



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
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In Reply Refer To:

May 22, 2023

Project code: 2023-0084305

Project Name: At&T FirstNet Network telecommunications tower Camp Merrill, GA

Federal Nexus: no

Federal Action Agency (if applicable): Army

**Subject:** Technical assistance for 'At&T FirstNet Network telecommunications tower Camp Merrill, GA'

Dear James Parker:

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 May 22, 2023, for 'At&T FirstNet Network telecommunications tower Camp Merrill, GA' (here forward, Project). This project has been assigned Project Code 2023-0084305 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

### 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 the 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 Rangewide Determination Key (Dkey), invalidates this letter.

### Determination for the Northern Long-Eared Bat

Based upon your IPaC submission and a standing analysis, your project is not reasonably certain to cause incidental take of the northern long-eared bat. Unless the Service advises you within 15 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the Action is not likely to result in unauthorized take of the northern long-eared bat.

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

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

- Amber Darter *Percina antesella* Endangered
- Cherokee Darter *Etheostoma scotti* Threatened
- Etowah Darter *Etheostoma etowahae* Endangered
- Frecklebelly Madtom *Noturus munitus* Threatened
- Monarch Butterfly *Danaus plexippus* Candidate
- Small Whorled Pogonia *Isotria medeoloides* Threatened
- Whooping Crane *Grus americana* Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may cause prohibited take of the animal species and/or critical habitat listed above. Note that if a new species is listed that may be affected by the identified action before it is complete, additional review is recommended to ensure compliance with the Endangered Species Act.

### Next Steps

Coordination with the Service is complete. This letter serves as technical assistance. All conservation measures should be implemented as proposed. Thank you for considering federally listed species during your project planning.

We are uncertain where the northern long-eared bat occurs on the landscape outside of known locations. Because of the steep declines in the species and vast amount of available and suitable forest habitat, the presence of suitable forest habitat alone is a far less reliable predictor of their presence. Based on the best available information, most suitable habitat is now expected to be unoccupied. During the interim period, while we are working on potential methods to address this uncertainty, we conclude take is not reasonably certain to occur in areas of suitable habitat where presence has not been documented.

If no changes occur with the Project or there are no updates on listed species, no further consultation/coordination for this project is required for the northern long-eared bat. 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 before project implements any changes which are final or commits additional resources.

If you have any questions regarding this letter or need further assistance, please contact the Georgia Ecological Services Field Office and reference Project Code 2023-0084305 associated with this Project.

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**Action Description**

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

**1. Name**

At&T FirstNet Network telecommunications tower Camp Merrill, GA

**2. Description**

The following description was provided for the project 'At&T FirstNet Network telecommunications tower Camp Merrill, GA':

The Proposed Action includes the construction, operation and maintenance of an AT&T FirstNet Network telecommunications tower on Camp Merrill that will integrate with the rest of the FirstNet system. The tower would be a Self-support lattice tower with a full height of 308-ft. Tower height breakdown includes the tower at 300-ft, medium density strobe lights installed at 300-ft, antenna protrusion would be at 305-ft, and a lightning rod up to its highest point of 308-ft. The FirstNet tower would be contained in a proposed 100-ft X 100-ft (10,000 SF or 0.23 acres) compound. The compound would include perimeter security fencing, one AT&T 6'-8" X 6'-8" pre-fabricated walk-in cabinet, and an AT&T stand alone 20kW Diesel powered emergency generator mounted on a prefabricated elevated helical foundation.

The lights will be medium intensity, dual obstruction strobe lights that will be red at night and white during the day. The Federal Aviation Administration sets the requirements for lighting (FAA Advisory Circular 70/7460-1 L Change 2, medium system – Chapters 4, 8, (M-Duel) and 12) and determines the type and location of tower lights based on aircraft safety and safe navigable airspace.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.62872659999999,-84.10390117279411,14z>



## DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect, but not likely to adversely affect” for the Endangered northern long-eared bat (*Myotis septentrionalis*).

## QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of the northern long-eared bat 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. Do you have post-white nose syndrome occurrence data that indicates that northern long-eared bats (NLEB) are likely to be present in the action area?

Bat occurrence data may include identification of NLEBs in hibernacula, capture of NLEBs, tracking of NLEBs to roost trees, or confirmed acoustic detections. With this question, we are looking for data that, for some reason, may have not yet been made available to U.S. Fish and Wildlife Service.

No

3. Does any component of the action involve construction or operation of wind turbines?

**Note:** For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

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

No

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## PROJECT QUESTIONNAIRE

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**IPAC USER CONTACT INFORMATION**

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