

Atlanta

6611 Bay Circle
Suite 220
Norcross, GA 30071
770-662-5807

Charleston

1051 Johnnie Dodds Blvd
Suite F
Mt. Pleasant, SC 29464
843-881-3128

Jacksonville

8535 Baymeadows Rd
Suite 45
Jacksonville, FL 32256
904-371-4221

Savannah

31 Park of Commerce Way
Suite 200A
Savannah, GA 31405
912-233-2550

www.brockington.org

October 16th, 2007

Kevin Dowdy
Flint Media, Inc
PO Box 7425
Bainbridge, Georgia 39818-7425

Re: Archaeological Site Assessment, Flint Media Tower Survey, Climax,
Decatur County, Georgia

Dear Mr. Dowdy,

This letter report summarizes the archaeological assessment carried out on 26 September 2007 on 4.23 acres of property for the proposed construction of a 379 foot (to include 34 foot antenna) radio tower for Flint Media, Inc. The enclosed research results should be used for planning purposes only, and are not meant as compliance with Section 106 of the National Historic Preservation Act or other state and federal legislation.

The purpose of the site visit on 26 September 2007 was to conduct a series of shovel tests to determine the extent, if any, of subsurface archaeological remains. According to archaeological regulations established in the state of Georgia, it is necessary to conduct a series of shovel tests in a given project area in an effort to determine if any artifacts are present. A shovel test consists of simply digging a test measuring 30 cm x 30 cm and up to a depth of approximately 80 cm or until reaching what is known as sterile soil; soil where no archaeological material will be found, such as red clay. In an ideal survey where the project area is flat with little to no terrain variation and no dissecting creeks, shovel tests are conducted every 30 meters across the entire area. Each test is screened and every level of soil color and consistency change is noted. If archaeological material is located, it is put in a bag noting the particular soil level it came from as well as various other details and returned to a lab for analysis. Because the proposed project area is located in an open field, the terrain is generally flat with little to now elevation change. As a result, seven shovel tests were conducted along with intensive pedestrian survey of the project area and proposed access route. Five shovel tests were conducted within the 418 ft x 418 ft proposed perimeter of the radio tower platform with one at the center marker and one in each corner. In addition to this, two shovel tests were conducted in the proposed 320 ft access road extending from SR 262 to the project area.

The project area consists of 4.23 acres that is bordered in all directions by an open plowed field (Figures 1-6). The project area is located on SR 262 north of the town of Climax, Georgia and can be accessed via a locked bar gate located on SR 262 (Figure 7-10). The property is barren of trees and was

recently cleared and plowed. Clearing included uprooting trees, plowing, and stacking the tree limbs and trunks in large piles in various places on the property. These piles were then burned. Since this activity took place, the field has become overgrown with tall grasses and briars. The entire project area has been disturbed by plowing and tree upheaval. Subsoils were tilled to the surface and often exposed and eroded. Seven shovel tests were conducted and consistently at 10 cm topsoils changed from dark brown silty loam to a sterile, reddish-yellow sandy subsoil. All seven shovel tests were excavated to 80 cm or sterile subsoil and all were negative for archaeological material.

In summary, no previously recorded archaeological sites or historic properties were located in the area of potential effects (Figure 11). State archaeological regulations in regard to radio tower construction require that background research for a project include a one-mile area of potential effect around the proposed project area. Visual reconnaissance of the project area did not identify any archaeological resources. The entire project area has been impacted by plowing and clearing of the existing field. As a result, impacts include heavy soil disruption and erosion. The potential of intact, previously unidentified, archaeological resources within the project area is considered low. Our investigation of the area definitively indicates that there is no intact buried archaeological site at the location. We do not recommend any additional investigation or preservation measures.

Please review this information and if you have any questions, or need additional information, please call me at 678-638-4132 or email at katknapp@brockington.org.

Sincerely,

BROCKINGTON AND ASSOCIATES, INC.

Katherine Knapp, M.S., RPA
Archaeologist

New Tower (“NT”) Submission Packet

FCC FORM 620

Introduction

The **NT Submission Packet** is to be completed by or on behalf of Applicants to construct new antenna support structures by or for the use of licensees of the Federal Communications Commission (“FCC”). **The Packet (including Form 620 and attachments) is to be submitted to the State Historic Preservation Office (“SHPO”) or to the Tribal Historic Preservation Office (“THPO”), as appropriate, before any construction or other installation activities on the site begin. Failure to provide the Submission Packet and complete the review process under Section 106 of the National Historic Preservation Act (“NHPA”)¹ prior to beginning construction may violate Section 110(k) of the NHPA and the Commission’s rules.**

The instructions below should be read in conjunction with, and not as a substitute for, the “Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission,” dated September 2004, (“Nationwide Agreement”) and the relevant rules of the FCC (47 C.F.R. §§ 1.1301-1.1319) and the Advisory Council on Historic Preservation (“ACHP”) (36 C.F.R. Part 800).²

Exclusions and Scope of Use

The NT Submission Packet should not be submitted for undertakings that are excluded from Section 106 Review. The categories of new tower construction that are excluded from historic preservation review under Section 106 of the NHPA are described in Section III of the Nationwide Agreement.

Where an undertaking is to be completed but no submission will be made to a SHPO or THPO due to the applicability of one or more exclusions, the Applicant should retain in its files documentation of the basis for each exclusion should a question arise as to the Applicant’s compliance with Section 106.

¹ 16 U.S.C. § 470f.

² Section II.A.9. of the Nationwide Agreement defines a “historic property” as: “Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian Organization that meet the National Register criteria.”

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB
3060-1039
Estimated Time Per Response:
.5 to 10 hours

The NT Submission Packet is to be used only for the construction of new antenna support structures. Antenna collocations that are subject to Section 106 review should be submitted using the Collocation (“CO”) Submission Packet (FCC Form 621).

General Instructions: NT Submission Packet

Fill out the answers to Questions 1-5 on Form 620 and provide the requested attachments. Attachments should be numbered and provided in the order described below.

For ease of processing, provide the Applicant’s Name, Applicant’s Project Name, and Applicant’s Project Number in the lower right hand corner of each page of Form 620 and attachments.³

1. Applicant Information

Full Legal Name of Applicant: Kevin Dowdy

Name and Title of Contact Person: Owner, Flint Media, Inc.

Address of Contact Person (including Zip Code):
PO Box 7452, Bainbridge, GA 39818-7452

Phone: 229-416-6021 Fax: 229-246-9995

E-mail address: kevin@live1019.com

2. Applicant's Consultant Information

Full Legal Name of Applicant's Section 106 Consulting Firm:

Brockington and Associates, Inc.

Name of Principal Investigator: Katherine Knapp

Title of Principal Investigator: Project Manager/Archaeologist

Investigator’s Address: 6611 Bay Circle, Suite 200

³ Some attachments may contain photos or maps on which this information can not be provided.

Applicant’s Name: Kevin Dowdy
Project Name: Flint Media Tower
Project Number: 3273

d. Proposed tower height above ground level:⁵ 375 feet; 114 meters

e. Tower type:

guyed lattice tower self-supporting lattice monopole

other (briefly describe tower) _____

4. Project Status:⁶

a. Construction not yet commenced;

b. Construction commenced on [date] _____; or,

c. Construction commenced on [date] _____ and was completed on [date] _____.

5. Applicant's Determination of Effect:

a. **Direct Effects** (check one):

i. No Historic Properties in Area of Potential Effects ("APE") for direct effects;

ii. "No effect" on Historic Properties in APE for direct effects;

iii. "No adverse effect" on Historic Properties in APE for direct effects;

iv. "Adverse effect" on one or more Historic Properties in APE for direct effects.

b. **Visual Effects** (check one):

i. No Historic Properties in Area of Potential Effects ("APE") for visual effects;

ii. "No effect" on Historic Properties in APE for visual effects;

iii. "No adverse effect" on Historic Properties in APE for visual effects;

iv. "Adverse effect" on one or more Historic Properties in APE for visual effects.

⁵ Include top-mounted attachments such as lightning rods.

⁶ Failure to provide the Submission Packet and complete the review process under Section 106 of the NHPA prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules. See Section X of the Nationwide Agreement.

Applicant's Name: Kevin Dowdy

Project Name: Flint Media Tower

Project Number: 3273

Certification and Signature

I certify that all representations on this FCC Form 620 and the accompanying attachments are true, correct, and complete.

Katherine A. Knapp
Signature

16 OCT 2007
Date

Katherine A. Knapp
Printed Name

Project Manager/Archaeologist
Title

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).

Applicant's Name: Kevin Dowdy
Project Name: Flint Media
Project Number: 3273

Attachments

Provide the following attachments in this order and numbered as follows:

Attachment 1. Résumés / Vitae.

Provide a current copy of the résumé 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 the Submission Packet for this proposed facility.

Attachment 2. Additional Site Information

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site in conjunction with the proposed facility.

Attachment 3. 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 undertaking 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.

Attachment 4. Local Government

- a. Has any local government agency been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Agreement? If so, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (e.g., correspondence or notices).
- b. If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.

Attachment 5. Public Involvement

Describe measures taken to obtain public involvement in this project (e.g., notices, letters, or public meetings). Provide copies of relevant documentation.

Attachment 6. Additional Consulting Parties

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

Attachment 7. Areas of Potential Effects

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

Attachment 8. Historic Properties Identified in the APE for Visual Effects

- 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.1.a. of the Nationwide Agreement.⁷
- 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 Attachment 8a, 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 C.F.R. Part 63).
- c. For any properties listed on Attachment 8a that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

⁷ Section VI.D.1.a. of the Nationwide Agreement requires the Applicant to review publicly available records to identify within the APE for visual effects: i) properties listed in the National Register; ii) properties formally determined eligible for listing by the Keeper of the National Register; iii) properties that the SHPO/THPO certifies are in the process of being nominated to the National Register; iv) properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local government representing the Department of Housing and Urban Development (HUD); and, v) properties listed in the SHPO/THPO Inventory that the SHPO/THPO has previously evaluated and found to meet the National Register criteria, and that are identified accordingly in the SHPO/THPO Inventory.

Attachment 9. Historic Properties Identified in the APE for Direct Effects

- a. List all properties identified in Attachment 8a or 8b that are within the APE for direct effects.
- 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 Attachment 9a, that the Applicant considers to be eligible for listing in the National Register as a result of the Applicant's research. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. 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.
- c. Describe the techniques and the methodology, including any field survey, used to identify historic properties within the APE for direct effects.⁸ 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.⁹

Attachment 10. Effects on Identified Properties

For each property identified as a Historic Property in Attachments 8 and 9:

- 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.
- b. Provide copies of any correspondence and summaries of any oral communications with the SHPO/THPO.
- c. 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.

⁸ 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.

⁹ Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if one 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.

Attachment 11. Photographs

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 (see Item 12 below) or text, and dated; the focal length of the lens 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 tower site showing 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 tower.
- b. Photographs of all listed and eligible properties within the Areas of Potential Effects.
- c. If any listed or eligible properties are visible from the proposed tower site, photographs looking at the tower site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included.
- d. Aerial photos of the APE for visual effects, if available.

Attachment 12. Maps

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 name of quad and date.
- b. Show the location of the proposed tower site and any new access roads or other easements including excavations.
- c. Show the locations of each property listed in Attachments 8 and 9.
- d. Include keys for any symbols, colors, or other identifiers.

Attribution and Bibliographic Standards. All reports included in the Submission Packet should be footnoted and contain a bibliography of the sources consulted.

- a. Footnotes may be in a form generally accepted in the preparer's profession so long as they identify the author, title, publisher, date of publication, and pages referenced for published materials. For archival materials/documents/letters, the citation should

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB

3060-1039

Estimated Time Per Response:

.5 to 10 hours

include author, date, title or description and the name of the archive or other agency holding the document.

- b. A bibliography should be appended to each report listing the sources of information consulted in the preparation of the report. The bibliography may be in a form generally accepted in the preparer's profession.

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information provided in the application to determine whether approving this application is in the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; (b) any employee of the FCC; or (c) the United States Government is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection.

If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized.

If you do not provide the information requested on this form, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

We have estimated that each response to this collection of information will take an average of .50 to 10 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-1039), Washington, DC 20554. We will also accept your comments via the Internet if you send them to Judith-B.Herman@fcc.gov. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number of if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1039.

ATTACHMENT 1

Brockington

Cultural Resources Consulting

Katherine Anne Knapp
Project Manager/
Archaeologist

Education MS, Anthropology (2001) Idaho State University
BA, Anthropology (1996) Washington State University

Areas of Specialization Cultural Resources Management
Archaeological Investigations
Lithic Analysis
Western U.S. Culture History and Material Culture

Professional Society Membership Register of Professional Archaeologists
Georgia Council of Professional Archaeologists

Professional Position [May 2007 - Present] Project Manager/ Archaeologist

Experience

2007 Project Manager, Principal Investigator, Archaeological Assessment, Flint Media Tower, Decatur County, Georgia

2007 Project Manager, Supervising Archaeologist, Archaeological Assessment, Rivercliff Lutheran Church Development, City of Roswell, Georgia

2007 Project Manager, Supervising Archaeologist Phase I Archaeological Survey of the Proposed State Route 119 Widening, Shelby County, Alabama.

2007 Project Manager, Supervising Archaeologist Phase I and II Archaeological Survey and Testing, Southern Cross Ranch Property, Lumpkin County, Georgia

2007 Project Manager, Supervising Archaeologist Phase I Survey for the Proposed Suwanee Retail Tract, Gwinnett County, Georgia

2007 Archaeologist, Report co-author Cultural Resources Survey of the Proposed Buck Station Combined Cycle Project, Rowan County, North Carolina

2007 Project Manager, Archaeologist, Archaeological Site Assessment, Dobbins AB, Forest Stand 8, Gwinnett County, Georgia

2006 Instructor, University of Maryland University College, European Division, Anthropology and Archaeology

2002-2005 Sergeant, U.S. Army, Russian Linguist and Paralegal

2001-2002 Staff Archaeologist, Report Author, Class III Cultural Resources Inventory of the Oak Springs Training Area, Camp Williams, Utah County

2000-2001 Historic and Lab Analyst, Interstate 15 Widening Project, Salt Lake City, UT

1999-2000 Field Director, Idaho State University, Pocatello, ID

1999 Assistant to Museums Exhibits Director, Idaho Museum of Natural History, Pocatello, ID

1995-1996 Field Director, Phase I Archaeological Surveys and one Phase III Data Recovery, USDA Forest Service Western United States

1994-1996 Lab Technician/Analyst, NAGPRA Recovery, Hanson Nuclear Facility, Center for Northwest Anthropology, Pullman, Washington

1996-1997 Field Technician, Phase I Archaeological Survey Hells Canyon, Idaho/Oregon Border, Rainshadow Research, Pullman, WA

Projects, Publications, and
Papers

2007	Archaeological Assessment and Letter Report/FCC Form 620, Flint Media Tower, Decatur County, Georgia
2007	Archeological Assessment and Letter Report, Rivercliff Lutheran Church Development, City of Roswell, Georgia
2007	Phase I Archaeological Survey and Phase II Testing of the Southern Cross Ranch Property, Lumpkin County, Georgia
2007	Intensive Cultural Resources Survey for the Proposed Suwanee Retail Tract, Gwinnett County, Georgia
2007	Addendum to Phase I Archaeological Survey of the Proposed State Route 119 Widening, Shelby County, Alabama.
2007	Cultural Resources Survey of the Proposed Buck Station Combined Cycle Project, Rowan County, North Carolina <i>With Patricia Stallings</i>
2007	Archaeological Site Assessment, Dobbins AB, Forest Stand 8, Gwinnett County, Georgia
2001	Class III Cultural Resources Inventory of the Oak Springs Training Area, Camp Williams, Utah County

ATTACHMENT 2

(See Attached Letter Report)

ATTACHMENT 3

(Not Applicable)

ATTACHMENTS 4-5

Kat Knapp

From: Bolenbevel@aol.com
Sent: Wednesday, October 10, 2007 10:25 AM
To: Kat Knapp
Cc: Bolenbevel@aol.com
Subject: Re: address

The Decatur County Planning and Zoning Commission meets the 1st Tuesday of each month and publishes their agenda two weeks prior in the Post Searchlight Newspaper. We met with the zoning commission on Sept 4th, 2007 and any interested members of the public. The tower project was presented and approved by the Planning Commission and sent to the Decatur County Board of Commissioners for approval. No objection from anyone in attendance or by proxy.

The Decatur County Board of Commissioners met on September 11th, 2007 in a public meeting with a published agenda (which included this proposed site) and unanimously approved the tower site project. There was no objection by anyone in attendance or by proxy.

So to answer your question (or the FCC's) we did involve the local government - two different agencies, and the public is encouraged and advised to be present and provide feedback.

This should be sufficient...let me know.

Kevin

See what's new at <http://www.aol.com>

ATTACHMENT 6

(No Additional Parties Contacted)

ATTACHMENT 7

(See Attached Letter Report)

ATTACHMENT 11



Figure 1. View to the north from the center point of the proposed project area.



Figure 2. View to the south from the center point of the proposed project area.



Figure 3. View to the east from the center point of the proposed project area.



Figure 4. View to the west from the center point of the proposed project area.



Figure 5. View of proposed access route from the northeast corner of the project area.



Figure 6. View of proposed access route looking west from Georgia SR 262.



Figure 7. Aerial view of site location, 1999.

ATTACHMENT 12



Figure 8. Overview of project location on Vada, Georgia, *USGS 7.5" Topographic Quadrangle, 1981.*



Figure 9. View of project location with the one-mile area of potential effects, Vada, Georgia USGS 7.5" Topographic Quadrangle, 1981.

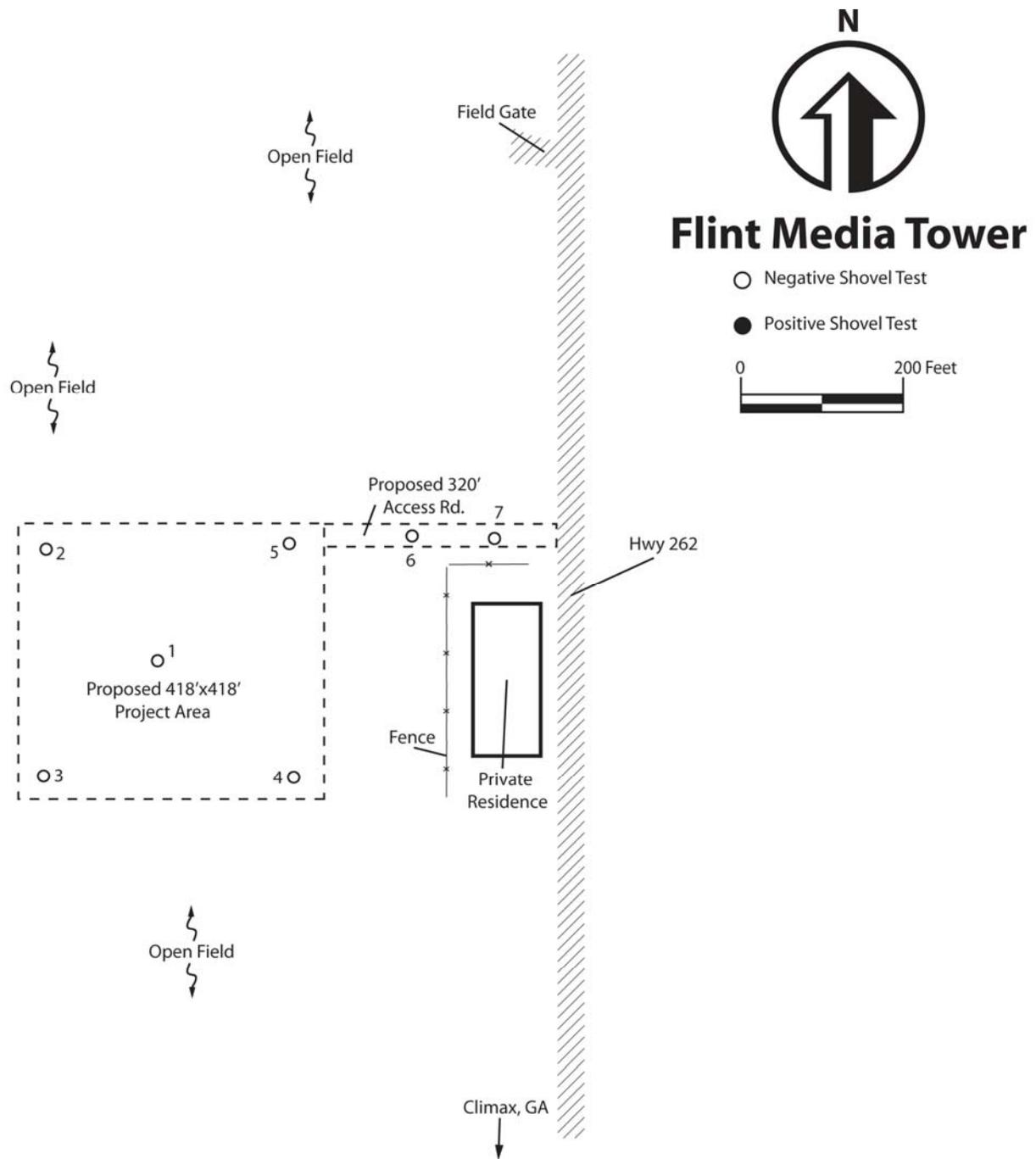


Figure 10. Site sketch of the proposed project area and access route.

NAHRGIS- Archaeologic Sites

 **Study Area layer**

 **Approved Sites**

 **Unapproved Sites**

Transportation

Abc Highway Numbers

 **Shields**

 **Interstates**

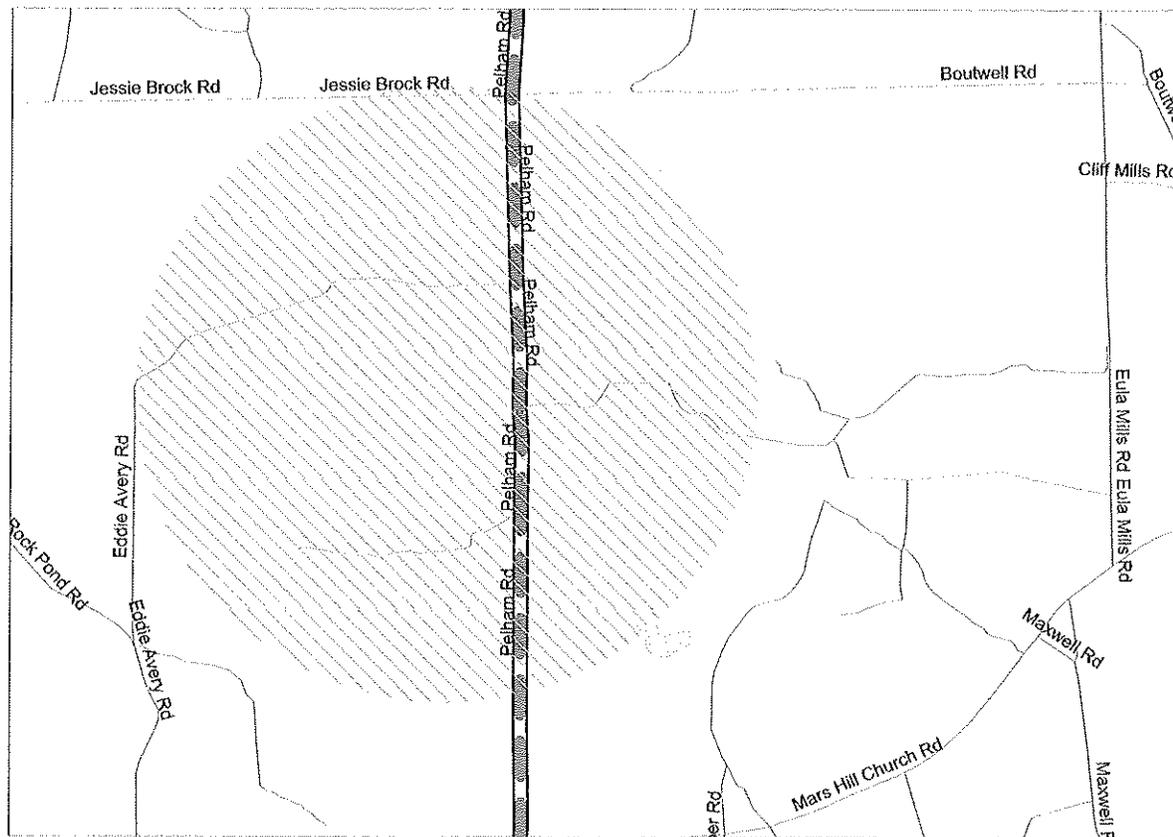
 **Highways**

 **Streets**

 **Lakes**

 **Streams**

 **Places**



SCALE 1 : 39,350

