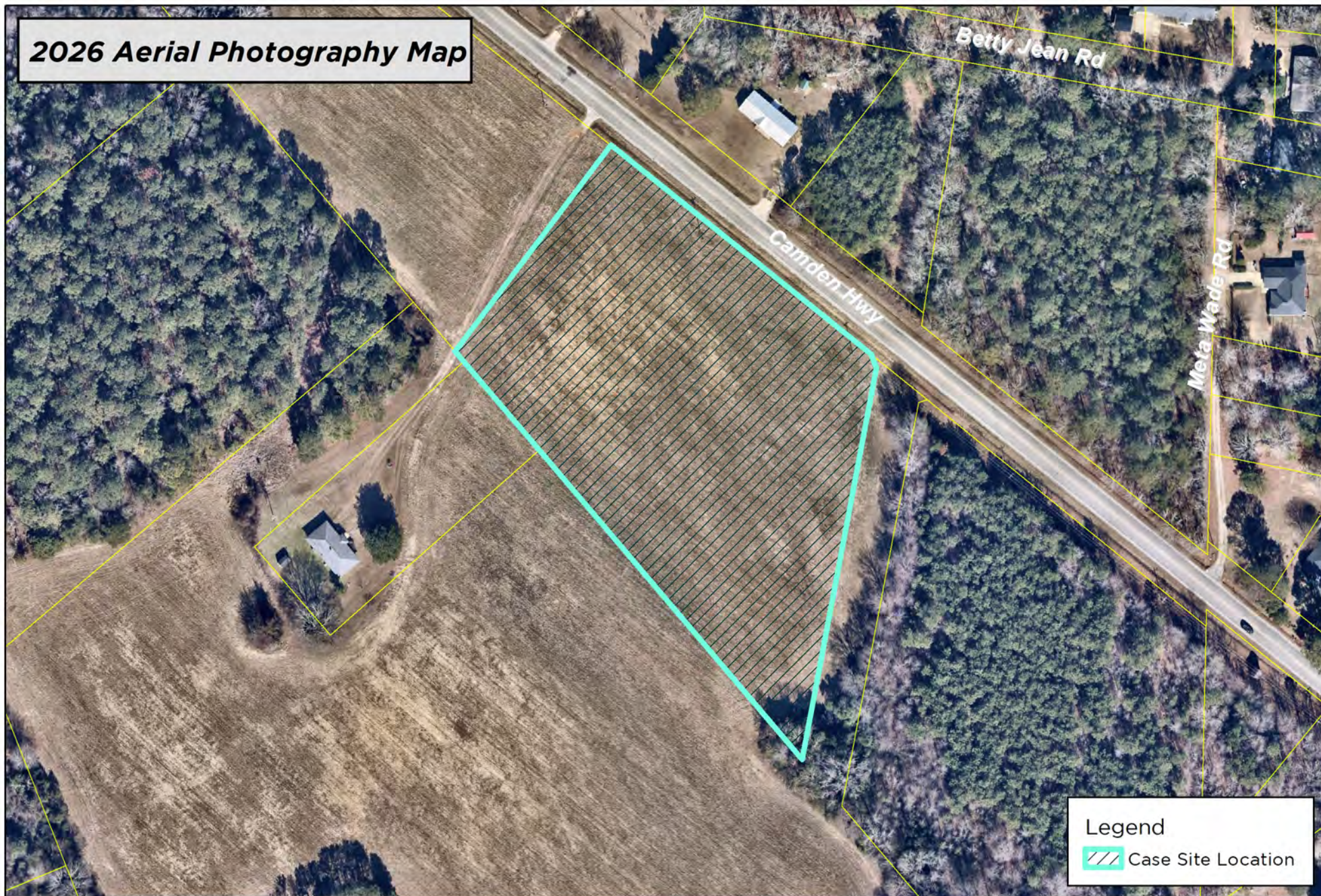


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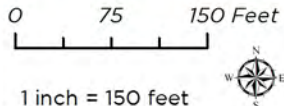
2026 Aerial Photography Map



Legend

 Case Site Location

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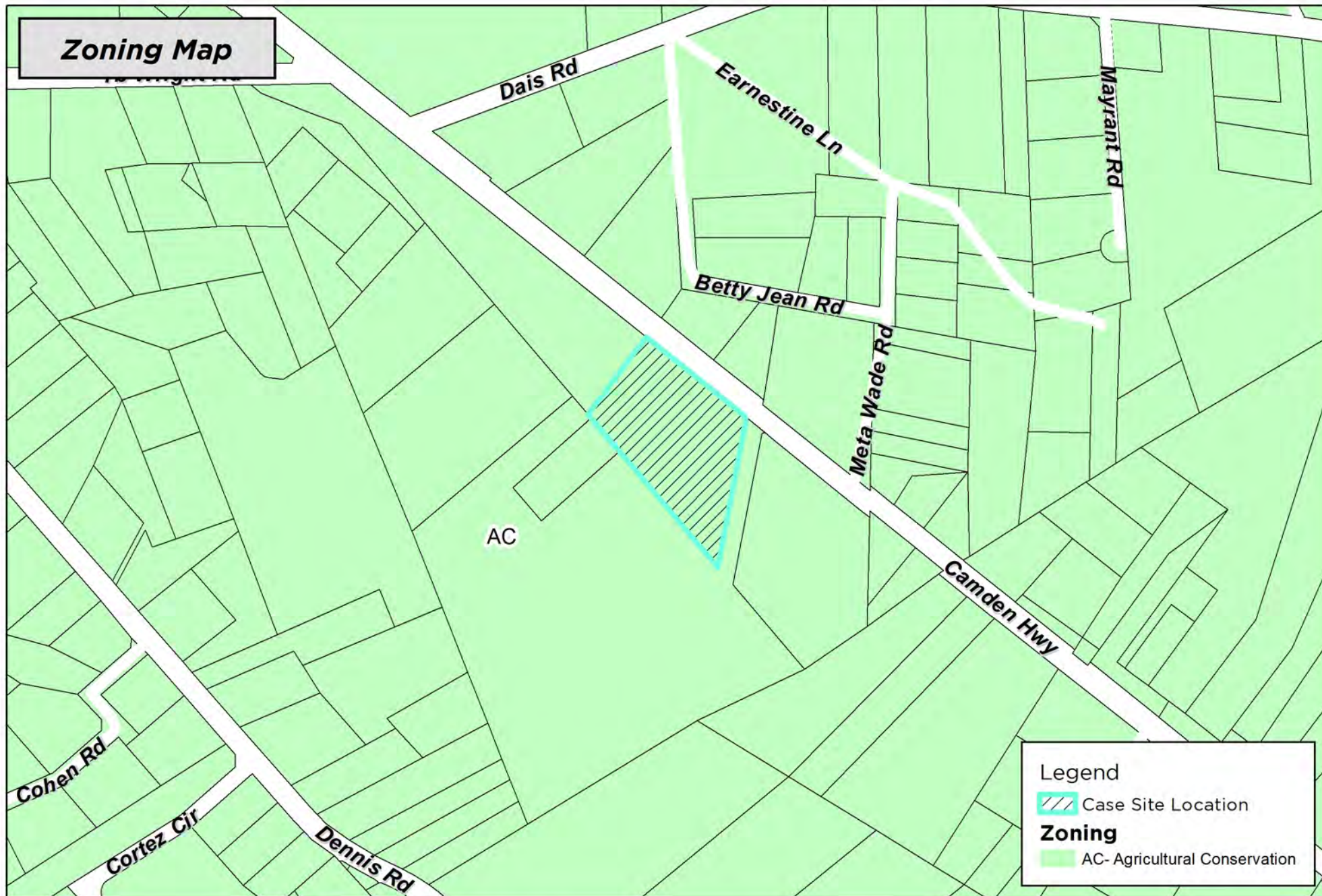


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Zoning Map



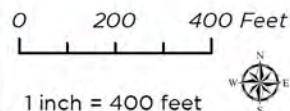
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 Case Site Location

Zoning

 AC- Agricultural Conservation

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Highway Corridor Protection District Map



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