

ENVIRONMENTAL ASSESSMENT REPORT
For
BLUE SKY TOWERS III, LLC

Parcel 3
Long Point & Cotton Garden
East End B Quarter
St. Croix, USVI
(08-30-2024)

CZM Major Land Development Application

Applicant: Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864
978-291-6517

SECTION INDEX

<u>SECTION NUMBER</u>	<u>SECTION NAME</u>
1.00	NAME AND ADDRESS OF APPLICANT
2.00	LOCATION OF PROJECT
3.00	ABSTRACT
4.00	STATEMENT OF OBJECTIVES SOUGHT BY THE PROPOSED PROJECT.
5.00	DESCRIPTION OF PROJECT
5.01	Summary
5.02	Drawings and Maps
5.03	Project Work Plan
6.00	ENVIRONMENTAL SETTING AND PROBABLE PROJECT IMPACT ON THE ENVIRONMENT
6.01	Climate/Weather
6.02	Landform, Geology, and Soils
6.03	Drainage, Flooding, and Erosion Control
6.04	Fresh Water Resources
6.05	Oceanography
6.06	Marine Resources
6.07	Terrestrial Resources
6.08	Wetlands
6.09	Rare and Endangered Species
6.10	Air Quality
7.00	IMPACT OF THE PROPOSED PROJECT ON THE HUMAN ENVIRONMENT
8.00	MITIGATION PLANS
9.00	ALTERNATIVES TO THE PROPOSED ACTION
10.00	RELATIONSHIP BETWEEN SHORT TERM AND LONG TERM USES OF MANS ENVIRONMENT
11.00	REFERENCES

Appendixes

APPENDIX LIST

APPENDIX A : MAPS

- Location Map
- Vicinity Map
- Survey Map: Green Piece Engineering
- Survey Map: Antilles Survey Inc. OLG 1177
- Recorded Plot Map
- Official Zoning Map
- FEMA Flood Insurance Rate Map
- Water Resources Map
- Sediment Reduction Program Map
- Soil Survey Map

APPENDIX B : MAJOR PROJECT SUMMARY

- Major Project Summary (DPNR Form L&WD-4)

APPENDIX C : SITE PLANS

- Site Plan (Tower Tech Engineering)
- Site Plan (Green Piece Engineering)

APPENDIX D : OTHER SUBMITTAL DOCUMENTS

- Lease Agreement
- Easement Details (Deed 1963)
- Title Search
- Current Business License
- Income Tax Clearance Letter
- Property Tax Clearance Letter
- Articles of Organization
- Letter of Authorization (Officer's Certificate)
- Permit Application (Form L&WD -2)
- Zoning Requirements Table (Form L&WD – 3)
- Major Project Summary Data (Form L&WD – 4)
- Proof of Legal Interest (Form L&WD – 5)
- Application for Tax Filing and Payment Status Report (Form L&WD-6)
- Corporate Application Form (Form L&WD – 7)
- NFIP Flood Zone Designation (Form L&WD – 8)
- Certificate of Good Standing
- Adjacent Ownership Certification
- Elevation & Location Certification
- Public Notice

APPENDIX E: WORK PLAN

- Work Plan

APPENDIX F: DRAWINGS

- T1: Title Sheet
- GN-1: General Notes
- SI-1: Existing and Proposed Site Plans
- C-1: Proposed Site Plan
- C-2: Proposed Compound Site Plan
- C-3: Proposed Equipment Area Layout
- C-4: Site Elevation & Tower Configuration
- C-5: Erosion and Sediment Control Plan
- C-6: Details
- C-7: Details
- C-8: Fence Details
- C-9: Site Grounding Plan
- C-10: Site Grounding Details
- S-1: Monopole Plan & Details
- S-2: Monopole Details
- S-3: Equipment Details
- S-4: Equipment Details
- S-5: Antenna Mounting Details
- F-1: Foundation Plan, Details, and Notes
- E-1: Proposed Electrical Site Plan
- E-2: Electrical Details
- E-3: One Line Diagram
- E-4: Electrical & Grounding Plan
- E-5: Electrical & Grounding Plan

APPENDIX G: ARCHEOLOGICAL

- VISHPO Clearance Letter
- Phase 1 (A&B) Archeological Survey

APPENDIX H : PHOTOS

- Photo#1: Looking north toward proposed undertaking
- Photo#2: Looking north away from proposed undertaking
- Photo#3: Looking east toward proposed undertaking
- Photo#4: Looking east away from proposed undertaking
- Photo#5: Looking south toward proposed undertaking
- Photo#6: Looking south away from proposed undertaking
- Photo#7: Looking west toward proposed undertaking
- Photo#8: Looking west away from proposed undertaking
- Photo#9: Looking north along proposed easement
- Photo#10: Looking south along proposed easement
- Photo#11: Looking south along proposed easement
- Photo#12: Looking north along proposed easement
- Photo#13: General view of proposed undertaking

APPENDIX I : ENVIRONMENTAL

- Fish & Wildlife Findings Letter
- Phase I Environmental Survey Assessment Report (ESA)
- Bio Survey and Endangered Species Assessment

APPENDIX J : FEDERAL COMMUNICATIONS COMMISSION (FCC)

- FCC NEPA Summary Report

1.00 NAME and ADDRESS OF APPLICANT

Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864

2.00 LOCATION OF PROJECT

Subject property, Parcel No. 3 Long Point & Cotton Garden, STX, U.S.V.I., is situated on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, The latitude/longitude of the parcel is 17° 45' 08.6297", -64° 35' 26.7075" and the elevation of the parcel is approximately 148.2 feet above mean sea level. Plots 3 is defined on Green Piece Survey dated Aug 17, 2023, and Antilles Surveys, Inc. survey OLG file number (1177) dated March 5, 1962 (See Appendix A)

2.01 LOCATION MAP

(See Appendix A)

2.02 VICINITY MAP

(See appendix A)

3.00 ABSTRACT

Blue Sky Towers III, LLC is seeking to erect a 150-foot-tall monopole communications tower along with associated equipment, to be contained within a 60-foot by 60-foot lease area at Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, USVI. The project shall also include a 15-foot wide by 1,285.84-foot-long access/utility easement that extends northwest connecting with East End Road. Also included is a 15-foot wide by 369.6-foot-long access/utility easement that extends southwest connecting with existing utilities. The tower and equipment will be located at Parcel 3, and, the easement connecting with East End Road shall cross over Parcel 2. Both parcels are zoned R-1 (Residential). In total the proposed project is approximately 28,431.60 square feet.

The proposed tower is intended to facilitate participation by Liberty Mobile and the VI Government in the "First Responder Network" (FirstNet). FirstNet is intended as a communications network dedicated to emergency responders and the public safety community. An added benefit would be enhanced network coverage for residents and visitors well. The site is currently undeveloped and covered by heavy brush. Land clearing would be limited to access/utility easements, and, the 60'x 60' fenced "compound area" where the tower and associated equipment would be located. Earth change activities would be limited to the easements and tower foundation. Proposed development would not alter existing storm water flow in any significant manner. The property is owned by Michael Lohman, with the tower compound area leased to Blue Sky Towers III, LLC.

4.00 STATEMENT OF OBJECTIVES SOUGHT BY THE PROPOSED PROJECT

The objective of the project is to erect a 150' self supporting monopole communications tower on the site.

5.00 DESCRIPTION OF PROJECT

- Prior to onset of any earth change or construction work, all necessary BMPs and erosion control devices, primarily in the form of silt fences, will be installed and then maintained for the duration of the project. Additional BMPS will be installed and maintained during construction as circumstances dictate.
- Compound area and easements cleared
- Excavation required to accommodate tower foundation.
- Cast tower foundation and equipment pads.
- Erect tower and associated equipment.
- Construct 60'x60' chain link enclosed area around tower.
- Installation of electrical services and connection to public electric utility (WAPA)

5.01 SUMMARY OF PROPOSED ACTIVITY

- a. Purpose of project:
The purpose of the project is to erect a 150' self supporting monopole communications tower on the site to support equipment necessary for participation in the First Responder Network.
Work on proposed project scheduled to begin upon receipt of necessary permits. Construction projected to be finished within three months from onset of work.
- b. Critical areas:
Archeological resources: The Virgin Islands State Historical Preservation Office (VISHPO) has reviewed the scope of work, report, and site plans for proposed tower project at Parcel 3, Long Point and Cotton Garden, St. Croix, and has indicated no objection to the proposed development.
(See VISHPO Clearance Letter & Phase I- A&B Arch. Survey: Appendix G)
- c. Method of land clearing:
Land clearing activities will be carried out by earth change equipment, and will be limited to the access/utility easements and a 60'x60' compound area.
- d. Provision to preserve topsoil:
It is not anticipated that there will be any significant removal of top soil.
- e. Erosion and sediment control devices:
All necessary BMPs and erosion control devices, primarily in the form of perimeter silt fences, shall be installed prior to the onset of work and maintained for the duration of the project.
- f. Earth change activities:
Earth change activities will commence once all necessary BMPs and erosion control devices have been installed.
Proposed earth change work will be limited to that necessary for tower foundation and access road. Any excavated materials will be used as backfill for foundation and to fill any imperfections in finish grade.
Given that area of disturbance shall be significantly less than one acre, applicant will not be submitting an NOI & Storm Water Pollution Prevention Plan (SWPPP) to DPNR's Division of Environmental Protection.

g. Maintenance of erosion and sediment control measures:

All temporary BMPs and erosion control measures shall be maintained for the duration of the project.

h. Method of storm water management:

Storm water currently flows across property in a westerly direction with ultimate receiving waters being Knight Bay. Post development run-off volumes and rates should remain relatively unchanged and should not require additional management measures.

i. Maintenance schedule for storm water facilities:

Silt fences to be inspected weekly and after major storm events for failure as well as for sediment and debris accumulation.

j. Method of sewage disposal

Proposed facility shall be an unmanned site, thus there will be no need for bathrooms or sewage disposal.

5.02 SITE PLAN

5.02.01 Lot layout

- | | |
|---------------------------------------|---|
| a. Lot area, dims, and metes & bounds | Appendix C – Proposed site plan |
| b. Set back dims | Appendix C – Proposed site plan |
| c. Lot density | Not applicable |
| d. Lot occupancy | Appendix C – Proposed site plan |
| e. Recreational areas | Not applicable |
| f. North arrow | Appendix C – Proposed site plan |
| g. Site Topo | Appendix C – Proposed site plan |
| h. Square footage/ lot coverage | Appendix C – Proposed site plan |
| i. Square footage/ open space | Appendix C – Proposed site plan |
| j. Project staging/material storage | Appendix C – Proposed site plan |
| k. Low water mark | Not applicable |
| l. Filled lands | Not applicable |
| m. Existing vegetation | Appendix C - Proposed site plan
Appendix I – ESA |

5.02.02 Road Layout

- | | |
|-------------------------------|---------------------------------|
| a. Road profile drawings | Appendix F - Drawings |
| b. Parking layouts | Not applicable |
| c. Parking space calculations | Not applicable |
| d. Road curb detail | Not applicable |
| e. Utility easement | Appendix C – Proposed site plan |

5.02.03 Position of Structures

- | | |
|---------------------------------|---------------------------------|
| a. Existing/proposed structures | Appendix C – Proposed site plan |
| b. Show building size | Appendix C – Proposed site plan |
| c. Location of cistern | Not applicable |
| d. Location of sewage disposal | Not applicable |
| e. Site profile | Appendix F– Drawings |
| f. Garbage receptacle area | Not applicable |
| g. Underground utilities | Not applicable |

5.02.04 Septic System/Wastewater Treatment

- | | |
|---------------------------|----------------|
| a. Setbacks | Not applicable |
| b. Septic Capacity | Not applicable |
| c. Septic details | Not applicable |
| d. Disposal site/effluent | Not applicable |

5.02.05 Storm water Drainage

- | | |
|---|---------------------------------|
| a. Natural/proposed drainage pattern | Appendix C – Proposed site plan |
| b. Cistern capacity/roof top collection | Not applicable |
| c. Storm water control measures | Appendix F - Drawings |
| d. TR-55 calculations | |

5.02.06 Storm water Facilities

- | | |
|-----------------------------------|---------------------------------|
| a. Capacity of structures | Not applicable |
| b. Cross section of design detail | Not applicable |
| c. Natural drainage off site | Appendix C – Proposed site plan |

5.02.07 Erosion and sediment control plan

- | | |
|--------------------------------------|-----------------------|
| a. Erosion control devices, etc. | Appendix F - Drawings |
| b. Construction entrance | |
| c. Final grading | Appendix F – Drawings |
| d. Post construction erosion control | Not applicable |

5.02.08 Landscaping Plan

- | | |
|-----------------------------------|------------------|
| a. Existing 6" vegetation | Appendix I - ESA |
| b. Irrigation plan and detail | Not applicable |
| c. Landscaping | Not applicable |
| d. Location of endangered species | Appendix I -ESA |

5.02.09 Other required drawings

- | | |
|----------------------------|-----------------------|
| a. Floor plans | Appendix F – Drawings |
| b. Project elevation views | Appendix F– Drawings |

5.02.10 Maps

- | | |
|-----------------------------------|------------|
| a. Recorded Parcel Map | Appendix A |
| b. Easement Maps | Appendix A |
| c. Official Zoning Map | Appendix A |
| d. FEMA Flood Insurance Map | Appendix A |
| e. Water Resources Map | Appendix A |
| f. Sediment Reduction Program Map | Appendix A |
| g. Soil Survey Map | Appendix A |

5.03 PROJECT WORK PLAN

- | | |
|--|------------|
| a. Subprojects and activities | Appendix E |
| b. Phasing of subprojects and activities | Appendix E |

6.0 SETTING AND PROBABLE PROJECT IMPACT ON THE NATURAL ENVIRONMENT

6.01 Climate/Weather

The Virgin Islands experience a sub-tropical climate tempered by easterly trade winds, relatively low humidity, little seasonal temperature variation; rainy season September to November. Weather patterns are strongly affected by the Bermuda High to the north and the Equatorial Trough to the south.

Climate data for US Virgin Islands

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Average high °F (°C)	86 (30)	86 (30)	86 (30)	88 (31.1)	88 (31.1)	90 (32.2)	90 (32.2)	91 (32.8)	90 (32.2)	90 (32.2)	88 (31.1)	86 (30)
Average low °F (°C)	72 (22.2)	72 (22.2)	72 (22.2)	74 (23.3)	76 (24.4)	77 (25)	78 (25.6)	78 (25.6)	77 (25)	76 (24.4)	75 (23.9)	73 (22.8)
Precipitation inches (mm)	1.89 (48)	1.51 (38.4)	1.52 (38.6)	2.39 (60.7)	3.36 (85.3)	2.35 (59.7)	2.42 (61.5)	3.50 (88.9)	5.34 (135.6)	5.57 (141.5)	5.28 (134.1)	2.74 (69.6)

Source: ^[6] May 2009

Monthly Averages for Saint Thomas, VI (00801)". The Weather Channel.

Probable maximum 24-hour rainfall for 10, 25, and 100-year storm events
(2002 Virgin Islands Environmental Protection Handbook)

FREQUENCY (years)	RAINFALL (inches per 24 hour period)
10	7
25	8.5
100	11.2

6.02 Landform Geology, Soils, and Historic Land use

Landform Geology

United State Geological Survey (USGS), Grass Point, VI 7.5 Minute Quadrangle map indicates that regional topography generally slopes in a south- southwesterly gradient.

Soils

Two soil types are noted for Parcel 3:

1. Cramer-VictoriaComplex(CvE): 12 to 20 percent slopes, very stony
2. Victory-Southgate complex (VsF): 40 to 70 percent slopes, very stony

Historic Land Use

Although the property is currently undeveloped land, some indications exist that the land may have been used previously for agricultural purposes. (See Appendix G:Phase I (A&B) Archeological Survey). Use of property as site of a communications tower is compliant with the property's R-1 zoning.

6.03 Drainage, Flooding, and Erosion Control

According to the Flood Insurance Rate Map (FIRM) for the Virgin Island, Terr / St. Croix, S, Virgin Islands (MapNumber 7800000075G) published by the Federal Emergency Management Agency (FEMA) effective on April 16, 2007 and exported on November 1, 2023, the proposed undertaking is not located within a 100-year floodplain.

Parcel 3 Long Point & Cotton Garden, STX is shown to be located in NFIP Flood Zone Designation "X". (See Appendix A)

Zone "X" areas are those of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood.

Storm water currently flows across property in a westerly direction with ultimate receiving waters being Knight Bay.

Drainage, Flooding & Erosion Control:

Proposed project will have minimal affect on existing storm water flow patterns and volume. All necessary BMPs and erosion control devices, primarily in the form of perimeter silt fences, shall be installed prior to the onset of work and maintained for the duration of the project.

6.04 Freshwater Resources

There are no fresh water resources on the property. (See Appendix I: ESA)

6.05 Oceanography

There are no oceanography issues that are likely to be impacted by the project.

6.06 Marine Resources

There are no marine resources at the site.

6.07 Terrestrial Resources

The subject site is characterized by steep slopes and rugged terrain. The forest on site is low, single-canopy, secondary forest. This dry forest type is characteristic of the arid east end of St. Croix. It is slow growing, but with a closed canopy comprised of primarily native species. A systematic search was completed of the plants and animals of the subject property by Lotis Environmental, LLC. No rare animal or plant species protected by Virgin Islands or federal statutes were encountered. (See Appendix I: Biosurvey and Endangered Species Assessment)

6.08 Wetlands

No wetland areas were identified on or adjacent to the subject property.
(See Appendix I: ESA)

6.09 Rare and Endangered Species

No protected animal or plant species were encountered after a complete biosurvey of the subject area. (See Appendix I: Biosurvey and Endangered Species Assessment)

The easement for the proposed project does, however, begin on the landward side of East End Road approximately 140 feet south from proposed Green sea turtle critical habitat unit USVI-04 on Knight's Bay. US Fish and Wildlife Services has made a determination that

the proposed project may affect, but is not likely to adversely affect the green, hawksbill and leatherback sea turtles with the implementation of the conservation measures provided by IPaC. (See Appendix I: Fish & Wildlife Findings Letter, ESA, & Biosurvey and Endangered Species Assessment)

6.10

Air Quality

Proposed project will have no effect on air quality.

7.00

SETTING AND PROBABLE PROJECT IMPACT ON THE HUMAN

7.01

ENVIRONMENT

Land Use Plans

The proposed use of Parcel 3 as the site of a communications tower complies with relevant zoning restrictions for R-1 zoned properties. Adjacent parcels are zoned either Zone R-1 or Zone R-3.

Visual Impacts

7.02

At present, the subject property is undeveloped land covered in heavy brush. The 150' communications tower that is being proposed could potentially be perceived by adjacent property owners as having some visual impact. In order to minimize the extent to which the tower will affect adjacent property views, a self-supporting monopole type tower is being proposed rather than the larger, visually less appealing "lattice" type towers commonly used in the past.

A Phase I (A&B) Archeological Survey identified one archaeological site of record (12VAm1-17 aka Cramer Park Site) as partially contained within the ½ mile Visual APE (Area of Potential Effect). Because of elevation differences, no direct line of vision is possible from the proposed access road or monopole compound to Cramer Park and vice versa. (See Appendix G: Phase I (A&B) Archeological Survey)

7.03 Impacts on Public Services

- a. Water: As the site will be unmanned, water will not be required at the site
- b. Sewage Treatment and Disposal: As the site will be unmanned, there will be no need for sewage treatment or disposal.
- c. Solid Waste Disposal: As the site will be unmanned and no solid waste generated, there will be no need for solid waste disposal
- d. Roads, Traffic, and Parking: Proposed tower facility will be an unmanned site, therefore traffic entering and leaving the site should be limited to periodic visits by technicians and maintenance personnel. There is no expectation of any significant increase in traffic to and from the site. There will be no need for customer or employee parking.
- e. Electrical: Estimated monthly power usage generated by the proposed facility is 6,000 kWh. Electrical connection to public utility (WAPA) will be required.

7.04 Social Impacts

The tower being proposed is part of Liberty Mobile and the VI Government efforts to enhance the territory's telecommunications network and enable the VI's participation in the First Responder Network Authority (FirstNet). FirstNet is a nationwide wireless broadband network, which was created by the US Congress, and is intended as a communications network dedicated to emergency responders and the public safety community. The goal of participating in the network is to transform the way the Virgin Island's fire, police, EMS, and other safety personnel communicate and share information. It is intended that the system will:

- Connect first responders to the critical information they need in a highly secure manner when handling day to day operations, responding to emergencies, and supporting large events like annual Carnival Festivities.
- Create an efficient communications experience for public safety personnel in agencies and jurisdictions across the territory during natural disasters, including hurricanes and tropical storms.
- Enhance network coverage for first responders, residents, and visitors alike.

In this manner, the proposed project will have a significant and beneficial social impact on the Virgin Islands community.

7.05 Economic Impacts

The proposed project will enhance existing communication services and thus contribute to the efficiency and success of local business enterprises. Liberty Mobile and others that would potentially use the tower have local offices and employees, and their operations will also contribute to tax revenues (gross receipts, income tax, etc.) .

7.06 Impacts on Historical and Archeological Resources

The Virgin Islands State Historic Preservation Office has reviewed the project and indicated no objection to the proposed development.
(See Appendix G: VISHPO Project Review)

7.07 Recreational Use

Not applicable to proposed project.

7.08 Waste Disposal

As the site will be unmanned, there will be no need for either sewage or solid waste disposal.

7.09 Accidental Spills

Not applicable to the proposed project

7.10 Potential Adverse Effects Which Cannot Be Avoided

Visual impact on surrounding properties.

8.00 MITIGATION PLANS

In order to minimize the extent to which the tower will affect adjacent property views, a self-supporting monopole type tower is being proposed rather than the larger, visually less appealing "lattice" type towers commonly used in the past.

9.00 ALTERNATIVES TO PROPOSED ACTION

- No action: This would negatively effect implementation of the FirstNet network in St. Croix, and hinder efforts to enhance communications service in St. Croix.
- Collocation of equipment to an alternate site: Existing support structures with the capacity to accommodate the equipment intended for the new tower, and which are suitably located to allow coverage in the proposed service areas do not currently exist, thus this is not a feasible option.

10.00 RELATIONSHIP BETWEEN SHORT & LONG TERM USES OF MAN'S ENVIRONMENT

All aspects of the proposed project are consistent with goals, regulations and policies of the Virgin Islands Government as presented in V.I.C.Z.M. Act of 1978.

It is not anticipated that the proposed project will initiate any negative impacts to the the long and short term uses of the surrounding environment.

11.00 REFERENCES

University of the Virgin Islands Cooperative Extension Service
Virgin Islands Environmental Protection Handbook 2002

Federal Emergency Management Agency
Flood Insurance Rate Map
Map number: 7800000075G

United States Department of Agriculture
USDA Natural Resources Conservation Service (NRCS)
National Cooperative Soil Survey

Government of the Virgin Islands
Department of Conservation and Cultural Affairs Sediment Reduction Program

Government of the Virgin Islands
Department of Conservation and Cultural Affairs Water Resources Edition

Government of the Virgin Islands
Virgin Islands Code
Title 29: Public Planning and Development

Green Piece Engineering Site Survey
Project #: 23X092
No. 3 Long Point & Cotton Garden
Eastend B Quarter
St. Croix, USVI
8-17-2023

Antilles Surveys, Inc.: Site Survey
OLG# 1177
#3 Long Point and Cotton Garden
Eastend B Quarter, St. Croix, USVI
3-5-1962

Tower Tech Drawings
Blue Sky East End Tower Project
#3 Long Point and Cotton Garden
Eastend B Quarter, St. Croix, USVI
8-23-2024
Certifying Engineer: Elias Manguel #1579-E

LOTIS Environmental
Phase 1 Environmental Site Assessment ASTM E1257-13
USVI-00408 Coral Bay
No. 6-4 Estate Carolina, Coral Bay STJ LOTIS Job # BST-148
8-16-2022

LOTIS Environmental
NEPA FCC Summary Report
East End Site (USVI-00230;BST_228)
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, USVI

FirstNet Web Resources
www.FirstNet.gov
www.commerce.gov

Department of Planning and Natural Resources
Virgin Islands State Historic Preservation Office
Project Review Letter
VISHPO Senior Archeologist: David Brewer
June 26, 2024

US Department of the Interior
Fish & Wildlife Service
Caribbean Ecological Service Field Office
Project Review Letter
Field Supervisor: Silmarie Padron

Geographic Consulting, LLC
Bio Survey and Endangered Species Assessment
Plot #3, Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, USVI

Persons/firms involved or consulted in development of EAR

Eduardo Bravo, PE MEM
Senior Project Manager
Tower Tech Engineering
Puerto Rico/ USVI

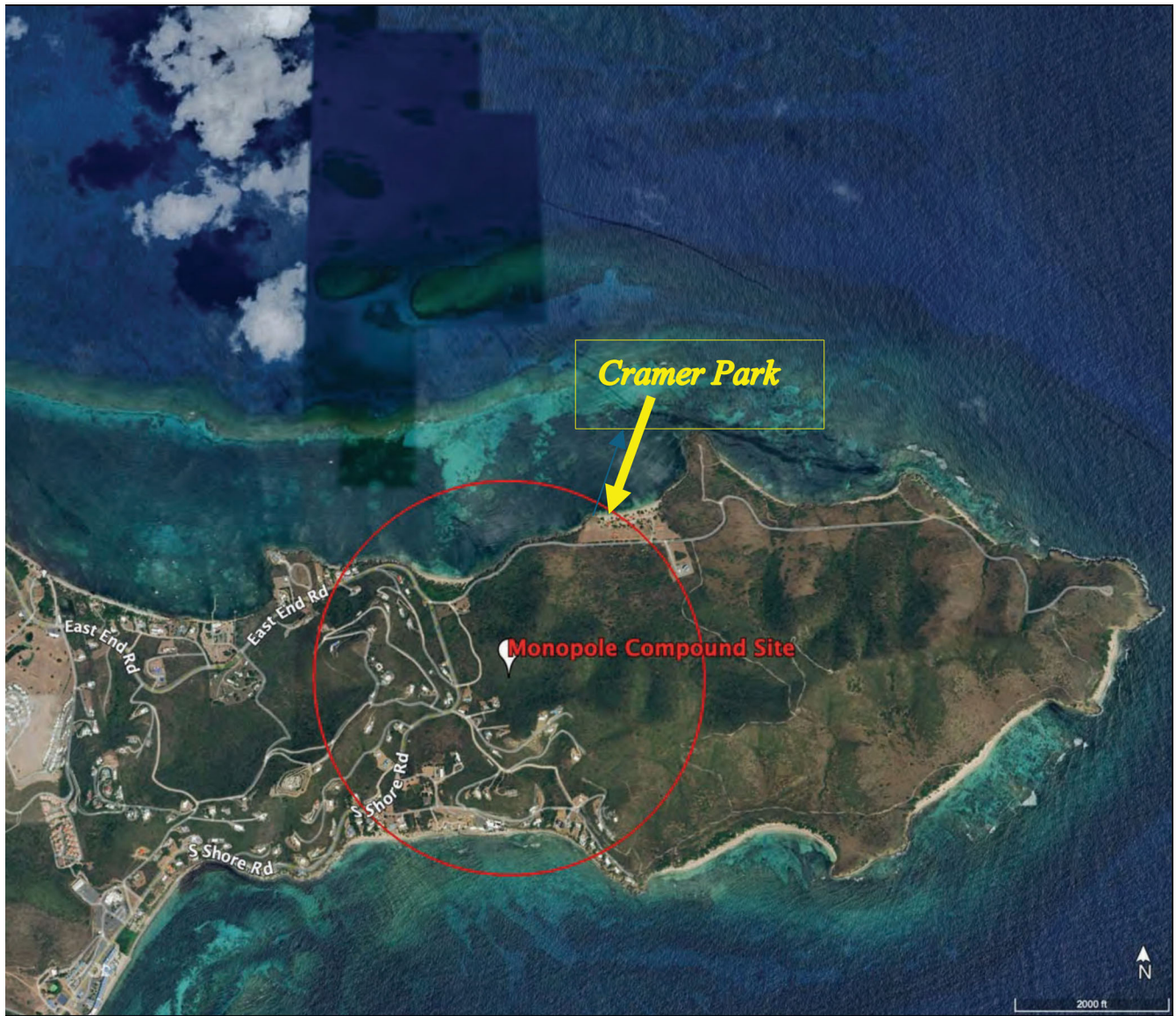
Mark McAllister, GC
McAllister & Associates
USVI

Randy Hamlin
Hamlin & Associates
Permitting Consultants
USVI

Leia LaPlace-Matthew
Territorial Planner
Department of Planning and Natural Resources
Division of Comprehensive and Coastal Zone Planning

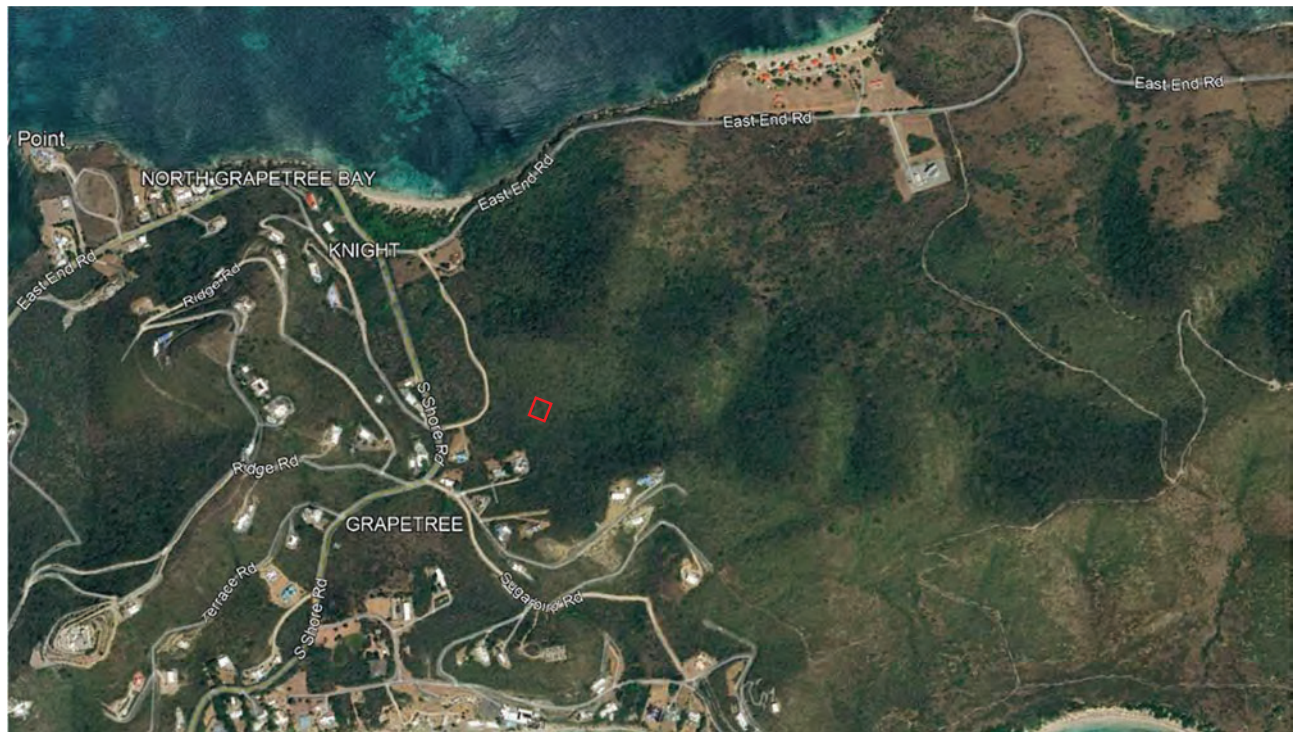
APPENDIX A : MAPS

- Location Map
- Vicinity Map
- Survey Map: Green Piece Engineering
- Survey Map: Antilles Survey Inc. OLG 1177
- Recorded Plot Map
- Official Zoning Map
- FEMA Flood Insurance Rate Map
- Water Resources Map
- Sediment Reduction Program Map
- Soil Survey Map



LOCATION MAP
(East End St. Croix)

Parcel No. 3
Long Point & Cotton Garden
Eastend B Qtr.
St. Croix, U.S. Virgin Islands



Lease Area (Far)



Lease Area (Close)

Aerial Images – Vicinity Maps

Blue Sky Towers III, LLC

East End

near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed
2023



CARIBBEEAN SEA

SA PUBLIC ROAD TO EAST END

TO CHRISTIANSTED

80' ± REC. DIST.

267.2' REC. DIST.

889.2' REC. DIST.

270° 384' REC. DIST.

1090' REC. DIST.

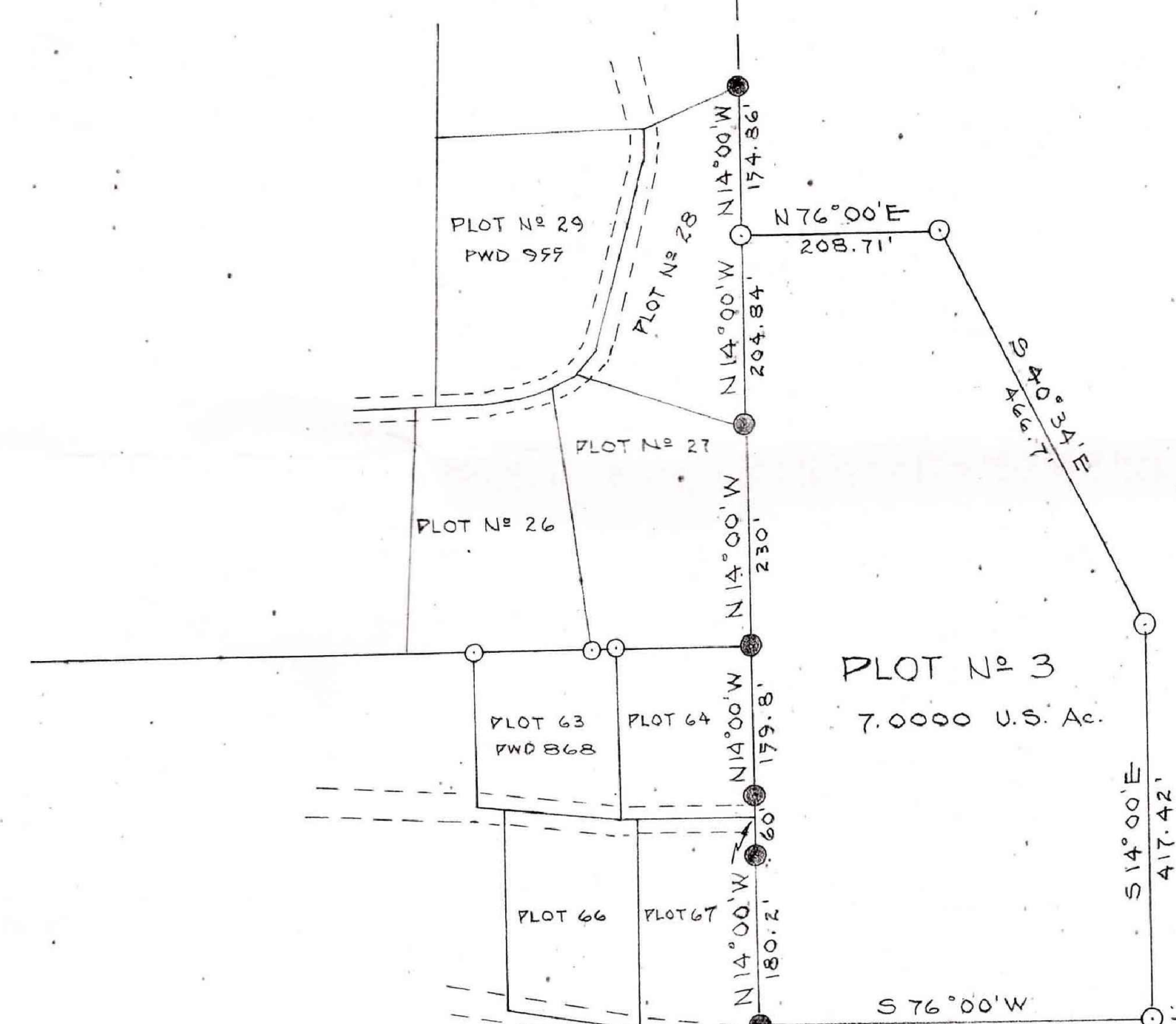
PARCEL N° 1
ESTATE LONG POINT & COTTON GARDEN
(CRAMER'S PARK)

1177

NOTE:
SURVEY CORRELATED TO THIS LINE
REFER TO P.W.D. DWGS. N° 868 & 955

ESTATE NORTH GRAPETREE BAY

REMAINDER of
PARCEL N° 2
MATR. N° 31
ESTATE LONG POINT & COTTON GARDEN
88.2 U.S. AC
BY DEDUCTION
REFER P.W.D. DWG. N° 220



ESTATE SOUTH GRAPETREE BAY

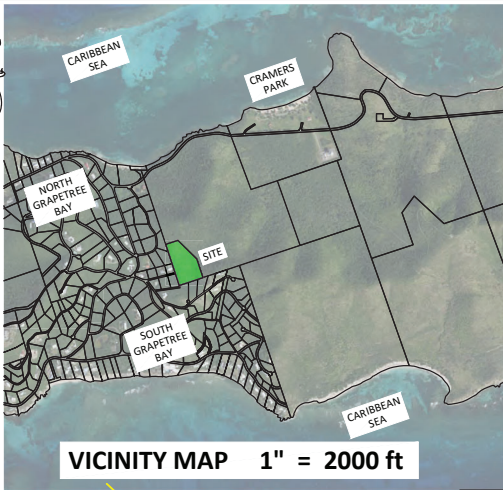
ESTATE ISAAC'S BAY & JACK'S BAY

NOTE:
● BOUND POST FOUND IN GOOD CONDITION
○ BOUND POST PLACED
REFER P.W.D. DWG. N° 220, 868 & 955
SURVEY BY TAPE & TRANSIT

P.W.D. DWG. N° 1177

ANTILLES SURVEYS, INC. - VIRGIN ISLANDS		
SURVEY MAP of PLOT N° 3 PARCEL N° 31 ESTATE LONG POINT & COTTON GARDEN EAST END QTR. — MATR. N° 31 — ST. CROIX, V.I.		
SURVEY: C.K.	TRACED: E.D.C.	APPROVED:
DRAWN: R.P.H.	CHECKED: J.W.	<i>X. J. Johnson</i>
DATE: 3-5-62	SCALE: 1" = 200'	LICENSED SURVEYOR

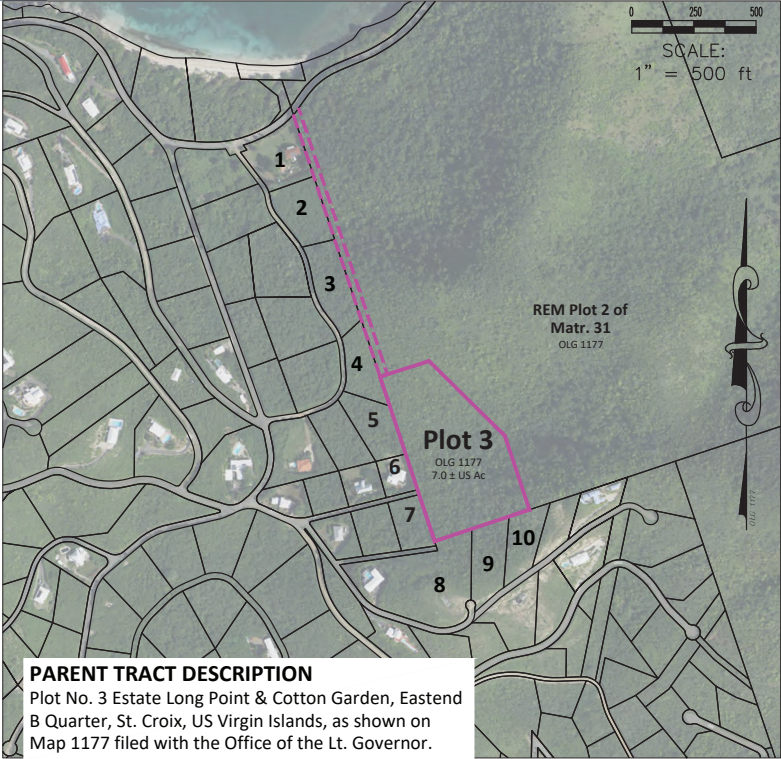
SPACE RESERVED FOR
CERTIFICATIONS



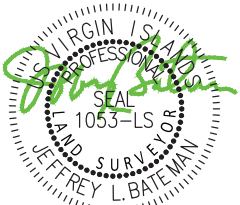
- GENERAL NOTES**
1. THIS SURVEY WAS PREPARED BY BCSC DOSPIVA, LLC., UNDER THE SUPERVISION OF JEFFREY BATEMAN, PLS.
 2. THIS PLAN HAS BEEN PREPARED FOR LAYOUT AND PERMITTING PURPOSES ONLY.
 3. THIS IS NOT A BOUNDARY SURVEY. PROPERTY LINES SHOWN WERE TAKEN FROM EXISTING FIELD EVIDENCE, EXISTING DEEDS AND PLATS OF PUBLIC RECORD, AND INFORMATION SUPPLIED TO THE SURVEYOR BY THE CLIENT.
 4. VERTICAL DATUM IS VIVD09. LATITUDE, LONGITUDE AND STATE PLANE COORDINATES, IF SHOWN, ARE GIVEN IN NORTH AMERICAN DATUM OF 1983 (NAD83) AND ARE DERIVED BY OPUS SOLUTION BASED ON ZONE 5200.
 5. FIELD EQUIPMENT USED: TRIMBLE GNSS GPS.
 6. ALL DISTANCES ARE HORIZONTAL GROUND DISTANCES AND ALL BEARINGS ARE PUERTO RICO / US VIRGIN ISLANDS COORDINATE SYSTEM UNLESS OTHERWISE SHOWN.
 7. PROPERTY OWNER: MIKE LOHMAN
 8. THIS MAP IS NOT A CERTIFIED SURVEY AND HAS NOT BEEN REVIEWED BY A LOCAL GOVERNMENT AGENCY FOR COMPLIANCE WITH ANY APPLICABLE LAND DEVELOPEMENT REGULATIONS.
 9. THE PROPERTY LIES IN ZONE "X", PER NATIONAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP 7800000075G, DATED APRIL 16, 2007 AND IS ZONED R-1.

SPACE RESERVED FOR
TITLE EXCEPTIONS

ADJOINERS



PARENT TRACT DESCRIPTION
Plot No. 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, US Virgin Islands, as shown on Map 1177 filed with the Office of the Lt. Governor.



August 17, 2023

Jeffrey L. Bateman, PLS

SITE NAME:	EAST END
SITE NUMBER:	USVI--00230

SITE ADDRESS:
3 LONG POINT & COTTON GARDEN
EASTEND B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

AREA:
ST CROIX US VIRGIN ISLANDS

SITE OWNER:
BLUE SKY TOWERS, III LLC

PROPERTY OWNER:
MIKE LOHMAN

1A LOCATION
LATITUDE: N 17° 45' 08.6297" NAD83
LONGITUDE: W 64° 35' 26.7075" NAD83
ELEVATION: 148.2' VIVD09

- LEGEND**
- EXIST. UTILITY POLE
 - EXIST. TELE PED
 - IRON FOUND
 - CHISEL MARK FOUND
 - COMPUTED POINT

NO.	REVISION/ISSUE	DATE

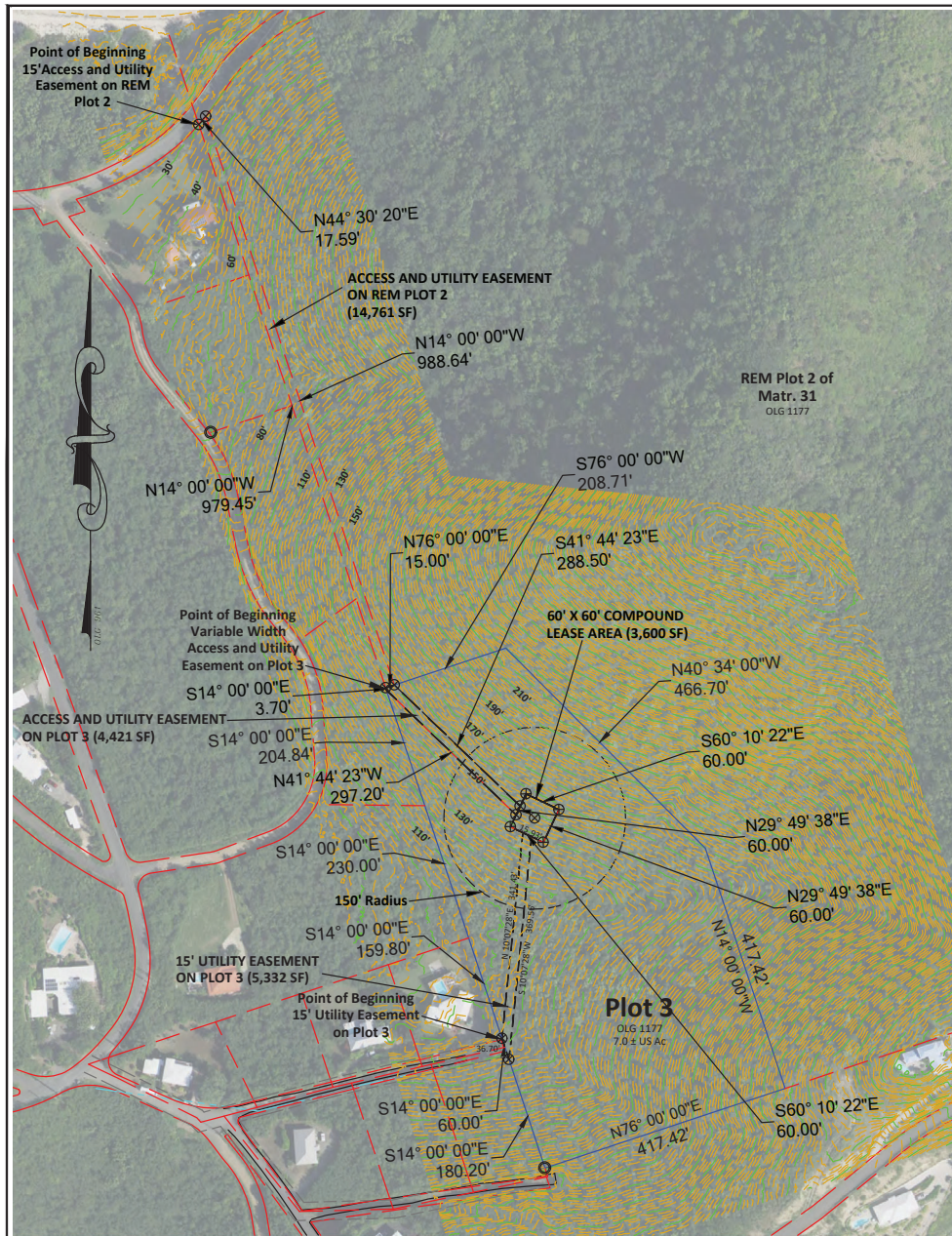


**The Green Piece Engineering
+ Environment, LLC**
5001-12 Chandler's Wharf
Christiansted, Virgin Islands 00820
Ph: 340.778.7474
www.thegreenpiece.us

PREPARED FOR:
Blue Sky Towers, LLC
352-106 Park Street
North Reading, MA 01864

PROJECT NUMBER: 23X092

SITE SURVEY	SHEET
	S-1



15' ACCESS AND UTILITY EASEMENT ON REM PLOT 2

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as REM Plot 2 of Matr. 31, and being more particularly described as follows:

Beginning at a point at the intersection of the Western boundary line of said REM Plot 2 and the southern Right-of-Way of Eastend Road, a paved public road, thence along said western boundary line S14°00'00"E 979.45' to a point, said point also being known as Point of Beginning on the referenced drawing of the herein described Variable Width Access and Utility Easement, said point also being the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence N14°00'00"W 988.64' to a point, said point being on the southern Right-of-Way of Eastend Road, thence along the Right-of-Way S44°30'20"W 17.59' to a point, said point being the Point of Beginning of the herein described 15' Wide Access and Utility Easement Area, said Easement Area contains 14,761 square feet, more or less.

15' ACCESS AND UTILITY EASEMENT ON PLOT 3

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:

Beginning at a point at the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence S41°44'23"E 288.50' to a point, said point being on the herein described 60' x 60' Lease Area, said point also being the Point of Beginning of said 60' x 60' lease area, thence along the Lease Area S29°49'38"W 15.81' to a point, thence N41°44'23"W 297.20' to a point, thence N14°00'00"W 3.70' to a point, said point being the Point of Beginning of the herein described Variable Width Access and Utility Easement Area, said Easement Area contains 4,421 square feet, more or less.

60' x 60' COMPOUND LEASE AREA

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:

Beginning at a point on the referenced drawing of the herein described 60' x 60' Compound Lease Area and as described in the Variable Width Access and Utility Easement, thence N29°49'38"E 22.50' to a point, thence S60°10'22"E 60.00' to a point, thence S29°49'38"E 60.00' to a point, thence N60°10'22"E 60.00' to a point, thence N29°49'38"W 37.50' to a point, said point being the Point of Beginning of the herein described 60' x 60' Compound Lease Area, said Lease Area contains 3,600 square feet, more or less.


15' UTILITY EASEMENT

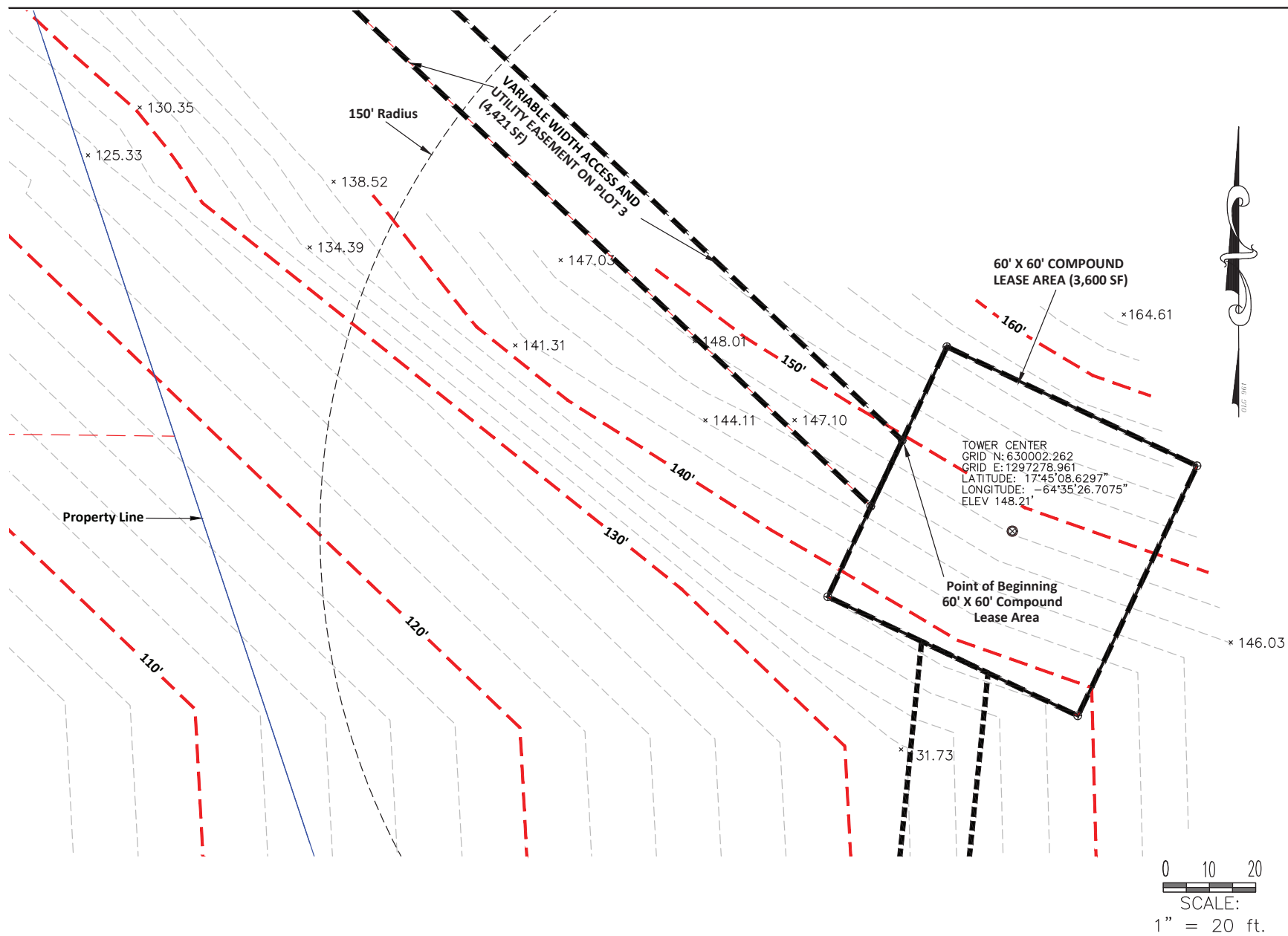
All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:

Beginning at a point, said point being the southeast corner of Plot 64 Estate North Grapetree Bay, thence N10°07'28"E 341.43' to a point, said point being on the 60' x 60' Compound Lease Area, thence along the 60'x60' Compound Lease Area, S60°10'22"E 15.93' to a point, thence S10°07'28"W 369.56' to a point, thence N14°00'00"W 36.70' to a point, said point being the Point of Beginning of the herein described 15' Utility Easement, said Easement contains 5,332 square feet, more or less.

0 100 200
SCALE:

1" = 200 ft.

SITE NAME:		EAST END	
SITE NUMBER:		USVI--00230	
SITE ADDRESS: 3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820			
AREA: ST CROIX US VIRGIN ISLANDS			
SITE OWNER: BLUE SKY TOWERS, III LLC			
PROPERTY OWNER: MIKE LOHMAN			
1A LOCATION LATITUDE: N 17° 45' 08.6297" NAD83 LONGITUDE: W 64°35' 26.7075" NAD83 ELEVATION: 148.2' VVD09			
<div>LEGEND</div> <div><div>Ⓒ</div>EXIST. UTILITY POLE</div> <div><div>Ⓓ</div>EXIST. TELE PED</div> <div><div>○</div>IRON FOUND</div> <div><div>⦿</div>CHISEL MARK FOUND</div> <div><div>⊗</div>COMPUTED POINT</div>			
NO.	REVISION/ISSUE		DATE
1	ADJUST LEASE AREA AND ACCESS		10.05.23
1	ADD UTILITY ESMNT		04.18.24
<div></div> <div><div>The Green Piece Engineering + Environment, LLC</div><div>5001-12 Chandler's Wharf Christiansted, Virgin Islands 00820 Ph: 340.778.7474 www.thegreenpiece.us</div></div>			
<div>Liberty Mobile USVI, Inc Blue Sky Towers, III LLC 352-106 Park Street North Reading, MA 01864</div>			
PROJECT NUMBER:		23X092	
SITE SURVEY			SHEET S-2



SITE NAME:		EAST END
SITE NUMBER:		USVI-00230
SITE ADDRESS:		3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820
AREA:		ST CROIX US VIRGIN ISLANDS
SITE OWNER:		BLUE SKY TOWERS, III LLC
PROPERTY OWNER:		MIKE LOHMAN
1A LOCATION		LATITUDE: N 17° 45' 08.6297" NAD83 LONGITUDE: W 64°35' 26.7075" NAD83 ELEVATION: 148.2' MVD09
LEGEND EXIST. UTILITY POLE EXIST. TELE PED IRON FOUND CHISEL MARK FOUND COMPUTED POINT		
NO.	REVISION/ISSUE	DATE
1	ADJUST LEASE AREA AND ACCESS	10.05.23
The Green Piece Engineering + Environment, LLC 5001-12 Chandler's Wharf Christiansted, Virgin Islands 00820 Ph: 340.778.7474 www.thegreenpiece.us		
Liberty Mobile USVI, Inc Blue Sky Towers, III LLC 352-106 Park Street North Reading, MA 01864		
PROJECT NUMBER:		23X092
SITE SURVEY		SHEET

APPENDIX B : MAJOR PROJECT SUMMARY

- Major Project Summary (DPNR Form L&WD-4)

**GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DEVELOPMENT PERMIT APPLICATION**

**FORM L&WD-4
MAJOR PROJECT SUMMARY DATA**

Section I. Applicant

1. Name, address and telephone number of applicant.

Blue Sky Towers III, LLC
352 Park Street, Suite 106, North Reading, Massachusetts 01864
978-291-6517 (James Rech)

2. Name, address and telephone number of owner of Property and of developer.

Owner: Michael Lohman 5008 S Grapetree Bay, Christiansted, St. Croix, USVI 00820 808-749-6540
Developer: Blue Sky Towers III, LLC, 352 Park Street, Suite 106, North Reading, Massachusetts 01864
978-291-6517 (James Rech)

Section II. Summary of Proposed Development

3. Describe the proposed development

Erection of 150' tall monopole communications tower w/ associated equipment within a
60'x60' leased area. Project also to include construction of 15' x 1,655' of access/utility
easement

Section III. Description of Proposed Development

4. Name of development East End
5. Plot No. 3 Est. Long Point & Cotton Garden
6. Zoning District: R-1
7. PWD Map No. 1177
8. Proposed use (residential, etc. as listed in Zoning Law): Communications tower
9. Accessory use if any n/a

FORM L&WD-4**MAJOR PROJECT SUMMARY DATA Cont'd**

10. Area of Lot(s) (acreage) 7 acres
11. Area covered by existing buildings (sq. ft.) 0.0 sq.ft.
12. Area covered by proposed buildings (sq. t.) (tower base): 100 sq.ft.
13. Floor area total (tower base): 100 sq.ft.
14. Floor area ratio (B-1, B-2 zones only) n/a
15. Number of buildings (1) tower
16. Number of units total n/a
17. Schedule of units:
- | | Person | Persons |
|---------------|------------|---------------------|
| Efficiencies | <u>n/a</u> | x 1.5 Unit <u>-</u> |
| 1 bedroom | <u>n/a</u> | x 2 <u>-</u> |
| 2 bedroom | <u>n/a</u> | x 3 <u>-</u> |
| 3 bedroom | <u>n/a</u> | x 4 <u>-</u> |
| Other | <u>n/a</u> | x <u>-</u> |
| Total Persons | <u>n/a</u> | |
18. Number of on site parking and loading spaces 1 (unmanned site)
19. Maximum building height (stories/ft) 150' (tower height)
20. Adjoining property land use(s) R-1 and R-3
Adjacent properties are residential. Some of the parcels are developed. Some are not.
21. Setback of building from street property line (ft) 270'
22. Sideyard setback (ft) 170'
23. Rear yard setback (ft) 345'
24. Density (person/acre) n/a
25. Area of usable open space (sq. ft. % of lot) 304,820 sq.ft. (.03%)

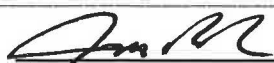
FORM L&WD-4
MAJOR PROJECT SUMMARY DATA Cont'd

Section IV. Comments

26. Proposed Potable Water Supply (method & quality estimate gal/day)
n/a (unmanned site)
27. Proposed Sewage Treatment (method & quality estimate gal/day)
n/a (unmanned site)
28. Proposed Solid Waste Disposal (method & quality estimate lbs/day)
n/a (unmanned site)
29. Proposed Electrical Supply (method & demand estimate KWH for single & 3 phase)
6,000 kW monthly
30. Air Conditioning (method & demand estimate (KWH)
n/a
31. Other Utilities n/a
32. Other n/a

Section V.

33. Will the development extend onto or adjoin any beach tidelands, submerged lands or public trustlands?
No.
34. Will the development maintain, enhance or conflict with public access to the shoreline and along the coast?
Development will not affect existing public to shoreline and along the coast.
35. Will the development protect or provide moderate income housing opportunities?
Will it displace moderate income housing?
No.
36. How will the development affect traffic on the coastal access roads?
Development will not affect traffic along coastal access road.



Signature of owner or authorized agent

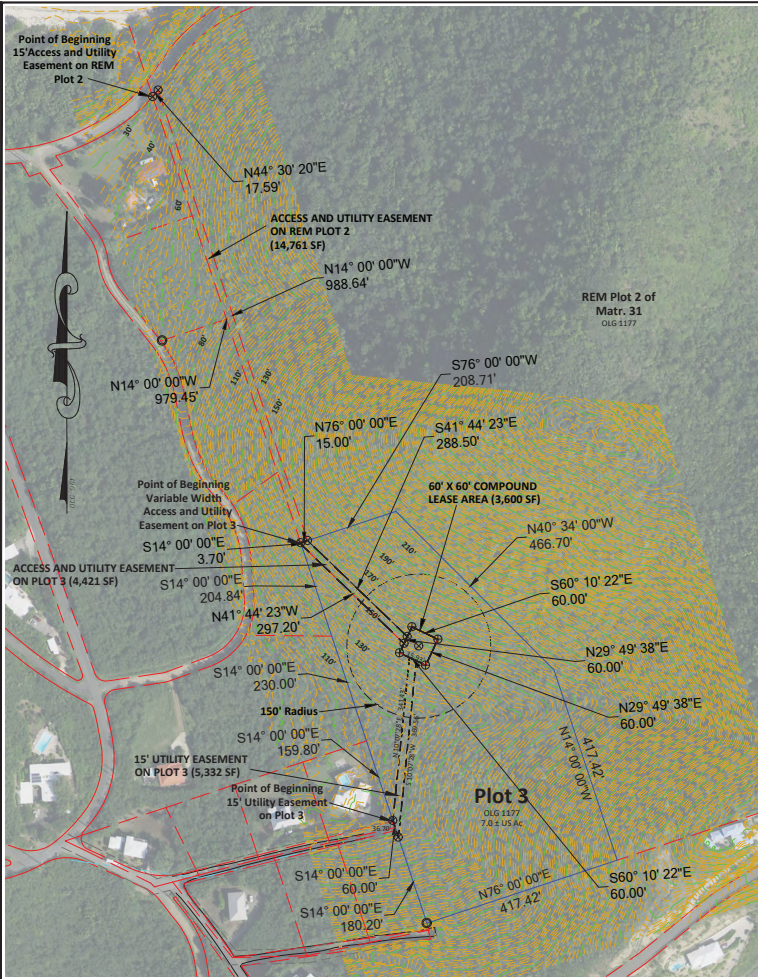
James Rech, President and CEO of Blue Sky Towers III, LLC

8/26/2024

Date

APPENDIX C : SITE PLANS

- Site Plan (Tower Tech Engineering)
- Site Plan (Green Piece Engineering)



15' ACCESS AND UTILITY EASEMENT ON REM PLOT 2

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as REM Plot 2 of Matr. 31, and being more particularly described as follows:
Beginning at a point at the intersection of the Western boundary line of said REM Plot 2 and the southern Right-of-Way of Eastend Road, a paved public road, thence along said western boundary line S14°00'00"E 979.45' to a point, said point also being known as Point of Beginning on the referenced drawing of the herein described Variable Width Access and Utility Easement, said point also being the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence N14°00'00"W 988.64' to a point, said point being on the southern Right-of-Way of Eastend Road, thence along the Right-of-Way S44°30'20"W 17.59' to a point, said point being the Point of Beginning of the herein described 15' Wide Access and Utility Easement Area, said Easement Area contains 14,761 square feet, more or less.

15' ACCESS AND UTILITY EASEMENT ON PLOT 3

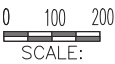
All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:
Beginning at a point at the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence S41°44'23"E 288.50' to a point, said point being on the herein described 60' x 60' Lease Area, said point also being the Point of Beginning of said 60' x 60' lease area, thence along the Lease Area S29°49'38"W 15.81' to a point, thence N41°44'23"W 297.20' to a point, thence N14° 00'00"W 3.70' to a point, said point being the Point of Beginning of the herein described Variable Width Access and Utility Easement Area, said Easement Area contains 4,421 square feet, more or less.


60' x 60' COMPOUND LEASE AREA

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:
Beginning at a point on the referenced drawing of the herein described 60' x 60' Compound Lease Area and as described in the Variable Width Access and Utility Easement, thence N29°49'38"E 22.50' to a point, thence S60°10'22"E 60.00' to a point, thence S29°49'38"E 60.00' to a point, thence N60°10'22"E 60.00' to a point, thence N29°49'38"W 37.50' to a point, said point being the Point of Beginning of the herein described 60' x 60' Compound Lease Area, said Lease Area contains 3,600 square feet, more or less.

15' UTILITY EASEMENT

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:
Beginning at a point, said point being the southeast corner of Plot 64 Estate North Grapetree Bay, thence N10°07'28"E 341.43' to a point, said point being on the 60' x 60' Compound Lease Area, thence along the 60'x60' Compound Lease Area, S60°10'22"E 15.93' to a point, thence S10°07'28"W 369.56' to a point, thence N14°00'00"W 36.70' to a point, said point being the Point of Beginning of the herein described 15' Utility Easement, said Easement contains 5,332 square feet, more or less.



SITE NAME:		EAST END	
SITE NUMBER:		USVI-00230	
SITE ADDRESS: 3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820			
AREA:		ST CROIX US VIRGIN ISLANDS	
SITE OWNER: BLUE SKY TOWERS, III LLC			
PROPERTY OWNER:		MIKE LOHMAN	
1A. LOCATION LATITUDE: N 17° 45' 08.6297" NAD83 LONGITUDE: W 64° 35' 26.7075" NAD83 ELEVATION: 148.2' VVD09			
LEGEND ⦿ EXIST. UTILITY POLE ⦿ EXIST. TELE PED ○ IRON FOUND ⦿ CHISEL MARK FOUND ⊗ COMPUTED POINT			
NO.	REVISION/ISSUE	DATE	
1	ADJUST LEASE AREA AND ACCESS	10.05.23	
1	ADD UTILITY ESMNT	04.18.24	
			
The Green Piece Engineering + Environment, LLC 5001-12 Chandler's Wharf Christiansted, Virgin Islands 00820 Ph: 340.778.7474 www.thegreenpiece.us			
Liberty Mobile USVI, Inc Blue Sky Towers, III LLC 352-106 Park Street North Reading, MA 01864			
PROJECT NUMBER:		23X092	
SITE SURVEY		SHEET	
		S-2	

APPENDIX D : OTHER SUBMITTAL DOCUMENTS

- Lease Agreement
- Easement Details (Deed 1963)
- Title Search
- Current Business License
- Income Tax Clearance Letter
- Property Tax Clearance Letter
- Articles of Organization
- Letter of Authorization (Officer's Certificate)
- Permit Application (Form L&WD -2)
- Zoning Requirements Table (Form L&WD – 3)
- Major Project Summary Data (Form L&WD – 4)
- Proof of Legal Interest (Form L&WD – 5)
- Corporate Application Form (Form L&WD – 7)
- NFIP Flood Zone Designation (Form L&WD – 8)
- Certificate of Good Standing
- Adjacent Ownership Certification
- Elevation & Location Certification
- Public Notice

RECEIVED

AUG 11 2023

RECORDER OF DEEDS-STX

DATE-STAMP

BST Site #: USVI-00230
BST Site Name: East End

Parcel ID:

PREPARED BY:
Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, MA 01864
ATTN: Legal

MEMORANDUM OF LEASE

This MEMORANDUM OF LEASE (this "**Memorandum**") is made as of August 9th, 2023 (the "**Effective Date**") by and between **Michael Lohman** (the "**Landlord**"), having an address of 5008 S. Grapetree Bay, Christiansted, VI 00820, and **Blue Sky Towers III, LLC**, a Delaware limited liability company (the "**Tenant**"), having an address of 352 Park Street, Suite 106, North Reading, Massachusetts 01864 (collectively the "**Parties**", and each a "**Party**").

RECITALS

WHEREAS, Landlord owns certain real property located at Plot 3 Long Point & Cotton Garden, Eastend B Quarter, in the Estate South Grapetree, Town of Christiansted, on the Island of Saint Croix, United States Virgin Islands, consisting of 7.0000 U.S. acres more or less, as more fully shown on OLG Drawings No. 1177 dated March 5, 1962, (the "**Property**" which is further described in **Exhibit 1** attached hereto); and

WHEREAS, Landlord and Tenant have executed that certain Ground Lease Agreement (the "**Lease**") dated as of July 24th, 2023, as may be amended, by which Landlord has leased to Tenant a certain compound on the Property measuring approximately Three Thousand Six Hundred Square Feet (60' x 60'), together with an access and utility way for ingress and egress from a public right-of-way through and over the Property to the compound, as well as for the installation and maintenance of utility facilities from a public right-of-way through, over, and under the Property to the compound (collectively, the "**Premises**" which is shown or described in detail on **Exhibit 2** attached hereto); and

WHEREAS Landlord and Tenant desire to record a notice of the Lease in the Official Records of the Recorder of Deeds of the United States Virgin Islands; and


NOW THEREFORE, in consideration of the foregoing, Landlord and Tenant hereby declare as follows:

1. Demise. Subject to the terms and conditions contained in the Lease, the Landlord has granted the Tenant the right to install, operate, maintain, and access a telecommunications facility and other improvements on the Premises.
2. Term. The Initial Term (defined hereafter) of the Lease shall commence upon the earlier of (i) the date that Tenant delivers notice of commencement of the Lease, or (ii) the date Tenant begins construction of the Premises on the Property (the "**Commencement Date**"). Unless extended or sooner terminated as provided in the Lease, the Initial Term shall be for a period of ten (10) years following the Commencement Date (the "**Initial Term**"). The Initial Term and Renewal Term (defined below) may also be referred to as the "**Term**".
3. Renewal Terms. Tenant shall have the option to extend the Initial Term of this Lease for four (4) successive additional periods of ten (10) years each (each a "**Renewal Term**").
4. Right of First Refusal. Tenant maintains a right of first refusal to all or any portion of the Property.
5. Notices. Notices shall be given to the Parties to the Lease in writing by certified mail to the Parties' respective addresses above.
6. Lease Controlling. This Memorandum is intended only for recording purposes to provide notice of certain terms and conditions contained in the Lease and is not to be construed as a complete summary of the terms and conditions thereof. This Memorandum is subject to the Lease and any amendments, modifications, alterations, renewals, and extensions of the Lease. The terms and provisions of the Lease are incorporated in this Memorandum by reference. In the event of any conflict between this Memorandum and the Lease, the provisions of the Lease shall control.
7. Location of Lease. Copies of the Lease are on file with each Party.
8. Binding Effect; Running Covenant. The Lease is binding upon and inures to the benefit of the Landlord and Tenant and their successors and assigns. It is intended to constitute a covenant that runs with the land, such that any purchaser of Landlord's interest in the Property shall take such interest subject to the Lease.
9. Counterparts. This Memorandum may be executed in one or more counterparts, each of which, when so executed, shall be deemed an original, and all of which taken together shall constitute one and the same instrument.

[Signature pages to follow]

IN WITNESS WHEREOF, the parties hereto have executed this Memorandum of Lease on the day and year first above written.

LANDLORD:



Michael Lohman

Date: July 19, 2023

LANDLORD ACKNOWLEDGEMENT

TERRITORY OF THE VIRGIN ISLANDS)
DISTRICT OF)

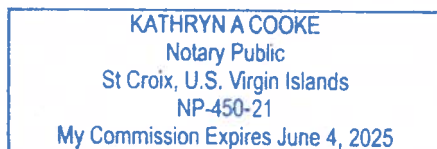
On the 19 day of July in the year 2023 before me, the undersigned notary public, personally appeared Michael Lohman, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument he executed the instrument.

[NOTARY SIGNATURE]



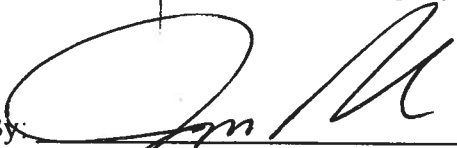
Notary Public

My Commission Expires:



Signatures Continue On The Next Page

TENANT: Blue Sky Towers III, LLC
a Delaware limited liability company

By: 

Name: James Rech

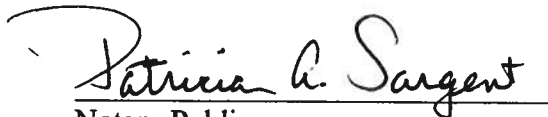
Its: President and CEO

TENANT ACKNOWLEDGMENT

COMMONWEALTH OF MASSACHUSETTS)
COUNTY OF MIDDLESEX) ss:

On the 9th day of August in the year 2023 before me, the undersigned notary public, personally appeared James Rech, President and Chief Executive Officer of Blue Sky Towers III, LLC, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity as President and Chief Executive Officer and that by his signature on the instrument, Blue Sky Towers III, LLC, executed the instrument.

[NOTARY SIGNATURE]


Notary Public

My Commission Expires: March 10, 2028

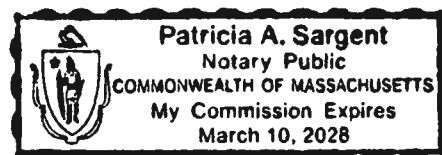


EXHIBIT "1"

Description of Property

A certain real property located at Plot 3 Long Point & Cotton Garden, Eastend B Quarter, in the Estate South Grapetree, Town of Christiansted, on the Island of Saint Croix, USVI consisting of 7.0000 U.S. acres, more or less, as more fully shown on OLG Drawing No. 1177 dated March 5, 1962 and as further described in that Warranty Deed dated February 2, 2023, recorded February 9, 2023 in Photocopy 1688, page 417, Document No. 2023000379 together with a Grant of Easement over a portion of Estate Long Point and Cotton Garden for ingress and egress as set forth in the Deed from West Indies Investment Company to Claude A. Benjamin and Martha Benjamin dated October 21, 1963, recorded October 30, 1963 in Photocopy 27, page 329, Document No. 2068.

EXHIBIT "2"
Legal Description of The Premises

The Premises is depicted/described as follows and will be replaced at the option of Tenant by a more accurate depiction and/or by a surveyed legal description when available.

A certain portion of the real property located at Plot 3 Long Point & Cotton Garden, Eastend B Quarter, in the Estate South Grapetree, Town of Christiansted, on the Island of Saint Croix, USVI together with a Grant of Easement over a portion of Estate Long Point and Cotton Garden for ingress and egress as set forth in the Deed from West Indies Investment Company to Claude A. Benjamin and Martha Benjamin dated October 21, 1963, recorded October 30, 1963 in Photocopy 27, page 329, Document No. 2068.



October 30, 1963

No. 2068/1963

4222

Deed

THIS INDENTURE, made October 24, 1963, by and between WEST INDIES INVESTMENT COMPANY, herein called the "Grantor", a VIRGIN ISLANDS corporation with offices in St. Croix, Virgin Islands, and CLAUDE A. BENJAMIN and MARTHA BENJAMIN, herein called the "Grantees", of 130 West 162nd Street, New York, New York.

WITNESSETH: That in accordance with the Deed of Conveyance dated August 5, 1957, from the said Claude A. Benjamin and Martha Benjamin to the said West Indies Investment Company of that parcel of Estate Long Point and Cotton Garden containing 93.7 acres, more or less, and designated as Matr. No. 31 on Public Works Department Drawing No. 155, dated September 23, 1948, and pursuant to the reservation in said Deed of Conveyance of seven (7) acres of the premises conveyed thereby to the grantors named therein, and in consideration of one dollar (\$1) and other good and valuable consideration, receipt of which is hereby acknowledged,

THE GRANTOR HEREBY GRANTS AND CONVEYS to the Grantees, as tenants by the entirety with right of survivorship, and not as tenants in common, their assigns or the heirs and assigns of the survivor of them, all its right, title, and interest in and to the following parcel of land:

Plot No. 3 Estate Long Point and Cotton Garden,
East End Quarter, Matr. No. 31,
St. Croix, Virgin Islands

as shown on Public Works Department Drawing No. 1177, dated March 5, 1962, comprising an area of 7.00 U.S. acres,

TOGETHER WITH the improvements thereon and the rights, privileges, and appurtenances belonging thereto:

TO HAVE AND TO HOLD said premises in fee simple forever;

AND THE GRANTOR HEREBY GRANTS AND CONVEYS to the Grantees a non-exclusive easement over the portion of Estate Long Point and Cotton Garden designated as Matr. No. 31 for the purposes of ingress and egress to Plot No. 3 conveyed hereby, to be fifteen (15) feet wide and to run along the westerly edge of Estate Long Point and Cotton Garden, subject to relocation from time to time at the option of the Grantor, provided, however, that such easement is granted on the condition that it shall terminate if an easement for ingress and egress to said Plot No. 3 is granted over Estate North Grapetree Bay or Estate South Grapetree Bay. The Grantees may, at their expense, improve and maintain such easement, but the Grantor shall not be required to bear any part of the cost of any such improvement or maintenance except that, if the Grantor relocates such easement, it shall bear the cost of such relocation.

IN WITNESS WHEREOF the Grantor has caused this Deed to be signed on its behalf and its seal to be hereunto affixed as of the date first written above.

Witnesses:

WEST INDIES INVESTMENT COMPANY

Robert H. Bennett
[Signature]

By [Signature] President
Sidney Lee, President

ISLAND TITLE SERVICES CORPORATION
1116 KING STREET, STE 302 & 303, 3rd FLOOR
CHRISTIANSTED, VI 00820

G. HUNTER LOGAN, ESQ.
GERALD T. GRONER, ESQ.
SAMUEL T. GREY, ESQ.
OFFICERS

PHONE: (340) 773-3930
FAX: (340) 773-3654

WANDAL CRUZ
GENERAL MANAGER

July 2, 2024

Jessica Zeringue
Blue Sky Towers, LLC
352 Park Street, Suite 106
North Reading, MA 01864

Re: Title Report:
Plot No. 3 Estate Longpoint and Cotton Garden
Our File No.: IT-24-0346

Dear Friends:

You have asked that I research the property captioned above, more particularly described as follows:

Plot No. 3 of Estate Longpoint and Cotton Garden, Eastend Quarter "B", St. Croix, U.S. Virgin Islands, consisting of 7.0000 U.S. acres, more or less, as more fully shown on OLG Drawing No. 1177 dated March 5, 1962.

It is my opinion that, as of the date of my search of the land records and subject to the exceptions noted below, the record Fee Simple title holder of the above described property is:

Michael Lohman by Warranty Deed from The Bennie and Martha Benjamin Foundation, Inc. dated February 2, 2023, recorded February 9, 2023 in Photocopy 1688, page 417, Document No. 2023000379.

The following exceptions appear of record as of July 1, 2024:

- a. Any matters as shown on the OLG drawing for the land.
- b. Rights of the United States of America, the Government of the Virgin Islands, and the public to lands lying below the mean high water mark; rights, if any, of the public acquired by virtue of Territorial Statute with respect to the special nature of seaside beaches to use any part of the subject property which lies within the area defined as running inland a distance of fifty (50') feet from the seaward line of low tide, or to the extreme seaward boundary of natural vegetation which spreads continuously inland, or to the natural barrier, whichever is the shortest distance.
- c. Reservation of the right to establish through this parcel rights of way to contiguous or adjacent property as stated in Warranty Deed from The Municipality of St. Croix to Claude A. Benjamin dated February 16, 1949, recorded February 23, 1949 at PC 6 F. D., page 339, Doc. No. 407.
- d. Grant of Easement over a portion of Estate Long Point and Cotton Garden for ingress and egress to Plot 3, subject to relocation, as set forth in Deed from West Indies Investment Company to Claude A. Benjamin and Martha Benjamin dated October 21, 1963, recorded October 30, 1963 in Photocopy 27, page 329, Document No. 2068.

Title Report:
Plot No. 3 Estate Longpoint and Cotton Garden
(Continued)

- e. Memorandum of Lease between Michael Lohman and Blue Sky Towers III, LLC dated August 9, 2023 and recorded August 11, 2023 in Photocopy 1705, Page 23, Document No. 2023002326.

No certification is made as to the following:

1. Defects, liens, encumbrances, adverse claims or other matters, if any, created, first appearing in the public records subsequent to the effective date hereof.
2. The lien of all taxes, special assessments or reassessments, which are not shown as existing liens by the records in the Office of the Tax Assessor for St. Croix, Virgin Islands, nor any taxes or bills, not yet submitted, due or payable.
3. Any lien which may heretofore or hereafter attach pursuant to the provisions of Title 19, Section 1538 of the Virgin Islands Code, with regard to municipal sewer charges, not yet due and payable, as may be applicable.
4. Virgin Islands Zoning, Coastal Zone Management, Conservation, or Building laws and regulations, ordinances or common law applicable or relating to the use and occupancy of the premises.
5. Rights or claims of parties in possession not shown by the public records.
6. Easements, or claims of easements, not shown by public records.
7. Encroachments, overlaps, boundary lines disputes, or other matters which would be disclosed by an accurate survey or inspection of the premises.
8. Title to any filled in land, littoral rights, riparian rights, or other rights not shown in the public records.
9. Any homeowner or landowner association dues or assessments.
10. Any lien or right to a lien for services, labor, or material heretofore or hereafter furnished, imposed by law and not shown by public record.
11. Any variation in the property descriptions not disclosed to the Company by the Office of the Public Surveyor.

This report does not constitute a Commitment to insure the title of this property but reflects the information available in the public records as of today's date, only. Liability hereunder is limited to the fee charged for the preparation of this report. The Company on request can issue a Title Commitment.

Sincerely yours,

Gerald Groner
Authorized Agent or Officer



THE GOVERNMENT OF THE VIRGIN ISLANDS
DEPARTMENT OF LICENSING AND CONSUMER AFFAIRS
BUSINESS LICENSE

KNOW ALL BY THIS PRESENT

That, in accordance with the applicable provisions of Title 3 Chapter 16 and Title 27 V.I.C. relating to the licensing of businesses and occupations, and compliance having been made with the provisions of 10 V.I.C. Sec. 41 relating to the Civil Rights Act of the Virgin Islands, the following license is hereby granted.

Licensee: BLUE SKY TOWERS III, LLC	
Trade Name: BLUE SKY TOWERS III, LLC	
Mailing Address	Physical Address
352 PARK STREET, SUITE 106 NORTH READING MA 01864	WATERFRONT CENTER, SUITE A 72 KRONPRINDSENS GADE ST. THOMAS ST. THOMAS VI 00802
Business No: 52754	License No: 1-52754-1L
Types of License(s) Importer of Goods Communic. Equip. Oper. Service	

As provided by law, the authorized licensing authority shall have the power to revoke or suspend any License issued hereunder, upon finding, after notice and adequate hearing, that such revocation or suspension is in the public interest; provided, that any persons aggrieved by any such decision of this office shall be entitled to a review of the same by the Territorial Court upon appeal made within (30) days from the date of the decision; provided, further, that all decisions of this office hereunder shall be final except upon specific findings by the Court that the same was arrived at by fraud or illegal means.

2024

If a renewal is desired, the holder is responsible for making application for same without any notice from this office. It is the responsibility of the Licensee to notify the Department in writing within (30) days, when a license is to be cancelled or placed in inactive status. Failure to do so will result in the assessment of penalties as authorized by law.

Valid from 05/01/2024 until 05/31/2025
Printed on 05/28/2024
Issued at St. Thomas, V.I.
Fee 455.00

H. Nathalie Hodge
Commissioner, Department of Licensing and Consumer Affairs

THIS LICENSE MUST BE PROMINENTLY DISPLAYED AT PLACE OF BUSINESS

INCOME TAX CLEARANCE LETTER

(TO BE PROVIDED BY BLUE SKY TOWERS III LLC)



**OFFICE OF THE LIEUTENANT GOVERNOR
DIVISION OF THE TAX COLLECTOR**

5049 Kogens Gade · Charlotte Amalie, Virgin Islands 00802 · 340.774.2991 · Fax 340.779.7825

1105 King Street · Christiansted, Virgin Islands 00820 · 340.773.6449 · Fax 340.719.2355

REAL PROPERTY TAX CLEARANCE CERTIFICATE

TO ALL WHOM THESE PRESENTS SHALL COME

In accordance with 28 V.I.C. §121, as amended, I hereby certify that there are no outstanding Real Property Tax obligations for the following parcel:

PARCEL NUMBER	2-03500-0418-00
CERT NUMBER	2024-98096573
LEGAL DESCRIPTION	3 LONG POINT & COTTON GARDEN
OWNER'S NAME	MICHAEL LOHMAN

Taxes have been researched up to and including 2024.

CERTIFIED TRUE AND CORRECT BY

Brent A. Leerdam

Real Property Tax Collector



SIGNATURE

08/27/2024

DATE

EXECUTION VERSION

BLUE SKY TOWERS III, LLC

LIMITED LIABILITY COMPANY AGREEMENT

Dated October 1, 2019

**LIMITED LIABILITY COMPANY AGREEMENT
OF
BLUE SKY TOWERS III, LLC**

THIS LIMITED LIABILITY COMPANY AGREEMENT (this “**Agreement**”) is effective as of October 1, 2019 (the “**Effective Date**”) by and among Blue Sky Towers III, LLC, a Delaware limited liability company (the “**Company**”), and the undersigned Members.

RECITALS

A. The Company’s Certificate of Formation was filed with the Secretary of State of the State of Delaware on August 22, 2019.

B. The Members wish to set forth their respective duties and responsibilities as well as the division of potential profits and losses resulting from the ownership and operation of the Company’s business.

AGREEMENTS

In consideration of the Recitals and mutual agreements set forth herein, the Company and the Members hereby agree as follows:

1. **Formation of Company; Registered Office and Agent; Term.** The Company was organized effective August 22, 2019, upon the filing of the Certificate of Formation with the Secretary of State of the State of Delaware. The Company’s current principal business office and postal address is 352 Park Street, Suite 106, North Reading Massachusetts 01864. The principal business office and postal address of the Company may be changed from time to time as determined by the Board. The Company’s current registered office is Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, and the Company’s registered agent is The Corporation Trust Company. The registered office and the registered agent of the Company may be changed from time to time as determined by the Board. The term of the Company’s existence shall be perpetual unless the Company is dissolved or merged in accordance with the provisions of this Agreement or the Delaware Act.

2. **Purpose of the Company.** The Company’s general purpose and business is to pursue any business, purpose or activity that the Board determines may be beneficial for the Company and which is not prohibited by this Agreement or the Delaware Act, including engaging in the business of purchasing, developing, owning and managing wireless telecommunication infrastructure and pursuing other matters incidental thereto.

3. **Addresses of the Members.** The names, addresses and other contact information of the Members are as set forth on Exhibit A, as updated from time to time.

4. **Definitions.** The following terms used in this Agreement and in the Schedules and Exhibits attached hereto shall be given the following meanings:

“**Adjusted Capital Account Deficit**” has the meaning set forth in Exhibit C to this Agreement.

8. **Management of the Company.**

(a) **Management and Control in General.** The business and affairs of the Company shall be managed by the Board, functioning in accordance with the Certificate of Formation, the terms of this Agreement and the Delaware Act. The Board shall collectively be considered the Company's Manager under the Delaware Act. Except as otherwise provided herein, the Board shall always act by the affirmative vote of a majority of the Directors then in office. The Directors shall not stand for annual election. A member of the Board need not be a Member. Except as otherwise expressly provided in this Agreement, the Board shall have the authority to manage the Company and is authorized to make any and all contracts and decisions, enter into transactions and make and obtain any commitments on behalf of the Company to conduct or further its business, including, without limitation:

(i) purchase such insurance as the Board may deem necessary to protect the Company's assets and operations;

(ii) enter into agreements or contracts on behalf of the Company and pay from Company funds the consideration required under such agreement or contracts;

(iii) employ such persons, firms and corporations and fix their compensation as may be reasonably necessary to carry on the business and accomplish the purposes of the Company;

(iv) pay out of Company funds all fees and expenses incurred in the organization of the Company as well as all fees and expenses necessary to carry on the business and accomplish the purposes of the Company;

(v) enter into any joint ventures between the Company and any other Person;

(vi) execute and deliver any and all documents necessary for the Company to acquire, mortgage, own, lease, operate and sell real or personal property;

(vii) borrow money on such terms and conditions and at such rates of interest as the Board may deem appropriate and in connection therewith, if security is required therefor, to mortgage, pledge or subject to any other security interest any assets of the Company;

(viii) bring, defend, settle, compromise or otherwise participate in any actions, proceedings or investigations (whether at law, in equity or before any governmental authority or agency, and whether brought against the Company, the Board or the Members) arising out of, connected with or related to the business and affairs of the Company or the enforcement or protection of interests in the Company;

(ix) authorize and issue Units at future Closings upon the terms and conditions set forth in this Agreement;

(x) establish Reserves and thereafter maintain Reserves in such amounts as the Board deems appropriate;

(xi) acquire, either directly or indirectly through a Subsidiary, any other business or Entity (whether through a purchase of stock or other interests, a merger, a purchase of assets or other structure) for such consideration that the Board deems appropriate;

(xii) authorize non-cash distributions to the Members and the terms and conditions of such distributions; and

(xiii) perform any and all other acts or activities customary or incidental to the business of the Company and such other activities as the Company may undertake from time to time.

(b) **Authority of Members to Bind the Company.** Only the Board, and officers or other agents of the Company authorized by this Agreement or the Board, shall have the authority to bind the Company. No Member who is not authorized as an agent shall take any action to bind the Company, and each Member shall indemnify the Company for any costs or damages incurred by the Company as a result of the unauthorized action of such Member.

(c) **President and Chief Executive Officer.** A President and Chief Executive Officer shall be appointed by the Board. The President and Chief Executive Officer, subject to the oversight of the Board, shall in general supervise and control all of the business and affairs of the Company. Until a successor is appointed or a Forfeiture Event, Vesting Termination Event or an Exit Event has occurred, the President and Chief Executive Officer of the Company shall be Mr. Rech. The President and Chief Executive Officer shall have authority, subject to such rules as may be prescribed by the Board, to appoint such agents and employees of the Company as he shall deem necessary, to prescribe their powers, duties and compensation, and to delegate authority to them. Such agents and employees shall hold office at the discretion of the President and Chief Executive Officer. The President and Chief Executive Officer shall have authority to sign, execute and acknowledge, on behalf of the Company, all deeds, mortgages, bonds, Membership Interest certificates (if any), contracts, leases, reports and all other documents or instruments necessary or proper to be executed in the course of the Company's regular business, or which shall be authorized by the Board. In general, he shall perform all duties incident to the office of President and Chief Executive Officer and such other duties as may be prescribed by the Board from time to time.

(d) **Titles and Obligations.** In addition to the President and Chief Executive Officer, the Board may bestow upon key employees of the Company or other Persons such titles as it deems necessary or expedient to enable them to carry out their duties on behalf of the Company. Such titles may include "Chief Financial Officer," "Executive Vice President," one or more "Vice Presidents," "Treasurer" or "Secretary." The Board, such employees or other Persons in their roles as officers of the Company must discharge their duties in good faith, with the care an ordinarily prudent person in a like position would exercise under similar circumstances, and in a manner reasonably believed to be in the best interests of the Company.

(e) **Indemnification.** No Director and no officer or other agent appointed by the Board, individually or severally, shall be liable, responsible or accountable in damages or otherwise to the Company or to any Member for any acts performed or omitted by him, her or it in good faith except for acts or omissions which constitute gross negligence or willful misconduct. Each Director and each officer or other agent appointed by the Board shall be indemnified and held harmless by the Company, to the extent of the Company's assets, against obligations and liabilities arising or resulting from or incidental to the management of the Company's affairs; provided that no party shall be entitled to indemnification ~~hereunder for acts or omissions constituting gross negligence or willful misconduct.~~

(f) **Board.**

(i) **Membership.** The authorized number of Directors on the Board shall initially be three (3), and may be adjusted upward (but not downward) from time to time by the Board. The following individuals shall be members of the Board:

(A) two (2) Directors appointed by the Investors, initially, F. Howard Mandel and Ryan Lepene;

(B) one (1) Director appointed by Management, initially, Mr. Rech.

(ii) **Tenure and Qualifications; Removal; Vacancies.** Each Director shall hold office until his or her successor shall have been properly appointed, or until his or her prior death, resignation or removal by the appointing Member, as the case may be. Any and all directors appointed by Management may be removed by the Board at any time after a Forfeiture Event or in connection with an Exit Event. In the event that any Director appointed by Management is subject to a Vesting Termination Event, such Director may be removed by the Board. Appointment as a Director shall not itself create contract rights. A Director may resign at any time by filing his or her written resignation with the Company. Directors need not be Members of the Company. A vacancy on the Board because of death, resignation, removal (by the Investors or Management as the case may be) or otherwise may be filled only by the removing party. If the Investors or Management fails to designate a representative to fill a directorship pursuant to the terms of this Section 8(f), such directorship shall remain vacant until such party exercises its right to designate a Director hereunder. A vacancy on the Board because of an increase in the authorized number of Directors shall be filled by the Board.

(iii) **Meetings.** The meeting schedule of the Board shall be determined by the Board. Meetings of the Board may also be called by or at the request of any two (2) Directors. The Person(s) authorized to call any meeting of the Board may fix any place within the United States as the place for holding any special meeting of the Board called by such Person(s). If no other place is fixed, the place of meeting shall be at the principal business office of the Company.

(iv) **Notice; Waiver.** Notice of each meeting of the Board shall be given not less than 24 hours prior to the time of the meeting. Such notice shall be given by written notice delivered personally, mailed (by United States mail or private carrier) or given by facsimile or email to each Director at his or her business or email address, or at such other address as such Director shall have designated in writing filed with the Company. If notice is given by mail, such notice shall be deemed to be delivered three (3) days after such notice is deposited in the United States mail or with such private carrier so addressed, with postage thereon prepaid. If notice is given by facsimile or email, such notice shall be deemed to be delivered when transmitted. Whenever any notice is required to be given to any Director under the Certificate of Formation, this Agreement or any provision of law, a waiver thereof in writing signed at any time, whether before or after the time of meeting, by the Director entitled to notice shall be deemed equivalent to the giving of such notice. The attendance of a Director at a meeting constitutes a waiver of notice of that meeting, except where a Director attends a meeting and objects at such meeting to the transaction of any business because the meeting is not lawfully called or convened. Neither the business to be transacted at nor the purpose of any meeting of the Board need be specified in the notice or waiver of notice of such meeting provided that any notice of a special meeting of the Board shall specify with reasonable clarity the purpose of any such meeting and the items to be disclosed and considered.

(v) **Quorum.** The presence of a majority of the Directors then in office at any meeting of the Board shall constitute a quorum for the transaction of business, but a majority of the Directors present (though such majority may be less than a quorum) may adjourn the meeting from time to time without further notice.

(vi) **Manner of Acting.** If a quorum is present, any act taken by the affirmative vote of a majority of the Directors then in office shall be the act of the Board. Unless

IN WITNESS WHEREOF, the Members have executed this Limited Liability Company Agreement as of the date first written above.

MEMBERS:

PEPPERTREE CAPITAL FUND VII, LP

By: Peppertree Capital FVII, LP, its General Partner

By: Peppertree Capital VII, Inc., its General Partner

By: 
Name: Ryan D. Lepene
Title: Co-President

PEPPERTREE CAPITAL FUND VII QP, LP


By: Peppertree Capital FVII, LP, its General Partner

By: Peppertree Capital VII, Inc., its General Partner

By: 
Name: Ryan D. Lepene
Title: Co-President

PEPPERTREE CAPITAL FVII CO-INVESTORS, LLC

By: Peppertree Capital VII, Inc., its Manager

By: 
Name: Ryan D. Lepene
Title: Co-President


James Reeh

BLUE SKY TOWERS III, LLC

OFFICER'S CERTIFICATE

July 22, 2024

This Certificate is being delivered by Blue Sky Towers III, LLC, a Delaware limited liability company (the "Company"), in connection with the filing of any and all permit applications with the Department of Planning & Natural Resources to include the Major Coastal Zone Management Application and Application for Building Permit of Wireless Facility and Wireless Support Services (the "Applications"), pursuant to which the Company will seek to obtain the necessary permits and approvals to install a telecommunications tower (the "Telecommunications Tower") on certain real property leased by the Company from the property owner Michael Lohman for premises at Plot 3 Long Point & Cotton Garden, Eastend B Quarter, in the Estate South Grapetree, Town of Christinasted, Saint Croix, U.S. Virgin Islands, and certain other related easement rights.

The undersigned President and Chief Executive Officer of the Company, in his capacity as such, hereby certifies on behalf of the Company as follows:

1. Attached hereto as Exhibit A are true and correct copies of the resolutions of the Company authorizing the appropriate officers of the Company to execute and deliver documents relating to the Applications on behalf of the Company, and to do all things necessary to complete the permitting of the Telecommunications Tower contemplated thereby, and such resolutions have not been amended, modified, or rescinded.

IN WITNESS WHEREOF, the undersigned has executed and delivered this Officer's Certificate as of the date first above written.

By: 
James Rech, President and Chief
Executive Officer of Blue Sky
Towers III, LLC

[remainder of page intentionally left blank]

The undersigned, being the duly elected and qualified Secretary of the Company, hereby certifies that James Rech is the duly elected and qualified President and Chief Executive Officer of the Company and that the signature appearing above his name is his genuine signature.

IN WITNESS WHEREOF, I have hereunto set my hand on behalf of the Company in my capacity as Secretary of the Company, and not in my individual capacity, as of the date first above written.



Ryan D. Lepene, Secretary

STATE OF OHIO)
) SS:
COUNTY OF CUYAHOGA)

The foregoing instrument was acknowledged before me this 22 day of July, 2024, by Ryan D. Lepene, Secretary of BLUE SKY TOWERS III, LLC, a Delaware limited liability company, on behalf of the limited liability company



NOTARY PUBLIC



DIANE S. LEUNG
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

[Secretary Signature Page to Blue Sky Towers III, LLC Officer's Certificate]

EXHIBIT A
BLUE SKY TOWERS III, LLC
WRITTEN ACTION BY THE BOARD OF DIRECTORS

The undersigned board of directors of Blue Sky Towers III, LLC, a Delaware limited liability company (the “Company”), hereby take the following actions and adopt the following resolutions pursuant to the Company’s Limited Liability Company Agreement, dated October 1, 2019 (as amended, the “LLC Agreement”). Capitalized terms used and not defined herein shall have the meanings given to such terms in the LLC Agreement.

WHEREAS, the Company, shall be filing with the Department of Planning & Natural Resources any and all permit applications to include the Major Coastal Zone Management Application and Application for Building Permit of Wireless Facility and Wireless Support Services (the “Applications”), pursuant to which the Company will seek to obtain the necessary permits and approvals to install a telecommunications tower (the “Telecommunications Tower”) on certain real property leased by the Company from the property owner Michael Lohman for premises at Plot 3 Long Point & Cotton Garden, Eastend B Quarter, in the Estate South Grapetree, Town of Christinasted, Saint Croix, U.S. Virgin Islands, and certain other related easement rights.


NOW, THEREFORE BE IT RESOLVED, that the actions of James Rech, President and Chief Executive Officer (the “Authorized Officer”), in executing and delivering any Applications, and such other documents and instruments in the permitting of the Telecommunications Tower (on behalf of the Company and all other actions deemed necessary by the Authorized Officer in connection with the permitting of the Telecommunications Tower are in all respects hereby ratified and affirmed; and be it

FURTHER RESOLVED, that any and all actions heretofore or hereafter taken by the Authorized Officer in the name or otherwise on behalf of the Company, within the terms of the foregoing resolutions, are hereby ratified and confirmed as the acts and actions of the Company; and be it


FURTHER RESOLVED, that the Authorized Officer, in the name or otherwise on behalf of the Company, is hereby authorized and empowered to take all such other actions and do all such other things, and to execute and deliver all other instruments and documents, the Authorized Officer deems necessary or advisable, to effectuate the permitting of the Telecommunications Tower.

IN WITNESS WHEREOF, all of the members of the Board of Directors of the Company have executed this Written Action by the Board of Directors this 22 day of July, 2024.

MEMBERS OF THE BOARD OF DIRECTORS



Ryan D. Lepene



James Rech



F. Howard Mandel

United States of America
State of Ohio
Office of the Secretary of State

*I, **FRANK LAROSE**, Secretary of State, do hereby certify that I am the duly elected, qualified and acting Secretary of State of the State of Ohio, and I further certify that*

DIANE S LEUNG

an Attorney at Law who signed as the Notary Public on the attached document was commissioned as a Notary Public commencing on February 11th 1993. The commission has no expiration date as long as they remain a resident of the state, are in good standing before the Ohio Supreme Court and the commission has not been revoked.

This certification certifies only the authenticity of the signature of the official who signed the document, the capacity in which that official acted, and where appropriate, the identity of the seal or stamp, which the document bears. This certification does not imply that the contents of the document(s) are correct, nor that they have the approval of this office.

*IN TESTIMONY WHEREOF, I have hereunto
subscribed my name and affixed the official
Seal of the Secretary of State of Ohio, at
Columbus, Ohio, this 23rd day of
July, 2024.*



Frank LaRose
Secretary of State



**GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DEVELOPMENT PERMIT APPLICATION**

**FORM L&WD-2
PERMIT APPLICATION**

Date Received: _____

Date Declared Complete: _____

Permit No. _____

Application is hereby made for a Earth Change/Coastal Zone Permit

1. Name, mailing address and telephone number of applicant.

Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864
978-291-6517 (James Rech)

2. Name, title, mailing address and telephone number of owner of property and of developer.

Owner

Michael Lohman
5008 S Grapetree Bay
Christiansted, St. Croix, USVI 00820
808-749-6540

Developer

Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864
978-291-6517 (James Rech)

3. Location of activity. Plot No. 3

Estate Long Point & Cotton Garden Island St. Croix

4. Zoning District R-1

5. Name, mailing address and telephone number of project designer.

Elias Manguel
AA1 Calle 22 Urb River VW, Bayamon, PR 00961-3802 939-338-6610

6. Name, mailing address and telephone number of principal earthwork contractor.

Not available at this time.

7. Summary of proposed activity. Include all incidental improvements such as utilities, roads, etc. (Use additional sheets if necessary).

Erection of 150' tall monopole communications tower w/ associated equipment within a 60'x60' leased area. Project also to include construction of 15' x 1,655' of access/utility easement.

- 7a. State type of Land Uses as specified in the VI Zoning Law, which are applied for e.g., restaurant, hotel, single dwelling, etc.

Communications tower

**FORM L&WD-2/PERMIT APPLICATION
CONT'D**

8. Date activity is proposed to start Within 30 days
of permit issuance, be completed Within 90 days from
onset of work

9. Classification of minor or major permit. Check one:

☐ Minor Permit Application

☒ Major Permit Application

State below which criterion applies in making above check.

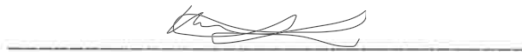
10. Application is hereby made for a permit to authorize the activities described herein. I agree to provide any additional information/data that may be necessary to provide reasonable assurance or evidence to show that the proposed project will comply with the applicable territorial water quality standard or other environmental protection standards both during construction and after the project is completed. I also agree to provide entry to the project site for inspectors from the environmental protection agencies for the purpose of making inspections regarding this application, and that to the best of my knowledge and belief the information provided herein, is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities.

Signature of Applicant or Agent



James Rech, President & CEO

Signature of Owner (Where Applicant
or Agent is not Owner)



Date

August 26, 2024

8/27/2024

**FOR DEPARTMENT USE ONLY
Inspector Record**

Date Inspected: _____

() Permit Approved

() Permit Disapproved

Inspector's Remarks: _____

Inspector

Date


Commissioner, Planning & Natural Resources

Date

**GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DEVELOPMENT PERMIT APPLICATION**

**FORM L&WD-3
ZONING REQUIREMENTS TABLE**

The following table shall be completed by the applicant with entries as appropriate for the zoning district in which the activity is taking place. Not all the requirements will necessarily apply to a particular zone. Consult the Zoning Law. For your guidance also consult the zoning Requirement Matrix attached to the application forms, i.e., for a R-2 zone only items 1 through 11 will apply.

Applicants Name: Blue Sky Towers III, LLC Signature:  Date: 8/26/2024
James Rech, President and CEO

Location of Activity-Plot No. 3 Estate Long Point & Cotton Garden Island St. Croix

Zoning District: R-1

1. Proposed use (residential etc.) Communications tower
2. Accessory use if any n/a
3. Number of on site parking spaces Existing 0 proposed 1
4. Area of lot, (sq. ft. or acreage) 7 acres
5. Area covered by proposed and existing buildings, (sq. ft.)
Proposed (tower base): 100 sq.ft. Existing: 0.0 sq.ft.
6. Setback of building from street property line, (ft.)
270'
7. Side yard setback ft) 170'
8. Rear yard setback (ft) 345'
9. Height of building (ft. or stories depending on zone) No existing structures
10. Proposed: 150' (tower height)
11. Lot width at street line (ft.) 208'
12. Area of usable open space (sq. ft. and (%) of lot 304,820 sq.ft. (.03%)
13. Persons per acre ratio n/a
14. Floor area ratio n/a
15. Number of onsite parking and loading spaces 1 parking space proposed. (Unmanned site)
16. Building setback (yards 11, W-2 only) n/a

FOR DEPARTMENT USE ONLY

Inspector: _____ Date: _____ Permit No. _____

**GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DEVELOPMENT PERMIT APPLICATION**

**FORM L&WD-4
MAJOR PROJECT SUMMARY DATA**

Section I. Applicant

1. Name, address and telephone number of applicant.

Blue Sky Towers III, LLC
352 Park Street, Suite 106, North Reading, Massachusetts 01864
978-291-6517 (James Rech)

2. Name, address and telephone number of owner of Property and of developer.

Owner: Michael Lohman 5008 S Grapetree Bay, Christiansted, St. Croix, USVI 00820 808-749-6540
Developer: Blue Sky Towers III, LLC, 352 Park Street, Suite 106, North Reading, Massachusetts 01864
978-291-6517 (James Rech)

Section II. Summary of Proposed Development

3. Describe the proposed development

Erection of 150' tall monopole communications tower w/ associated equipment within a
60'x60' leased area. Project also to include construction of 15' x 1,655' of access/utility
easement

Section III. Description of Proposed Development

4. Name of development East End
5. Plot No. 3 Est. Long Point & Cotton Garden
6. Zoning District: R-1
7. PWD Map No. 1177
8. Proposed use (residential, etc. as listed in Zoning Law): Communications tower
9. Accessory use if any n/a

GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES DEPARTMENT OF
PLANNING AND NATURAL RESOURCES DEVELOPMENT PERMIT APPLICATION

FORM L&WD-5
PROOF OF LEGAL INTEREST

AFFIDAVIT

I, James Rech, President and CEO of Blue Sky Towers III, LLC being duly sworn depose and say that:
Applicant(s)* (or John Doe of Entity Applicant)

1. Blue Sky Towers III, LLC am/is the (check one)
(I or Entity/Applicant)

☐ Record title owner (fee simple)

☒ Lessee

☐ Other (specify)

Of the real property described as Parcel No(s) 3

Estate Long Point & Cotton Garden Quarter Eastend B Island St. Croix

***Applicant(s) is required to provide documentation for legal interest stated above (e.g. deed, lease, etc.)**

2. I have the irrevocable approvals, permission, or power of attorney from all other persons with a legal interest in the property to undertake the work proposed in the permit application as more fully set forth in the exhibit (s) attached hereto:



Signature _____ Date _____

James Rech, President and CEO
Blue Sky Towers III, LLC

Print _____

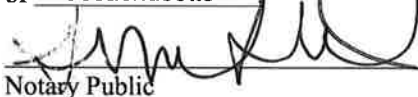
Signature _____ Date _____

Print _____

The foregoing instrument was acknowledged before me this 26th day of August

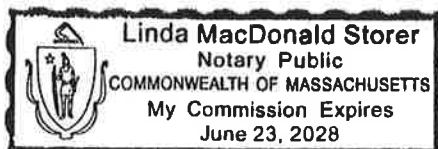
20 24 by James Rech, President and CEO at Middlesex county
(Name or Name/Title of Entity)

of Massachusetts



Notary Public

June 23, 2028
My Commission expires



FORM L&WD-4**MAJOR PROJECT SUMMARY DATA Cont'd**

10. Area of Lot(s) (acreage) 7 acres
11. Area covered by existing buildings (sq. ft.) 0.0 sq.ft.
12. Area covered by proposed buildings (sq. t.) (tower base): 100 sq.ft.
13. Floor area total (tower base): 100 sq.ft.
14. Floor area ratio (B-1, B-2 zones only) n/a
15. Number of buildings (1) tower
16. Number of units total n/a
17. Schedule of units:
- | | Person | Persons |
|---------------|------------|---------------------|
| Efficiencies | <u>n/a</u> | x 1.5 Unit <u>-</u> |
| 1 bedroom | <u>n/a</u> | x 2 <u>-</u> |
| 2 bedroom | <u>n/a</u> | x 3 <u>-</u> |
| 3 bedroom | <u>n/a</u> | x 4 <u>-</u> |
| Other | <u>n/a</u> | x <u>-</u> |
| Total Persons | <u>n/a</u> | |
18. Number of on site parking and loading spaces 1 (unmanned site)
19. Maximum building height (stories/ft) 150' (tower height)
20. Adjoining property land use(s) R-1 and R-3
Adjacent properties are residential. Some of the parcels are developed. Some are not.
21. Setback of building from street property line (ft) 270'
22. Sideyard setback (ft) 170'
23. Rear yard setback (ft) 345'
24. Density (person/acre) n/a
25. Area of usable open space (sq. ft. % of lot) 304,820 sq.ft. (.03%)

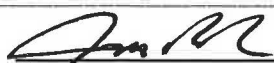
FORM L&WD-4
MAJOR PROJECT SUMMARY DATA Cont'd

Section IV. Comments

26. Proposed Potable Water Supply (method & quality estimate gal/day)
n/a (unmanned site)
27. Proposed Sewage Treatment (method & quality estimate gal/day)
n/a (unmanned site)
28. Proposed Solid Waste Disposal (method & quality estimate lbs/day)
n/a (unmanned site)
29. Proposed Electrical Supply (method & demand estimate KWH for single & 3 phase)
6,000 kW monthly
30. Air Conditioning (method & demand estimate (KWH)
n/a
31. Other Utilities n/a
32. Other n/a

Section V.

33. Will the development extend onto or adjoin any beach tidelands, submerged lands or public trustlands?
No.
34. Will the development maintain, enhance or conflict with public access to the shoreline and along the coast?
Development will not affect existing public to shoreline and along the coast.
35. Will the development protect or provide moderate income housing opportunities?
Will it displace moderate income housing?
No.
36. How will the development affect traffic on the coastal access roads?
Development will not affect traffic along coastal access road.



Signature of owner or authorized agent

James Rech, President and CEO of Blue Sky Towers III, LLC

8/26/2024

Date

**GOVERNMENT OF
THE VIRGIN ISLANDS OF THE UNITED STATES
-0-
VIRGIN ISLANDS BUREAU OF INTERNAL REVENUE**

**(DPNR FORM L&WD-6)
APPLICATION FOR TAX FILING AND PAYMENT STATUS REPORT****

Date: August 26, 2024

The applicant identified below hereby requests a letter certifying his or her tax filing and payment status for the purpose of receiving a Coastal Zone Management Permit from the Virgin Islands Department of Planning and Natural Resources pursuant to Act 5270, amending Sections 910 (a)(2) and 911 (d)(2) of the Coastal Zone Management Act (Title 12, Chapter 21, Virgin Islands Code). The applicant authorizes the Bureau of Internal Revenue to disclose any taxpayer information necessary to process this application to the Virgin Islands Department of Planning and Natural Resources, who may make such further disclosures as are necessary to carry out the requirements of the Coastal Zone Management Act, as amended.

Name: Blue Sky Towers III, LLC

Business Name: Blue Sky Towers III, LLC

EIN/TIN: 84-2902563

SSN: _____

Please Indicate:

☐ *Corporation
☐ *Partnership
☐ Individual
☒ Other

Type of Business: Limited Liability Company

Please circle forms that you use: 1120, 1120s,
1065, 1040, 941 VI, 722 VI, 720, 720 VI, 720
BVI, 50VI, other (list)

Date Business Started: October 1, 2019

Person Representing Applicant: James Rech Position: President & CEO

Signature: 

Mailing Address: 352 Park Street, Suite 106, North Reading, MA 01864

Date: August 26, 2024 Telephone Number: 978-291-6415

Reply to: #1A Lockharts Garden, St. Thomas VI 00802 or 4008 Estate Diamond, St. Croix VI 00820

* Partnerships and/or Corporations must list partners/ corporate officers, social security numbers and addresses on a separate sheet and attach it to this application.

GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES
DEPARTMENT OF PLANNING AND NATURAL RESOURCES
DEVELOPMENT PERMIT APPLICATION

FORM L&WD-7
CORPORATION/ASSOCIATION APPLICATION
(To be used when a corporation or association is making a Permit Application in Tier I)

Blue Sky Towers III, LLC

(Corporation or Association Name)

By:



(Signature)

President or Vice-President or equivalent

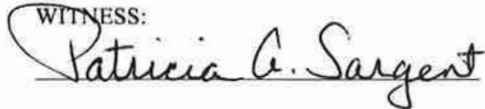
President and CEO

Title/Position (Print)

James Rech

Print

WITNESS:



ATTEST:

Secretary (or equivalent)

Signature

Secretary (or equivalent)

Print

Seal

On this 26th day of August, 20 24, before me the undersigned officer, personally appeared _____

James Rech, who acknowledges himself to be the President and CEO

of Blue Sky Towers III, LLC, that he executed the foregoing instrument in the capacity above and has the

authority to execute this application on behalf of the company.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal the day and year above written.


Notary Public

Include Supporting Documents:

1. Compliance with Act No. 5270 by providing:
 - (a) Tax clearance letter from the Bureau of Internal Revenue
 - (b) Property tax clearance letter from the Lieutenant Governor's Office.
 - (c) Corporations and Associations: Certificate of Good Standing or equivalent, organizational documents & Amendments (Articles, Bylaws, Operating Agreement, Declarations)
 - (d) Corporate Resolution (or equivalent) authorizing action on behalf of the company.

Flood Plain Determination and Permit Application

To be completed by all applicants

1. Owner: Michael Lohman
 Mailing Address 5008 S Grapetree Bay, Christiansted, St. Croix, USVI 00820
 Home Tel. #: _____ Business Tel. #: _____ Cellular #: 808-749-6540
 Applicant: Blue Sky Towers III
 Mailing Address: 352 Park Street, Suite 106, North Reading, Mass. 01864 Phone: 978-291-6517 (James Rech)
2. Designer: Elias Manguel, MECE, PE, PG, CWI
 Lic. #: 1579-E Tel. #: 939-338-6610 Cellular #: _____
3. Plot #: 3 Long Point & Cotton Garden
 Estate: _____ Quarter: Eastend B
 Flood Zone Designation: X

If your flood zone designation is Zone A, AE, AO, A1-30, A99, V, VO, Ve or V1-V30 as shown on the NFIP FIRM Map, then complete this section.

***** NFIP Flood Zone Designation *****

1. Type of development:
- 1 or 2 Family dwelling ☐ Mobile Home ☐ Non-Structural ☐
- 3 Family or more, Apartment or Condo Structure ☐ Non-Residential Structure: ☐
- Commercial Structure ☐ New Construction ☐ Non-Structural ☐
- Addition to Structure () 50% Substantial Improvement of Existing Structure ☐
- Description of Activity _____
2. Base Flood Elevation at the Development Site is _____ ft. above mean sea level (msl) .
3. Elevation of the First Floor, Basement or Flood proof level for proposed structure is _____ ft.
4. Describe the Non-Structural Activity i.e. septic tank, waste water treatment plants etc. (including the location and development): _____
5. Attach a certified copy of site plan (8.5" x 11") showing Base Flood Elevation . See sample attached.

FOR OFFICE USE ONLY

Is the property located in an identified Flood Hazard Area? () YES () NO

NFIP Zone Designation: _____ Forward to Flood Plain Manager : () YES () NO

Application : APPROVED () DENIED () RESUBMIT ()

Plan Reviewer Name: _____

Signature: _____ Date: _____



**Government of
The United States Virgin Islands**

-O-

*Office of the Lieutenant Governor
Division of Corporations & Trademarks*

CERTIFICATE OF GOOD STANDING

To Whom These Presents Shall Come:

I, the undersigned Lieutenant Governor the United States Virgin Islands, do hereby certify that **BLUE SKY TOWERS III, LLC** has filed in the Office of the Lieutenant Governor the requisite annual reports and statements as required by the Virgin Islands Code, and the Rules and Regulations of this Office. In addition, the aforementioned entity has paid all applicable taxes and fees to date, and has a legal existence not having been cancelled or dissolved as far as the records of my office show.

Wherefore, the aforementioned entity is duly formed under the laws of the Virgin Islands of the United States, is duly authorized to transact business, and, is hereby declared to be in good standing as witnessed by my seal below. This certificate is valid through June 30th, 2024.

Entity Type: Foreign Limited Liability Company

Entity Status: In Good Standing

Registration Date: 03/09/2021

Jurisdiction: Delaware, United States



Witness my hand and the seal of the Government of the United States Virgin Islands, on this 3rd day of July, 2023.

A handwritten signature in blue ink, reading "Tregenza A. Roach".

Tregenza A. Roach
Lieutenant Governor
United States Virgin Islands

5001-12 Chandlers Wharf
Christiansted, Saint Croix
Virgin Islands of the US
jeff@thegreenpiece.us



PO Box 25105
Gallows Bay, VI 00824
Phone: 340.778.7474
www.thegreenpiece.us

1A Certification of Location and Elevation

Date of Survey: 16 August 2023

Prepared For: Blue Sky Towers, III LLC

Site Reference: East End STX USVI 00230

Site Address: Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, US Virgin Islands 00820

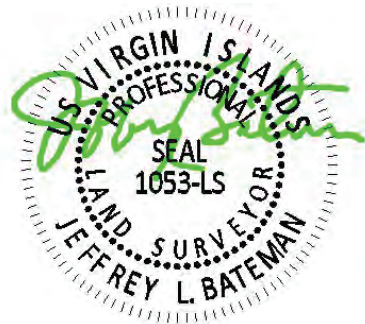
The elevation of the ground at the tower center referenced hereon are based on VIVD09, and are accurate to within 3 feet as determined by our field survey of the subject property. The elevation is as follows:

Ground Elevation of Site: 148.2'

The horizontal values of the above referenced point, and the geodetic coordinates thereof, were established by taking multiple readings with Global Positioning Satellite receivers and are hereby certified to be within 15 feet. The values are based on NAD 1983 and are as follows:

Latitude: 17° 45' 08.6297"
Longitude: -64° 35' 26.7075"

Jeffrey Bateman, PLS
VI PLS 1053-LS



The Virgin Islands
DAILY NEWS

A Pulitzer Prize-Winning Newspaper

ST. CROIX

ST. JOHN

ST. THOMAS

TORTOLA

9155 Estate Thomas, St. Thomas, VI 00802 • 340-774-8772

CustomerService@DailyNews.vi

**VIRGIN ISLANDS OF THE UNITED STATES
JUDICIAL DISTRICT OF ST. CROIX**

In the matter of: **Public Notice Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). Near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127.**

I, Aimee Laplace of St Thomas, Virgin Islands of the United States, being duly sworn, deposes and says as follows:

✓ 1. I am the Accounting Department Representative of The Virgin Islands Daily News, a daily newspaper of general circulation printed and published in English in St. Thomas and distributed in St. Croix, United States Virgin Islands

✓ 2. The advertisement as described above of which the annexed is a printed copy was published in said newspapers(s) on:

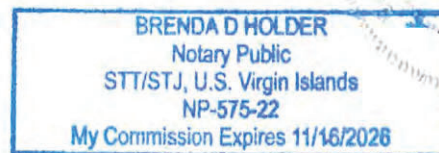
Product	Category	Classification	Insertions Period
Daily News Classified	LEGAL CL	LEGAL NOTICES	05/29/24

Dated 6-7-24

Aimee LaPlace
Accounting Department Representative

Sworn and executed on this date: 6-7-24

Brenda D. Holder
NOTARY PUBLIC



The Virgin Islands
DAILY NEWS

A Pulitzer Prize-Winning Newspaper

ST. CROIX

ST. JOHN

ST. THOMAS

TORTOLA

9155 Estate Thomas, St. Thomas, VI 00802 • 340-774-8772

CustomerService@DailyNews.vi

Public Notice Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). If lighting is required the applicant will request the use of dual red/white, medium intensity lighting (but will ultimately use lighting/marking required by the FAA), located at 17°45'08.6297" N & 64°35'26.7075" W near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127. The application for this proposed project can be viewed at www.fcc.gov/asr/applications by entering the ASR file number. If you have environmental concerns about the proposed structure, a Request for Environmental Review may be filed with the FCC at www.fcc.gov/asr/environmentalrequest or by writing to FCC Requests for Environmental Review, ATTN: Ramon Williams, 445 12th St SW, Washington, DC 20554. If you have any concerns of any historic properties that may be affected by this proposed undertaking, please write to: **DeAnna Anglin**, Lotis Environmental, LLC, Legals@TheLotisGroup.com

APPENDIX E: WORK PLAN

WORK PLAN

Activity	Start Date	Completion Date	Week																							
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Permitting process	9/6/2024	12/6/2024																								
Land Clearing	12/7/2024	12/14/2024																								
Foundation excavation & road preparation	12/15/2024	1/1/2025																								
Cast tower foundation & equip. slabs	1/2/2025	2/2/2025																								
Erect tower	2/3/2025	2/17/2025																								
Erect tower compound security fence	2/18/2025	2/25/2025																								
Install electrical service	2/26/2025	3/3/2025																								

APPENDIX F : DRAWINGS

- T1: Title Sheet
- GN-1: General Notes
- SI-1: Existing and Proposed Site Plans
- C-1: Proposed Site Plan
- C-2: Proposed Compound Site Plan
- C-3: Proposed Equipment Area Layout
- C-4: Site Elevation & Tower Configuration
- C-5: Erosion and Sediment Control Plan
- C-6: Details
- C-7: Details
- C-8: Fence Details
- C-9: Site Grounding Plan
- C-10: Site Grounding Details
- S-1: Monopole Plan & Details
- S-2: Monopole Details
- S-3: Equipment Details
- S-4: Equipment Details
- S-5: Antenna Mounting Details
- F-1: Foundation Plan, Details, and Notes
- E-1: Proposed Electrical Site Plan
- E-2: Electrical Details
- E-3: One Line Diagram
- E-4: Electrical & Grounding Plan
- E-5: Electrical & Grounding Plan

EAST END
USVI-00230

[illegible]

TOWER TECH ENGINEERING, P.S.C.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00961

[illegible]

TITLE SHEET

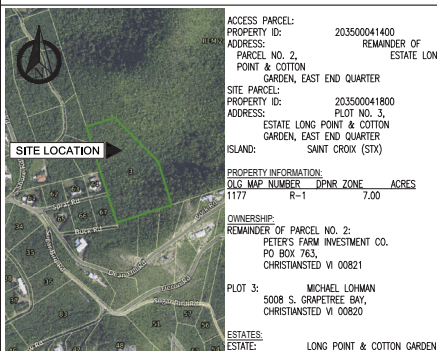
SHEET NUMBER

T1

1. CONTRACTOR SHALL VERIFY ALL PLANS AND 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.
2. CONTRACTOR SHALL NOTIFY OWNER FOR ACCESS TO SITE.
3. THIS PROJECT CONSISTS OF THE INSTALLATION OF:
 - A. ACCESS ROAD - GRUBBING & SUB BASE
 - B. MATERIAL HANDLING YARD TOWER AND ANCHOR BOLTS FROM PORT TO SITE
 - C. COMPOUND CLEARING AND PREPARATION
 - D. TOWER CONCRETE FOUNDATION CONSTRUCTION
 - E. TOWER ERECTION
 - F. ANCHOR TENANT PAD
 - G. ANCHOR TENANT - SECONDARY CONDUITS P&T
 - H. ANCHOR TENANT TOWER BANK W/ GROUNDING
 - I. TOWER SITE GROUNDING - INCLUDES PIGTAILS FOR PROPOSED AND FUTURE TENANTS
 - J. COMPOUND STONE AND FABRIC
 - K. COMPOUND FENCING AND LOCKS
 - L. INSTALLATION OF SITE SIGNAGE
 - M. ALL REQUIRED INSPECTIONS
 - N. 3RD PARTY INSPECTIONS REQUIRED IN BID DOCS.

- | | |
|---|--|
| 1. THIS IS AN UNMANNED FACILITY AND WILL BE USED FOR THE TRANSMISSION OF RADIO SIGNALS FOR THE PURPOSE OF PROVIDING PUBLIC CELLULAR SERVICE. | DATED: -----
JOB NO: ----- |
| 2. LIBERTY MOBILE CERTIFIES THAT THIS EQUIPMENT FACILITY WILL BE SERVICES ONLY BY SERVICE EMPLOYEES AND SUBCONTRACTORS AND THE WORK ASSOCIATED WITH ANY EQUIPMENT CANNOT BE PERFORMED BY HANDICAPPED PERSONS. | FOUNDATION DESIGN BY: -----

TOWER DESIGN: AMBOR STRUCTURES
TITLE: 150FT.199MPH TIA-H
CLIENT: BLUESKY TOWER / QUOTATION NO: C15011028
DATE: 08/15/2024 / VERSION: A |
| 3. THIS FACILITY WILL BE FREQUENTED ONLY BY SERVICE PERSONNEL FOR REPAIR PURPOSES ONLY. | SURVEY PLANS BY: THE GREEN PICE ENGINEERING + ENVIRONMENT, LLC |
| 4. NO POTABLE WATER SUPPLY IS TO BE PROVIDED AT THIS LOCATION. | NSB LIBERTY MOBILE USVI INITIATIVE RFD:
LCPR_EAST_END_2023 NEW SITE_11E_15167353_313669_FINAL_FOR_SAQ |
| 5. NO WASTEWATER WILL BE GENERATED AT THIS LOCATION. | |
| 6. NO SOLID WASTE WILL BE GENERATED AT THIS LOCATION. | MOUNT MANUFACTURER DRAWINGS:
AMBOR MODEL NO.: A5P0101-4120
AMBOR 3-SECTOR UNIVERSAL RING MOUNT, MODEL NO.: PMB1040 |



1. ALL REFERENCES TO OWNER HEREIN SHALL BE CONSTRUED TO MEAN BLUE SKY TOWERS III, LLC, LIBERTY MOBILE USVI INC. OR IT'S DESIGNATED REPRESENTATIVE.
2. ALL WORK PRESENTED ON THESE DRAWINGS MUST BE COMPLETED BY THE CONTRACTOR UNLESS NOTED OTHERWISE. THE CONTRACTOR MUST HAVE CONSIDERABLE EXPERIENCE IN PERFORMANCE OF WORK SIMILAR TO THAT DESCRIBED HEREIN, BY ACCEPTANCE OF THIS ASSIGNMENT, THE CONTRACTOR IS ATTESTING THAT HE DOES HAVE SUFFICIENT EXPERIENCE AND ABILITY, THAT HE IS KNOWLEDGEABLE OF THE WORK TO BE PERFORMED AND THAT HE IS PROPERLY LICENSED AND PROPERLY REGISTERED TO DO THIS WORK IN THE STATE AND/OR COUNTY IN WHICH IT IS TO BE PERFORMED.
3. UNLESS SHOWN OR NOTED OTHERWISE ON THE CONTRACT DRAWINGS, OR IN THE SPECIFICATIONS, THE FOLLOWING NOTES SHALL APPLY TO THE MATERIALS LISTED HEREIN, AND TO THE PROCEDURES TO BE USED ON THIS PROJECT.
4. IT IS THE CONTRACTOR'S SOLE RESPONSIBILITY TO DETERMINE ERECTION PROCEDURE AND SEQUENCE TO INSURE THE SAFETY OF THE STRUCTURE AND ITS COMPONENT PARTS DURING ERECTION AND/OR FIELD MODIFICATIONS. THIS INCLUDES, BUT IS NOT LIMITED TO, THE ADDITION OF WHATEVER TEMPORARY BRACING, GUYS OR TIE DOWNS THAT MAY BE NECESSARY. SUCH MATERIAL SHALL BE REMOVED AND SHALL REMAIN THE PROPERTY OF THE CONTRACTOR AFTER THE COMPLETION OF THE PROJECT.
5. ALL DIMENSIONS, ELEVATIONS, AND EXISTING CONDITIONS SHOWN ON THE DRAWINGS SHALL BE FIELD VERIFIED BY THE CONTRACTOR AND THE TESTING AGENCY PRIOR TO BEGINNING ANY MATERIALS ORDERING, FABRICATION OR CONSTRUCTION WORK ON THIS PROJECT. ANY DISCREPANCIES SHALL BE IMMEDIATELY BROUGHT TO THE ATTENTION OF THE OWNER AND THE OWNER'S ENGINEER. THE DISCREPANCIES MUST BE RESOLVED BEFORE THE CONTRACTOR IS TO PROCEED WITH THE WORK. THE CONTRACT DOCUMENTS DO NOT INDICATE THE METHOD OF CONSTRUCTION. THE CONTRACTOR SHALL SUPERVISE AND DIRECT THE WORK AND SHALL BE SOLELY RESPONSIBLE FOR ALL CONSTRUCTION MEANS, METHODS, TECHNIQUES, SEQUENCES, AND PROCEDURES. OBSERVATION VISITS TO THE SITE BY THE OWNER AND/OR THE ENGINEER SHALL NOT INCLUDE INSPECTION OF THE PROTECTIVE MEASURES OR THE CONSTRUCTION PROCEDURES.
6. ALL MATERIALS AND EQUIPMENT FURNISHED SHALL BE NEW AND OF GOOD QUALITY, FREE FROM FAULTS AND DEFECTS AND IN CONFORMANCE WITH THE CONTRACT DOCUMENTS. ANY AND ALL SUBSTITUTIONS MUST BE PROPERLY APPROVED AND AUTHORIZED IN WRITING BY THE OWNER AND ENGINEER PRIOR TO INSTALLATION. THE CONTRACTOR SHALL FURNISH SATISFACTORY EVIDENCE AS TO THE KIND AND QUALITY OF THE MATERIALS AND EQUIPMENT BEING SUBSTITUTED.
7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR INITIATING, MAINTAINING, AND SUPERVISING ALL SAFETY PRECAUTIONS AND PROGRAMS IN CONNECTION WITH THE WORK. THE CONTRACTOR IS RESPONSIBLE FOR INSURING THAT THIS PROJECT AND RELATED WORK COMPLIES WITH ALL APPLICABLE LOCAL, STATE, AND FEDERAL SAFETY CODES AND REGULATIONS GOVERNING THIS WORK.
8. ALL WORK SHALL BE COMPLETED IN ACCORDANCE WITH THE LATEST EDITION OF THE LOCAL BUILDING CODE.
9. ALL PROPOSED CELLULAR EQUIPMENT AND FIXTURES SHALL BE FURNISHED BY OWNER FOR INSTALLATION BY THE CONTRACTOR, UNLESS SPECIFICALLY NOTED OTHERWISE HEREIN.
10. ACCESS TO THE PROPOSED WORK SITE MAY BE RESTRICTED. THE CONTRACTOR SHALL COORDINATE INTENDED CONSTRUCTION ACTIVITY, INCLUDING WORK SCHEDULE AND MATERIALS ACCESS, WITH THE RESIDENT LEASING AGENT FOR APPROVAL.

1. STRUCTURAL STEEL SHALL CONFORM TO THE LATEST EDITION OF THE A.I.S.C. SPECIFICATIONS FOR STRUCTURAL STEEL BUILDINGS— ALLOWABLE STRESS DESIGN AND PLASTIC DESIGN INCLUDING THE COMMENTARY AND THE A.I.S.C. CODE OF STANDARD PRACTICE.
2. STRUCTURAL STEEL PLATES AND SHAPES SHALL CONFORM TO ASTM A26. ALL STRUCTURAL STEEL PIPES SHALL CONFORM TO ASTM A53 GRADE B. ALL STRUCTURAL STEEL TUBING SHALL CONFORM TO ASTM A500 GRADE B. ALL STRUCTURAL STEEL COMPONENTS AND FABRICATED ASSEMBLIES SHALL BE HOT DIP GALVANIZED AFTER FABRICATION.
3. WELDING SHALL BE IN ACCORDANCE WITH THE AMERICAN WELDING SOCIETY (AWS) D.1.1/01.1M:2015. STRUCTURAL WELDING CODE—STEEL WELD ELECTRODES SHALL BE E70XX.

1. CONTRACTOR SHALL SECURE ALL NECESSARY PERMITS FOR THIS PROJECT FROM ALL APPLICABLE GOVERNMENTAL AGENCIES.
2. ANY PERMITS WHICH MUST BE OBTAINED SHALL BE THE CONTRACTOR'S RESPONSIBILITY. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ABIDING BY ALL CONDITIONS AND REQUIREMENTS OF THE PERMITS.
3. ALL WORK SHALL BE IN ACCORDANCE WITH LOCAL CODES AND THE ACI 318-14, "BUILDING REQUIREMENTS FOR STRUCTURAL CONCRETE".
4. THE CONTRACTOR SHALL NOTIFY THE APPLICABLE JURISDICTIONAL (STATE, COUNTY OR CITY) ENGINEER 24 HOURS PRIOR TO THE BEGINNING OF CONSTRUCTION.
5. ALL DIMENSIONS SHALL BE VERIFIED WITH THE PLANS (LATEST REVISION) PRIOR TO COMMENCING CONSTRUCTION. NOTIFY THE OWNER IMMEDIATELY IF DISCREPANCIES ARE DISCOVERED. THE CONTRACTOR SHALL HAVE A SET OF APPROVED PLANS AVAILABLE AT THE SITE AT ALL TIMES WHEN WORK IS BEING PERFORMED. A DESIGNATED RESPONSIBLE EMPLOYEE SHALL BE AVAILABLE FOR CONTACT BY GOVERNING AGENCY INSPECTORS.

1. ALL THREADED STRUCTURAL FASTENERS FOR ANTENNA SUPPORT ASSEMBLIES SHALL CONFORM TO ASTM A307 OR ASTM 36. ALL STRUCTURAL FASTENERS FOR STRUCTURAL STEEL FRAMING SHALL CONFORM TO ASTM A325. FASTENERS SHALL BE 5/8" MIN. DIA. BEARING TYPE CONNECTIONS WITH THREADS EXCLUDED FROM THE PLANE. ALL EXPOSED FASTENERS, NUTS, AND WASHERS SHALL BE GALVANIZED UNLESS OTHERWISE NOTED. ALL ANCHORS INTO CONCRETE SHALL BE STAINLESS STEEL.
2. THE CONTRACTOR SHALL FURNISH ALL CONNECTION HARDWARE REQUIRED TO SECURE THE CABLES. CONNECTION HARDWARE SHALL BE STAINLESS STEEL.
3. NORTH ARROW SHOWN ON PLANS REFERS TO TRUE NORTH. CONTRACTOR SHALL VERIFY NORTH AND NOTIFY CONSULTANT OF ANY DISCREPANCY BEFORE STARTING CONSTRUCTION.
4. PROVIDE LOCK WASHERS FOR ALL MECHANICAL CONNECTIONS FOR GROUND CONDUCTORS. USE GRADE 304 STAINLESS STEEL HARDWARE THROUGHOUT.
5. THOROUGHLY REMOVE ALL PAINT AND CLEAN ALL DIRT FROM SURFACES REQUIRING GROUND CONNECTIONS.

- SHEET DESCRIPTION
GENERAL NOTES



2
C-7

SITE COMPOUND AREA
SURFACING

1
C-8

PROPOSED 12FT WIDE
ACCESS GATE

1
E-2

PROPOSED ELECTRICAL
METER BANK
(REFER TO ELECTRICAL
DRAWINGS FOR DETAILS)

1
E-2

PROPOSED POWER WOOD POLE
WITH A 75KVA TRANSFORMER
(REFER TO ELECTRICAL DRAWINGS
FOR DETAILS)

PROPOSED TELECOMMUNICATIONS SITE AREA:
FENCED AREA: 185.8061 SQMTS. = 2,000.00 SQFT.

PROPOSED AREA FOR THE CONSTRUCTION
OF A TELECOMMUNICATIONS SITE WITH AN
150 FT HIGH SELF SUPPORT MONOPOLE
CENTER COORDINATES
LAT: 17.752397
LONG: -64.590752
X = 395,411.417
Y = 192,025.075

1
C-4

SYMBOL LEGEND

----- PROPOSED FENCE
----- LEASE AREA
----- UNDERGROUND FOUNDATION
----- ACCESS AND UTILITY
EASEMENT AREA

----- CENTER LINE
● PROPOSED POLE WITH
(N.I.C.) TRANSFORMER (BY OTHERS)
NOT IN CONTRACT

1
C-7

REPRESENTS DETAIL #
REPRESENTS SHEET#

NOTE 1
SHT E7

REPRESENTS NOTE
REPRESENTS SHEET#

1 C-2 PROPOSED COMPOUND SITE PLAN

SCALE: 3/8"=1'-0"

TOWER TECH
ENGINEERING PSC
TELECOM INFRASTRUCTURE
CONSULTANTS AND ENGINEERS
TOWER TECH ENGINEERING, PSC.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00951

BST BLUE SKY
TOWERS ILLC
BLUE SKY TOWERS ILLC
352 PARK STREET STE 106
NORTH READING MA 01864

Liberty
LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

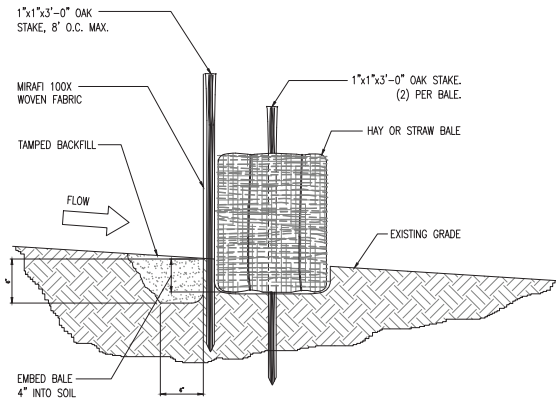
ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



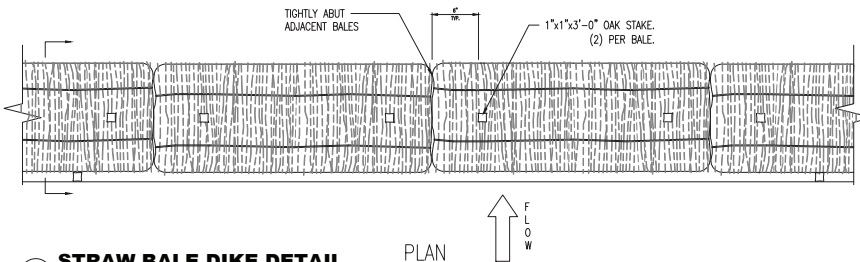
REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY:	CHECKED BY:
A.C.R.	E.M.U.

**EAST END
USVI-00230**
3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820
SHEET DESCRIPTION
**PROPOSED COMPOUND
SITE PLAN**
SHEET NUMBER
C-2



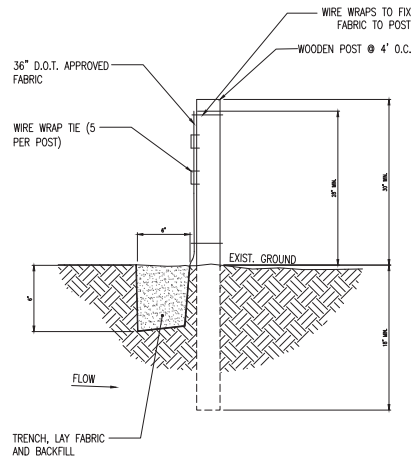
SECTION



PLAN

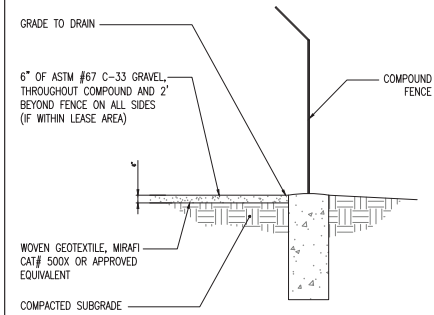
STRAW BALE DIKE DETAIL

1
C-6
NOT TO SCALE



2 C-6 SILT FENCE DETAIL (IF NECESSARY) NOT TO SCALE

1. THE FILTER FABRIC USED SHALL BE TYPE I OR II AND SHALL COMPLY W/ ALL NATIONAL, STATE AND LOCAL CODES AS ADOPTED BY THE LOCAL AUTHORITY HAVING JURISDICTION (AHJ).
2. SILT FENCE HEIGHT SHALL BE A MINIMUM OF 2.5 FEET ABOVE GROUND HEIGHT.
3. CONSTRUCT SILT FENCE OF A CONTINUOUS ROLL CUT THE LENGTH OF THE BARRIER TO AVOID JOINTS. FABRIC TO BE FASTENED SECURELY TO FENCE POSTS WITH 1 INCH STAPLES OR TIE WIRES.
4. SUPPORT FABRIC WITH WOVEN WIRE MESH (TOP AND BOTTOM WIRES SHALL BE 10 GA., OTHER WIRES SHALL BE AT LEAST 12.5 GA.). OPENING SHALL BE 6" MAX. SPACING. WOVEN WIRE FENCE TO BE FASTENED SECURELY TO POSTS WITH 1" STAPLES, NAILS OR TIE WIRES.
5. POST FOR SILT FENCE SHALL BE STEEL.
6. FENCE POST SPACING SHALL NOT EXCEED 4 FEET O.C.
7. EXCAVATE A TRENCH APPROXIMATELY 6 INCHES WIDE AND 6 INCHES DEEP ALONG THE PROPOSED LINE OF POSTS AND UP SLOPE FROM THE BARRIER. BACK FILL THE TRENCH WITH #57 STONE PLACED OVER THE FILTER FABRIC.
8. DO NOT ATTACH FILTER FABRIC TO EXISTING FENCES, TREES, ETC.
9. REMOVE FENCING FOLLOWING STABILIZATION OF SLOPES AND ALL DISTURBED AREAS.



3 C-6 GRAVEL COMPOUND DETAIL NOT TO SCALE



TOWER TECH ENGINEERING, PSC.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00951



BLUE SKY TOWERS ILLC
352 PARK STREET STE 106
NORTH READING MA 01864



LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY: A.C.R.
CHECKED BY: E.M.U.

EAST END USVI-00230

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION

DETAILS

SHEET NUMBER

C-6



SHEET NUMBER
C-7

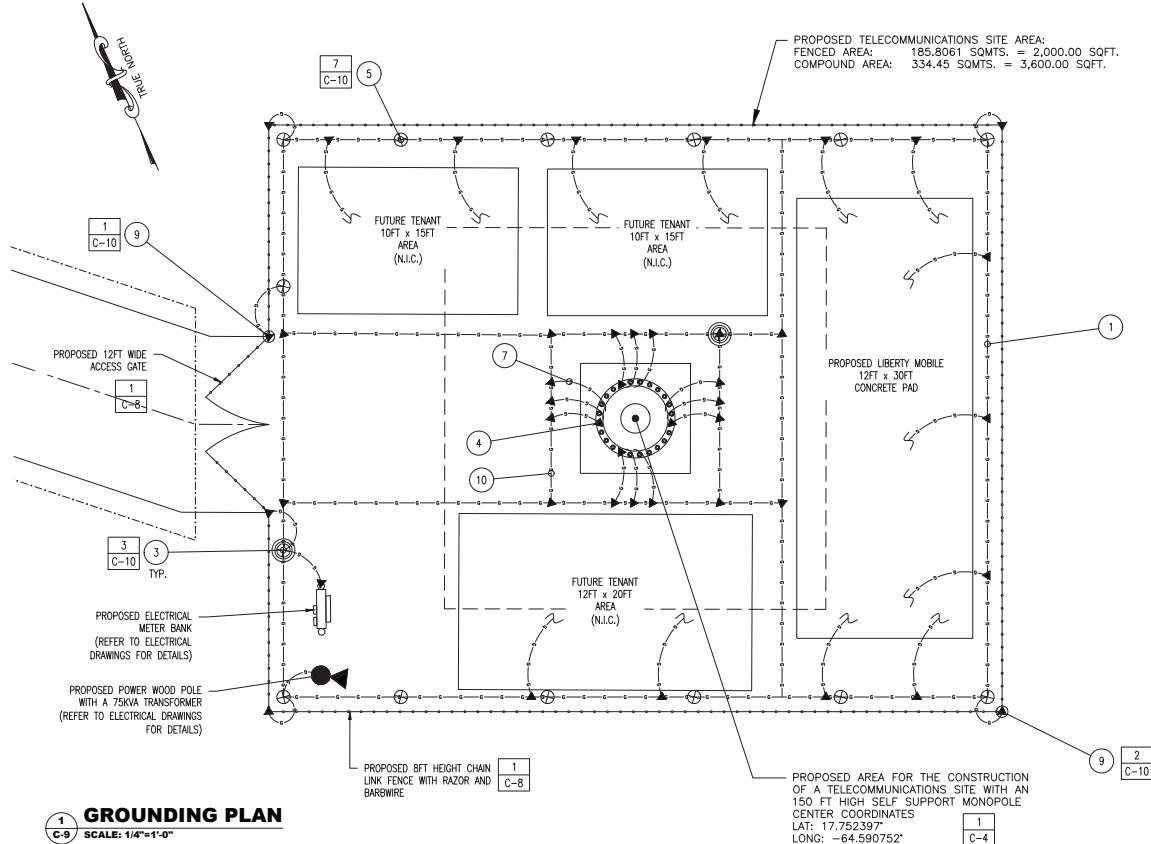


-
- A technical diagram of a gate locking system. It shows two vertical bars labeled 'STRETCHER BARS' and two horizontal bars labeled 'GATES'. A 'GATE KEEPER BRACKET' is attached to the top of the vertical bars. A 'TYPICAL STYMIE LOCK OR SIMILAR APPROVED BY OWNER' is shown as a horizontal bar with three padlocks. A label 'VERIFY WITH BLUE SKY TOWER THE NUMBER OF PADLOCKS REQUIRED' points to the padlocks. The background is a cross-hatched pattern.

2 STYMIE LOCK DETAIL
C-8 NOT TO SCALE

10. CORNER, END OR PULL POST PIPE 4 STD.
21. LINE POST: PIPE 3 STD, PER ASTM-F1083. LINE POSTS SHALL BE EQUALLY SPACED AT MAXIMUM 8'-0" O.C.
3. TOP RAIL & CORNER WIRE: PIPE 2 STD, PER ASTM-F1083.
4. FABRIC: 12 GA BRACE WIRE, SIZE 2" MESH, CONFORMING TO ASTM-A392.
5. THE WIRE: MINIMUM 11 GA GALVANIZED STEEL AT POSTS AND RAILS A SINGLE WRAP OF FABRIC TIE AND AT TENSION WIRE BY HOG RINGS SPACED MAX. 24" INTERVALS.
6. TENSION WIRE: 7 GA. GALVANIZED STEEL.
7. BARBED WIRE: DOUBLE STRAND 12-1/2" O.D. TWISTED WIRE TO MATCH WITH FABRIC 14 GA, 4 PT. BARBS SPACED ON APPROXIMATELY 5" CENTERS.
8. STRETCHER BAR.
9. 3/8" DIAGONAL ROD WITH GALVANIZED STEEL TURNBUCKLE OR DIAGONAL THREADED ROD.
10. FENCE CORNER POST BRACE: PIPE 1 STD EACH CORNER, EACH WAY.
11. 1 1/2" MAXIMUM CLEARANCE FROM GRADE.
12. 1" CROWN ABOVE FINISH GRADE.
13. 6" COMPACTED 85% BASE MATERIAL OR AS DETERMINED BY CONSTRUCTION MANAGER DURING BID WALK.
14. FINISH GRADE SHALL BE UNIFORM AND LEVEL.
15. GATE POST PIPE 4 STD, FOR GATE WIDTHS UP THRU 6 FEET OR 12 FEET FOR DOUBLE SWING GATE, PER ASTM-F1083.
16. GATE FRAME: PIPE 2 STD, PER ASTM-F1083.
17. STYME LOCK: SEE DETAIL ON THIS SHEET.
18. GATE DIAGONAL GALVANIZED STEEL PIPE 1.5 STD.
19. EXTENSION ARM.
20. CONTINUOUS ROW OF RAZOR WIRE.





- PROVIDE A #2 AWG SOLID BARE TINNED COPPER GROUND RING AROUND THE CONCRETE PAD. ALL EXTERIOR GROUNDING CONDUCTORS SHALL BE BURIED A MINIMUM OF 30" BELOW GRADE (OR 6" BELOW FROST LINE, WHICHEVER IS GREATER). THE GROUND RING SHALL BE INSTALLED 2'-0" AWAY FROM CONCRETE PAD (MINIMUM UNLESS SHOWN OTHERWISE ON DRAWINGS). ALL BONDS TO THE BURIED GROUND RING SHALL BE WITH EXOTHERMIC WELDS.
- BOND EACH WAVEGUIDE POST TO THE BURIED GROUND RING. EXOTHERMICALLY WELD A #2 AWG SOLID BARE TINNED COPPER CONDUCTOR TO THE WAVEGUIDE POST AT 12" ABOVE GRADE AND CONNECT TO THE BURIED GROUND RING. PROVIDE CONDUCTOR LENGTH AS REQUIRED TO MAKE CONNECTION.
- PROVIDE INSPECTION SLEEVE WHERE SHOWN FOR ALL PRIMARY CONNECTIONS TO BURIED GROUND RING. SEE GROUND ROD INSPECTION SLEEVE DETAIL, FOR TYPICAL GROUND RING INSPECTION SLEEVE. NOTE: INSPECTION SLEEVE CAN BE USED AS A TEST WELL FOR GROUND WATER LEVEL INSPECTION AND GROUND RESISTANCE TESTING.
- A BGR GREEN GROUND SHALL BE INSTALLED THAT ENCLOSES THE TOWER FOUNDATION. THE BGR WILL BE CONSTRUCTED IN THE SAME MANNER AS THE BTS EQUIPMENT BGR EXCEPT THAT FOUR GROUND RODS WILL BE INSTALLED 90 DEGREES APART. THE TOWER AND EQUIPMENT BGRS WILL BE CONNECTED USING TWO BURIED RUNS OF NO. 2 AWG BARE, SOLID, ANNEALED, TINNED COPPER WIRE. THESE CONNECTIONS WILL FOLLOW THE SAME PATH AS THE COAX BRIDGE IF POSSIBLE. EXOTHERMICALLY WELD FOUR NO. 2 AWG BARE TINNED COPPER WIRES LOCATED AT 90 DEGREE POINTS AROUND THE BASE PLATE OR WELD TABS OF A TOWER. DO NOT EXOTHERMICALLY WELD DIRECTLY TO THE TOWERS SHELL. THE OTHER END OF EACH NO. 2 AWG WIRE SHALL BE EXOTHERMICALLY WELDED TO A GROUND ROD OF THE BGR.
- INSTALL 5/8"x10'-0" LONG COPPERCLAD STEEL GROUNDING RODS. SPACING BETWEEN RODS NOT TO EXCEED 10'-0" (NON-LINEAR). TYPICAL FOR ALL GROUND RODS SHOWN, UNLESS NOTED OTHERWISE. GROUND ROD MAY BE INSTALLED WITH A MAXIMUM VARIATION OF 30° FROM VERTICAL IF ROCK IS ENCOUNTERED. SUBCONTRACTOR SHALL BE PREPARED TO CORE DRILL TO INSTALL GROUND RODS AND BACKFILL WITH GROUND ENHANCEMENT MATERIAL.
- BOND ALL EXTERIOR METALLIC CONDUITS, PIPES AND CYLINDRICAL OBJECTS WITH A PENN-UNION GT SERIES CLAMP, BLACKBURN GUY SERIES CLAMP OR A BURNDY GAR 3900UB SERIES CLAMP ONLY. NO SUBSTITUTES ARE ACCEPTABLE.
- BENDED TO METAL OF THE GROUND RING.
- EXOTHERMICALLY WELD FOUR NO. 2 AWG BARE TINNED COPPER WIRES LOCATED AT 90 DEGREE POINTS AROUND THE BASE PLATE OR WELD TABS OF THE TOWER. DO NOT EXOTHERMICALLY WELD DIRECTLY TO THE TOWERS SHELL.
- THE OTHER END OF EACH NO. 2 AWG WIRE SHALL BE EXOTHERMICALLY WELDED TO A GROUND ROD OF THE BGR.
- EXOTHERMICALLY WELD #2 AWG SOLID BARE TINNED COPPER GROUND CONDUCTOR BETWEEN TOWER GROUND RING AND EACH CORNER FENCE POST AND GATE POST.
- GROUND RING AROUND TOWER SHALL BE #2/0 SOLID BARE TINNED COPPER AND SHALL BE 24" MIN. AWAY FROM THE TOWER FOUNDATION.

- ALL GROUNDING CABLES IN CONCRETE OR THROUGH WALL SHALL BE IN 3/4" PVC CONDUIT. NO METALLIC CONDUIT SHALL BE USED FOR GROUNDING CONDUCTOR SLEEVES AND WITHIN THE ENTIRE FENCED COMPOUND.
- GROUND ALL EXPOSED METALLIC OBJECTS ON PROPOSED UTILITY RACK USING A TWO-HOLE NEMA DRILLED CONNECTOR SUCH AS THOMAS AND BETTS 32207 OR APPROVED EQUAL.
- THE SUBCONTRACTOR SHALL NOTIFY THE CONTRACTOR WHEN THE GROUND RING IS INSTALLED SO THAT THE REPRESENTATIVE CAN INSPECT GROUND RING BEFORE IT IS BURIED.
- ALL EXTERIOR GROUNDING CONDUCTORS INCLUDING GROUND RING SHALL BE 2 AWG SOLID BARE TINNED COPPER. MAKE ALL GROUND CONNECTIONS AS SHORT AND DIRECT AS POSSIBLE AND AVOID SHARP BENDS. THE RADIUS OF ANY BEND SHALL NOT BE LESS THAN 8" AND THE INCLUSIVE ANGLE OF ANY BEND SHALL NOT EXCEED 90°. GROUNDING CONDUCTORS SHALL BE ROUTED DOWNWARD TOWARD THE BURIED GROUND RING.
- ALL BELOW GROUND EXTERNAL CONNECTIONS SHALL BE EXOTHERMICALLY WELDED. ALL EXOTHERMIC WELDS TO BURIED GROUND RING SHALL BE THE PARALLEL-TYPE EXCEPT FOR THE GROUND RODS WHICH ARE TEE-TYPE EXOTHERMIC WELDS. REPAIR ALL GALVANIZED SURFACES THAT HAVE BEEN DAMAGED BY EXOTHERMIC WELDING. USE GALVANIZED SPRAY SUCH AS HOLLIB LECTROSOL #15-501.
- WHERE MECHANICAL CONNECTORS (TWO-HOLE OR CLAMP) ARE USED, APPLY A LIBERAL PROTECTIVE COATING OF A CONDUCTIVE ANTI-OXIDE COMPOUND ON ALL CONNECTORS (NO-OX-ID "A"). PROVIDE LOCK WASHERS ON ALL MECHANICAL CONNECTORS. USE STAINLESS STEEL HARDWARE THROUGHOUT. THOROUGHLY REMOVE ALL PAINT AND CLEAN ALL DIRT FROM SURFACES REQUIRING GROUND CONNECTORS. REPAINT TO MATCH EXISTING AFTER CONNECTION IS MADE TO MAINTAIN CORROSION RESISTANCE. ALL GROUND CONNECTIONS SHALL BE APPROVED FOR THE TYPES OF METALS BEING ATTACHED TO.
- THE SUBCONTRACTOR SHALL COORDINATE AS REQUIRED TO HAVE A UTILITY COMPANY REPRESENTATIVE AT THE SITE TO DISCONNECT THE UTILITY NEUTRAL FROM GROUNDING SYSTEM DURING FINAL INSPECTION SO THAT REQUIRED TESTING ON THE GROUND SYSTEM CAN BE PERFORMED. THE SUBCONTRACTOR SHALL PROVIDE NOTICE TO THE CONTRACTOR (TWO) DAYS PRIOR TO FINAL TESTING. IF THE SUBCONTRACTOR FAILS TO MAKE UTILITY COMPANY REPRESENTATIVE AVAILABLE DURING THE FINAL TESTING, THE SUBCONTRACTOR SHALL PAY THE COST FOR AN INDEPENDENT GROUNDING CONSULTANT TO PERFORM THE GROUND RESISTANCE TEST. GROUNDING CONSULTANT SHALL BE SELECTED BY THE CONTRACTOR. IF THE UTILITY COMPANY REPRESENTATIVE FAILS TO APPEAR DUE TO NO FAULT OF THE SUBCONTRACTOR, NO PENALTY SHALL APPLY.
- A RESISTANCE TO GROUND OF (5) OHMS OR LESS IS REQUIRED FOR ALL SITES. THE SUBCONTRACTOR SHOULD RETAIN HIS OWN TESTER AT HIS OWN EXPENSE. IN ADDITION, A THIRD PARTY SHOULD BE HIRED TO OBTAIN MEGGER AND SWEEP RESULTS ON ALL SITES INCLUSIVE OF WHAT RESULTS THE SUBCONTRACTOR SUBMITS TO ENSURE PROPER QUALITY CONTROL ON ALL SITES. SCHEDULE FINAL MEGGER TESTING PROCEDURES. IF THE FINAL GROUNDING RESISTANCE MEASUREMENT EXCEEDS 5 (FIVE) OHMS, THE SUBCONTRACTOR SHALL NOTIFY THE CONTRACTOR.
- ALL MOUNTING HARDWARE SHALL BE STAINLESS STEEL.
- THE GROUND WIRES SHALL BE STRAIGHT FOR MINIMUM INDUCTANCE AND VOLTAGE DROP SINCE CABLE BENDS INCREASE INDUCTANCE. THE MINIMUM REQUIRED BENDING RADIUS IS 8 INCHES WHEN BENDS ARE UNAVOIDABLE. ALL METAL WORK WITHIN 10 FEET OF THE GROUND RING SHALL BE DIRECTLY BONDED TO THIS GROUND SYSTEM WITHOUT USING SERIES OR DASHY CHAIN CONNECTION ARRANGEMENTS.
- PAINT, ENAMEL, LACQUER AND OTHER ELECTRICALLY NON-CONDUCTIVE COATINGS SHALL BE REMOVED FROM THREADS AND SURFACE AREAS WHERE CONNECTIONS ARE MADE TO ENSURE GOOD ELECTRICAL CONTINUITY.
- CONNECTIONS BETWEEN DISSIMILAR METALS SHALL NOT BE MADE UNLESS THE CONDUCTORS ARE SEPARATED BY A SUITABLE MATERIAL THAT IS A PART OF THE ATTACHMENT DEVICE. ONLY ATTACHMENT DEVICES LISTED AND APPROVED FOR USE WITH THE SPECIFIC DISSIMILAR METALS MAY BE USED FOR THIS PURPOSE.
- ALL BELOW GRADE GROUND SYSTEM CONDUCTORS SHALL BE A MINIMUM DEPTH OF 30".
- NO-OX-ID "A" TO BE ADDED UNDER ALL GROUND LUG CONNECTIONS.

SYMBOL LEGEND

	GROUND INSPECTION WELL		PROPOSED FENCE
	GROUND ROD		GROUNDING
	MECHANICAL CONNECTION		NOT IN CONTRACT
	EXOTHERMIC WELD		

	REPRESENTS DETAIL #
	REPRESENTS SHEET#

	REPRESENTS NOTE
	REPRESENTS SHEET#



TOWER TECH ENGINEERING, PSC.
AA1 CALL 22 RIVER VW
BAYANON PR 00651



BLUE SKY TOWERS ILL, LLC
352 PARK STREET STE 106
NORTH READING MA 01864



LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY: A.C.R.
CHECKED BY: E.M.U.

**EAST END
USVI-00230**
3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
SITE GROUNDING PLAN

SHEET NUMBER
C-9



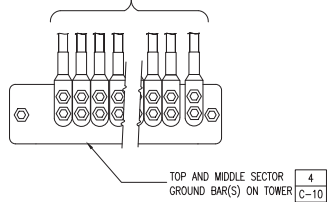
1. THE #2 AWG BCW, FROM THE GROUND RING SHALL BE CADWELDED TO THE POST ABOVE GRADE.
2. GATE JUMPER SHALL BE #4/0 AWG WELDING CABLE OR FLEXIBLE COPPER BRAID BURNDY TYPE B WITH SLEEVES ON EACH END DESIGNED FOR EXOTHERMIC WELDING.
3. GATE JUMPER SHALL BE INSTALLED SO THAT IT WILL NOT BE SUBJECTED TO DAMAGING STRAIN WHEN GATE IS FULLY OPEN IN EITHER DIRECTION.



1. VERTICAL POSTS SHALL BE BONDED TO THE RING AT EACH CORNER AND AT EACH GATE POST. AS A MINIMUM ONE VERTICAL POST SHALL BE BONDED TO THE GROUND RING IN EVERY 100 FOOT STRAIGHT RUN OF FENCE.



1. TOP & MIDDLE (IF REQUIRED) GROUND BARS.
2. CONNECTIONS PLUS 50% FUTURE CAPACITY.
3. WELDING GROUND BAR TO TOWER PROHIBITED. USE MECHANICAL CONNECTION ONLY.
4. ENSURE THAT GROUND BAR SIZE AND HOLE SPACING IS SUFFICIENT TO ALLOW FOR NO OVERLAPPING OF GROUND LUG WASHERS.



5 WIRE TO COAX GROUND BAR
-10 NOT TO SCALE


1. SUBCONTRACTOR TO UTILIZE NO-OX ON ALL LUG CONNECTIONS.
2. SIMILAR INSTALLATION FOR TOP AND MIDDLE (IF APPLICABLE) TOWER GROUND BARS AND FOR COAX ENTRY PORT GROUND BARS.
3. BACK-BOLTING HAS BEEN CARRIER APPROVED.



1. ALL HARDWARE SHALL BE 18-8 STAINLESS STEEL. COAT ALL SURFACES WITH ANTI-OXIDATION COMPOUND BEFORE MATING.
2. ALL EXPOSED, EASILY ACCESSIBLE GROUND BARS SHALL BE TAGGED "DO NOT DISCONNECT."
3. COAT ALL BARRELS WITH ANTI-OXIDATION COMPOUND BEFORE CRIMPING.



1. GROUND ROD TO BE DRIVEN 10' VERTICALLY.



TOWER TECH
ENGINEERING PSC

TELECOM INFRASTRUCTURE
CONSULTANTS AND ENGINEERS

TOWER TECH ENGINEERING, PSC.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00961



ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES
DRAWN BY:		CHECKED BY:
A.C.R.		E.M.U.

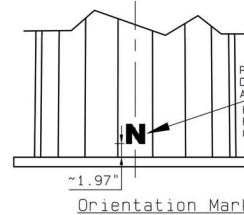
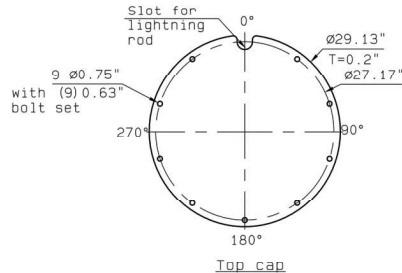
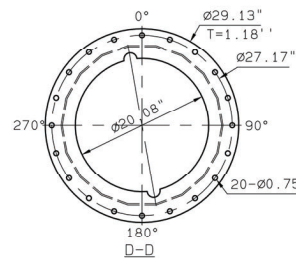
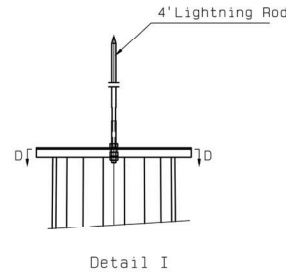
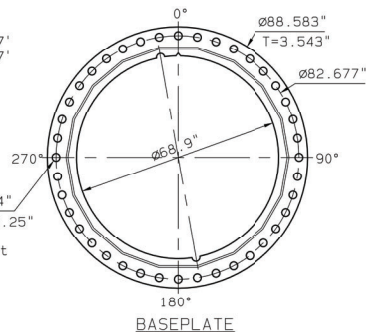
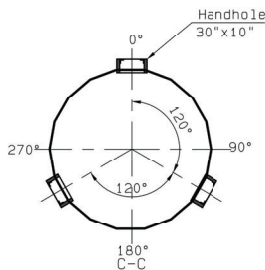
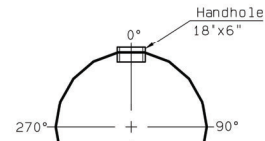
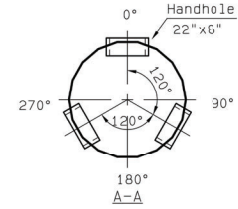
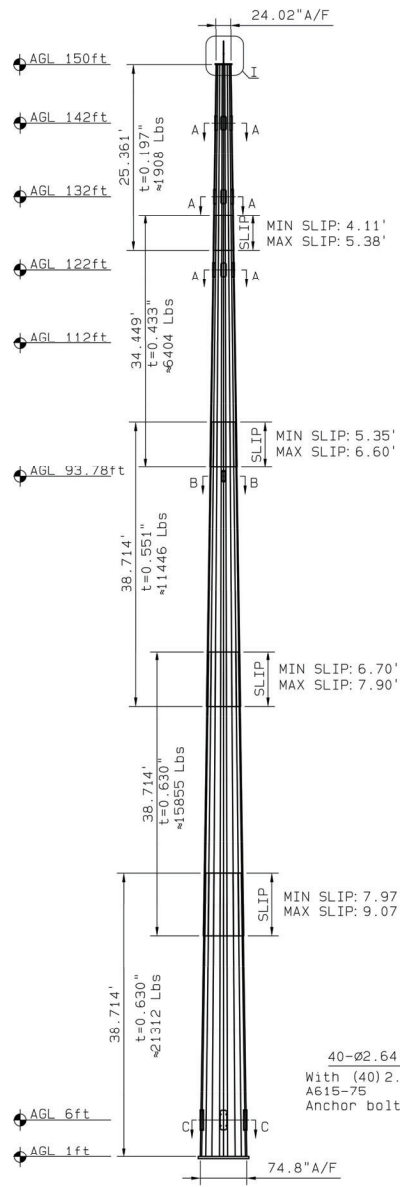
EAST END
USVI-00230

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
**SITE GROUNDING
DETAILS**

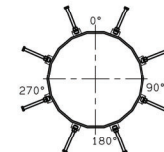
SHEET NUMBER

C-10



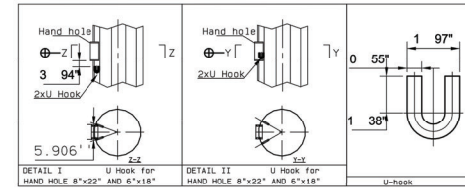
Tower Notes:

1. Material:
Pole shaft: ASTM A572 GR65
Baseplate: GR50 or Q355B; Top Flange: Q235B
2. Pole section has 18 sides
3. Finished: Galvanizing per ASTM A123
Lightning Rod will be copper-clad
4. All fasteners will be with metric unit according to Chinese standard GB 5783/5782.



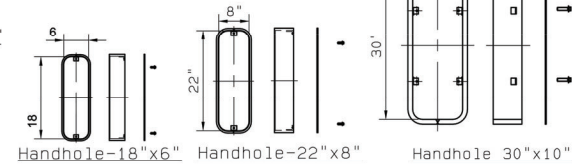
Work Steps and Climbing System Detail

1. Climbing System is centered at 40 Degrees
2. Working steps are placed ~55"-67" below the appurtenance access center. Extra step bolts are placed ~71" above working working steps for convenience.
3. Working steps (6~8) at the same elevation may not be evenly spaced.



1. U Hook use detail I as priority, if conflicts with slip joint, then use detail II.

Please refer to separate drawing for step bolts with safety system



Site name: USVI-00230 East End
Site Coordinates: 17.752397°,-64.590752°
Site Address: Plot 3 Estate Long Point & Cotton Garden
East End B Quarter, St. Croix, US Virgin Islands 00820

NO	PART NO.	DESCRIPTION	WEIGHT	QTY
7		4' Steel Lightning Rod		1
6		Safety Device		TBD
5		Step Bolts		1
4		Hand hole 18"x6"		2
3		Hand hole 22"x8"		9
2		Hand hole 30"x10"		3
1		Pole		1

AMBOR Ambor Structures
amborstructures.com

CLIENT	Bluesky Tower
TITLE	150ft.199mph TIA H
DRAWN	DZY 2024/08/15
ENGR	ZHJ 2024/08/15
CHECKED	ZHJ 2024/08/15
SPECIFICATIONS	
MATERIAL	
THK (mm)	
WT (kg)	
SCALE	
MANUFACTURING ORDER	
VERSION	A

REV	DATE	REVISION DESCRIPTION
A		

*AGL stands for Above ground line

TOWER TECH
ENGINEERING PSC
TELECOM INFRASTRUCTURE
CONSULTANTS AND ENGINEERS

TOWER TECH ENGINEERING, PSC
AA1 CALLE 22 RIVER VW
BAYAMON PR 00951

BST BLUE SKY
TOWERS ILLC

BLUE SKY TOWERS ILLC
352 PARK STREET STE 106
NORTH READING MA 01864

Liberty

LIBERTY MOBILE USVI INC.
279 AVE Ponce de Leon
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC #1579

PROFESSIONAL ENGINEER
ELIAS MANGUAL
1579-E
VIRGIN ISLANDS

REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
C	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY:	CHECKED BY:
A.C.R.	E.M.U.

EAST END
USVI-00230

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
MONOPOLE PLAN
DETAILS AND NOTES

SHEET NUMBER
S-1

EAST END
USVI-00230

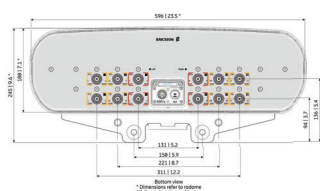
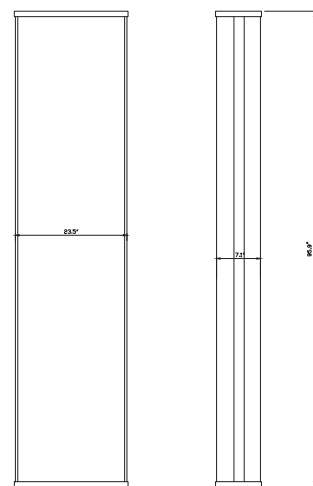
3 LONG POINT & COTTON GARDEN
 EAST END B QUARTER
 CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION

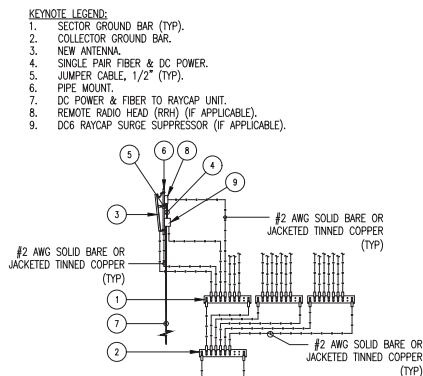
MONOPOLE DETAILS

SHEET NUMBER

S-2

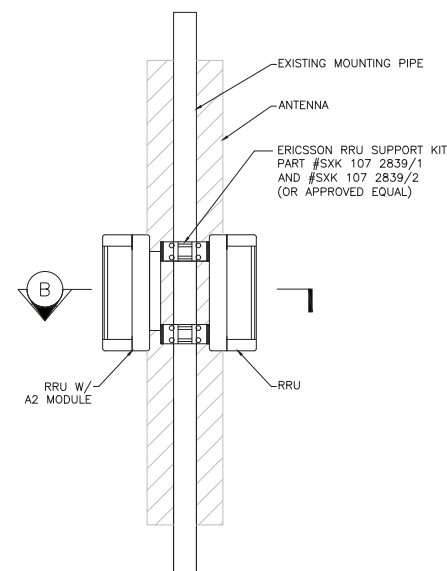


KATHREIN (ERICSSON) - 840590003
SCALE: N.T.S.



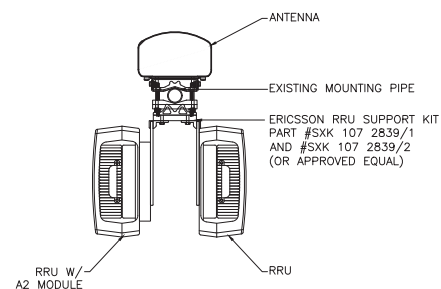
1. UTILIZE EXISTING AT&T GROUND BARS AND GROUNDING.
2. ADD GROUND BARS IF THERE ARE INSUFFICIENT LUG POSITIONS.
3. REFERENCE AT&T BONDING & GROUNDING PRACTICE TP76416.

3 ANTENNA GROUNDING SCHEMATIC



NOTE:
DETAIL IS DIAGRAMMATIC. CONTRACTOR
TO INSTALL RRU'S AND/OR RRU'S W/A2
MODULES ON RRU MOUNT BEST SUITED
FOR ANTENNA CONFIGURATION.

BACK VIEW



NOTE:
DETAIL IS DIAGRAMMATIC. CONTRACTOR
TO INSTALL RRU'S AND/OR RRU'S W/A2
MODULES ON RRU MOUNT BEST SUITED
FOR ANTENNA CONFIGURATION.

RRU MOUNTING DETAIL
SCALE: N.T.S.

FIBER OR DC BUNDLE

SNAP IN HANGER
ROSENBERGER PART NO.
TH496-DC114 OR EQUIVALENT

HANGER ADAPTER GROMMET
ROSENBERGER PART NO.
CX608-HA0720 OR EQUIVALENT

DOUBLE CLAMP

FIBER BUNDLE

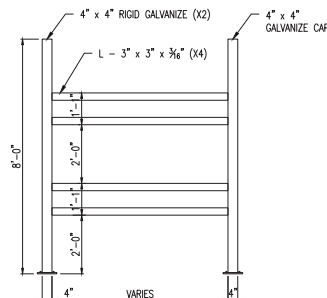
HANGER ADAPTER GROMMET
ROSENBERGER PART NO.
CX608-HA0711 OR EQUIVALENT

SNAP IN HANGER
ROSENBERGER PART NO.
TH496-DC114 OR EQUIVALENT

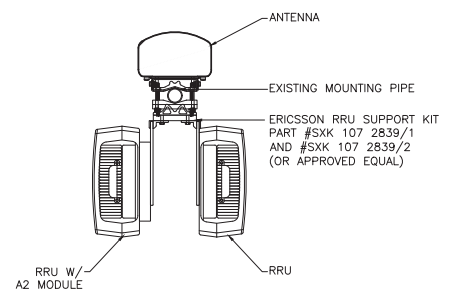
SNAP IN HANGER

- NOTES:
1. REFER TO JSA DOCUMENTS FOR EXACT CABLE NUMBER AND MANUFACTURER SPECIFICATIONS FOR PROPER GROMMETS AND HANGER TO SUPPORT THE FIBER AND DC CABLE BUNDLES.
 2. REFER TO STRUCTURAL ANALYSIS FOR EXACT CABLE ROUTING AND MOUNTING CONFIGURATION.

4 HANGER ADAPTER GROMMET DETAILS



5 DETAILED "H" FRAME
S-3 SCALE: N.T.S.



NOTE:
DETAIL IS DIAGRAMMATIC. CONTRACTOR
TO INSTALL RRU'S AND/OR RRU'S W/A2
MODULES ON RRU MOUNT BEST SUITED
FOR ANTENNA CONFIGURATION.

RRU MOUNTING DETAIL
SCALE: N.T.S.



[illegible]

FRONT VIEW

SIDE VIEW

MIN. 2" TO MAX. 4" GALVANIZED PIPE

10.34"

DOMESECURING BAND

CLIP FOR ATTACHING DC6 (OVF) TO BASE ASSEMBLY (TYP)

RAYCAP SUPPLIED POLE MOUNTING BRACKETS

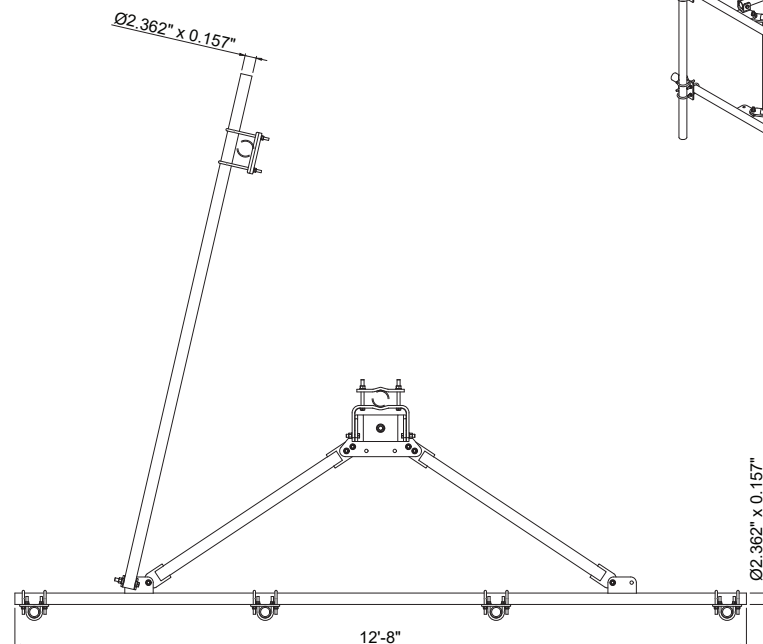
RAYCAP SUPPLIED BASE ASSEMBLY

CABLE TIE BAR

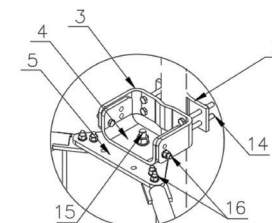
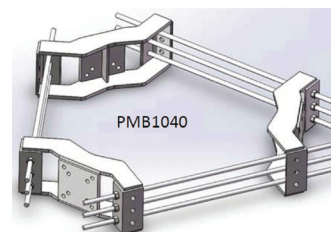
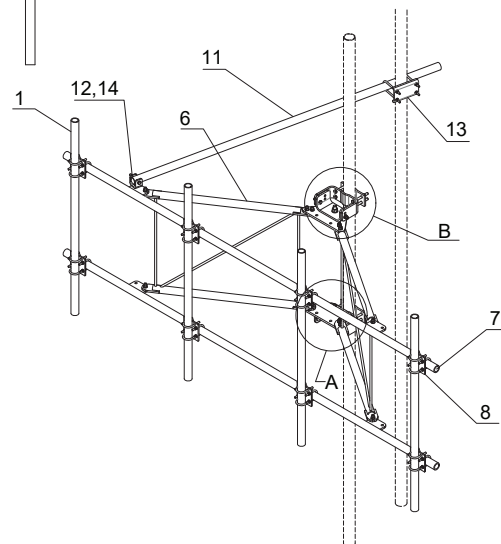
18.0"

POWER CABLE INGRESS PORTS

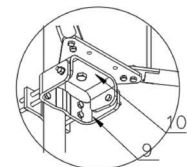
SHEET NUMBER
S-4



1 **AMBOR MODEL NO.: ASF0101-4120**
S-5 NOT TO SCALE



VIEW B



VIEW A

16	AL51617	Bolt set M0.63"x3.15" INIWISW #8.8 Grade?	/	16
15	AL52415	Bolt set M0.945"x2.953"x2.362" INIWISW	/	2
14	AL51606	Bolt set M0.63"x5.512" INIWISW	/	9
13	C1905712113	Hoop assembly-UB 40034183		1
12	C1905712112	Connecting U plate 3		1
11	C1905712111	GB/T13793 Pipe 2.362"x0.157"x109.449"		1
10	C1905712110	Connecting U plate 2		1
9	C1905712109	Clamping U plate 2		1
8	C1622052	Hoop assembly 1(CP238238)		2
7	C1905712107	Pipe 2.362"x0.157"x12'8"		2
6	C1905712106	Bracket arm		2
5	C1905712105	Connecting straight plate 1		2
4	C1905712104	Connecting U plate 1		1
3	C1905712103	Clamping U plate 1		1
2	C1905712102	Clamping straight plate 1		2
1	C1905712101B	GB/T13793 Pipe 2.362"x0.157"x120"		4

NO	PART NO.	DESCRIPTION	QTY
----	----------	-------------	-----

AMBOR Ambor Structures
ASF0101-4120/MODEL
amborstructures.com

Application Data

Fits Poles: Round or Polygon
Material: Hot dip galvanized steel
Wind Ratng: 140mph per TIA/EIA-222 160mph
3-second gust, Exposure "D", at 150' AGL

Part No	Size Range	Weight (lbs)
PMB1040	10" - 40"	231

**AMBOR 3-SECTOR UNIVERSAL
RING MOUNT MODEL NO.: PMB1040**

2 **RING M**
S-5 **NOT TO SCALE**



TOWER TECH ENGINEERING, P.S.C.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00961



BLUE SKY TOWERS III, LLC
352 PARK STREET STE 106
NORTH READING MA 01864



LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY:	CHECKED BY:
A.C.R.	E.M.U.

**EAST END
USVI-00230**

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

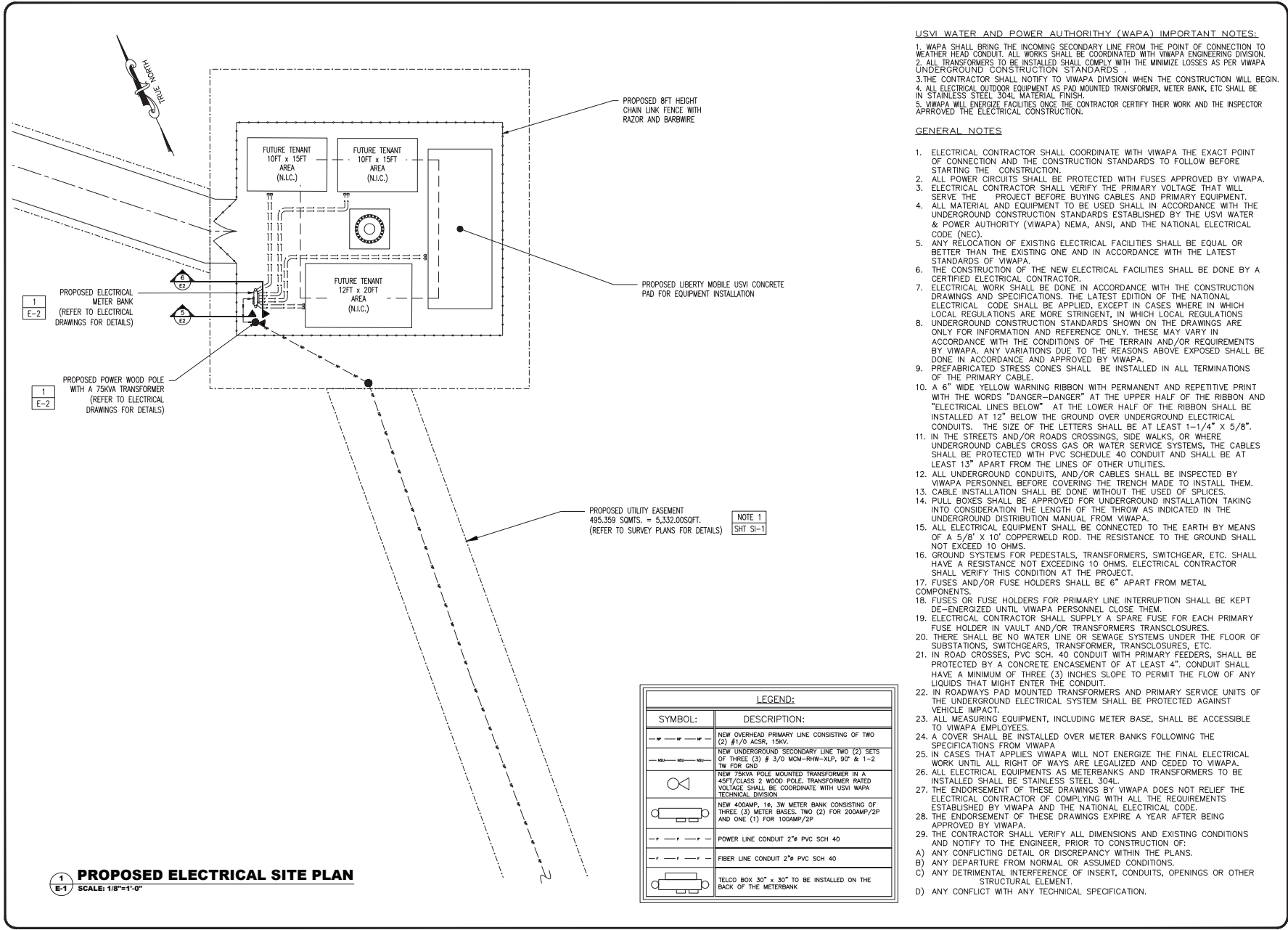
SHEET DESCRIPTION
**ANTENNA MOUNT
DETAIL**

SHEET NUMBER

S-5



F-1



TOWER TECH
ENGINEERING PSC
TELECOM INFRASTRUCTURE
CONSULTANTS AND ENGINEERS

TOWER TECH ENGINEERING, PSC.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00951

BST

BLUE SKY
TOWERS III, LLC

BLUE SKY TOWERS III, LLC
352 PARK STREET STE 106
NORTH READING MA 01864

Liberty

LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC #1579

REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
0	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY:	CHECKED BY:
A.C.R.	E.M.U.

EAST END
USVI-00230

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
PROPOSED ELECTRICAL
SITE PLAN

SHEET NUMBER
E-1



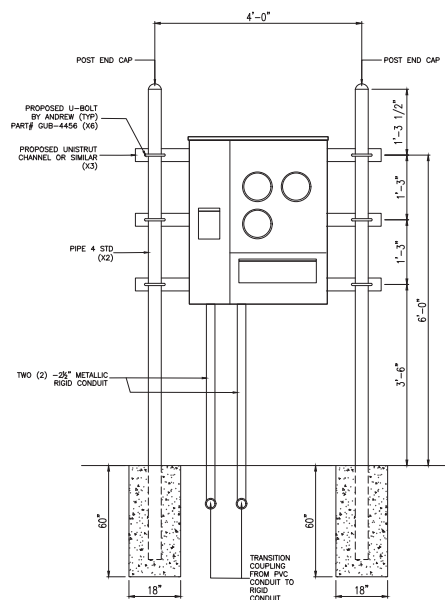
BILL OF MATERIAL				
ITEM	QTY.	MFRD.	CAT.NO.	DESCRIPTION
A	1	SIEMENS	/XD228400L	MAIN BREAKER 400AMP. 2P
B	3	MILBANK	Z916.308-AC	METER SOCKET 200A, 4 CLIPS
C	3	SIEMENS	GRH228200L	LOAD CKT.BREAKERS 200A 2P @22KAIC
D				

SPECIFICATION

1—CONST. (OUT DOOR)
2—MATERIAL GALVANIZED STEEL
3—FINISH AIR DRY LIGHT GRAY ASA No.6
4—FACTORY WIRE & BUSSED.
5—DESIGNED FOR LINE CABLES TO ENTER
BOTTOM LOAD TO LEAVE BOTTOM.

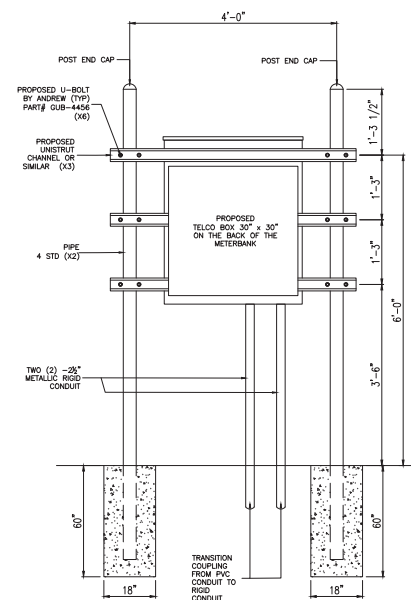
1 NEW METERBANK DETAIL

E-2 SCALE: NOT TO SCALE



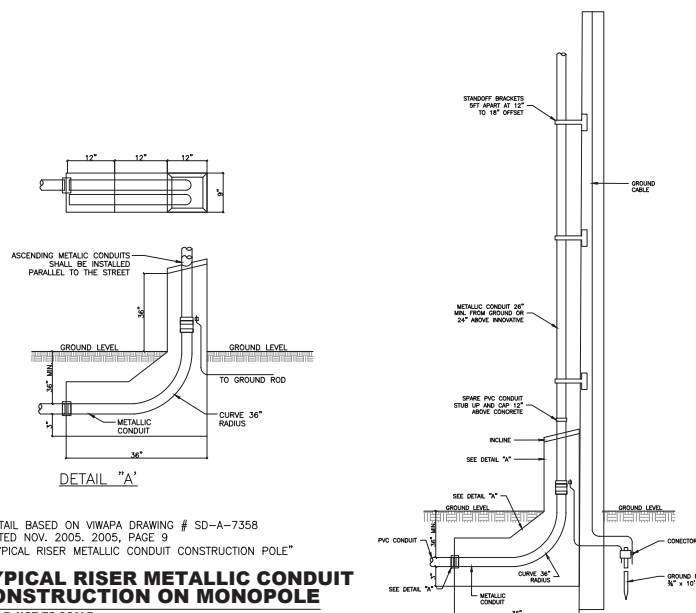
NEW METERBANK H-FRAME DETAIL (FRONT VIEW)

2
E-2 **DETAIL (FR**
SCALE: NOT TO SCALE



NEW METERBANK H-FRAME DETAIL (REART VIEW)

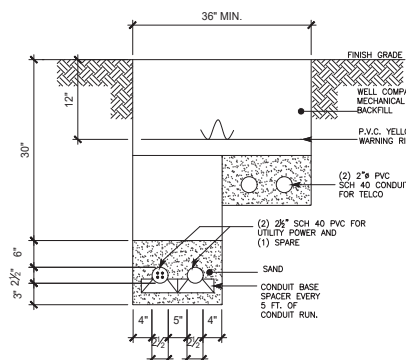
3
E-2 **DETAIL (RE**
SCALE: NOT TO SCALE



NOTE:
- DETAIL BASED ON VIWAPA DRAWING # SD-A-7358
DATED NOV. 2005. 2005, PAGE 9
"TYPICAL RISER METALLIC CONDUIT CONSTRUCTION POLE"

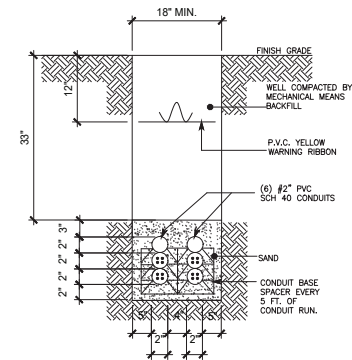
TYPICAL RISER METALLIC CONDUIT CONSTRUCTION ON MONOPOLE

4 **CONSTRUCT**
E-2 **SCALE: NOT TO SCALE**



MAIN FEEDER TRENCH DETAIL

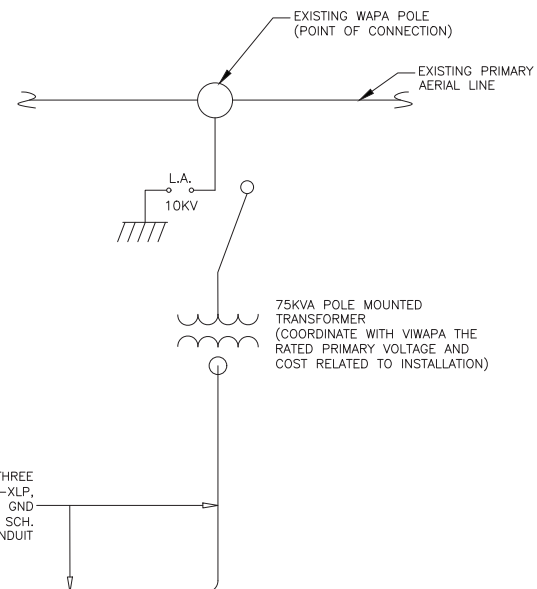
E-2 SCALE: NOT TO SCALE



NEW TRENCH DETAIL

E-2 SCALE: NOT TO SCALE

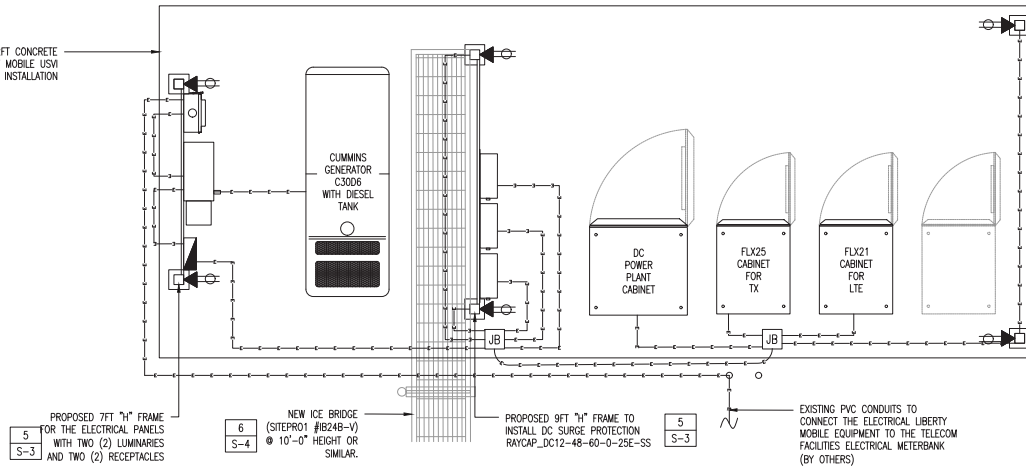




SHEET NUMBER
E-3



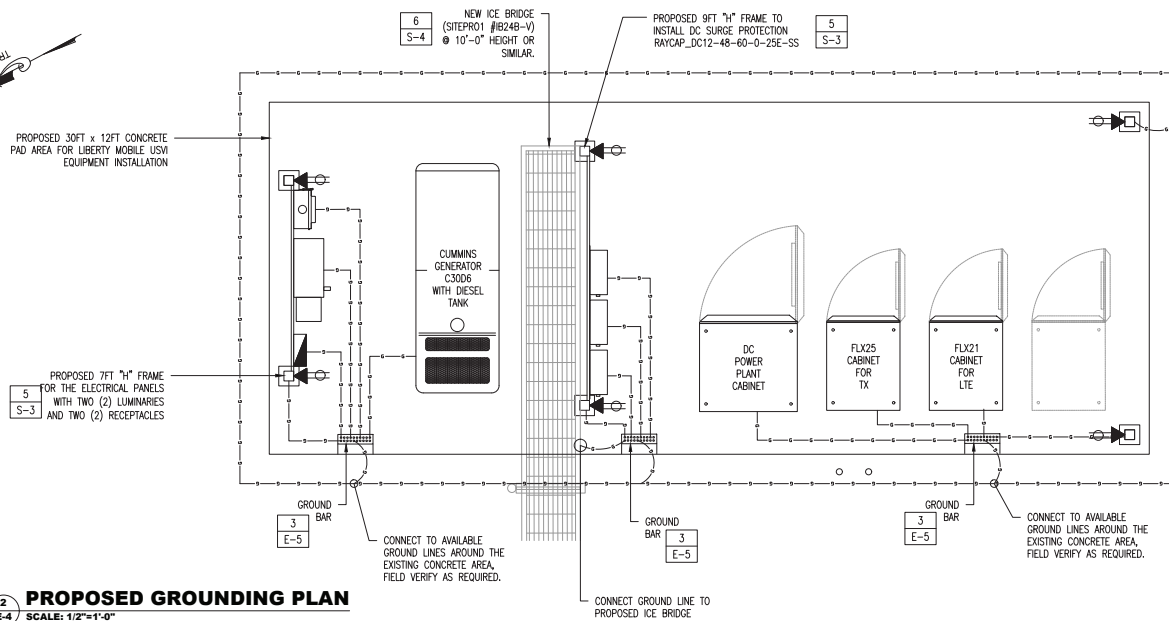
PROPOSED 30FT x 12FT CONCRETE
PAD AREA FOR LIBERTY MOBILE USVI
EQUIPMENT INSTALLATION



1 PROPOSED ELECTRICAL PLAN
E-4 SCALE: 1/2"=1'-0"



PROPOSED 30FT x 12FT CONCRETE
PAD AREA FOR LIBERTY MOBILE USVI
EQUIPMENT INSTALLATION



2 PROPOSED GROUNDING PLAN
E-4 SCALE: 1/2"=1'-0"

****NOTE:**
CONTRACTOR SHALL FIELD VERIFY THE EXISTING GROUND LEADS RESISTIVITY
PRIOR TO UTILIZATION FOR LIBERTY MOBILE USVI EQUIPMENT GROUNDING.

SYMBOL LEGEND

- NEW ELECTRICAL LINE CONSISTING OF THREE (3) #3 THWN & 1 #6 THWN FOR GROUND IN 2 1/2" RIGID METALIC CONDUIT.
- NEW STRANDED WIRE #2 AWG.
- PROPOSED LAMP. VERIFY WITH A LIBERTY MOBILE REPRESENTATIVE FOR THE MODEL.
- 20A, 120V DUPLEX RECEPTACLE GROUNDING TYPE, HUBBELL# CBRF201
- NEW 8"x8" JUNCTION BOX.
- SQUARE D LOAD CENTER WITH 200 AMP. MAIN BREAKER, NEMA 3R, 120/240V, 42 BREAKER POSITIONS.
- SQUARE D 200 AMP. SAFETY SWITCH, NON FUSIBLE
- HD, 120V-240V (208V), NEMA 3R OUTDOOR.
- PROPOSED AUTOMATIC TRANSFER SWITCH INTERSECT D300

1 REPRESENTS DETAIL #
C-7 REPRESENTS SHEET #

NOTE 1 REPRESENTS NOTE
SHT E7 REPRESENTS SHEET #

TOWER TECH
ENGINEERING PSC
TELECOM INFRASTRUCTURE
CONSULTANTS AND ENGINEERS
TOWER TECH ENGINEERING, PSC.
AA1 CALLE 22 RIVER VW
BAYAMON PR 00951

BST BLUE SKY
TOWERS ILLC
BLUE SKY TOWERS ILLC
352 PARK STREET STE 106
NORTH READING MA 01864

Liberty
LIBERTY MOBILE USVI INC.
279 AVE PONCE DE LEON
SAN JUAN PR 00917

ELIAS MANGUAL, PE
USVI PROFESSIONAL ENGINEER LIC. #1579



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
C	08/23/24	FOR PERMITTING PURPOSES

DRAWN BY:	CHECKED BY:
A.C.R.	E.M.U.

**EAST END
USVI-00230**
3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
**ELECTRICAL &
GROUNDING PLAN**

SHEET NUMBER
E-4



-
- FROM ANTENNA OR TMA
- JUMPER REQUIRED ONLY WHEN CABLE LARGER THAN 7/8" IS USED (TYP). JUMPER TO BE 10' MAX, ANDREW CAT# LD4-50A
- CONNECTOR WEATHERPROOFING KIT
- MAIN COAXIAL CABLE TO BTS
- WEATHERPROOFING KIT (TYP.)
- COAXIAL CABLE GROUND KIT (TYP.)
- WEATHERPROOFING KIT (TYP.)
- #2 AWG (INCLUDED WITH GROUND KIT) TO TOWER TOP GROUND BAR MOUNTED NEAR ANTENNA

2 CONNECTION OF GROUND WIRES TO UPPER CGB @ ANTENNAS
E-5 SCALE: N.T.S.

- 3 TYPICAL GROUND BAR**
E-5 SCALE: N.T.S.

-
- TOP AND MIDDLE SECTOR
GROUND BAR(S) ON TOWER
- | |
|---|
| 3 |
|---|

GROUND WIRE INSTALLATION TO COAX GROUND BAR

4 TO COME
E-5 SCALE: N.T.S.

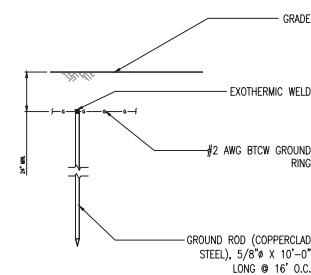
-
- Diagram illustrating the assembly of a ground bar. The components shown include:
- 3) THREADS MIN. MUST SHOW
 - S/S NUT
 - S/S SPLIT WASHER
 - S/S FLAT WASHER
 - S/S BOLT (1 OF 2)
 - TINNED COPPER BUSS
 - S/S FLAT WASHER
 - DO NOT DISCONNECT TAG ON ALL GROUND BAR INTERCONNECTS
 - LABEL
 - DO NOT DISCONNECT

5 LUG DETAIL
E-5 SCALE: N.T.S.

-
- Diagram illustrating the construction of a removable cover for a buried ground ring. The diagram shows a cross-section of the assembly. A removable cover is placed over a #2 solid copper test loop, which is connected to a #2 AWG, tinned solid BOW buried ground ring. The ground ring is surrounded by 12" of crushed gravel. The cover is secured by a 6" x 30" min. PVC or concrete pipe. The assembly is installed in a hole, with the ground ring extending 1" above the ground ring. The cover shall be removable by hand.
- Labels and dimensions:
- GRADE
 - REMOVABLE COVER, COVER SHALL BE REMOVABLE BY HAND
 - #2 SOLID COPPER TEST LOOP
 - 6" x 30" MIN. PVC OR CONCRETE PIPE
 - #2 AWG, TINNED SOLID BOW BURIED GROUND RING
 - EXOTHERMICALLY WELD TO GROUND ROD (C/WELD)
 - 1" WIDE SLOT FOR GROUND WIRE, EXTEND 1" ABOVE GROUND RING
 - 12" OF CRUSHED GRAVEL BELOW WELD, WELD SHALL REMAIN VISIBLE.
 - 12"

GROUND INSPECTION TEST WELL

6
E-5 SCALE: N.T.S.

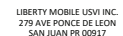
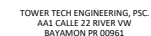


GROUND ROD DETAIL

E-5 **SCALE: N.T.S.**

- NOTES:

1. PROVIDE A #2 AWG SOLID BARE TINNED COPPER GROUND RING AROUND THE SHELTER PAD. ALL EXTERIOR GROUNDING CONDUCTORS SHALL BE BURIED A MINIMUM OF 18" BELOW GRADE. THE GROUND RING SHALL BE INSTALLED 2'-0" AWAY FROM SHELTER PAD (MINIMUM UNLESS SHOWN OTHERWISE ON DRAWINGS). ALL BONDS TO THE BURIED GROUND RING SHALL BE WITH EXOTHERMIC WELDS.
2. BOND EACH WAVEGUIDE POST TO THE BURIED GROUND RING. EXOTHERMICALLY WELD A #2 AWG SOLID BARE TINNED COPPER CONDUCTOR TO THE WAVEGUIDE POST AT 12" ABOVE GRADE AND CONNECT TO THE BURIED GROUND RING. PROVIDE CONDUCTOR LENGTH AS REQUIRED TO MAKE CONNECTION.
3. PROVIDE INSPECTION SLEEVE WHERE SHOWN FOR ALL PRIMARY CONNECTIONS TO BURIED GROUND RING. SEE GROUND RING INSPECTION SLEEVE DETAIL FOR THE GROUND RING INSPECTION SLEEVE. NOTE: INSPECTION SLEEVE CAN BE USED AS A TEST POINT FOR GROUND WATER LEVEL INSPECTION AND GROUND RESISTANCE TESTING.
4. INSTALL GROUNDING CONDUCTOR(S) FROM THE NEW ANTENNAS @ BUILDING ROOF TOP TO THE GROUND BAR AT SHELTER ENTRY PORT . VERIFY EXACT LOCATION OF GROUND BAR AND PROPER CONDUCTOR LENGTH. EXOTHERMICALLY WELD (2) #2 AWG SOLID BARE TINNED COPPER GROUNDING CONDUCTOR (LENGTH AS REQUIRED) TO THE GROUND BAR. COORDINATE LOCATION WITH AT&T CONSTRUCTION MANAGER.
5. INSTALL 5/8"x10'-0" LONG COPPER CLAD STEEL GROUNDING RODS. SPACING BETWEEN RODS NOT TO EXCEED 15'-0" (NON-LEVEL AREAS). TYPES FOR ALL GROUND RODS SHOWN, UNLESS NOTED OTHERWISE. GROUND ROD MAY BE INSTALLED WITH A MAXIMUM VARIATION OF 30" FROM VERTICAL IF ROCK IS ENCOUNTERED. SUBCONTRACTOR SHALL BE PREPARED TO CORE DRILL TO INSTALL GROUND RODS AND BACKFILL WITH GROUND ENHANCEMENT MATERIAL AS REQUIRED.
6. INSTALL GROUND BAR ON COAX BRIDGE SUPPORT CLOSEST TO PROPOSED EQUIPMENT AREA FOR FINAL GROUNDING CONNECTION OF COAX CABLES (VIA COAX CABLE GROUNDING KITES)
7. BOND ALL EXTERIOR METALLIC CONDUITS, PIPES AND CYLINDRICAL OBJECTS WITH A PENN-UNION GT SERIES CLAMP, BLACKBURN GUY SYSTEM CLAMP OR A BURIED GROUND RING. ALL GUY CLAMPS, COAX BRIDGE CLAMPS, OR SUBSTITUTES ARE ACCEPTABLE.
8. PROVIDE A #2 AWG SOLID BARE COPPER GROUND BAR LEAD FROM HALO TO GROUND RING (MIN. OF 4')
9. INSTALL NEW GROUND BAR FOR ANTENNAS ON EACH SECTOR.



REV	DATE	DESCRIPTION
A	07/18/24	ISSUED FOR REVIEW
B	08/13/24	ISSUED FOR REVIEW
D	08/23/24	FOR PERMITTING PURPOSES
DRAWN BY:		CHECKED BY:
A.C.R.		E.M.U.

EAST END
USVI-00230

3 LONG POINT & COTTON GARDEN
EAST END B QUARTER
CHRISTIANSTED, ST CROIX, VI 00820

SHEET DESCRIPTION
**ELECTRICAL &
GROUNDING PLAN**

SHEET NUMBER

E-5

APPENDIX G : HISTORICAL

- VISHPO Clearance Letter
- Phase 1 (A&B) Archeological Survey

DeAnna Anglin

From: David Brewer <David.Brewer@dpnr.vi.gov>
Sent: Wednesday, June 26, 2024 12:05 PM
To: DeAnna Anglin
Cc: Carlos Solis; Miles Walz-Salvador; NEPA NHPA; Sean L. Krigger; Eboni Powell
Subject: Re: [EXTERNAL MAIL] SHPO Section 106 Consultation request for BST_228 - East End USVI-00230
Attachments: BST_228 - East End USVI-00230.kmz

Ms. Anglin:

I reviewed the many pages of data and the cultural survey contained in the Dropbox below. I also discussed the project with both the archaeological consultant and my Director. **The VISHPO has no objection to the proposed monopole cell tower.**

By the way, the SHPO has 45 days to respond, and in the Virgin Islands it sometimes may go beyond that – marking something as "High Importance" does not necessarily make it so, and the amount of information contained in the Dropbox was unnecessary. You may wish to consult with your co-worker Miles, with whom we have interacted successfully on these type of projects for quite a while. It is our understanding that both the Lotis Group and we (VISHPO) want to make this operation quick and smooth and painless as possible, in anticipation of the other ones wherein serious issues might arise.

Finally, I am retiring, so be sure to copy my Director, Sean L. Krigger, on any forthcoming correspondence (please tell Miles as well, since he and Sean have already developed a productive working relationship).

David M. Brewer
Senior Archaeologist
Virgin Islands State Historic Preservation Office
Fort Frederik Museum
198 Strand St.
Frederiksted, St. Croix
U.S. Virgin Islands 00840

E-mail: david.brewer@dpnr.vi.gov
Phone: (340) 719-7089

From: DeAnna Anglin <Anglin@thelotisgroup.com>
Sent: Friday, May 24, 2024 4:13 PM
To: David Brewer <David.Brewer@dpnr.vi.gov>
Cc: Carlos Solis <cmsolis@gmail.com>; NEPA NHPA <NEPA.NHPA@thelotisgroup.com>
Subject: [EXTERNAL MAIL] SHPO Section 106 Consultation request for BST_228 - East End USVI-00230

**PHASE I (A&B) ARCHAEOLOGICAL SURVEY
ACCESS ROAD AND MONOPOLE COMPOUND LEASE AREA
LOCATED ON PORTIONS OF
2 and 3 LONG POINT AND COTTON GARDEN
ST. CROIX, US VIRGIN ISLANDS**

Prepared for:

**Lotis Environmental, LLC
8899 Main Street - Suite 107
Williamsville, NY
14221**

CocoSol International Inc. Project 231101

Prepared by:

**CocoSol International Inc.
777 Brickell Ave
#500-97996
Miami, Florida
33131**

May 23, 2024

TABLE OF CONTENTS

TABLE OF CONTENTS	i
TABLE OF FIGURES.....	i
1.0 INTRODUCTION	1
1.1 Proposed Project.....	1
1.2 Regulatory Framework	4
1.3 Environmental Setting.....	4
1.4 Cultural Setting	5
1.4.1 Precolonial Setting.....	5
1.4.2 Colonial Setting.....	6
2.0 SURVEY METHODS	7
3.0 FINDINGS.....	9
3.1 Literature and Records Search	9
3.2 Field Survey.....	12
4.0 CONCLUSIONS AND RECOMMENDATIONS.....	13
4.1 Conclusions	13
4.2 Recommendations.....	13

TABLE OF FIGURES

Figure 1: Google Earth image of East End, St. Croix, USVI depicting the location of the survey area	1
Figure 2: Map depicting the general location of the Survey's general location, the proposed access road and Plot 3, Estate Long Point & Cotton Garden.....	2
Figure 3: Segment of Google Earth image with topography, access road and monopole compound overlay: Image source: Lotis.....	2
Figure 4: Photograph of the location where the access road will connect to the public road.....	3
Figure 5: Photograph depicting the dense vegetation in the general area where the monopole would be erected.....	3
Figure 6: Photograph depicting steep slope gradient.....	4
Figure 7: Photograph depicting the typical dense vegetation of the project area (s).....	5
Figure 8: Photograph of example shovel test along the less steep parts of the access road	7
Figure 9: Photograph of example shovel test in the monopole compound	8
Figure 10: Google Earth image depicting the 1/2-mile APE for visual effects and the location of the Cramer Park.....	9
Figure 11: Segment of the 1750 Cronenberg-Jagaesberg map depicting the approximate location (red arrow) of the monopole compound.....	10
Figure 12: Segment of the 1799 Oxholm map depicting the approximate location (red arrow) of the monopole compound.....	11
Figure 13: Segment of the 1923 US Coastal Geodetic map of St. Croix depicting the approximate location (red arrow) of the monopole compound.....	11

Figure 14: Image of the access road and monopole compound depicting the location of the negative shovel tests. 12

1.0 INTRODUCTION

CocoSol International Inc., performed a Phase IA and B Cultural Resources Survey (Survey) for a telecommunications monopole compound lease area and access road, located on portions of 2 and 3 Long Point and Cotton Garden, St. Croix, USVI, (Figure 1). The Survey was performed for the Lotis Engineering Group (Lotis) of East Amherst, New York. The work was performed during the month of May 2024.



Figure 1: Google Earth image of East End, St. Croix, USVI depicting the location of the survey area

1.1 Proposed Project

The project consists of the erection of a 150/157-foot-tall telecommunications monopole, and related amenities contained within an area measuring 60 by 60 feet and located on Plot 3, Estate Long Point and Cotton Garden, St. Croix. A 15' wide by 1,300' long unimproved road easement along the western parts of Rem. 2 Estate Long Point and Cotton Garden is also proposed. The proposed access road starts at the public road (East End Road) and continues south for 1,300 feet through dense vegetation until reaching the site where the monopole will be erected. Figures 2 to 5 depict the proposed plans and the general site conditions at the time of our Survey.

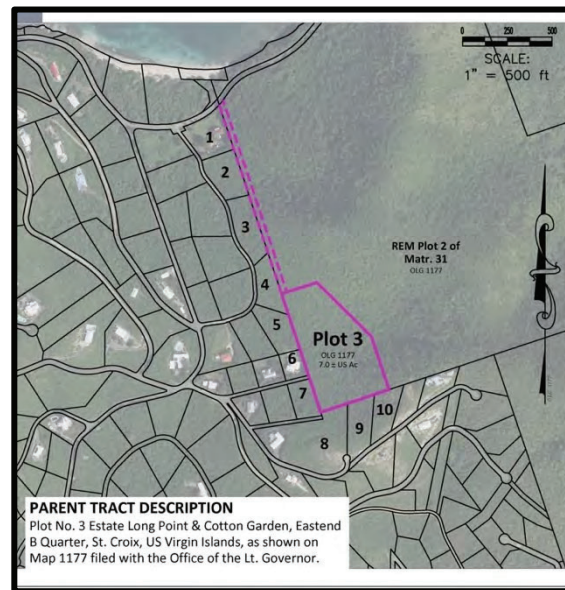


Figure 2: Map depicting the general location of the survey area, the proposed access road and Plot 3, Estate Long Point & Cotton Garden.

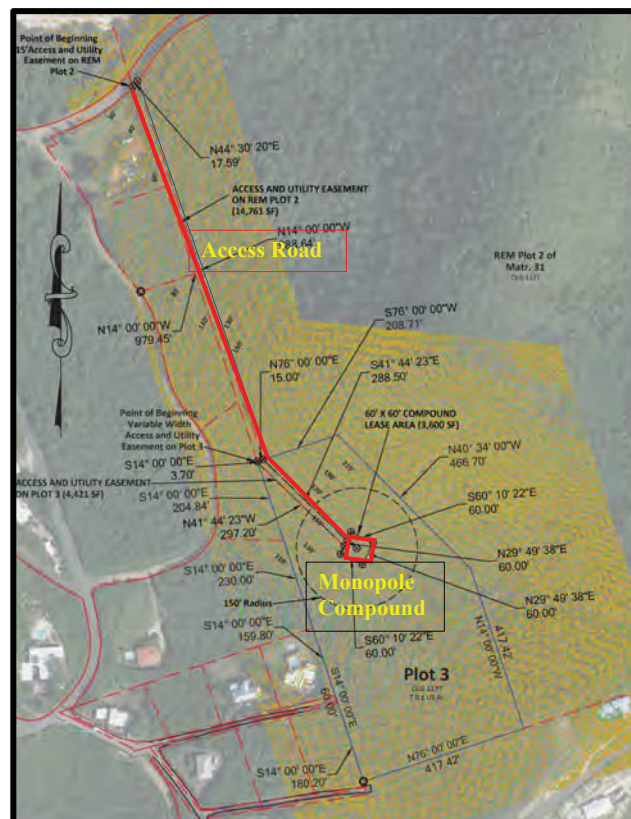


Figure 3: Segment of Google Earth image with topography, access road and monopole compound overlay: Image source: Lotis.



Figure 4: Photograph of the general location where the access road will connect to the public road.



Figure 5: Photograph depicting the dense vegetation in the general area where the monopole would be erected.

1.2 Regulatory Framework

Because of the earth change activities required to develop the site, the project is required to comply with Title 29, Chapter 17, Section 959, of the Virgin Islands Code, also known as the Virgin Islands Antiquities and Cultural Properties Act, and Section 106 of the National Historic Preservation Act of 1966, as amended.

1.3 Environmental Setting

The proposed access road and monopole compound are in the eastern parts of St. Croix (Figure 6). The topography is moderately to steeply sloping along the access road and moderately sloping for the monopole compound.



Figure 6: Photograph depicting steep slope gradient

The soil for the access road and the monopole compound consists of gravelly loam extending from the surface to 14 to 40 centimeters below surface and are underlain by very gravelly loams.

The vegetation along the proposed access road and monopole compound consists of dense vegetation composed of tan-tan, various cacti, though prominently trumpet cactus, inkberry, turpentine tree and grasses (Figure 7).



Figure 7: Photograph depicting the typical dense vegetation of the project area (s)

1.4 Cultural Setting

The following provides a brief description of the archaeology and history of the USVI.

1.4.1 Precolonial Setting

The U.S. Virgin Islands (USVI) contains a rich milieu of cultural resources that offer testimony to over three thousand years of human experience. These cultural resources range from habitation sites established during the Archaic Period at Krum Bay and the Magens Bay Arboretum Complex on St. Thomas approximately three thousand years ago, to the multiple village and farmstead sites on all the islands, to chiefly ceremonial centers such as the Salt River Site on St. Croix, which is the site of the first encounter between the Taino and Europeans.

After the Archaic Period, the indigenous people of the Virgin Islands participated in a geographically vast network of social and economic relationships. More recent archaeological research indicates that the insular landscapes were dotted with small and large villages along the coastal section fringes of the islands as well as the uplands. Additionally, small settlements herein characterized as farmsteads or homesteads are now being discovered in the uplands. These small upland settlements were previously mostly unrecognized in the archaeological record; however recent archaeological surveys for development projects have resulted in the identification of such sites.

The indigenous people of the Virgin Islands participated within a larger social, religious, and economic network (s), as evidenced by shared stylistic attributes of ceramics from the Saladoid, Ostionan and Chican

culture periods across a significant part of the Antilles. Shared cosmological ideas are also evidenced by the presence of cemís and other religious paraphernalia in the Virgin Islands and across large areas of the Caribbean Archipelago.

Long distance trade is evidenced by the presence of jadeite artifacts manufactured from raw lithic sources found in Central America and chert from Puerto Rico and down island. A whole host of cultigens with origins in the continent became part of the quotidian diet; more exotic items such as guinea pig, an Andean domesticate, have been found in Puerto Rico and St. John, and are likely to be documented by future archaeological studies elsewhere in Virgin Islands.

1.4.2 Colonial Setting

Following the brief European incursion on St. Croix in 1493, the islands came to be in the possession of several European nations including Spain, England, Malta, the Netherlands, and France. The colonies that these nations attempted to establish largely failed. Not until Denmark's Danish West Indies Company settled in St. Thomas in 1672 and on St. John in 1694, did these colonies become viable enterprises to the Europeans. The Danes purchased St. Croix from the French in 1733 and the island, with its larger size, gentler topography, fertile soils, and surface streams, became a dynamic sugarcane-based enterprise that lasted for a century.

The Danes divided the islands into estates that were mainly dedicated to agriculture. Although largely owned by Danes, British managers often administered the estates. The early plantations, particularly on St. Thomas and St. John were primarily dedicated to the production of cotton and indigo, but because of competition from the continent, particularly the southern United States, these two agricultural pursuits were largely abandoned in favor of sugar cane. The economies of St. Croix and St. John were primarily based on sugar cane agriculture and the production of muscovado sugar and rum. In contrast, the economy of St. Thomas was primarily based on trade, although agricultural pursuits also formed an integral part of its economy.

2.0 SURVEY METHODS

The methods employed during the Survey are presented below.

2.1 Literature and Records Review

The literature and records review included the following:

- Review of the archaeological site files through consultation with the VISHPO
- Review of historic and modern cartographic sources
- Review of readily available published and unpublished literature

The findings obtained during the literature and records search are presented in Section 3.0 of this report.

2.2 Field Survey

The less steep slopes along the proposed access road alignment were shovel tested along a single transect that because of the dense vegetation meandered within an approximately 20-meter-wide area and was shovel tested at 30-meter intervals. Each corner and the center of the 60 by 60-foot monopole compound was shovel tested. The shovel tests measured approximately 30 centimeters in diameter and were excavated to depths no longer considered to have the potential of containing non-random artifact bearing matrices.

Generally, the shovel tests were extended to between 14 and 40 centimeters below the ground surface, the depths at which the artifactually sterile, gravelly loam substrata was encountered. Test locations that were on steeply sloping ground (30+% slope) were raked back to assess for the presence of cultural materials that might be eroding from higher elevations. The soil from each shovel test was screened through ¼ inch hardware cloth to recover artifacts, if any (Figures 8 and 9).



Figure 8: Photograph of example shovel test along the less steep parts of the access road



Figure 9: Photograph of example shovel test in the monopole compound

3.0 FINDINGS

No cultural resources were identified along the proposed access road and monopole compound during our Survey. The results of the Survey are presented below.

3.1 Literature and Records Search

The literature and records review performed did not identify potentially significant cultural resources within the survey areas. The VISHPO informed us that no cultural resources of record were listed in the archaeological site files or the VI Registry for the subject property, i.e. the access road alignment easement and the proposed monopole compound. The VISHPO did provide information regarding cultural resources of record for the general area. One precolonial archaeological site (12VAm1-17) *aka* Cramer Park Site which is listed in the Virgin Islands Inventory of Historic Places is partially contained within the ½ mile visual area of potential effects (APE) radius of the monopole, (Figure 10). No sites listed on the National Register of Historic Places (NRHP) exist within the ½ mile APE shown below.

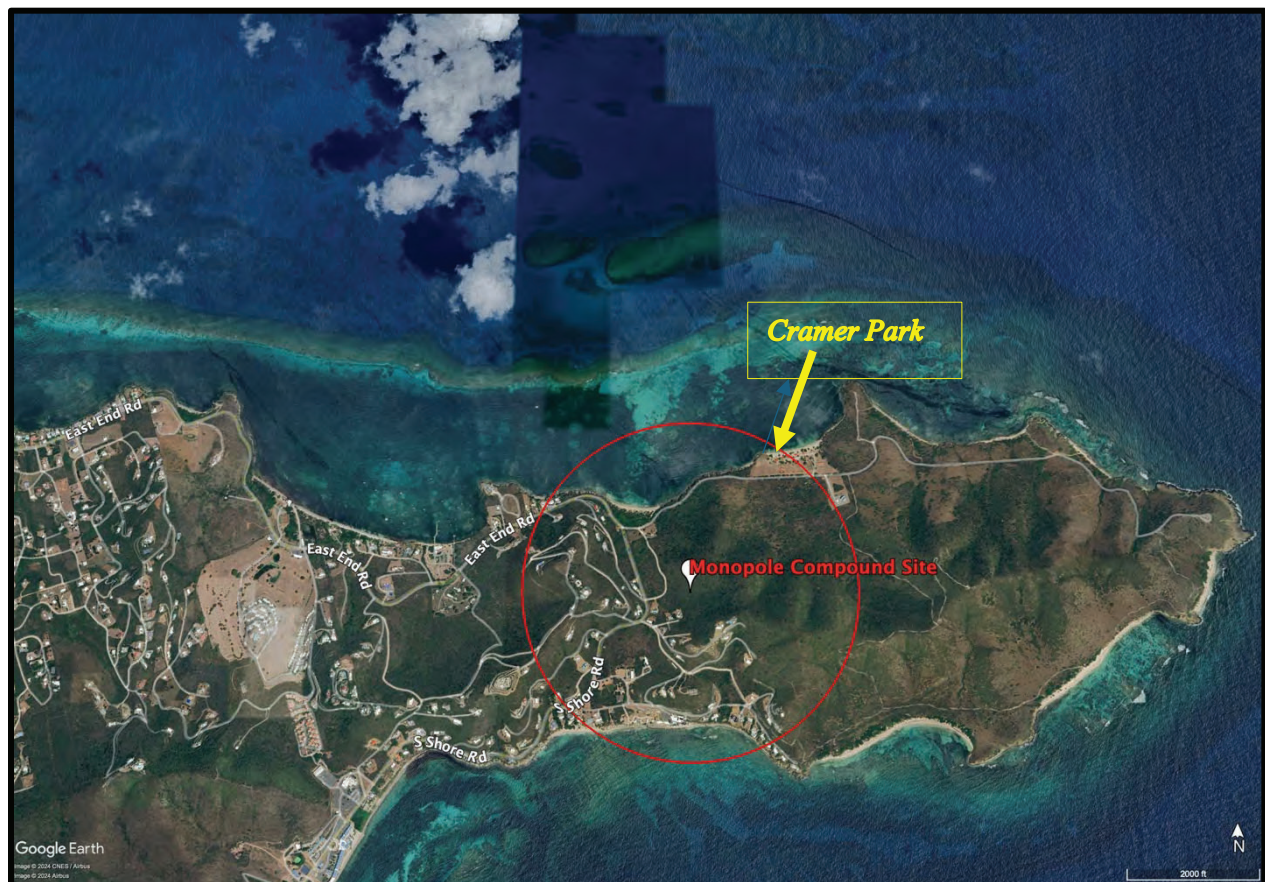


Figure 10: Google Earth image depicting the 1/2-mile APE for visual effects and the location of the Cramer Park.

Our review of historic cartographic sources indicates no settlements were located along the proposed access road or the monopole compound. The 1750 Cronenberg-Jaegesberg map (Figure 11) depicts a structure located approximately 400 meters to the northeast of the monopole compound that likely depicts the location of the Cotton Garden plantation settlement.

No structures are shown along the proposed access road or monopole compound and their immediate vicinity on the 1799 Oxholm map (Figure 12), though the Cotton Garden plantation settlement is shown to the northeast of the monopole compound. Neither the 1766 I.M. Beck map nor the 1863 Parsons Admiralty Chart, nor do 20th century USCGS (Figure 13) or USGS quadrangles depict settlements or structures within the monopole site, the access road, or their immediate vicinity.



Figure 11: Segment of the 1750 Cronenberg-Jagaesberg map depicting the approximate location (red arrow) of the monopole compound. Source: courtesy of the Danish Geodata Agency.

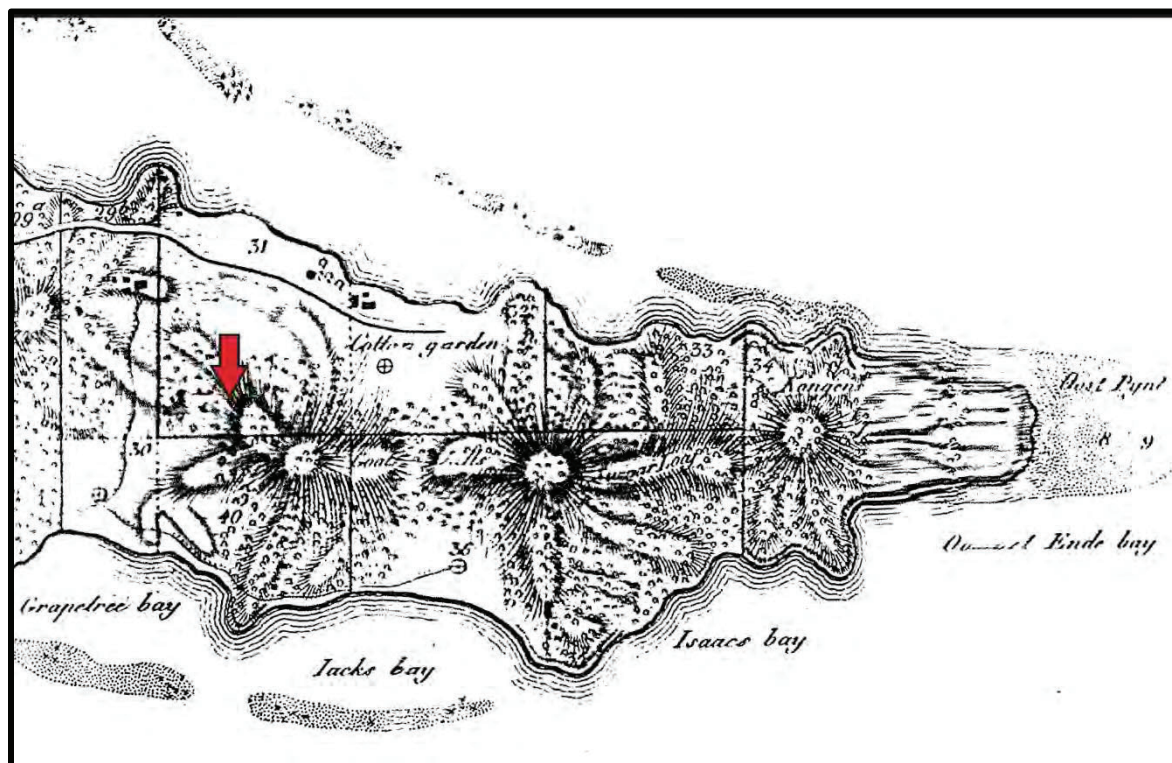


Figure 12: Segment of the 1799 Oxholm map depicting the approximate location (red arrow) of the monopole compound

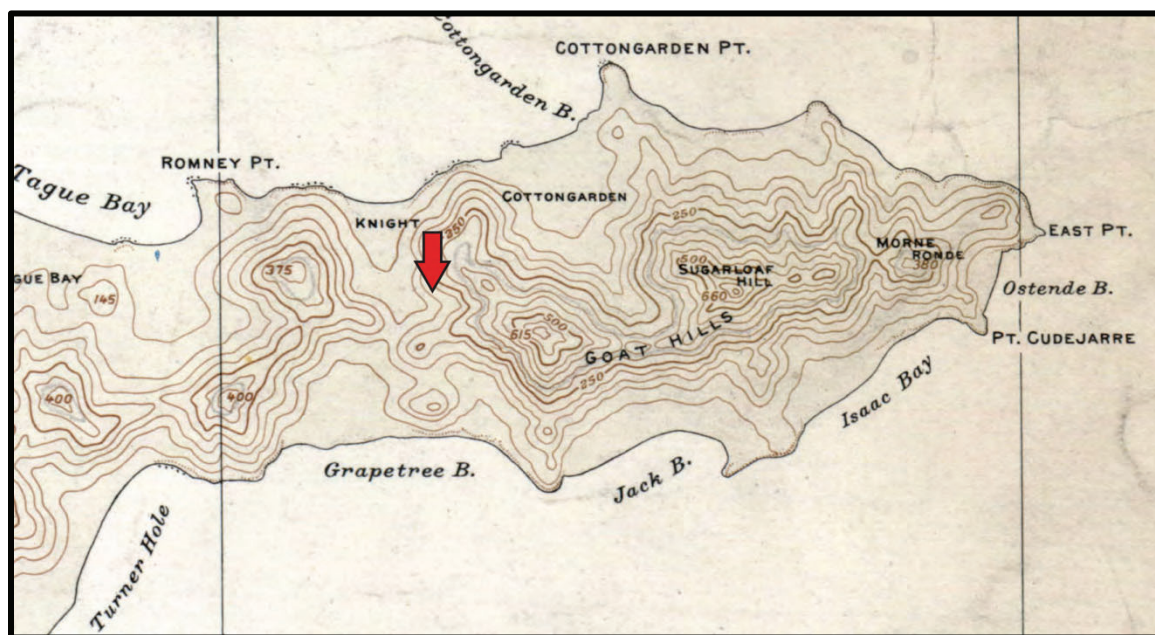


Figure 13: Segment of the 1923 US Coastal Geodetic map of St. Croix depicting the approximate location (red arrow) of the monopole compound.

3.2 Field Survey

No cultural resources were identified during the field survey performed for the access road and monopole compound. All the fourteen shovel tests performed as well as the raking of surface litter along steep slopes to assess for the presence of artifacts that might be eroding from higher elevations were negative. Figure 14 depicts the locations of all the shovel tests and the steep slopes.

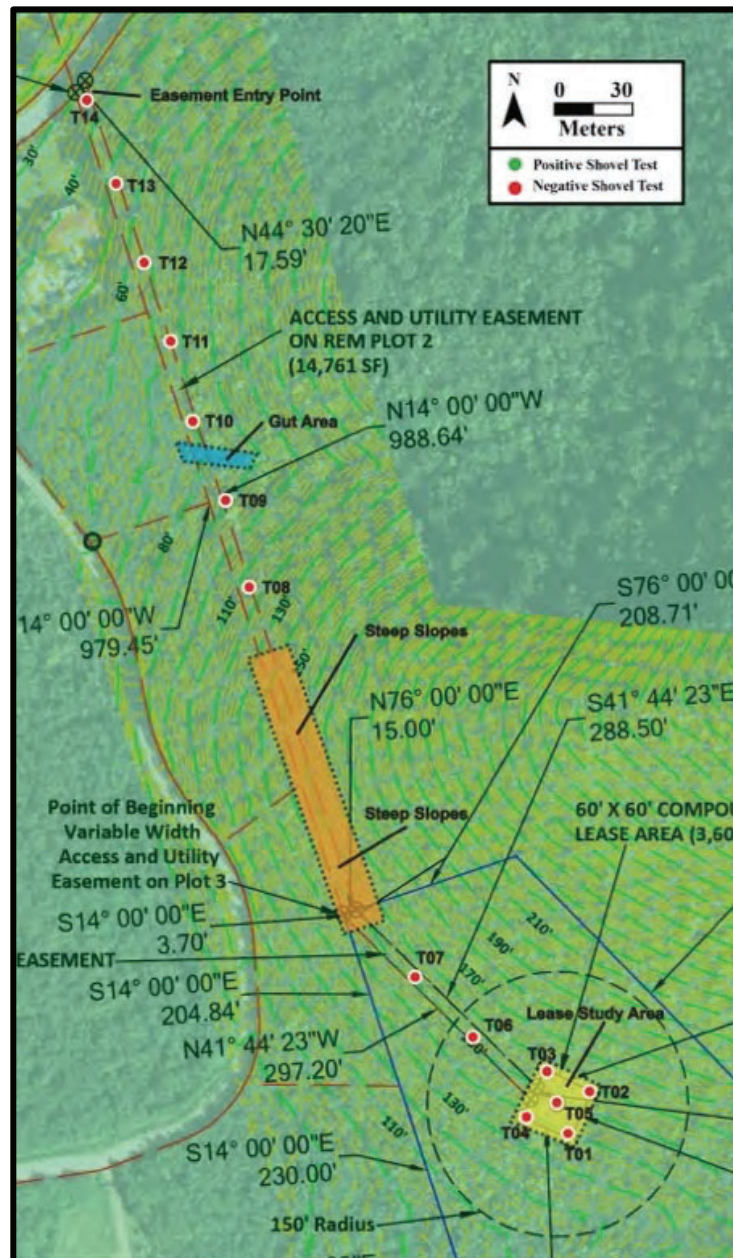


Figure 14: Image of the access road and monopole compound depicting the location of the negative shovel tests and very steep slopes.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Our concluding remarks and recommendations are provided below.

4.1 Conclusions

No cultural resources were identified during the Phase I (A&B) Cultural Resources Survey for the proposed 1,300-foot-long access road or the 60 by 60-foot monopole compound site. The literature and records search resulted in the identification of one archaeological site of record (12VAm1-17 *aka* Cramer Park Site) as partially contained within the ½ mile APE (Figure 10). Because of elevation differences, no direct line of vision is possible from the proposed access road or monopole compound to Cramer Park and vice versa. We note that the massive Long Base Array Antenna is located approximately 150 meters from the archaeological site. We also note that based on our past observations and recent testing for part of the site, that the contextual integrity of the archaeological site appears to have been compromised by past agricultural practices and more recent clearing and landscape maintenance activities.

4.2 Recommendations

CocoSol recommends that the Virgin Islands Department of Planning and Natural Resources: Virgin Islands State Historic Preservation Office issue a finding of ***no objection*** to the proposed project to build the proposed unimproved road and the monopole compound and its related appurtenances. If cultural resources are identified during clearing and/or construction activities, work should be stopped in the area of concern, the cultural resources protected, and the Department of Planning and Natural Resources: Virgin Islands State Historic Preservation Office notified immediately.

REFERENCES

- Dookhan, Isaac
1994 A History of the Virgin Islands of the United States. Canoe Press, Kingston, Florida Museum of Natural History
- Hardy, Meredith
2008 Saladoid Economy and Complexity on the Arawakan Frontier. Unpublished Ph.D. Dissertation, Department of Anthropology, Florida State University, Tallahassee.
- Hatt, Gudmund
1924 Archaeology of the Virgin Islands. In Proceedings of the 21st International Congress of Americanists (Part 1), 29-42. The Hague.
- Keegan, William F.
2000 West Indian Archaeology. 3. Ceramic Age. Journal of Archaeological Research, 8:135-167.
- Morse, Birgit Faber
1989 Saladoid Remains and Adaptive Strategies in St. Croix, Virgin Islands. In Early Ceramic Population Lifeways and Adaptive Strategies in the Caribbean, edited by Peter E. Siegel, pp. 29-42. British Archaeological Reports, BAR International Series 506. Oxford.
- 1978 National Register of Historic Places Nomination Form for Estate Hogensborg.
<https://npgallery.nps.gov/NRHP/AssetDetail/2e2edad7-71a4-44c3-83ac-c00245bea4e6>
- Rouse, Irving B.
1992 The Tainos: Rise and Decline of the People Who Greeted Columbus. Yale University Press, New Haven.
- United States Department of Agriculture
1994 Soil Survey of the United States Virgin Islands. Natural Resources Conservation Service, U.S.D.A., Washington, DC

APPENDIX H : SITE PHOTOS

- Photo#1: Looking north toward proposed undertaking
- Photo#2: Looking north away from proposed undertaking
- Photo#3: Looking east toward proposed undertaking
- Photo#4: Looking east away from proposed undertaking
- Photo#5: Looking south toward proposed undertaking
- Photo#6: Looking south away from proposed undertaking
- Photo#7: Looking west toward proposed undertaking
- Photo#8: Looking west away from proposed undertaking
- Photo#9: Looking north along proposed easement
- Photo#10: Looking south along proposed easement
- Photo#11: Looking south along proposed easement
- Photo#12: Looking north along proposed easement
- Photo#13: General view of proposed undertaking



Site Photograph 1 – Looking north toward the proposed undertaking



Site Photograph 2 – Looking north away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 3 – Looking east toward the proposed undertaking



Site Photograph 4 – Looking east away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
May 16, 2024





Site Photograph 5 – Looking south toward the proposed undertaking



Site Photograph 6 – Looking south away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 7 – Looking west toward the proposed undertaking



Site Photograph 8 – Looking west away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
May 16, 2024





Site Photograph 9 – Looking north along the proposed access/utility easement



Site Photograph 10 – Looking south along the proposed access/utility easement

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 11– Looking south along the proposed utility easement



Site Photograph 12 – Looking north along the proposed utility easement

Site Photographs

Blue Sky Towers III, LLC – East End
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
May 16, 2024





Site Photograph 13 – General view of the proposed undertaking

Site Photographs

Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024



APPENDIX I : ENVIRONMENTAL

- Fish & Wildlife Findings Letter
- Phase I Environmental Survey Assessment Report (ESA)
- Bio Survey and Endangered Species Assessment



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
Bayamón | Mayagüez | Maricao | Río Grande | St Croix
P.O. Box 491
Boquerón, Puerto Rico 00622



In Reply Refer To:
FWS/R4/CESFO/78010-033

Submitted Via Electronic Mail: anglin@thelotisgroup.com

Ms. DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
8899 Main Street – Suite 107
Williamsville, NY 14221

Re: East End Telecommunication Tower,
St. Croix, USVI

Dear Ms. Anglin:

Thank you for your letter dated May 24, 2024, requesting informal consultation on the above referenced project. As per your request, our comments are provided under the Endangered Species Act (Act) (87 Stat. 884, as amended; 16 United States Code 1531 et seq.), and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

Blue Sky Towers III (BST), LLC (the Applicant), is proposing to construct a 150 feet monopole telecommunication tower in addition to a 15 feet wide by 1,286 feet long easement road that will connect with East End Road. The project area of approximately 0.7 acres is located near Plot 3 Estate Long Point and Cotton Garden Eastend B Quarter, St. Croix, U.S. Virgin Islands (17° 45' 0.86297" N, -64° 35' 26.7075" W). Lotis Environmental (Lotis), LCC, is the designated non-federal representative and submitted the consultation for this project on behalf of BST.

Using the U.S. Fish and Wildlife Service's (Service) Information for Planning and Consultation (IPaC) system, Lotis determined that the proposed project lies within the range of the threatened green sea turtle (*Chelonia mydas*), and the endangered hawksbill (*Eretmochelys imbricata*) and leatherback (*Dermochelys coriacea*) sea turtles. According to the information provided, the proposed project is on the landward side of East End Road approximately 140 feet south from the proposed Green sea turtle critical habitat unit USVI-04 on Knight's Bay.

Based on the nature of the project, scope of work, and location, available information, and implementation of the Service's sea turtle conservation measures, Lotis determined that the proposed project may affect, but is not likely to adversely affect the above mentioned sea turtles. Lotis also determined that sea turtle critical habitat would not be adversely affected. The sea turtle conservation measures provided by IPaC will be implemented.

We have reviewed the information provided in your letter and our files, and concur with your determination that the proposed project may affect, but is not likely to adversely affect the green, hawksbill and leatherback sea turtles with the implementation of the conservation measures provided by IPaC.

In view of this, we believe that requirements of section 7 of the Endangered Species Act (Act) have been satisfied. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impact of this identified action that may affect listed species or critical habitat in a manner that was not previously considered; (2) this action is subsequently modified in a manner not previously considered in this assessment; or (3) a new species is listed, or critical habitat determined that may be affected by the identified action.

Telecommunication and other towers can have impacts to migratory birds not protected under the Act. For instance, lighting can attract birds during migration. We would be glad to assist in design and planning for future towers on the Island. For best management practices related to migratory birds and towers, please visit:

- <https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf>
- <https://www.fws.gov/library/collections/bird-friendly-communication-tower-toolkit>

Thank you for the opportunity to comment on this project. If you have any questions or require additional information, please contact us via email at caribbean_es@fws.gov or by phone at (786) 244-0081.

Sincerely,

Silmarie Padrón
Acting Field Supervisor

jpz



PHASE I ENVIRONMENTAL SITE ASSESSMENT (ASTM E1527-21)

USVI-00230 East End

Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820



Prepared for:

Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864

Prepared by:

Lotis Environmental, LLC
8899 Main Street - Suite 107
Williamsville, New York 14221

PROJECT SUMMARY

ASTM Practice E1527-21

Phase I ESA Environmental Site Assessment

Site Name: East End
Site ID: USVI-00230
Coordinates: 17.752397, -64.590752
Project Location: Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820
Prepared For: Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864
Lotis Job Number: BST_228



Concerns Identified
but No Further Work
Recommended
(see Executive
Summary, Page 1)



Further Work
Recommended
(see Executive
Summary, Page 1)

Critical Report Dates

Date of Regulatory Database: May 23, 2024
Date of Site Reconnaissance: May 16, 2024
Date of Owner Interview: No response
Date of Fire Interview: No response
Date of Issuance: June 13, 2024

Report Valid Until: November 12, 2024

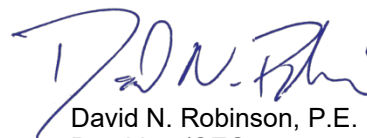
CLIENT DISCLOSURE STATEMENT

This report has been prepared for Blue Sky Towers III, LLC, its subsidiaries, successors, assigns, and affiliates. The report is intended for use by any rating agency, issuer, purchaser, or underwriter of securities that are collateralized or backed by the property described in this report, as well as for any loans placed upon the property. Blue Sky Towers III, LLC consents to the inclusion of this report in any paper or digital format, including any electronic media, such as storage devices or the internet/hyperlink, in the Prospectus Supplement related to such securitization transactions, and consents to our firm's reference under the caption 'Experts' in such Prospectus Supplement.

We, as the authors of this report, declare that we meet the definition of Environmental Professionals as defined in 40 CFR 312.10, and possess the specific qualifications based on education, training, and experience required to assess a property with the nature, history, and setting of the subject property (also known as the Subject Property). We have developed and conducted all appropriate inquiries into the environmental conditions at the subject property in conformance with the standards and practices set forth in 40 CFR Part 312. Additional details about our qualifications can be found in Appendix F.



Kelly Reidy-Kaczmarek
Environmental Scientist



David N. Robinson, P.E.
President/CEO

TABLE OF CONTENTS

1.0	Introduction.....	6
1.1	Purpose.....	6
1.2	Scope of Work	6
1.3	Significant Assumptions.....	6
1.4	Limitations and Exceptions	6
1.5	Deviations	7
2.0	Site Description	8
2.1	General	8
2.2	Site Reconnaissance	8
2.2.1	Current Uses of the Subject Property:	8
2.2.2	Site Visit Observations for the Subject Property	9
2.2.3	Current Uses of Adjacent/Nearby Properties:.....	10
2.2.4	Site Visit Observations for Adjacent Properties	10
3.0	Environmental and Historical Records Review	11
3.1	Physical Setting	11
3.1.1	General Topographic Setting	11
3.1.2	Surface Water	11
3.1.3	Groundwater Wells and Depth	11
3.1.4	Groundwater Flow	11
3.2	Historical Use Information.....	12
3.3	Summary of Previous Environmental Site Assessments.....	12
3.4	State Standard and Federal Environmental Record Sources.....	13
4.0	Environmental and Historical Records Review	14
4.1	Current Owner/Operators/Site Occupants/Site Manager	14
4.2	Local Government Officials.....	14
4.3	Additional Interviews	14
4.4	User Questionnaire	14
5.0	Non-Scope Environmental Considerations	15
5.1	Asbestos-Containing Building Materials	15
5.2	Lead-Based Paint	15
5.3	Radon	15
5.4	Title Search.....	15
5.5	Wetlands	15
5.6	Mold	15
5.7	Vapor Encroachment Conditions	15
5.8	Per- and Polyfluoroalkyl Substances	15
6.0	Data Gaps	16
7.0	Findings and Opinions	17
7.1	RECs.....	17
7.2	Historical RECs.....	17
7.3	Controlled RECs	17
7.4	De Minimis Conditions	17

8.0	Recommendations	18
9.0	References	19

Figures

- Figure 1 Vicinity Map
- Figure 2 USGS 7.5 Minute Topographic Map

Appendices

- A Site Photographs
- B Interviews/Questionnaires
- C Regulatory Information
- D Historical Information
- E Previous Study
- F Client Provided
- G Personnel Qualifications

EXECUTIVE SUMMARY

Summary of Action

At the request of Blue Sky Towers III, LLC (BST), and/or its Subsidiaries, a Phase I Environmental Site Assessment (Phase I ESA) was conducted by Lotis Environmental, LLC (Lotis), at a proposed communications site located at **Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix (17.752397, -64.590752)** hereinafter referred to as the "subject property". This Phase I ESA was conducted in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Standard E 1527-21 (Standard). Any exceptions to, or deviations from, the Standard are described in Section 1.0 of this report.

Overview

The subject property generally consists of undeveloped forested land. The subject property is referred to in this report as "**East End.**"

It should be noted that the subject property is part of a larger tract of land, which will be treated as a separate and distinct entity from the subject property for the purpose of this assessment. This larger tract of land will be referred to as the "parent tract" in this document.

Significant Data Gaps

Historical Source Interval: Standard historical sources reviewed for the Phase I ESA were not available at the 5-year intervals described in Section 8.3.2.1 of the Standard.

First Historical Development: Historical records before 1940 are unavailable. However, the site has consistently been depicted as a forest, matching its current use.

Interviews: It is noted that interviews with the current property owner and the local fire department were not completed. This constitutes a data gap.

Based on the information collected and reviewed as part of this Phase I ESA, the data gaps presented above are not likely to impact the overall ability to determine recognized environmental conditions at the subject property.

Summary of Results

The following potential environmental concerns were identified during the review of historical and/or regulatory information and from observations made during site reconnaissance activities.

Potential Environmental Concerns	
RECs:	None
Historical RECs:	None
Controlled RECs:	None
De Minimis Conditions:	None

Recommendations

Based on the results of this Phase I ESA, it is the opinion of Lotis that **no further investigation** is necessary at the subject property.

1.0 INTRODUCTION

1.1 PURPOSE

The primary purpose of this study was to provide BST with sufficient information about recognized environmental conditions (RECs) associated with the subject property.

1.2 SCOPE OF WORK

The Scope of Work for this assessment included the following components:

- Site Reconnaissance (to the extent possible)
 - Observations of Hazardous Substances/Petroleum Product Containers
 - Observations of Storage Tanks
 - Indications of Polychlorinated Biphenyls (PCBs)
 - Indications of Solid Waste Disposal/Other
- Records Review
 - Physical Setting Sources
 - Standard Environmental Record Sources
 - Historical Use Information
- Interviews
 - Interviews with Owners and Occupants (if available during site visit and/or via telephone)
 - Interviews with Local Government Officials (when applicable)
- Evaluation, Report Findings, and Recommendations summarized in this written Phase I Environmental Site Assessment (ESA).

1.3 SIGNIFICANT ASSUMPTIONS

No significant assumptions were made during the completion of this study.

1.4 LIMITATIONS AND EXCEPTIONS

Lotis performed these services in a manner consistent with the level of care and expertise exercised by members of the environmental assessment profession and in accordance with the ASTM Standard for Phase I ESA which is “intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner defense to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).”

It is Lotis’ experience that environmental liabilities may be incurred that are in addition to those associated with CERCLA. Lotis is strictly limited to identifying RECs associated with the subject property as identified within the scope of work. Lotis’ assessment does not evaluate the structural conditions of any buildings on the subject property or for regulatory compliance issues. Lotis additionally did not assess the subject property for the potential of asbestos containing building materials, biological agents, cultural or historic resources, ecological resources, endangered species, health and safety concerns, indoor air quality unrelated to releases of hazardous substances or petroleum products into the environment, industrial hygiene concerns, lead-based paint, lead in drinking water, mold, radon, or wetlands. Non-assessed potential issues such as these can present environmental liabilities to a property owner but are generally considered “non-scope” items in the ASTM scope of work for Phase I ESAs. In addition, any limitations requested by BST are described herein. Additional limitations were not requested by BST. By not commenting on the presence of materials or the conduct of practices, Lotis does not confirm the absence of materials or the acceptability of site operations. Sampling of soils, groundwater, and surface water were not included within the scope of work for this project.

Additionally, the site inspection activities did not include any attempt to identify the presence of environmental contamination that exists in areas that cannot be visually observed. This includes surface soils located under pavement, structures,

vehicles, or other media interference; subsurface soils; groundwater; areas in any buildings; or other areas on the property that are otherwise inaccessible due to locked or blocked accesses, geographic or vegetation impediments, weather interference, or size of the property. **NO WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE.**

This report presents Lotis' site reconnaissance observations, findings, and conclusions based on conditions as they existed at the time of the site reconnaissance. The findings presented in this report are based upon reasonably ascertainable information, available records, and site conditions observed during the ESA. Lotis makes no representation or warranty that past or current operations at the property are, or have been, in compliance with applicable federal, state, and local laws, regulations, and codes. Lotis makes no guarantees as to the accuracy or completeness of information obtained from others during this Phase I ESA investigation. It is possible that information exists beyond the scope of this assessment, or that pertinent information was not provided to Lotis. Additional information subsequently provided, discovered, or produced may alter findings or conclusions presented in this Phase I ESA report. Lotis is under no obligation to update this report to reflect such subsequent information.

The ASTM E1527-21 Standard recognizes inherent limitations for Phase I ESAs that apply to this report, including:

- Uncertainty Not Eliminated – No Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Data gaps identified during this Phase I ESA are listed in Section 6.0.
- Not Exhaustive – A Phase I ESA is not an exhaustive investigation.
- Past Uses of the Property – A review of standard historical sources at intervals of less than five years is not required.

BST is advised that the Phase I ESA conducted at the subject property is a limited inquiry into a property's environmental status, cannot wholly eliminate uncertainty, and is not an exhaustive assessment to discover every potential source of environmental liability at the subject property. Therefore, Lotis does not make a statement: i) of warranty or guarantee, expressed or implied for any specific use; ii) that the subject property is free of RECs or environmental impairment; iii) that the subject property is "clean"; or iv) that impairments, if any, are limited to those that were discovered while Lotis was performing the Phase I ESA. This limiting statement is not meant to compromise the findings of this report; rather, it is meant as a statement of limitations within the ASTM Standard and intended scope of this assessment. Any site-specific limitations identified during the subject property reconnaissance are described in Section 2.2. Subsurface conditions may differ from the conditions implied by surface observations and can be evaluated more thoroughly through intrusive techniques that are beyond the scope of this assessment.

This report does not warrant against future operations or conditions, nor does it warrant against the presence of operations or conditions of a type or at a location not assessed. Regardless of the findings stated in this report, Lotis is not responsible for consequences or conditions arising from facts that were not fully disclosed to Lotis prior to submission of this report.

An independent data research company conducted the government agency database review referenced in this report. Information regarding surrounding area properties was requested for approximate minimum search distances. The information provided was assumed to be correct and complete unless obviously contradicted by Lotis' observations or other credible reference sources reviewed during the assessment.

Results of this assessment are based upon the visual site inspection of readily accessible areas of the subject property conducted by Lotis personnel, information from interviews with knowledgeable persons regarding the subject property, information reviewed regarding historical uses, information requested from regulatory agencies, and review of publicly available and practicably reviewable information identifying current and historical uses of the subject property and surrounding properties.

All conclusions regarding this property represent the professional opinions of the Lotis personnel involved with this project. The findings of this report should not be considered a legal interpretation of existing environmental regulations. Lotis assumes no responsibility or liability for errors in the public data utilized, statements from sources outside of Lotis, or developments resulting from situations outside the scope of this project.

1.5 DEVIATIONS

There were no deviations from the ASTM E1527-21 Standard during the completion of this Phase I ESA report.

2.0 SITE DESCRIPTION

2.1 GENERAL

A current aerial photograph of the subject property and USGS 7.5 Minute Topographic Map showing the subject property and surrounding area are provided as Figure 1 and Figure 2, respectively.

The subject property is located on the east side of South Shore Road, less than one-eighth mile north of Buck Road. The latitude/longitude of the subject property is 17.752397, -64.590752, and the elevation of the subject property is approximately 160 feet above mean sea level.

2.2 SITE RECONNAISSANCE

Lotis performed a site reconnaissance on May 16, 2024 and was unaccompanied during the site visit. The site inspector reported the findings of the site reconnaissance to environmental professional(s) for review. The purpose of the reconnaissance was to evaluate the subject property, to observe adjoining/nearby properties, and to identify unlisted properties in the area that may affect the subject property. Photographs from the site reconnaissance are provided as Appendix A. The area of the subject property was walked, as its small area did not necessitate the use of a grid search pattern.

2.2.1 Current Uses of the Subject Property:

The subject property is currently undeveloped forested land.

The table below summarizes the findings from the site reconnaissance, including on-site features, limitations, as well as observations of temperature and precipitation:

Site Feature	Description
Communications Tower(s)	None
Fenced	No
Equipment Cabinet(s)	No
Equipment Shelter(s)	None
Electrical Service	None
Electric Meter(s)	None
Generator(s)/Observed or Indicated	None
Surface Material	Dirt and vegetation
Topography	Hilly
Vegetation	Lush and abundant
Temperature at Time of Visit	90°F
Precipitation	None
Limitations	Vegetation
Other	None

2.2.2 Site Visit Observations for the Subject Property

The following is a summary of information based on exterior observations completed during the Phase I ESA site visit.

Items of Potential Environmental Concern	Observed on the Subject Property	Notes:			
Potable Water Supply/Source	No				
Sewage Disposal System	No				
Hazardous Substances and Petroleum Products	No				
Underground Storage Tanks	No	Contents	Quantity	Size	Staining
		Propane			
		Diesel			
Aboveground Storage Tanks	No	Contents	Quantity	Size	Staining
		Propane			
		Diesel			
Odors	No				
Standing Liquids	No				
Drums	No	Contents		Quantity	Staining
Unidentified Substance Containers	No				
Transformer(s)	No	Pad	Pole	PCB Free	Staining
Pits, Ponds and Lagoons	No				
Stained Soil or Pavement	No				
Stressed Vegetation	No				
Solid Waste Disposal	No				
Indications of Fill Materials	No				
Heating and Cooling	No				
Drains and Sumps	No				
Evidence of Trash Burning	No				
Stormwater	No				
Wells	No				
Septic System	No				
General Housekeeping Concerns	No				
Other Conditions of Concern	No				

2.2.3 Current Uses of Adjacent/Nearby Properties:

Current visible uses of adjacent and nearby properties include the following as viewed from the subject property to the:

Direction	Adjacent/Proximate Properties
North:	Forested
East:	Forested
South:	Forested
West:	Forested

2.2.4 Site Visit Observations for Adjacent Properties

The following is a summary of information based on exterior observations completed during the Phase I ESA site visit.

Items of Potential Environmental Concern	Observed on the Adjacent Properties	Notes:			
Hazardous Substances and Petroleum Products	No				
Underground Storage Tanks	No				
Aboveground Storage Tanks	No				
Standing Liquids	No				
Drums	No				
Unidentified Substance Containers	No				
Transformer(s)	No	Pad	Pole	PCB Free	Staining
Pits, Ponds and Lagoons	No				
Stained Soil or Pavement	No				
Stressed Vegetation	No				
Indications of Fill Materials	No				
Evidence of Trash Burning	No				
General Housekeeping Concerns	No				
Other Conditions of Concern	No				

3.0 ENVIRONMENTAL AND HISTORICAL RECORDS REVIEW

3.1 PHYSICAL SETTING

3.1.1 General Topographic Setting

Review of the United States Geological Survey (USGS), Grass point, VI 7.5-Minute Quadrangle map indicates that the regional topography generally slopes in a south-southwesterly gradient. The soil surface texture in the vicinity of the subject property is loam and the soil drainage is considered well drained.

3.1.2 Surface Water

No surface water that indicated a potential environmental concern was observed on the subject property or adjacent properties during the site visit.

3.1.3 Groundwater Wells and Depth

Environmental Risk Information Services (ERIS) searches and summarizes data on wells and groundwater depth from public databases. The number and type of wells is listed in the Physical Setting Report (PSR) located in Appendix C of this report. However, it should be noted that groundwater depth fluctuates based on several factors. If the actual groundwater depth needs to be determined, a site specific groundwater survey should be completed.

3.1.4 Groundwater Flow

Groundwater flow direction at the subject property is not known. However, based on topographic gradient, the direction of groundwater flow in the general area of the subject property is estimated to be in a south-southwesterly direction. Groundwater beneath the subject property is of concern when there are properties located upgradient of the subject property that may have environmental concerns. Section 3.4 provides additional information on identified upgradient properties with current or historical environmental concerns.

It is important to note that although groundwater flow direction can be interpreted based on topography, the actual measurement of groundwater levels and potentiometric surface mapping is beyond the scope of work for this project. Measurement of groundwater levels and potentiometric surface mapping is the only accurate means of determining groundwater flow direction and gradient. Additionally, localized factors such as the presence of undocumented or unregistered pumping wells or other subsurface obstructions, seasonal fluctuations in precipitation, geologic heterogeneity, and nearby surface waters may also significantly influence groundwater gradient and flow direction at the subject property.

3.2 HISTORICAL USE INFORMATION

Consulting historical sources helps to establish the history of the property and its surroundings, with the aim of determining the probability of recognized environmental conditions resulting from past uses. Standard historical sources, as defined by ASTM, consist of various materials such as aerial photographs, fire insurance maps, property tax files, recorded land title records, USGS topographic maps, local street directories, building department records, zoning/land use records, as well as other credible historical sources that reveal the property's past uses.

Lotis carried out an investigation of standard historical records that were readily available and reliable to document all observable past uses of the property, dating back to its first development, which may have involved agricultural use or the placement of fill dirt. This research covered the period up to the earlier of the property's first developed use or the year 1940. According to ASTM, this task only requires examining those standard historical sources identified in 8.3.4.1 through 8.3.4.8 that are both reasonably ascertainable and likely to be beneficial (as described under Data Failure in 8.3.2.3).

If the property was originally developed for agricultural use, it may not be possible to obtain records that are easily accessible and reliable to document the date of the property's initial development.

An acceptable historical source may be disregarded in two situations. Firstly, if the source is not reasonably ascertainable, and secondly, if previous experience suggests that it is not likely to be adequate in terms of defining the property's uses in a useful, accurate, or comprehensive manner. Although other historical sources that are listed in 8.3.4.9 of the ASTM Practice E1527-21 can be used to meet the ASTM requirement for identifying past uses of the property, they are not obligated to follow this practice. The determination of past uses is based on examining only those standard historical sources outlined in 8.3.4.1 through 8.3.4.8 that are necessary and reasonably ascertainable, and expected to be useful.

The following historical reference materials were utilized to determine prior use of the subject property and adjacent/nearby properties:

ERIS Historic Aerials Report – 1954, 1971, 1977, 1999, 2004, 2007, and 2019.

ERIS Fire Insurance Maps - Fire Insurance Maps were ordered by Lotis through ERIS for historical information relative to the subject property and surrounding area. However, ERIS indicated that the subject property is an unmapped property. A copy of the letter is included in Appendix D of this report.

Local Street Directories – Based on the use of the subject property as a communications site, it is unlikely that Local Street Directories would identify any pertinent information associated with the subject property.

Physical characteristic changes for the subject and adjacent/nearby properties were observed as follows:

Historic Uses Summary

Year	Subject Property Use	Adjacent/Nearby Property Use			
		North	East	South	West
1954	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land
2019	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land	Undeveloped – Forested Land

3.3 SUMMARY OF PREVIOUS ENVIRONMENTAL SITE ASSESSMENTS

Lotis was not provided a previous Phase I ESA for the subject property, as reflected in Appendix E.

3.4 STATE STANDARD AND FEDERAL ENVIRONMENTAL RECORD SOURCES

ERIS was utilized to conduct a database search of environmental records. The search radius of the ERIS Database Report (ERIS Report) meets or exceeds the government records search requirements of the ASTM Standard E1527-21 for Phase I ESAs. The ERIS Report is provided as Appendix C and contains definitions of searched for acronyms. The below table provides the summary of the databases searched by ERIS and findings of each, i.e. number of sites identified within the search radius. Within the one-mile radius of the subject property, no sites were identified on the federal and/or state databases. One unplottable site, those sites not mapped due to poor or inadequate address information, was identified. During the site visit, the unplottable site was not observed near the subject property.

Environmental Risk Information Services Summary

Database *	Total Site(s)
DOE FUSRAP	0
NPL	0
PROPOSED NPL	0
DELETED NPL	0
SEMS	0
SEMS ARCHIVE	0
ODI	0
IODI	0
CERCLIS	0
CERCLIS NFRAP	0
CERCLIS LIENS	0
RCRA CORRACTS	0
RCRA TSD	0
RCRA LQG	0
RCRA SQG	0
RCRA VSQG	0
RCRA NON GEN	0
RCRA CONTROLS	0
FED ENG	0
FED INST	0
LUCIS	0
NPL IC	0
ERNS 1982 to 1986	0
ERNS 1987 to 1989	0
ERNS	0
FED BROWNFIELDS	0
FEMA UST	0
FRP	0
DELISTED FRP	0
HIST GAS STATIONS	0
REFN	0
BULK Terminal	0
SEMS LIEN	0
SUPERFUND ROD	0

Database *	Total Site(s)
SHWS	0
DELISTED CONTAM	0
DELISTED SHWS	0
SITE CLEANUP	0
SWF/LF	0
WASTE	0
RECYCLING	0
LUST	0
DELISTED LUST	0
LST	0
UST	0
AST	0
UNREG TANK	0
TANK FACILITY	0
DELISTED TANK	0
AUL	0
BROWNFIELD (state)	0
VCP	0
VAPOR	0
CBS	0
INDIAN LUST	0
INDIAN UST	0
DELISTED INDIAN UST	0
DELISTED INDIAN LST	0
FINDS/FRS	0
PFAS	0
HMIRS	0
DRYCLEANER	0
DELISTED DRYCLEANER	0
MINES	0
ALT FUELS	0
PCB	0
SPILLS	0
LIEN	0

4.0 ENVIRONMENTAL AND HISTORICAL RECORDS REVIEW

4.1 CURRENT OWNER/OPERATORS/SITE OCCUPANTS/SITE MANAGER

Lotis has not yet received a response from the property owner, Mr. Mike Lohman. An updated report will be issued once a response is received.

4.2 LOCAL GOVERNMENT OFFICIALS

Lotis attempted to interview at least one staff member of the Cotton Valley Fire Department to obtain information indicating RECs in connection with the subject property; however, contact could not be established. If a response is received that identifies environmental concerns an addendum to this report will be issued.

4.3 ADDITIONAL INTERVIEWS

No additional interviews were completed.

4.4 USER QUESTIONNAIRE

A completed User Questionnaire was not provided to Lotis by the User.

5.0 NON-SCOPE ENVIRONMENTAL CONSIDERATIONS

5.1 ASBESTOS-CONTAINING BUILDING MATERIALS

No structures were located onsite at the time of the inspection and no asbestos containing materials were noted onsite.

5.2 LEAD-BASED PAINT

No painted surfaces were noted onsite.

5.3 RADON

No Radon information is available for the area of the subject property. However, based on the commercial nature of the subject property, radon should not be a concern.

5.4 TITLE SEARCH

No title records were provided to Lotis by the User.

5.5 WETLANDS

The ERIS Database Report includes general information relative to wetlands and flood zones. No wetland or flood zone areas were identified on or adjacent to the subject property.

5.6 MOLD

None observed.

5.7 VAPOR ENCROACHMENT CONDITIONS

This assessment included review of the regulatory database discussed above in relation to section 3.4 of the ASTM E2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. If soil or groundwater is contaminated with a volatile compound (that is, something that can escape from water or soil to air, such as gasoline and solvents), that contaminant can migrate through the soil and present in the air inside of buildings, especially within basement areas. The ASTM E2600-10 standard designates this a Vapor Encroachment Condition (VEC). Soil vapors do not necessarily migrate along groundwater flow paths. Vapors can migrate via hydraulic gradients and may extend beyond a groundwater plume. Vapor intrusion has been identified at a significant number of sites and state and federal environmental regulators have "reopened" numerous spill and waste cases to assess whether a VEC assessment is warranted.

None of the information obtained/reviewed as part of this assessment suggested the potential for a VEC at the subject property.

5.8 PER- AND POLYFLUOROALKYL SUBSTANCES

Per- and Polyfluoroalkyl Substances (PFAS) are widely used, long lasting chemicals, components of which break down very slowly over time. Because of their widespread use and their persistence in the environment, many PFAS are found in the water, air, fish and soil at locations across the globe. Scientific studies have shown that exposure to PFAS in the environment may be linked to harmful health effects in humans and animals. There are thousands of PFAS chemicals, and they are found in many different consumer, commercial, and industrial products. The List of conditions where PFAS could be identified as a potential environmental concern are numerous (manufacturing operations, car washes, tanneries, former junk yards, sites where firefighting foam may have been used, etc.).

None of the information obtained/reviewed as part of this assessment suggested a PFAS concern at the subject property.

6.0 DATA GAPS

A data gap, as defined in the ASTM Standard E1527-21, is an absence of information that affects the ability of the environmental professional to identify RECs. The following data gaps were identified in the Phase I ESA:

Historical Source Interval: Standard historical sources reviewed for the Phase I ESA were not available at the 5-year intervals described in Section 8.3.2.1 of the Standard.

First Historical Development: Historical information does not date back to 1940. However the earliest map predates construction of the existing/proposed telecommunications site, which will be the first known development of the subject property.

Interviews: It is noted that interviews with the current property owner and the local fire department were not completed. This constitutes a data gap. However, given the comprehensive review of additional data conducted for this report, Lotis does not consider this data gap to be of significant concern.

Based on the information collected and reviewed as part of this Phase I ESA, the data gaps presented above are not likely to impact the overall ability to determine recognized environmental conditions at the subject property.

7.0 FINDINGS AND OPINIONS

7.1 RECs

ASTM defines recognized environmental conditions (RECs) as “the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.”

This Phase I ESA has identified no RECs in connection with the subject property.

7.2 HISTORICAL RECs

ASTM defines historical recognized environmental conditions (HRECs) as “a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).”

This Phase I ESA has identified no HRECs in connection with the subject property.

7.3 CONTROLLED RECs

ASTM defines controlled recognized environmental conditions (CRECs) as “a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).”

This Phase I ESA has identified no CRECs in connection with the subject property.

7.4 DE MINIMIS CONDITIONS

ASTM defines de minimis conditions (de minimis) as “a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

This Phase I ESA has identified no de minimis conditions in connection with the subject property.

8.0 RECOMMENDATIONS

Based on the results of the Phase I ESA, Lotis does not recommend further investigation at this time.

9.0 REFERENCES

Site Reconnaissance

Phase I ESA Site Reconnaissance Checklist and Photos. May 16, 2024.

Regulatory

Environmental Risk Information Services, Database Report, Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix. Order Number: 24052200607. May 23, 2024.

Environmental Risk Information Services, Physical Setting Report, Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix. Order Number: 23110300488p. June 06, 2024.

Environmental Risk Information Services, Historical Aerials, Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix. Order Number: 23110300488. June 12, 2024.

Environmental Risk Information Services, Fire Insurance Maps, Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix. Order Number: 23110300488. May 28, 2024.

Previous Studies

None

Figures

Figure 1 Vicinity Map
Figure 2 Topographic Map



Figure 1 Vicinity Map

Blue Sky Towers III, LLC
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820



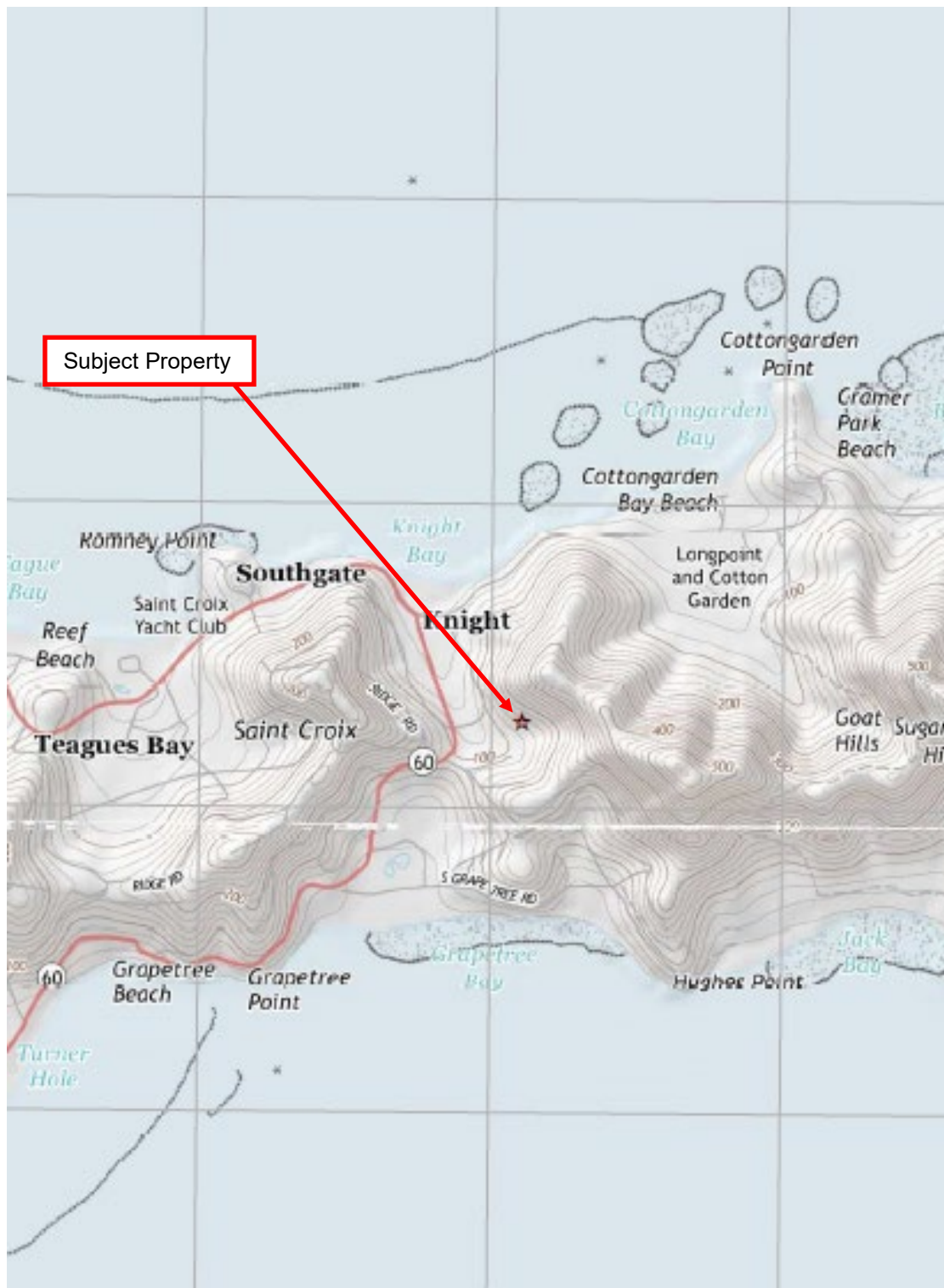


Figure 2
USGS Topographic Map
Blue Sky Towers III, LLC
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820



Appendices

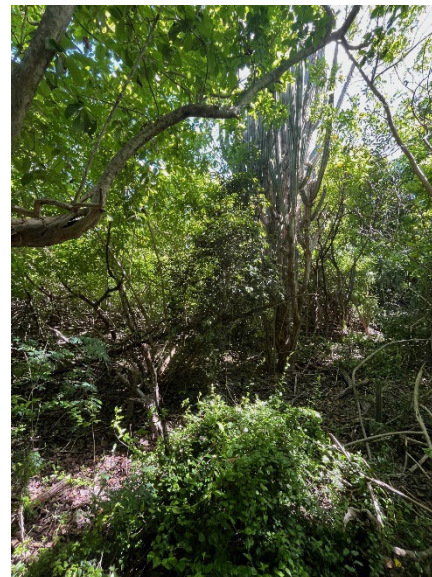
<i>Appendix A</i>	<i>Site Photographs</i>
<i>Appendix B</i>	<i>Interviews/Questionnaires</i>
<i>Appendix C</i>	<i>Regulatory Information</i>
<i>Appendix D</i>	<i>Historical Information</i>
<i>Appendix E</i>	<i>Previous Study</i>
<i>Appendix F</i>	<i>Client Provided Documents</i>
<i>Appendix G</i>	<i>Personnel Qualifications</i>

Appendix **A**

Site Photographs



Overview of entire lease area



View of the Subject Property



View of the Subject Property



View of the Subject Property

Photographed:
May 16, 2024

Site Photographs
East End USVI-00230
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820





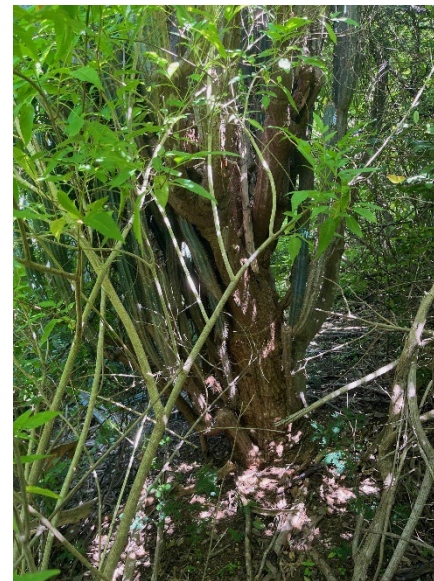
View of the north adjacent property



View of the east adjacent property



View of the south adjacent property



View of the west adjacent property

Photographed:
May 16, 2024

Site Photographs
East End USVI-00230
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix 00820



Appendix **B**

Interviews/Questionnaires



Lotis Environmental, LLC
8899 Main Street, Suite 107
Williamsville, New York 14221

KEY SITE PERSONNEL TELEPHONE INTERVIEW FORM

Lotis Interviewer	<input type="text" value="Anna Pearson"/>	Interview Date	<input type="text"/>
Site ID	<input type="text" value="USVI-00230"/>		
Site Name	<input type="text" value="East End"/>		
Site Address	<input type="text" value="Plot 3 Estate Long Point & Cotton Garden"/>	<input type="text" value="Eastend B Quarter"/>	<input type="text" value="St. Croix"/>
			<input type="text" value="00820"/>
Key Site Personnel	<input type="text" value="Mr."/>	<input type="text" value="Mike"/>	<input type="text" value="Lohman"/>
	<input type="text" value="Phone Number"/>		
Relationship to Property	<input type="text"/>		

The objective of this telephone interview is to obtain information indicating recognized environmental conditions in connection with the property.

1. Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law? ☐

If yes, describe.

1. Are you aware of any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law? ☐

If yes, describe.

2. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30):

a. Do you know the past uses of the property? ☐

If yes, what were they?

b. Do you know of specific chemicals that are present or once were present at the property? ☐

c. Do you know of spills or other chemical releases that have taken place at the property? ☐

d. Do you know of any environmental cleanups that have taken place at the property? ☐

3. When was the property acquired by the current owner?

4. What year was the communications tower constructed?

Other pertinent information



Lotis Environmental, LLC
8899 Main Street, Suite 107
Williamsville, New York 14221

LOCAL FIRE DEPARTMENT TELEPHONE INTERVIEW FORM

Lotis Interviewer

Anna Pearson

Interview Date

6/4/2024

Site ID

USVI-00230

Site Name

East End

Site Address

Plot 3 Estate Long Point & Cotton Garden

Eastend B Quarter

St. Croix

00820

Fire Department or other Emergency Response Agency

Cotton Valley

Representative

Phone Number

(340) 773-9670

The objective of this telephone interview is to obtain information indicating recognized environmental conditions in connection with the property.

1. Are you aware of any environmental concerns at the subject property?

☐

1. Has your department ever responded to an environmental emergency at the subject property?

☐

Other pertinent information

Lotis called on 5/22/2024, 5/28/2024, 6/4/2024, but did not receive a response.

Appendix **C**

Regulatory Information



Property Information

Order Number:	23110300488p
Date Completed:	June 6, 2024
Project Number:	BST_228
Project Property:	USVI-00230 East End Plot 3 Estate Long Point & Cotton Garden Eastend B Quarter VI 00820
Coordinates:	
Latitude:	17.752397
Longitude:	-64.590752
UTM Northing:	1963506.03465 Meters
UTM Easting:	331347.606472 Meters
UTM Zone:	UTM Zone 20Q
Elevation:	159.83 ft
Slope Direction:	SSW

Topographic Information.....	2
Hydrologic Information.....	4
Geologic Information.....	9
Soil Information.....	11
Wells and Additional Sources.....	21
Summary.....	22
Detail Report.....	23
Radon Information.....	26
Appendix.....	27
Liability Notice.....	29

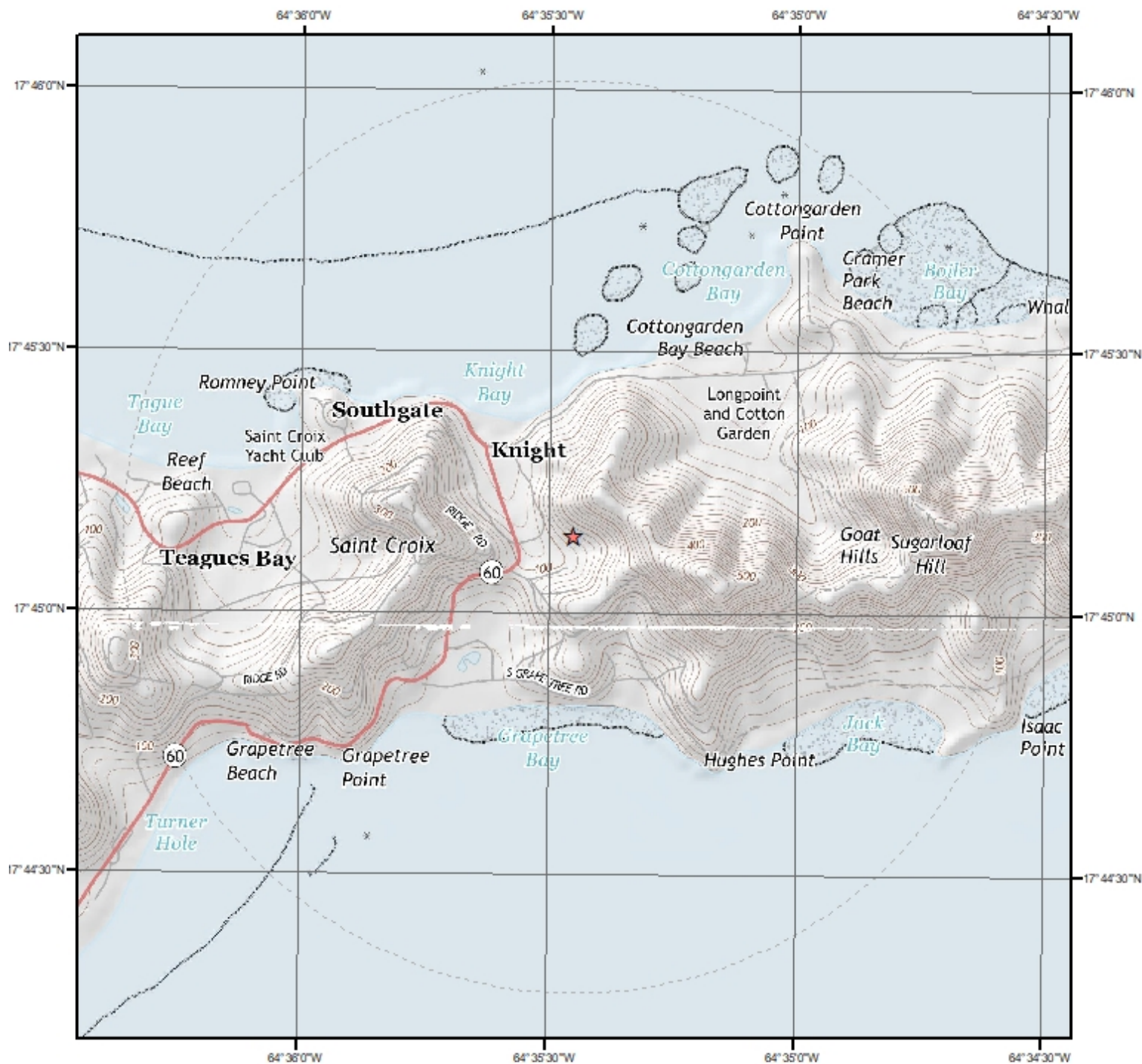
The ERIS **Physical Setting Report - PSR** provides comprehensive information about the physical setting around a site and includes a complete overview of topography and surface topology, in addition to hydrologic, geologic and soil characteristics. The location and detailed attributes of oil and gas wells, water wells, public water systems and radon are also included for review.

The compilation of both physical characteristics of a site and additional attribute data is useful in assessing the impact of migration of contaminants and subsequent impact on soils and groundwater.

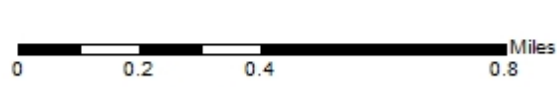
Disclaimer

This Report does not provide a full environmental evaluation for the site or adjacent properties. Please see the terms and disclaimer at the end of the Report for greater detail.

Topographic Information



Current USGS Topo (2013)



Quadrangle(s): Buck Island, VI; Grass Point, VI

Source: USGS 7.5 Minute Topographic Map

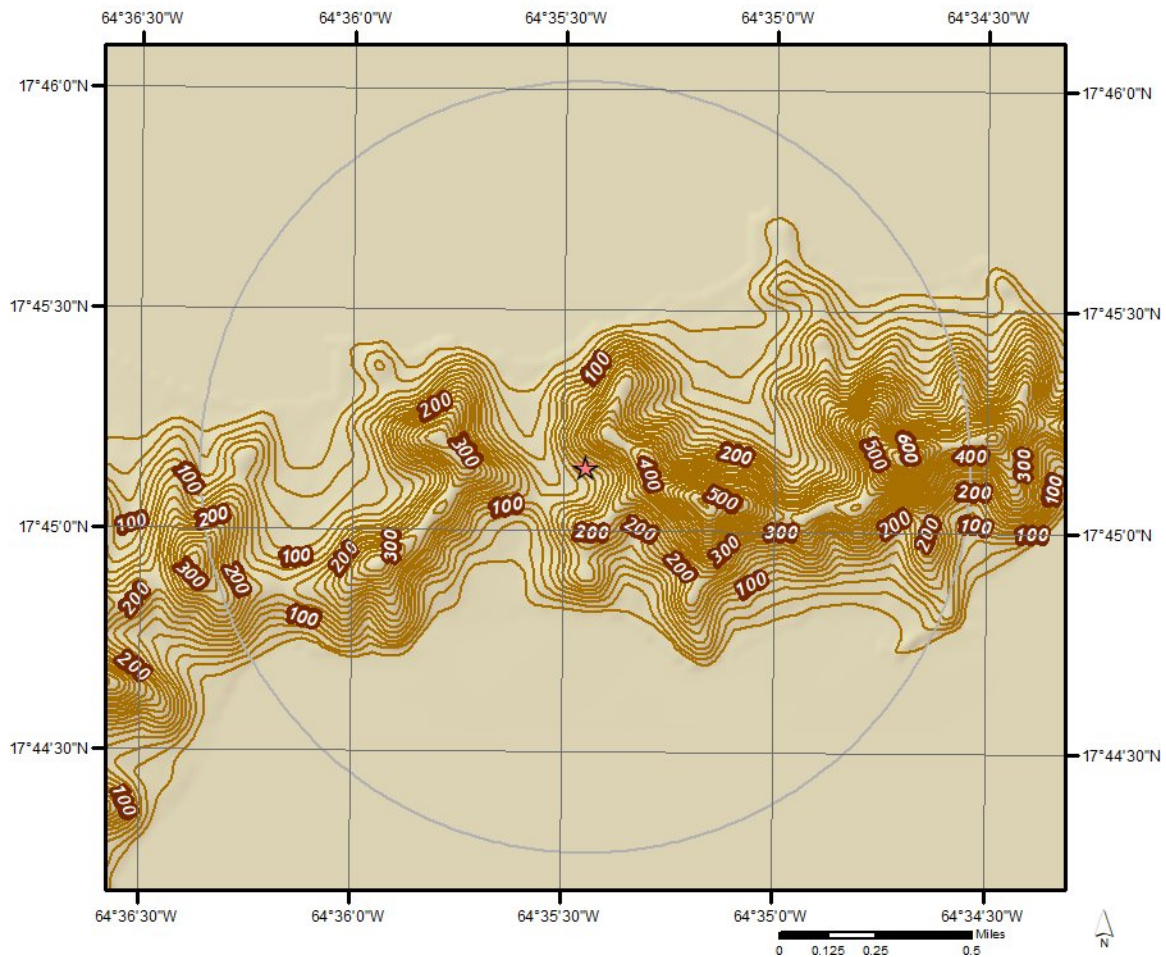


Topographic Information

The previous topographic map(s) are created by seamlessly merging and cutting current USGS topographic data. Below are shaded relief map(s), derived from USGS elevation data to show surrounding topography in further detail.

Topographic information at project property:

Elevation: 159.83 ft
Slope Direction: SSW



Hydrologic Information

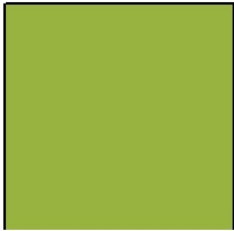
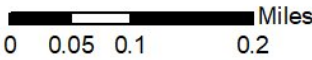


Wetland

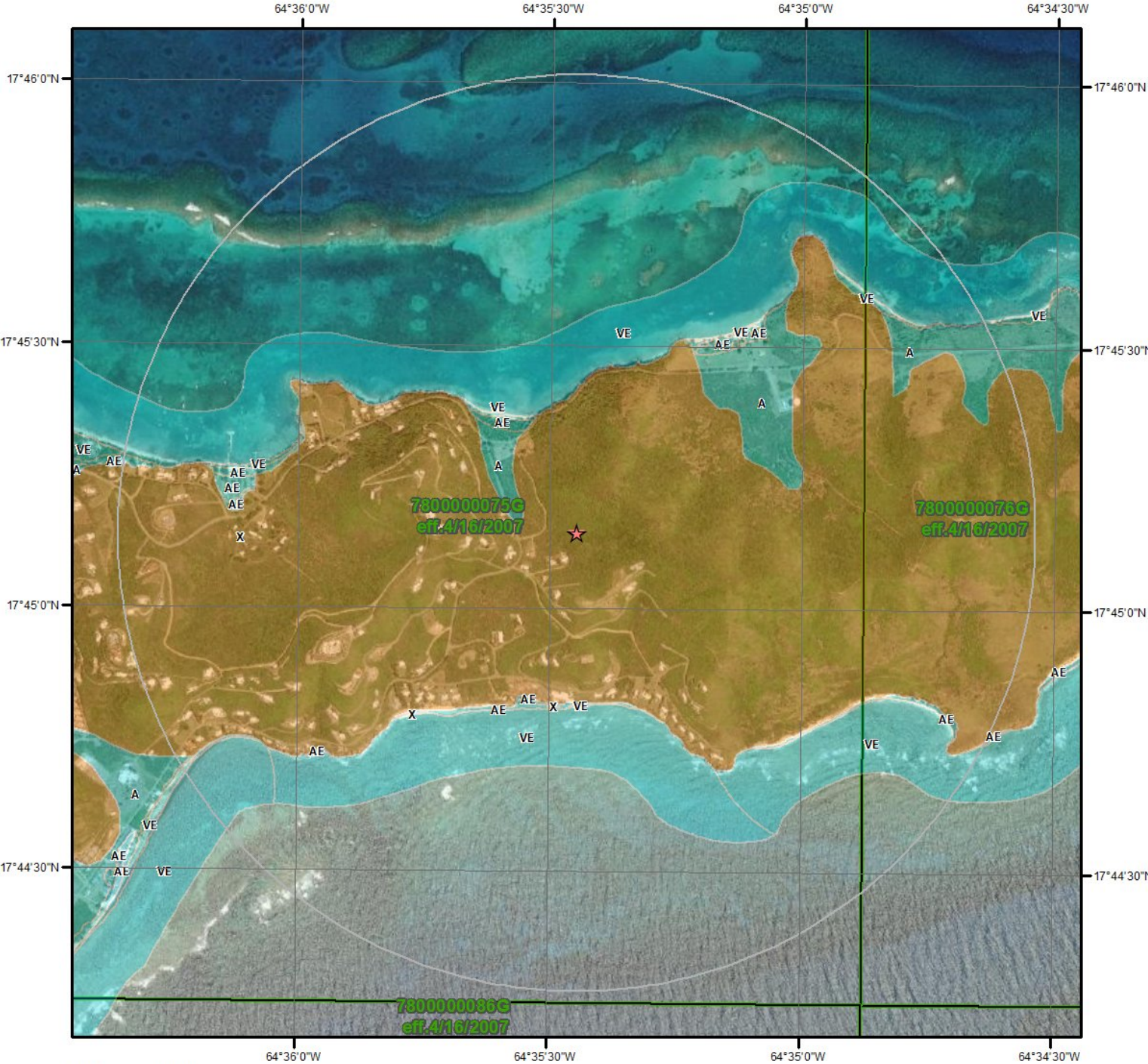
This map shows wetland existence using data from US Fish & Wildlife. Data coverage is shown to the right. Gray indicates no data available in the area.

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland

- Freshwater Pond
- Lake
- Other
- Riverine



Hydrologic Information



Flood Hazard Zones

This map shows FEMA flood hazard zones based on FEMA's National Flood Hazard Layer. FIRM Panels are overlaid. An absent FIRM panel represents no data available.

- 1% Annual Chance Flood Hazard
- Regulatory Floodway
- Special Floodway
- Area of Undetermined Flood Hazard
- 0.2% Annual Chance Flood Hazard
- Future Conditions 1% Annual Chance Flood Hazard
- Area with Reduced Risk Due to Levee
- Area with Risk Due to Levee
- Open Water

Quadrangle(s): Buck Island, VI; Grass Point, VI



Hydrologic Information

The Wetland Type map shows wetland existence overlaid on an aerial imagery. The Flood Hazard Zones map shows FEMA flood hazard zones overlaid on an aerial imagery. Relevant FIRM panels and detailed zone information is provided below. For detailed Zone descriptions please click the link: <https://floodadvocate.com/fema-zone-definitions>

Available FIRM Panels in area: 7800000076G(effective:2007-04-16) 7800000075G(effective:2007-04-16)

Flood Zone A-01

Zone: A
Zone subtype:

Flood Zone AE-01

Zone: AE
Zone subtype:

Flood Zone VE-01

Zone: VE
Zone subtype:

Flood Zone X-12

Zone: X
Zone subtype: AREA OF MINIMAL FLOOD HAZARD

FEMA Flood Zone Definitions

Special Flood Hazard Areas – High Risk

Special Flood Hazard Areas represent the area subject to inundation by 1-percent-annual chance flood. Structures located within the SFHA have a 26-percent chance of flooding during the life of a standard 30-year mortgage. Federal floodplain management regulations and mandatory flood insurance purchase requirements apply in these zones.

ZONE	DESCRIPTION
A	Areas subject to inundation by the 1-percent-annual-chance flood event. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown.
AE, A1-A30	Areas subject to inundation by the 1-percent-annual-chance flood event determined by detailed methods. BFEs are shown within these zones. (Zone AE is used on new and revised maps in place of Zones A1–A30.)
AH	Areas subject to inundation by 1-percent-annual-chance shallow flooding (usually areas of ponding) where average depths are 1–3 feet. BFEs derived from detailed hydraulic analyses are shown in this zone.
AO	Areas subject to inundation by 1-percent-annual-chance shallow flooding (usually sheet flow on sloping terrain) where average depths are 1–3 feet. Average flood depths derived from detailed hydraulic analyses are shown within this zone.
AR	Areas that result from the decertification of a previously accredited flood protection system that is determined to be in the process of being restored to provide base flood protection.
A99	Areas subject to inundation by the 1-percent-annual-chance flood event, but which will ultimately be protected upon completion of an under-construction Federal flood protection system. These are areas of special flood hazard where enough progress has been made on the construction of a protection system, such as dikes, dams, and levees, to consider it complete for insurance rating purposes. Zone A99 may be used only when the flood protection system has reached specified statutory progress toward completion. No BFEs or flood depths are shown.

Coastal High Hazard Areas – High Risk

Coastal High Hazard Areas (CHHA) represent the area subject to inundation by 1-percent-annual chance flood, extending from offshore to the inland limit of a primary front al dune along an open coast and any other area subject to high velocity wave action from storms or seismic sources. Structures located within the CHHA have a 26-percent chance of flooding during the life of a standard 30-year mortgage. Federal floodplain management regulations and mandatory purchase requirements apply in these zones.

ZONE	DESCRIPTION
V	Areas along coasts subject to inundation by the 1-percent-annual-chance flood event with additional hazards associated with storm-induced waves. Because detailed coastal analyses have not been performed, no BFEs or flood depths are shown.
VE, V1-V30	Areas along coasts subject to inundation by the 1-percent-annual-chance flood event with additional hazards due to storm-induced velocity wave action. BFEs derived from detailed hydraulic coastal analyses are shown within these zones. (Zone VE is used on new and revised maps in place of Zones V1–V30.)

Hydrologic Information

Moderate and Minimal Risk Areas

Areas of moderate or minimal hazard are studied based upon the principal source of flood in the area. However, buildings in these zones could be flooded by severe, concentrated rainfall coupled with inadequate local drainage systems. Local stormwater drainage systems are not normally considered in a community's flood insurance study. The failure of a local drainage system can create areas of high flood risk within these zones. Flood insurance is available in participating communities, but is not required by regulation in these zones. Nearly 25-percent of all flood claims filed are for structures located within these zones.

ZONE	DESCRIPTION
B, X (shaded)	Moderate risk areas within the 0.2-percent-annual-chance floodplain, areas of 1-percent-annual-chance flooding where average depths are less than 1 foot, areas of 1-percent-annual-chance flooding where the contributing drainage area is less than 1 square mile, and areas protected from the 1-percent-annual-chance flood by a levee. No BFEs or base flood depths are shown within these zones. (Zone X (shaded) is used on new and revised maps in place of Zone B.)
C, X (unshaded)	Minimal risk areas outside the 1-percent and .2-percent-annual-chance floodplains. No BFEs or base flood depths are shown within these zones. (Zone X (unshaded) is used on new and revised maps in place of Zone C.)

Undetermined Risk Areas

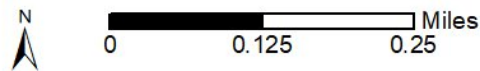
ZONE	DESCRIPTION
D	Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

Geologic Information



Geologic Units

This maps shows geologic units in the area. Please refer to the report for detailed descriptions.

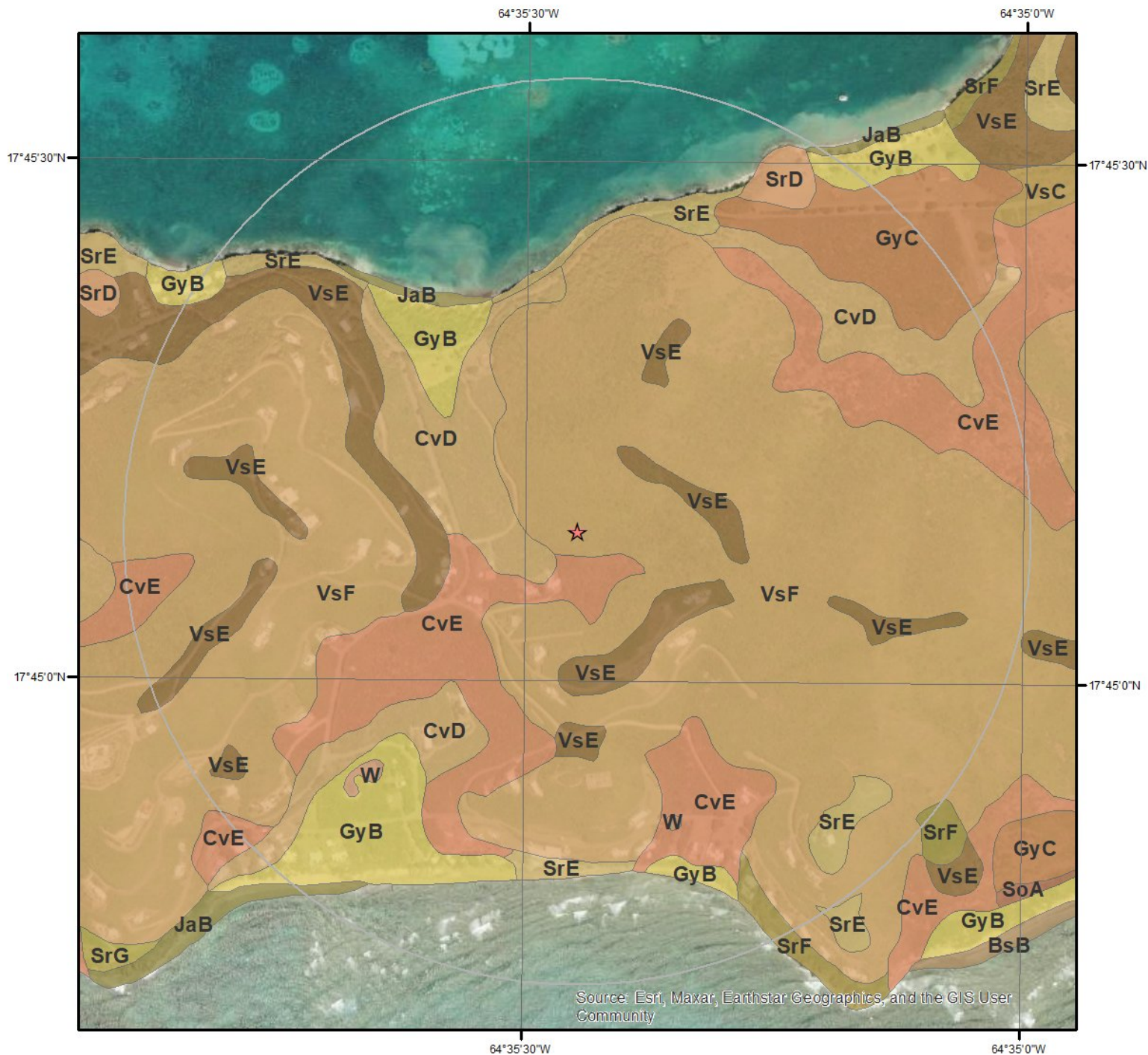


Geologic Information

The previous page shows USGS geology information. Detailed information about each unit is provided below.

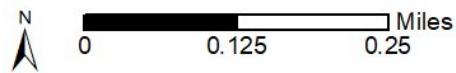
No records found for the project property or surrounding properties.

Soil Information



SSURGO Soils

This maps shows SSURGO soil units around the target property. Please refer to the report for detailed soil descriptions.



Soil Information

The previous page shows a soil map using SSURGO data from USDA Natural Resources Conservation Service. Detailed information about each unit is provided below.

Map Unit CvD (1.37%)

Map Unit Name:	Cramer-Victory complex, 12 to 20 percent slopes, very stony
Bedrock Depth - Min:	38cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	D - Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted.

Major components are printed below

Cramer(50%)

horizon H1(0cm to 23cm)	Gravelly clay loam
horizon H2(23cm to 48cm)	Gravelly clay
horizon H3(48cm to 81cm)	Weathered bedrock
horizon H4(81cm to 152cm)	Unweathered bedrock

Component Description:

Minor map unit components are excluded from this report.

Map Unit: CvD - Cramer-Victory complex, 12 to 20 percent slopes, very stony

Component: Cramer (50%)

The Cramer component makes up 50 percent of the map unit. Slopes are 12 to 20 percent. This component is on hills on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 7 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 5 within 30 inches of the soil surface.

Component: Victory (30%)

The Victory component makes up 30 percent of the map unit. Slopes are 12 to 20 percent. This component is on ridges. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Maho Bay (10%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (10%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit CvE (2.56%)

Map Unit Name:	Cramer-Victory complex, 20 to 40 percent slopes, very stony
Bedrock Depth - Min:	38cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained

Soil Information

Hydrologic Group - Dominant:

D - Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted.

Major components are printed below

Cramer(50%)

horizon H1(0cm to 23cm)

Gravelly clay loam

horizon H2(23cm to 48cm)

Gravelly clay

horizon H3(48cm to 81cm)

Weathered bedrock

horizon H4(81cm to 152cm)

Unweathered bedrock

Component Description:

Minor map unit components are excluded from this report.

Map Unit: CvE - Cramer-Victory complex, 20 to 40 percent slopes, very stony

Component: Cramer (50%)

The Cramer component makes up 50 percent of the map unit. Slopes are 20 to 40 percent. This component is on hills on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 7 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 5 within 30 inches of the soil surface.

Component: Victory (30%)

The Victory component makes up 30 percent of the map unit. Slopes are 20 to 40 percent. This component is on ridges. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Parasol (10%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Component: Maho Bay (10%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Map Unit GyB (1.0%)

Map Unit Name:

Glynn gravelly loam, 2 to 5 percent slopes

Bedrock Depth - Min:

null

Watertable Depth - Annual Min:

null

Drainage Class - Dominant:

Well drained

Hydrologic Group - Dominant:

C - Soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through the soil is somewhat restricted.

Major components are printed below

Glynn(85%)

horizon H1(0cm to 10cm)

Gravelly loam

horizon H2(10cm to 25cm)

Gravelly clay loam

horizon H3(25cm to 43cm)

Very gravelly clay

horizon H4(43cm to 69cm)

Very gravelly clay loam

horizon H5(69cm to 81cm)

Very gravelly sandy clay loam

horizon H6(81cm to 104cm)

Very gravelly clay

horizon H7(104cm to 152cm)

Very gravelly sandy clay loam

Component Description:

Soil Information

Minor map unit components are excluded from this report.

Map Unit: GyB - Glynn gravelly loam, 2 to 5 percent slopes

Component: Glynn (85%)

The Glynn component makes up 85 percent of the map unit. Slopes are 2 to 5 percent. This component is on alluvial fans on uplands, terraces on uplands. The parent material consists of stratified alluvial sediments weathered from volcanic residuum. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is moderate. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 4 percent. Nonirrigated land capability classification is 2c. Irrigated land capability classification is 2e. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 23 percent. The soil has a very slightly saline horizon within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 30 within 30 inches of the soil surface.

Component: Arawak (3%)

Generated brief soil descriptions are created for major soil components. The Arawak soil is a minor component.

Component: Hesselberg (3%)

Generated brief soil descriptions are created for major soil components. The Hesselberg soil is a minor component.

Component: Carib (3%)

Generated brief soil descriptions are created for major soil components. The Carib soil is a minor component.

Component: Aquents (2%)

Generated brief soil descriptions are created for major soil components. The Aquents soil is a minor component.

Component: Solitude (2%)

Generated brief soil descriptions are created for major soil components. The Solitude soil is a minor component.

Component: Sion (2%)

Generated brief soil descriptions are created for major soil components. The Sion soil is a minor component.

Map Unit GyC (0.75%)

Map Unit Name:	Glynn gravelly loam, 5 to 12 percent slopes
Bedrock Depth - Min:	null
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	C - Soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through the soil is somewhat restricted.

Major components are printed below

Glynn(85%)

horizon H1(0cm to 10cm)	Gravelly loam
horizon H2(10cm to 25cm)	Gravelly clay loam
horizon H3(25cm to 43cm)	Very gravelly clay
horizon H4(43cm to 69cm)	Very gravelly clay loam
horizon H5(69cm to 81cm)	Very gravelly sandy clay loam
horizon H6(81cm to 104cm)	Very gravelly clay
horizon H7(104cm to 152cm)	Very gravelly sandy clay loam

Component Description:

Minor map unit components are excluded from this report.

Map Unit: GyC - Glynn gravelly loam, 5 to 12 percent slopes

Component: Glynn (85%)

The Glynn component makes up 85 percent of the map unit. Slopes are 5 to 12 percent. This component is on alluvial fans on uplands, terraces on uplands. The parent material consists of stratified alluvial sediments weathered from volcanic residuum. Depth to

Soil Information

a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is moderate. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 4 percent. Nonirrigated land capability classification is 2c. Irrigated land capability classification is 2e. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 23 percent. The soil has a very slightly saline horizon within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 30 within 30 inches of the soil surface.

Component: Hesselberg (3%)

Generated brief soil descriptions are created for major soil components. The Hesselberg soil is a minor component.

Component: Sion (3%)

Generated brief soil descriptions are created for major soil components. The Sion soil is a minor component.

Component: Solitude (3%)

Generated brief soil descriptions are created for major soil components. The Solitude soil is a minor component.

Component: Carib (3%)

Generated brief soil descriptions are created for major soil components. The Carib soil is a minor component.

Component: Arawak (3%)

Generated brief soil descriptions are created for major soil components. The Arawak soil is a minor component.

Map Unit JaB (0.22%)

Map Unit Name:	Jaucas sand, 0 to 5 percent slopes
Bedrock Depth - Min:	null
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Excessively drained
Hydrologic Group - Dominant:	A - Soils in this group have low runoff potential when thoroughly wet. Water is transmitted freely through the soil.

Major components are printed below

Jaucas(85%)

horizon H1(0cm to 15cm)	Sand
horizon H2(15cm to 152cm)	Sand

Component Description:

Minor map unit components are excluded from this report.

Map Unit: JaB - Jaucas sand, 0 to 5 percent slopes

Component: Jaucas (85%)

The Jaucas component makes up 85 percent of the map unit. Slopes are 0 to 5 percent. This component is on beaches on coastal plains. The parent material consists of deposits of calcareous sand. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is excessively drained. Water movement in the most restrictive layer is very high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 1 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 30 percent. The soil has a moderately saline horizon within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 5 within 30 inches of the soil surface.

Component: Glynn (3%)

Generated brief soil descriptions are created for major soil components. The Glynn soil is a minor component.

Component: Sugar Beach (3%)

Generated brief soil descriptions are created for major soil components. The Sugar Beach soil is a minor component.

Component: Solitude (3%)

Generated brief soil descriptions are created for major soil components. The Solitude soil is a minor component.

Component: Sandy Point (3%)

Soil Information

Generated brief soil descriptions are created for major soil components. The Sandy Point soil is a minor component.

Component: Cinnamon Bay (3%)

Generated brief soil descriptions are created for major soil components. The Cinnamon Bay soil is a minor component.

Map Unit SrD (0.09%)

Map Unit Name:	Southgate-Rock outcrop complex, 12 to 20 percent slopes
Bedrock Depth - Min:	0cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	D - Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted.

Major components are printed below

Southgate(45%)

horizon H1(0cm to 13cm)	Gravelly loam
horizon H2(13cm to 25cm)	Very gravelly loam
horizon H3(25cm to 43cm)	Weathered bedrock
horizon H4(43cm to 152cm)	Unweathered bedrock

Rock outcrop(40%)

horizon H1(0cm to 152cm)	Unweathered bedrock
--------------------------	---------------------

Component Description:

Minor map unit components are excluded from this report.

Map Unit: SrD - Southgate-Rock outcrop complex, 12 to 20 percent slopes

Component: Southgate (45%)

The Southgate component makes up 45 percent of the map unit. Slopes are 12 to 20 percent. This component is on hillslopes on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Rock outcrop (40%)

Generated brief soil descriptions are created for major soil components. The Rock outcrop is a miscellaneous area.

Component: Cramer (5%)

Generated brief soil descriptions are created for major soil components. The Cramer soil is a minor component.

Component: Jealousy (5%)

Generated brief soil descriptions are created for major soil components. The Jealousy soil is a minor component.

Component: Maho Bay (3%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (2%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit SrE (0.37%)

Map Unit Name:	Southgate-Rock outcrop complex, 20 to 40 percent slopes
Bedrock Depth - Min:	0cm
Watertable Depth - Annual Min:	null

Soil Information

Drainage Class - Dominant: Well drained
Hydrologic Group - Dominant: D - Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted.

Major components are printed below

Southgate(45%)

horizon H1(0cm to 13cm)	Gravelly loam
horizon H2(13cm to 25cm)	Very gravelly loam
horizon H3(25cm to 43cm)	Weathered bedrock
horizon H4(43cm to 152cm)	Unweathered bedrock

Rock outcrop(40%)

horizon H1(0cm to 152cm)	Unweathered bedrock
--------------------------	---------------------

Component Description:

Minor map unit components are excluded from this report.

Map Unit: SrE - Southgate-Rock outcrop complex, 20 to 40 percent slopes

Component: Southgate (45%)

The Southgate component makes up 45 percent of the map unit. Slopes are 20 to 40 percent. This component is on hillslopes on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Rock outcrop (40%)

Generated brief soil descriptions are created for major soil components. The Rock outcrop is a miscellaneous area.

Component: Jealousy (5%)

Generated brief soil descriptions are created for major soil components. The Jealousy soil is a minor component.

Component: Cramer (5%)

Generated brief soil descriptions are created for major soil components. The Cramer soil is a minor component.

Component: Maho Bay (3%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (2%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit SrF (0.19%)

Map Unit Name:	Southgate-Rock outcrop complex, 40 to 60 percent slopes
Bedrock Depth - Min:	0cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	D - Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted.

Major components are printed below

Southgate(45%)

horizon H1(0cm to 13cm)	Gravelly loam
horizon H2(13cm to 25cm)	Very gravelly loam
horizon H3(25cm to 43cm)	Weathered bedrock
horizon H4(43cm to 152cm)	Unweathered bedrock

Rock outcrop(40%)

horizon H1(0cm to 152cm)	Unweathered bedrock
--------------------------	---------------------

Soil Information

Component Description:

Minor map unit components are excluded from this report.

Map Unit: SrF - Southgate-Rock outcrop complex, 40 to 60 percent slopes

Component: Southgate (45%)

The Southgate component makes up 45 percent of the map unit. Slopes are 40 to 60 percent. This component is on hillslopes on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Rock outcrop (40%)

Generated brief soil descriptions are created for major soil components. The Rock outcrop is a miscellaneous area.

Component: Cramer (5%)

Generated brief soil descriptions are created for major soil components. The Cramer soil is a minor component.

Component: Jealousy (5%)

Generated brief soil descriptions are created for major soil components. The Jealousy soil is a minor component.

Component: Maho Bay (3%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (2%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit VsE (1.59%)

Map Unit Name:	Victory-Southgate complex, 20 to 40 percent slopes, very stony
Bedrock Depth - Min:	38cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	C - Soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through the soil is somewhat restricted.

Major components are printed below

Victory(45%)

horizon H1(0cm to 28cm)	Loam
horizon H2(28cm to 51cm)	Very gravelly loam
horizon H3(51cm to 84cm)	Very gravelly loam
horizon H4(84cm to 127cm)	Bedrock
horizon H5(127cm to 152cm)	Bedrock

Southgate(40%)

horizon H1(0cm to 13cm)	Gravelly loam
horizon H2(13cm to 25cm)	Very gravelly loam
horizon H3(25cm to 43cm)	Weathered bedrock
horizon H4(43cm to 152cm)	Unweathered bedrock

Component Description:

Minor map unit components are excluded from this report.

Map Unit: VsE - Victory-Southgate complex, 20 to 40 percent slopes, very stony

Component: Victory (45%)

The Victory component makes up 45 percent of the map unit. Slopes are 20 to 40 percent. This component is on ridges. The parent

Soil Information

material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Southgate (40%)

The Southgate component makes up 40 percent of the map unit. Slopes are 20 to 40 percent. This component is on hillslopes on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Cramer (5%)

Generated brief soil descriptions are created for major soil components. The Cramer soil is a minor component.

Component: Jealousy (5%)

Generated brief soil descriptions are created for major soil components. The Jealousy soil is a minor component.

Component: Maho Bay (3%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (2%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit VsF (91.84%)

Map Unit Name:	Victory-Southgate complex, 40 to 70 percent slopes, very stony
Bedrock Depth - Min:	38cm
Watertable Depth - Annual Min:	null
Drainage Class - Dominant:	Well drained
Hydrologic Group - Dominant:	C - Soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through the soil is somewhat restricted.

Major components are printed below

Victory(45%)

horizon H1(0cm to 28cm)	Loam
horizon H2(28cm to 51cm)	Very gravelly loam
horizon H3(51cm to 84cm)	Very gravelly loam
horizon H4(84cm to 127cm)	Bedrock
horizon H5(127cm to 152cm)	Bedrock

Southgate(40%)

horizon H1(0cm to 13cm)	Gravelly loam
horizon H2(13cm to 25cm)	Very gravelly loam
horizon H3(25cm to 43cm)	Weathered bedrock
horizon H4(43cm to 152cm)	Unweathered bedrock

Component Description:

Minor map unit components are excluded from this report.

Map Unit: VsF - Victory-Southgate complex, 40 to 70 percent slopes, very stony

Component: Victory (45%)

The Victory component makes up 45 percent of the map unit. Slopes are 40 to 70 percent. This component is on ridges. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, paralithic, is 20 to 40 inches. The natural drainage

Soil Information

class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Southgate (40%)

The Southgate component makes up 40 percent of the map unit. Slopes are 40 to 70 percent. This component is on hillslopes on hills, mountain slopes on mountains, ridges on mountains. The parent material consists of weathered material. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches (or restricted depth) is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface. The soil has a maximum sodium adsorption ratio of 3 within 30 inches of the soil surface.

Component: Jealousy (5%)

Generated brief soil descriptions are created for major soil components. The Jealousy soil is a minor component.

Component: Cramer (5%)

Generated brief soil descriptions are created for major soil components. The Cramer soil is a minor component.

Component: Maho Bay (3%)

Generated brief soil descriptions are created for major soil components. The Maho Bay soil is a minor component.

Component: Parasol (2%)

Generated brief soil descriptions are created for major soil components. The Parasol soil is a minor component.

Map Unit W (0.02%)

Map Unit Name: Water

No more attributes available for this map unit

Component Description:

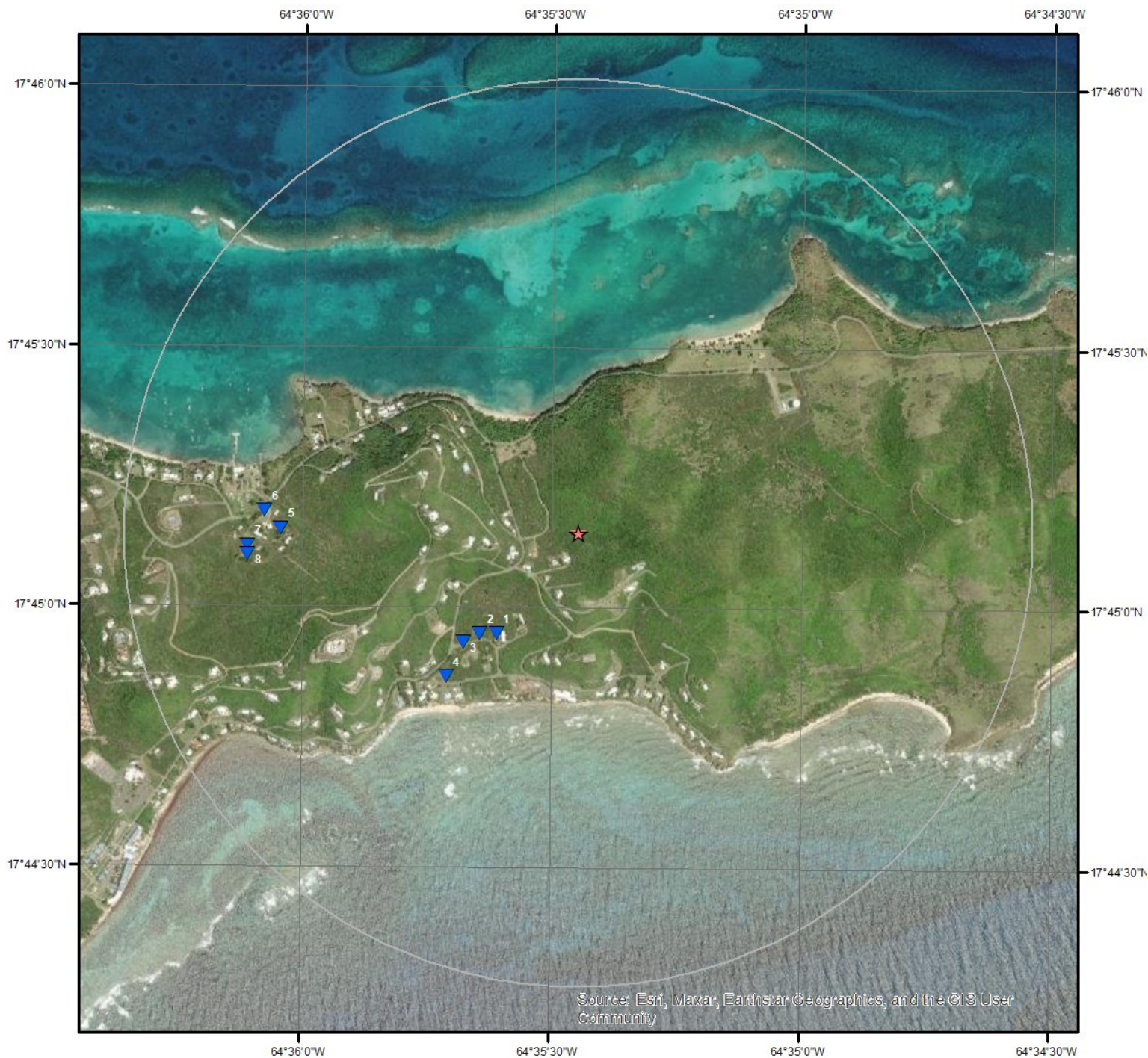
Minor map unit components are excluded from this report.

Map Unit: W - Water

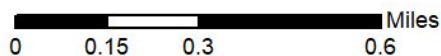
Component: Water (100%)

Generated brief soil descriptions are created for major soil components. The Water is a miscellaneous area.

Wells and Additional Sources



Wells & Additional Sources



- | | |
|--------------------------------|------------------------------------|
| ▲ Sites with Higher Elevation | ▲ OGW Sites with Higher Elevation |
| ■ Sites with Same Elevation | ■ OGW Sites with Same Elevation |
| ▼ Sites with Lower Elevation | ▼ OGW Sites with Lower Elevation |
| ○ Sites with Unknown Elevation | ● OGW Sites with Unknown Elevation |



Wells and Additional Sources Summary

Federal Sources

Public Water Systems Violations and Enforcement Data

Map Key	ID	Distance (ft)	Direction
No records found			

Safe Drinking Water Information System (SDWIS)

Map Key	ID	Distance (ft)	Direction
No records found			

USGS National Water Information System

Map Key	Site No	Distance (ft)	Direction
1	USGS-174504064353800	1514.58	SW
2	USGS-174504064354000	1642.31	SW
3	USGS-174503064354200	1850.38	SW
4	USGS-174459064354400	2274.82	SW
5	USGS-174516064360400	3459.37	W
6	USGS-174518064360600	3659.75	W
7	USGS-50331001	3849.81	W
8	USGS-174513064360800	3855.68	W

Wells and Additional Sources Detail Report

USGS National Water Information System

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
1	SW	0.29	1,514.58	16.96	FED USGS

Site No: USGS-174504064353800
Site Type: Well
Formation Type:
Date Drilled:
Well Depth:
Well Depth Unit:
Well Hole Depth:
Well Hole Depth Unit:
Reporting Agency: USGS Puerto Rico Water Science Center
Station Name: GRAPETREE 3 WELL, ST. CROIX, USVI
Latitude: 17.74914023000000
Longitude: -64.5934719900000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
2	SW	0.31	1,642.31	24.31	FED USGS

Site No: USGS-174504064354000
Site Type: Well
Formation Type:
Date Drilled:
Well Depth:
Well Depth Unit:
Well Hole Depth:
Well Hole Depth Unit:
Reporting Agency: USGS Puerto Rico Water Science Center
Station Name: GRAPETREE 2 WELL, ST. CROIX, USVI
Latitude: 17.74914023000000
Longitude: -64.5940275700000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
3	SW	0.35	1,850.38	25.42	FED USGS

Site No: USGS-174503064354200
Site Type: Well
Formation Type:
Date Drilled:
Well Depth:
Well Depth Unit:
Well Hole Depth:

Wells and Additional Sources Detail Report

Well Hole Depth Unit:

Reporting Agency: USGS Puerto Rico Water Science Center

Station Name: GRAPETREE 1 WELL, ST. CROIX, USVI

Latitude: 17.74886245000000

Longitude: -64.5945832000000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
4	SW	0.43	2,274.82	16.87	FED USGS

Site No: USGS-174459064354400

Site Type: Well

Formation Type:

Date Drilled: 1986

Well Depth: 11.65

Well Depth Unit: ft

Well Hole Depth:

Well Hole Depth Unit:

Reporting Agency: USGS Puerto Rico Water Science Center

Station Name: RBUS WELL, ST. CROIX, USVI

Latitude: 17.74775136000000

Longitude: -64.5951387000000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
5	W	0.66	3,459.37	29.30	FED USGS

Site No: USGS-174516064360400

Site Type: Well

Formation Type:

Date Drilled:

Well Depth: 40

Well Depth Unit: ft

Well Hole Depth:

Well Hole Depth Unit:

Reporting Agency: USGS Puerto Rico Water Science Center

Station Name: WEST INDIES 1 WELL, ST. CROIX, USVI

Latitude: 17.75247353000000

Longitude: -64.6006945900000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
6	W	0.69	3,659.75	15.94	FED USGS

Site No: USGS-174518064360600

Site Type: Well

Formation Type:

Date Drilled:

Wells and Additional Sources Detail Report

Well Depth: 12
Well Depth Unit: ft
Well Hole Depth:
Well Hole Depth Unit:
Reporting Agency: USGS Puerto Rico Water Science Center
Station Name: WEST INDIES 2 WELL, ST. CROIX, USVI
Latitude: 17.75302908000000
Longitude: -64.6012501700000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
7	W	0.73	3,849.81	22.38	FED USGS

Site No: USGS-50331001
Site Type: Atmosphere
Formation Type:
Date Drilled:
Well Depth:
Well Depth Unit:
Well Hole Depth:
Well Hole Depth Unit:
Reporting Agency: USGS Puerto Rico Water Science Center
Station Name: TEAGUES BAY RAINGAGE, ST. CROIX USVI
Latitude: 17.75191798000000
Longitude: -64.6018058000000

Map Key	Direction	Distance (mi)	Distance (ft)	Elevation (ft)	DB
8	W	0.73	3,855.68	26.97	FED USGS

Site No: USGS-174513064360800
Site Type: Well
Formation Type:
Date Drilled:
Well Depth: 40
Well Depth Unit: ft
Well Hole Depth:
Well Hole Depth Unit:
Reporting Agency: USGS Puerto Rico Water Science Center
Station Name: WEST INDIES 3 WELL, ST. CROIX, USVI
Latitude: 17.75164020000000
Longitude: -64.6018058000000

Radon Information

This section lists any relevant radon information found for the target property.

No Radon Zone Level records found for the project property or surrounding properties.

Zone 1: Counties with predicted average indoor radon screening levels greater than 4 pCi/L

Zone 2: Counties with predicted average indoor radon screening levels from 2 to 4 pCi/L

Zone 3: Counties with predicted average indoor radon screening levels less than 2 pCi/L

No Indoor Radon Data records found for the project property or surrounding properties.

Federal Sources

FEMA National Flood Hazard Layer

FEMA FLOOD

The National Flood Hazard Layer (NFHL) data incorporates Flood Insurance Rate Map (FIRM) databases published by the Federal Emergency Management Agency (FEMA), and any Letters Of Map Revision (LOMRs) that have been issued against those databases since their publication date. The FIRM Database is the digital, geospatial version of the flood hazard information shown on the published paper FIRMs. The FIRM Database depicts flood risk information and supporting data used to develop the risk data. The FIRM Database is derived from Flood Insurance Studies (FISs), previously published FIRMs, flood hazard analyses performed in support of the FISs and FIRMs, and new mapping data, where available.

Indoor Radon Data

INDOOR RADON

Indoor radon measurements tracked by the Environmental Protection Agency(EPA) and the State Residential Radon Survey.

Public Water Systems Violations and Enforcement Data

PWSV

This list of drinking water violations and enforcement actions is sourced from the U.S Environmental Protection Agency's (EPA) Enforcement and Compliance History Online (ECHO) system that incorporates Public Water Systems data from EPA's Safe Drinking Water Information System (SDWIS) database, as part of the national download of Safe Drinking Water Act (SDWA) data. SDWIS contains information on public water systems from the Public Water System Supervision (PWSS) Program, including monitoring, enforcement, and violation data related to requirements established by the SWDA. Address information provided in SWDIS may correspond either with the physical location of the water system, or with a contact address.

Radon Zone Level

RADON ZONE

Areas showing the level of Radon Zones (level 1, 2 or 3) by county. This data is maintained by the Environmental Protection Agency (EPA).

Safe Drinking Water Information System (SDWIS)

SDWIS

This national download of Safe Drinking Water Act (SDWA) data is sourced from the U.S Environmental Protection Agency's (EPA) Enforcement and Compliance History Online (ECHO) system that incorporates Public Water Systems data from EPA's Safe Drinking Water Information System (SDWIS) database. SDWIS contains information on public water systems from the Public Water System Supervision (PWSS) Program related to requirements established by the Safe Drinking Water Act (SDWA). Address information provided in SWDIS may correspond either with the physical location of the water system, or with a contact address.

Soil Survey Geographic database

SSURGO

The Soil Survey Geographic database (SSURGO) contains information about soil as collected by the National Cooperative Soil Survey at the Natural Resources Conservation Service (NRCS). Soil maps outline areas called map units. The map units are linked to soil properties in a database. Each map unit may contain one to three major components and some minor components.

U.S. Fish & Wildlife Service Wetland Data

US WETLAND

The U.S. Fish & Wildlife Service Wetland layer represents the approximate location and type of wetlands and deepwater habitats in the United States.

USGS Current Topo

US TOPO

US Topo topographic maps are produced by the National Geospatial Program of the U.S. Geological Survey (USGS). The project was launched in late 2009, and the term "US Topo" refers specifically to quadrangle topographic maps published in 2009 and later.

USGS Geology

US GEOLOGY

Seamless maps depicting geological information provided by the United States Geological Survey (USGS).

USGS Historical Topo

HTMC

In 2009, the US Geological Survey (USGS) began the release of a new generation of topographic maps (US Topo) in electronic form, and in 2011, complemented them with the release of high-resolution scans of more than 178,000 historical topographic maps of the United States.

USGS National Water Information System

FED USGS

The U.S. Geological Survey's (USGS) National Water Information System (NWIS) is the nation's principal repository of water resources data. The data includes comprehensive information of well-construction details, time-series data for gage height, streamflow, groundwater level, and precipitation and water use data. This NWIS database information is obtained through the Water Quality Data Portal (WQP). The WQP is a cooperative service sponsored by the USGS, the Environmental Protection Agency (EPA), and the National Water Quality Monitoring Council (NWQMC).

Liability Notice

Reliance on information in Report: The Physical Setting Report (PSR) DOES NOT replace a full Phase I Environmental Site Assessment but is solely intended to be used as a review of environmental databases and physical characteristics for the site or adjacent properties.

License for use of information in Report: No page of this report can be used without this cover page, this notice and the project property identifier. The information in Report(s) may not be modified or re-sold.

Your Liability for misuse: Using this Service and/or its reports in a manner contrary to this Notice or your agreement will be in breach of copyright and contract and ERIS may obtain damages for such mis-use, including damages caused to third parties, and gives ERIS the right to terminate your account, rescind your license to any previous reports and to bar you from future use of the Service.

No warranty of Accuracy or Liability for ERIS: The information contained in this report has been produced by ERIS Information Inc. ("ERIS") using various sources of information, including information provided by Federal and State government departments. The report applies only to the address and up to the date specified on the cover of this report, and any alterations or deviation from this description will require a new report. This report and the data contained herein does not purport to be and does not constitute a guarantee of the accuracy of the information contained herein and does not constitute a legal opinion nor medical advice. Although ERIS has endeavored to present you with information that is accurate, ERIS Information Inc. disclaims, any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence, negligence or otherwise, and for any consequences arising therefrom. Liability on the part of ERIS is limited to the monetary value paid for this report.

Trademark and Copyright: You may not use the ERIS trademarks or attribute any work to ERIS other than as outlined above. This Service and Report(s) are protected by copyright owned by ERIS Information Inc. Copyright in data used in the Service or Report(s) (the "Data") is owned by ERIS or its licensors. The Service, Report(s) and Data may not be copied or reproduced in whole or in any substantial part without prior written consent of ERIS.



DATABASE REPORT

Project Property:	<i>USVI-00230 East End Plot 3 Estate Long Point & Cotton Garden Eastend B Quarter VI 00820</i>
Project No:	<i>BST_228</i>
Report Type:	<i>Database Report</i>
Order No:	<i>24052200607</i>
Requested by:	<i>Lotis Environmental</i>
Date Completed:	<i>May 23, 2024</i>

Environmental Risk Information Services

A division of Glacier Media Inc.

1.866.517.5204 | info@erisinfo.com | erisinfo.com

Table of Contents

Table of Contents.....	2
Executive Summary.....	3
Executive Summary: Report Summary.....	4
Executive Summary: Site Report Summary - Project Property.....	7
Executive Summary: Site Report Summary - Surrounding Properties.....	8
Executive Summary: Summary by Data Source.....	9
Map.....	10
Aerial.....	13
Topographic Map.....	14
Detail Report.....	15
Unplottable Summary.....	16
Unplottable Report.....	17
Appendix: Database Descriptions.....	19
Definitions.....	31

Notice: IMPORTANT LIMITATIONS and YOUR LIABILITY

Reliance on information in Report: This report DOES NOT replace a full Phase I Environmental Site Assessment but is solely intended to be used as database review of environmental records.

License for use of information in Report: No page of this report can be used without this cover page, this notice and the project property identifier. The information in Report(s) may not be modified or re-sold.

Your Liability for misuse: Using this Service and/or its reports in a manner contrary to this Notice or your agreement will be in breach of copyright and contract and ERIS may obtain damages for such mis-use, including damages caused to third parties, and gives ERIS the right to terminate your account, rescind your license to any previous reports and to bar you from future use of the Service.

No warranty of Accuracy or Liability for ERIS: The information contained in this report has been produced by ERIS Information Inc. ("ERIS") using various sources of information, including information provided by Federal and State government departments. The report applies only to the address and up to the date specified on the cover of this report, and any alterations or deviation from this description will require a new report. This report and the data contained herein does not purport to be and does not constitute a guarantee of the accuracy of the information contained herein and does not constitute a legal opinion nor medical advice. Although ERIS has endeavored to present you with information that is accurate, ERIS disclaims, any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence, negligence or otherwise, and for any consequences arising therefrom. Liability on the part of ERIS is limited to the monetary value paid for this report.

Trademark and Copyright: You may not use the ERIS trademarks or attribute any work to ERIS other than as outlined above. This Service and Report(s) are protected by copyright owned by ERIS Information Inc. Copyright in data used in the Service or Report(s) (the "Data") is owned by ERIS or its licensors. The Service, Report(s) and Data may not be copied or reproduced in whole or in any substantial part without prior written consent of ERIS.

Executive Summary

Property Information:

Project Property: *USVI-00230 East End
Plot 3 Estate Long Point & Cotton Garden Eastend B Quarter VI 00820*

Project No: *BST_228*

Coordinates:

Latitude:	<i>17.752397</i>
Longitude:	<i>-64.590752</i>
UTM Northing:	<i>1,963,506.03</i>
UTM Easting:	<i>331,347.61</i>
UTM Zone:	<i>20Q</i>

Elevation: *160 FT*

Order Information:

Order No: *24052200607*

Date Requested: *May 22, 2024*

Requested by: *Lotis Environmental*

Report Type: *Database Report*

Historicals/Products:

ERIS Xplorer [*ERIS Xplorer*](#)

Excel Add-On *Excel Add-On*

Executive Summary: Report Summary

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
<u>Standard Environmental Records</u>								
Federal								
NPL	Y	1	0	0	0	0	0	0
PROPOSED NPL	Y	1	0	0	0	0	0	0
DELETED NPL	Y	0.5	0	0	0	0	-	0
SEMS	Y	0.5	0	0	0	0	-	0
ODI	Y	0.5	0	0	0	0	-	0
SEMS ARCHIVE	Y	0.5	0	0	0	0	-	0
CERCLIS	Y	0.5	0	0	0	0	-	0
IODI	Y	0.5	0	0	0	0	-	0
CERCLIS NFRAP	Y	0.5	0	0	0	0	-	0
CERCLIS LIENS	Y	PO	0	-	-	-	-	0
RCRA CORRACTS	Y	1	0	0	0	0	0	0
RCRA TSD	Y	0.5	0	0	0	0	-	0
RCRA LQG	Y	0.25	0	0	0	-	-	0
RCRA SQG	Y	0.25	0	0	0	-	-	0
RCRA VSQG	Y	0.25	0	0	0	-	-	0
RCRA NON GEN	Y	0.25	0	0	0	-	-	0
RCRA CONTROLS	Y	0.5	0	0	0	0	-	0
FED ENG	Y	0.5	0	0	0	0	-	0
FED INST	Y	0.5	0	0	0	0	-	0
LUCIS	Y	0.5	0	0	0	0	-	0
NPL IC	Y	0.5	0	0	0	0	-	0
ERNS 1982 TO 1986	Y	PO	0	-	-	-	-	0
ERNS 1987 TO 1989	Y	PO	0	-	-	-	-	0
ERNS	Y	PO	0	-	-	-	-	0
FED BROWNFIELDS	Y	0.5	0	0	0	0	-	0
FEMA UST	Y	0.25	0	0	0	-	-	0
FRP	Y	0.25	0	0	0	-	-	0

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
DELISTED FRP	Y	0.25	0	0	0	-	-	0
HIST GAS STATIONS	Y	0.25	0	0	0	-	-	0
REFN	Y	0.25	0	0	0	-	-	0
BULK TERMINAL	Y	0.25	0	0	0	-	-	0
SEMS LIEN	Y	PO	0	-	-	-	-	0
SUPERFUND ROD	Y	1	0	0	0	0	0	0
DOE FUSRAP	Y	1	0	0	0	0	0	0

State

LUST	Y	0.25	0	0	0	-	-	0
UST VIRGIN ISLANDS	Y	0.25	0	0	0	-	-	0
DELISTED TANKS	Y	0.25	0	0	0	-	-	0
BROWNFIELDS	Y	0.5	0	0	0	0	-	0

Tribal

No Tribal standard environmental record sources available for this State.

County

No County standard environmental record sources available for this State.

Additional Environmental Records

Federal

PFAS GHG	Y	0.5	0	0	0	0	-	0
OSC RESPONSE	Y	0.125	0	0	-	-	-	0
FINDS/FRS	Y	PO	0	-	-	-	-	0
TRIS	Y	PO	0	-	-	-	-	0
PFAS NPL	Y	0.5	0	0	0	0	-	0
PFAS FED SITES	Y	0.5	0	0	0	0	-	0
PFAS SSEHRI	Y	0.5	0	0	0	0	-	0
ERNS PFAS	Y	0.5	0	0	0	0	-	0
PFAS NPDES	Y	0.5	0	0	0	0	-	0
PFAS TRI	Y	0.5	0	0	0	0	-	0
PFAS WATER	Y	0.5	0	0	0	0	-	0
PFAS TSCA	Y	0.5	0	0	0	0	-	0
PFAS E-MANIFEST	Y	0.5	0	0	0	0	-	0
PFAS IND	Y	0.5	0	0	0	0	-	0
HMIRS	Y	0.125	0	0	-	-	-	0
NCDL	Y	0.125	0	0	-	-	-	0
TSCA	Y	0.125	0	0	-	-	-	0

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
HIST TSCA	Y	0.125	0	0	-	-	-	0
FTTS ADMIN	Y	PO	0	-	-	-	-	0
FTTS INSP	Y	PO	0	-	-	-	-	0
PRP	Y	PO	0	-	-	-	-	0
SCRD DRYCLEANER	Y	0.5	0	0	0	0	-	0
ICIS	Y	PO	0	-	-	-	-	0
FED DRYCLEANERS	Y	0.25	0	0	0	-	-	0
DELISTED FED DRY	Y	0.25	0	0	0	-	-	0
FUDS	Y	1	0	0	0	0	0	0
FUDS MRS	Y	1	0	0	0	0	0	0
FORMER NIKE	Y	1	0	0	0	0	0	0
PIPELINE INCIDENT	Y	PO	0	-	-	-	-	0
MLTS	Y	PO	0	-	-	-	-	0
HIST MLTS	Y	PO	0	-	-	-	-	0
MINES	Y	0.25	0	0	0	-	-	0
SMCRA	Y	1	0	0	0	0	0	0
MRDS	Y	1	0	0	0	0	0	0
LM SITES	Y	1	0	0	0	0	0	0
ALT FUELS	Y	0.25	0	0	0	-	-	0
CONSENT DECREES	Y	0.25	0	0	0	-	-	0
AFS	Y	PO	0	-	-	-	-	0
SSTS	Y	0.25	0	0	0	-	-	0
PCBT	Y	0.5	0	0	0	0	-	0
PCB	Y	0.5	0	0	0	0	-	0

State **No State additional environmental record sources available for this State.**

Tribal **No Tribal additional environmental record sources available for this State.**

County **No County additional environmental record sources available for this State.**

Total: 0 0 0 0 0 0

* PO – Property Only

* 'Property and adjoining properties' database search radii are set at 0.25 miles.

Executive Summary: Site Report Summary - Project Property

<i>Map Key</i>	<i>DB</i>	<i>Company/Site Name</i>	<i>Address</i>	<i>Direction</i>	<i>Distance (mi/ft)</i>	<i>Elev Diff (ft)</i>	<i>Page Number</i>
--------------------	-----------	--------------------------	----------------	------------------	-----------------------------	---------------------------	------------------------

No records found in the selected databases for the project property.

Executive Summary: Site Report Summary - Surrounding Properties

<i>Map Key</i>	<i>DB</i>	<i>Company/Site Name</i>	<i>Address</i>	<i>Direction</i>	<i>Distance (mi/ft)</i>	<i>Elev Diff (ft)</i>	<i>Page Number</i>
--------------------	-----------	--------------------------	----------------	------------------	-----------------------------	---------------------------	------------------------

No records found in the selected databases for the surrounding properties.

Executive Summary: Summary by Data Source

No records found in the selected databases for the project property or surrounding properties.

64°36'W

64°35'30"W

64°35'W

64°34'30"W

17°46'N

17°45'30"N

17°45'N

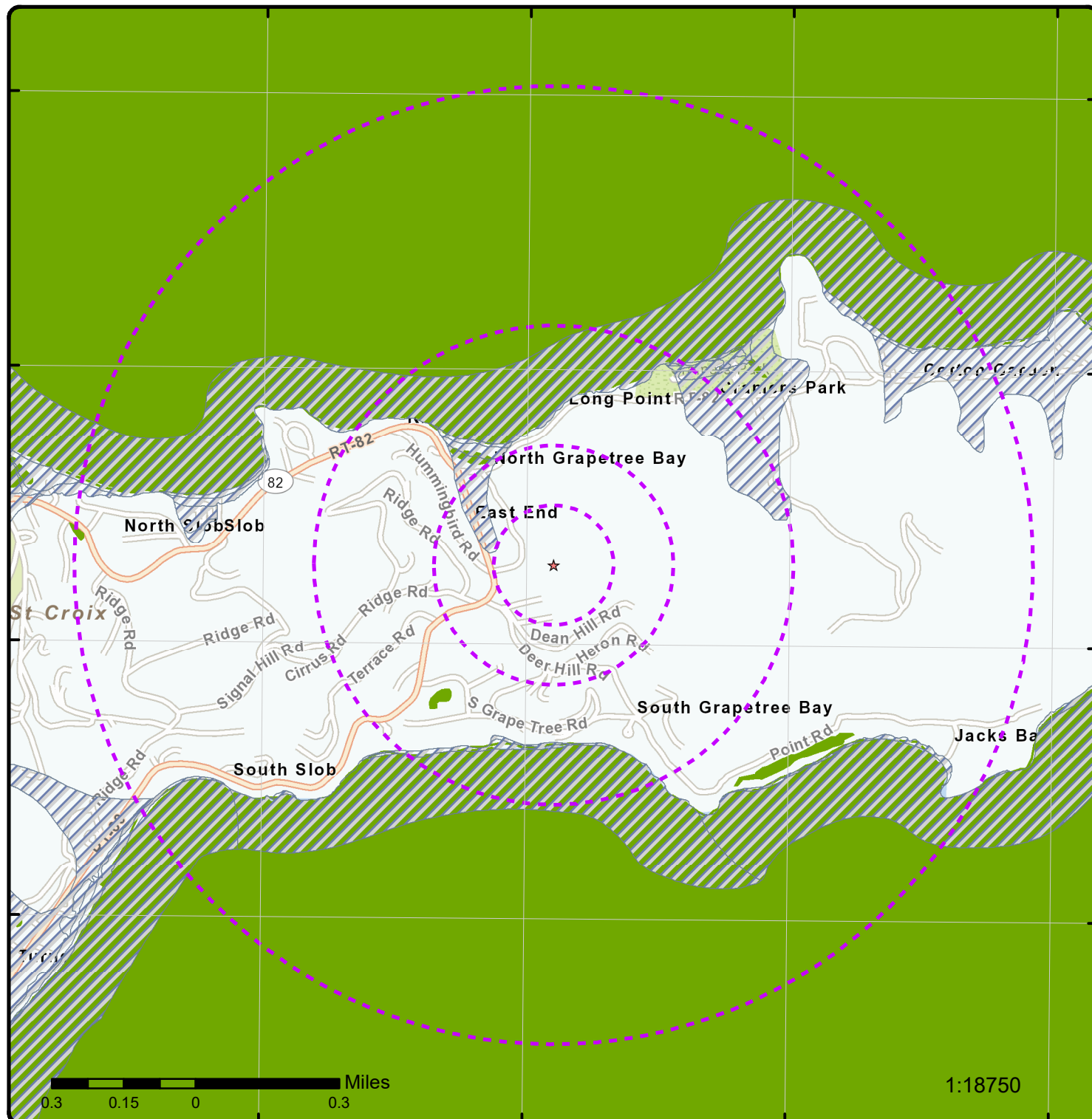
17°44'30"N

17°46'N

17°45'30"N

17°45'N

17°44'30"N



Map: 1.0 Mile Radius

Order Number: 24052200607

Address: Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, VI



★ Project Property

--- Buffer Outline

▲ Sites with Higher Elevation

■ Sites with Same Elevation

▼ Sites with Lower Elevation

○ Sites with Unknown Elevation

□ Areas with Higher Elevation

□ Areas with Same Elevation

□ Areas with Lower Elevation

□ Areas with Unknown Elevation

Freeways; Highways

Traffic Circle; Ramp

Major & Minor Arterial

Traffic Circle; Ramp

Local Road

Rail

State

Country

National Wetland

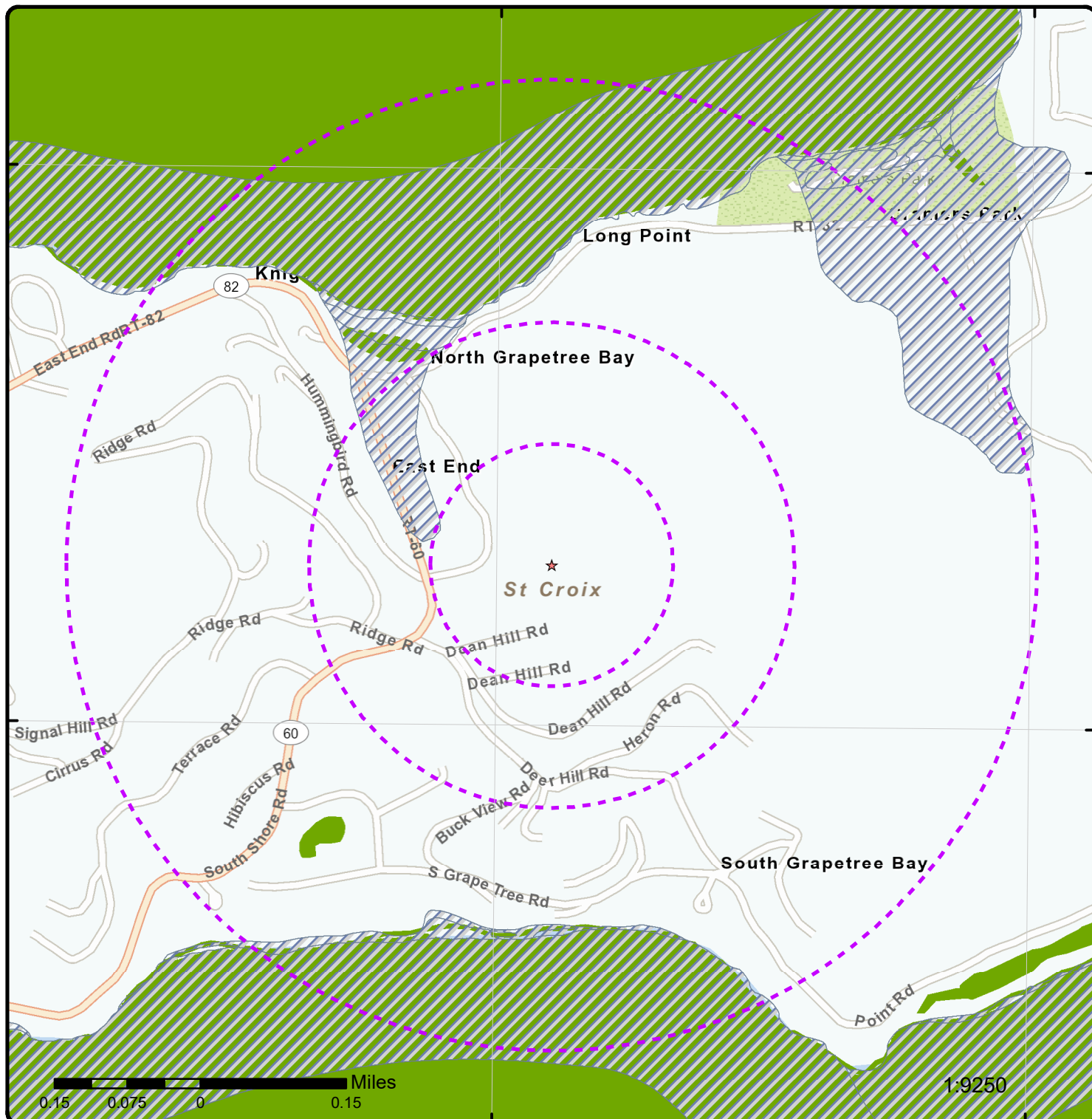
Indian Reserve Land

100 Year Flood Zone

500 Year Flood Zone

FWS Special Designation Areas

National Priorities List (Active, Delisted, Proposed, Institutional Control)



Map: 0.5 Mile Radius

Order Number: 24052200607

Address: Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, VI



★ Project Property

--- Buffer Outline

▲ Sites with Higher Elevation

■ Sites with Same Elevation

▼ Sites with Lower Elevation

○ Sites with Unknown Elevation

□ Areas with Higher Elevation

□ Areas with Same Elevation

□ Areas with Lower Elevation

□ Areas with Unknown Elevation

Freeways; Highways

Traffic Circle; Ramp

Major & Minor Arterial

Traffic Circle; Ramp

Local Road

Rail

State

Country

National Wetland

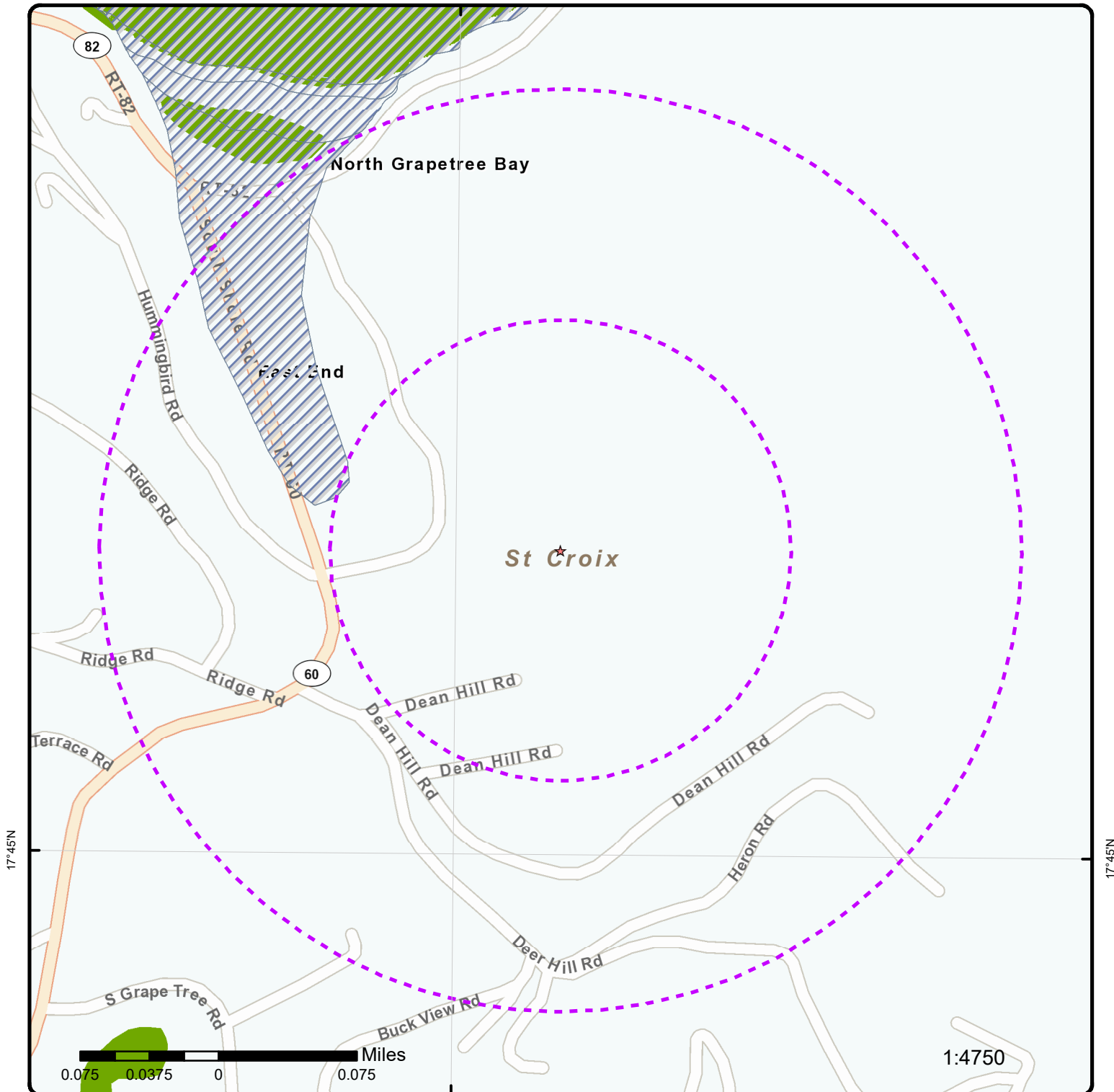
Indian Reserve Land

100 Year Flood Zone

500 Year Flood Zone

FWS Special Designation Areas

National Priorities List (Active, Delisted, Proposed, Institutional Control)



Map: 0.25 Mile Radius

Order Number: 24052200607

Address: Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, VI



★ Project Property

--- Buffer Outline

- ▲ Sites with Higher Elevation
- Sites with Same Elevation
- ▼ Sites with Lower Elevation
- Sites with Unknown Elevation
- Areas with Higher Elevation
- Areas with Same Elevation
- Areas with Lower Elevation
- Areas with Unknown Elevation

- Freeways; Highways
- Traffic Circle; Ramp
- Major & Minor Arterial
- Traffic Circle; Ramp
- Local Road
- Rail

- State
- Country
- National Wetland
- Indian Reserve Land
- 100 Year Flood Zone
- 500 Year Flood Zone

- FWS Special Designation Areas
- National Priorities List (Active, Delisted, Proposed, Institutional Control)

64°36'W

64°35'30"W

64°35'W

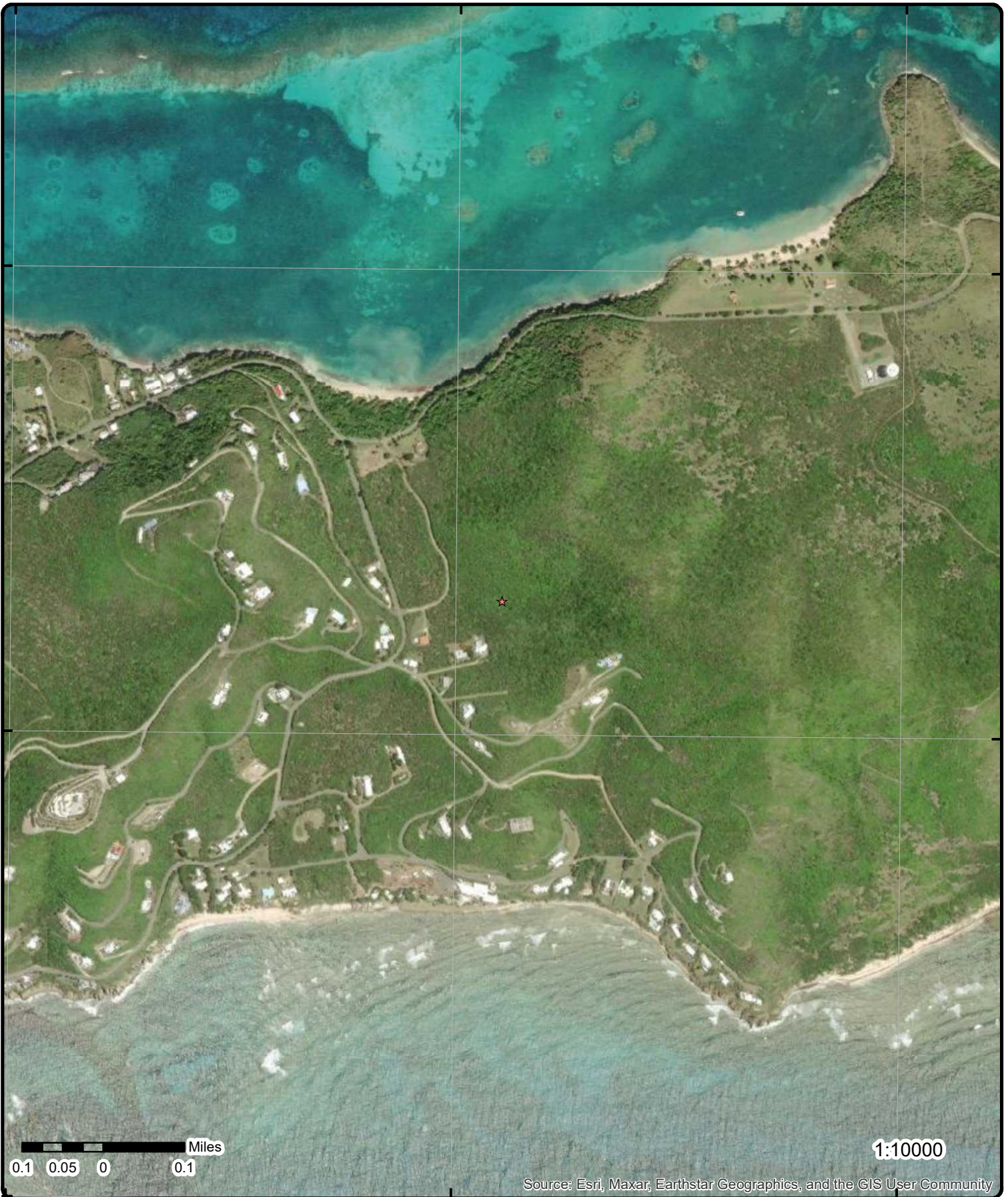
17°45'30"N

17°45'30"N

17°45'N

17°45'N

17°44'30"N



Aerial Year: 2019

Order Number: 24052200607

Address: Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, VI



© ERIS Information Inc.

Source: ESRI World Imagery

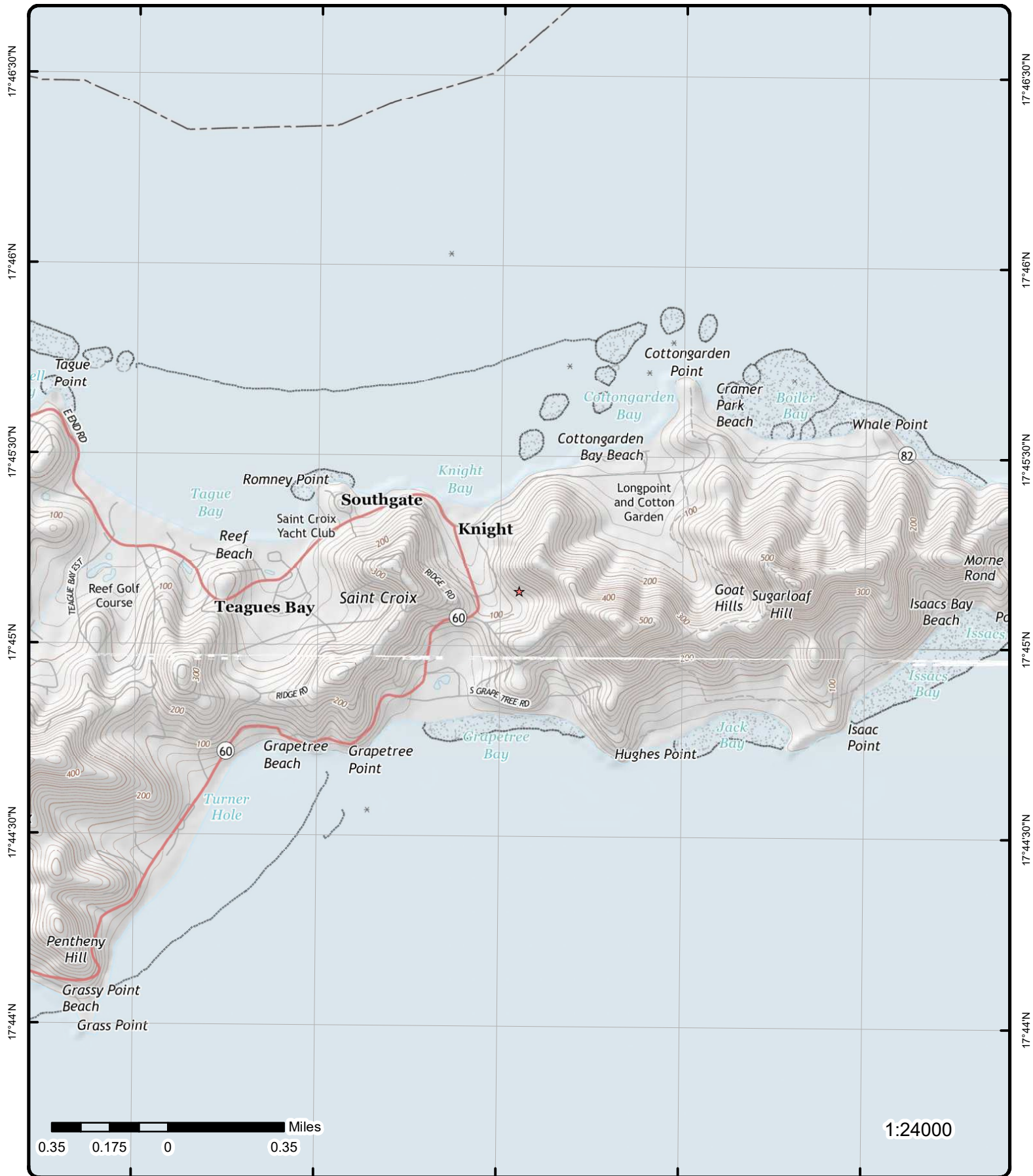
64°36'30"W

64°36'W

64°35'30"W

64°35'W

64°34'30"W



Topographic Map

Year: 2013

Order Number: 24052200607

Address: Plot 3 Estate Long Point & Cotton Garden, VI

Quadrangle(s): Grass Point VI, Buck Island VI

Source: USGS Topographic Map



© ERIS Information Inc.

Detail Report

<i>Map Key</i>	<i>Number of Records</i>	<i>Direction</i>	<i>Distance (mi/ft)</i>	<i>Elev/Diff (ft)</i>	<i>Site</i>	<i>DB</i>
----------------	------------------------------	------------------	-----------------------------	---------------------------	-------------	-----------

No records found in the selected databases for the project property or surrounding properties.

Unplottable Summary

Total: 1 Unplottable sites

DB	Company Name/Site Name	Address	City	Zip	ERIS ID
ERNS		RTE. 82	ST. CROIX VI	20820	895837874
		NRC Report No: 1322636			

Unplottable Report

Site:

RTE. 82 ST. CROIX VI 20820

ERNS

NRC Report No:	1322636	Latitude Degrees:	
Type of Incident:	VESSEL	Latitude Minutes:	
Incident Cause:	VESSEL SINKING	Latitude Seconds:	
Incident Date:	11/21/2021 13:30	Longitude Degrees:	
Incident Location:	NORTH OF THE EATERNMOST POINT	Longitude Minutes:	
Incident Dtg:	DISCOVERED	Longitude Seconds:	
Distance from City:		Lat Quad:	
Distance Units:		Long Quad:	
Direction from City:		Location Section:	
Location County:	ST. CROIX	Location Township:	
Potential Flag:	Yes	Location Range:	
Year:	Year 2021 Reports		
Description of Incident:	///THIS IS A POTENTIAL RELEASE REPORT///		

THE CALLER IS REPORTING A VESSEL THAT RAN AGROUND AT POINT UDALL IN BOILER BAY.

Material Spill Information

Chris Code:	OUN	Unit of Measure:	UNKNOWN AMOUNT
CAS No:	000000-00-0	If Reached Water:	YES
UN No:		Amount in Water:	0
Name of Material:	UNKNOWN OIL	Unit Reach Water:	UNKNOWN AMOUNT
Amount of Material:	0		

Calls Information

Date Time Received:	11/21/2021 3:54:00 PM	Responsible City:	
Date Time Complete:	11/21/2021 4:11:00 PM	Responsible State:	XX
Call Type:	INC	Responsible Zip:	
Resp Company:		Source:	TELEPHONE
Resp Org Type:	UNKNOWN		

Incident Information

Tank ID:		Building ID:	
Tank Regulated:	U	Location Area ID:	
Tank Regulated By:		Location Block ID:	
Capacity of Tank:		OCSG No:	
Capacity Tank Units:		OCSF No:	
Description of Tank:		State Lease No:	
Actual Amount:		Pier Dock No:	
Actual Amount Units:		Berth Slip No:	
Tank Above Ground:	ABOVE	Brake Failure:	U
NPDES:		Airbag Deployed:	U
NPDES Compliance:	U	Transport Contain:	U
Init Contin Rel No:		Location Subdiv:	
Contin Rel Permit:		Platform Rig Name:	
Contin Release Type:		Platform Letter:	
Aircraft ID:		Allision:	U
Aircraft Runway No:		Type of Structure:	
Aircraft Spot No:		Structure Name:	
Aircraft Type:		Structure Oper:	U
Aircraft Model:		Transit Bus Flag:	
Aircraft Fuel Cap:		Date Time Norm Serv:	
Aircraft Fuel Cap U:		Serv Disrupt Time:	
Aircraft Fuel on Brd:		Serv Disrupt Units:	

Aircraft Fuel OB U:
Aircraft Hanger:
Road Mile Marker:
Power Gen Facility: U
Generating Capacity:
Type of Fixed Obj:
Type of Fuel:
DOT Crossing No:
DOT Regulated: U
Pipeline Type:
Pipeline Abv Ground: ABOVE
Pipeline Covered: U
Exposed Underwater: N
Railroad Hotline:
Railroad Milepost:
Grade Crossing: U
Crossing Device Ty:
Ty Vehicle Involved:
Device Operational: U

CR Begin Date:
CR End Date:
CR Change Date:
FBI Contact:
FBI Contact Dt Tm:
Passenger Handling:
Passenger Route: XXX
Passenger Delay: XXX
Sub Part C Test Req: XXX
Conductor Test:
Engineer Test:
Trainman Test:
Yard Foreman Test:
RCL Operator Test:
Brakeman Test:
Train Dispat Test:
Signalman Test:
Oth Employee Test:
Unknown Test:

Incident Details Information

Release Secured: U
Release Rate:
Release Rate Unit:
Release Rate Rate:
Est Duration of Rel:
Desc Remedial Act: NONE
Fire Involved: N
Fire Extinguished: U
Any Evacuations: N
No Evacuated:
Who Evacuated:
Radius of Evac:
Any Injuries: N
No. Injured:
No. Hospitalized:
No. Fatalities:
Any Fatalities: N
Any Damages: N
Damage Amount:
Air Corridor Closed: N
Air Corridor Desc:
Air Closure Time:
Waterway Closed: N
Waterway Desc:
Waterway Close Time:
Road Closed: N
Road Desc:
Road Closure Time:
Road Closure Units:
Closure Direction:
Major Artery: No
Track Closed: N
Track Desc:
Track Closure Time:
Track Closure Units:
Track Close Dir:
Media Interest: NONE
Medium Desc: WATER
Addl Medium Info: BOILER BAY

State Agen Report No:
State Agen on Scene:
State Agen Notified:
Fed Agency Notified: USCG
Oth Agency Notified:
Body of Water: BOILER BAY
Tributary of: ATLANTIC OCEAN
Near River Mile Make:
Near River Mile Mark:
Offshore: No
Weather Conditions: PARTLY CLOUDY
Air Temperature:
Wind Direction:
Wind Speed:
Wind Speed Unit:
Water Supp Contam: U
Water Temperature:
Wave Condition:
Current Speed:
Current Direction:
Current Speed Unit:
EMPL Fatality:
Pass Fatality:
Community Impact:
Passengers Transfer: NO
Passenger Injuries:
Employee Injuries:
Occupant Fatality:
Sheen Size:
Sheen Size Units:
Sheen Size Length:
Sheen Size Length U:
Sheen Size Width:
Sheen Size Width U:
Sheen Color:
Dir of Sheen Travel:
Sheen Odor Desc:
Duration Unit:
Additional Info: ///THIS IS A POTENTIAL RELEASE REPORT///

Appendix: Database Descriptions

Environmental Risk Information Services (ERIS) can search the following databases. The extent of historical information varies with each database and current information is determined by what is publicly available to ERIS at the time of update. ERIS updates databases as set out in ASTM Standard E1527-13 and E1527-21, Section 8.1.8 Sources of Standard Source Information:

"Government information from nongovernmental sources may be considered current if the source updates the information at least every 90 days, or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public."

Standard Environmental Record Sources

Federal

National Priority List:

NPL

Sites on the United States Environmental Protection Agency (EPA)'s National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial action under the Superfund program. The NPL, which EPA is required to update at least once a year, is based primarily on the score a site receives from EPA's Hazard Ranking System. A site must be on the NPL to receive money from the Superfund Trust Fund for remedial action. Sites are represented by boundaries where available in the EPA Superfund Site Boundaries maintained by the Shared Enterprise Geodata and Services (SEGS). Site boundaries represent the footprint of a whole site, the sum of all of the Operable Units and the current understanding of the full extent of contamination; for Federal Facility sites, the total site polygon may be the Facility boundary. Where there is no polygon boundary data available for a given site, the site is represented as a point.

Government Publication Date: Apr 22, 2024

National Priority List - Proposed:

PROPOSED NPL

Sites proposed by the United States Environmental Protection Agency (EPA), the state agency, or concerned citizens for addition to the National Priorities List (NPL) due to contamination by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. Sites are represented by boundaries where available in the EPA Superfund Site Boundaries maintained by the Shared Enterprise Geodata and Services (SEGS). Site boundaries represent the footprint of a whole site, the sum of all of the Operable Units and the current understanding of the full extent of contamination; for Federal Facility sites, the total site polygon may be the Facility boundary. Where there is no polygon boundary data available for a given site, the site is represented as a point.

Government Publication Date: Apr 22, 2024

Deleted NPL:

DELETED NPL

Sites deleted from the United States Environmental Protection Agency (EPA)'s National Priorities List. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate. Sites are represented by boundaries where available in the EPA Superfund Site Boundaries maintained by the Shared Enterprise Geodata and Services (SEGS). Site boundaries represent the footprint of a whole site, the sum of all of the Operable Units and the current understanding of the full extent of contamination; for Federal Facility sites, the total site polygon may be the Facility boundary. Where there is no polygon boundary data available for a given site, the site is represented as a point.

Government Publication Date: Apr 22, 2024

SEMS List 8R Active Site Inventory:

SEMS

The U.S. Environmental Protection Agency's (EPA) Superfund Program has deployed the Superfund Enterprise Management System (SEMS), which integrates multiple legacy systems into a comprehensive tracking and reporting tool. This inventory contains active sites evaluated by the Superfund program that are either proposed to be or are on the National Priorities List (NPL) as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The Active Site Inventory Report displays site and location information at active SEMS sites. An active site is one at which site assessment, removal, remedial, enforcement, cost recovery, or oversight activities are being planned or conducted. This data includes SEMS sites from the List 8R Active file as well as applicable sites from the EPA's Facility Registry Service map tool.

Government Publication Date: Mar 27, 2024

Inventory of Open Dumps, June 1985:

ODI

The Resource Conservation and Recovery Act (RCRA) provides for publication of an inventory of open dumps. The Act defines "open dumps" as facilities which do not comply with EPA's "Criteria for Classification of Solid Waste Disposal Facilities and Practices" (40 CFR 257).

Government Publication Date: Jun 1985

SEMS List 8R Archive Sites:

SEMS ARCHIVE

The U.S. Environmental Protection Agency's (EPA) Superfund Enterprise Management System (SEMS) Archived Site Inventory displays site and location information at sites archived from SEMS. An archived site is one at which EPA has determined that assessment has been completed and no further remedial action is planned under the Superfund program at this time. This data includes sites from the List 8R Archived site file.

Government Publication Date: Mar 27, 2024

Comprehensive Environmental Response, Compensation and Liability Information System - CERCLIS:

CERCLIS

Superfund is a program administered by the United States Environmental Protection Agency (EPA) to locate, investigate, and clean up the worst hazardous waste sites throughout the United States. CERCLIS is a database of potential and confirmed hazardous waste sites at which the EPA Superfund program has some involvement. It contains sites that are either proposed to be or are on the National Priorities List (NPL) as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The EPA administers the Superfund program in cooperation with individual states and tribal governments; this database is made available by the EPA.

Government Publication Date: Oct 25, 2013

EPA Report on the Status of Open Dumps on Indian Lands:

IODI

Public Law 103-399, The Indian Lands Open Dump Cleanup Act of 1994, enacted October 22, 1994, identified congressional concerns that solid waste open dump sites located on American Indian or Alaska Native (AI/AN) lands threaten the health and safety of residents of those lands and contiguous areas. The purpose of the Act is to identify the location of open dumps on Indian lands, assess the relative health and environment hazards posed by those sites, and provide financial and technical assistance to Indian tribal governments to close such dumps in compliance with Federal standards and regulations or standards promulgated by Indian Tribal governments or Alaska Native entities.

Government Publication Date: Dec 31, 1998

CERCLIS - No Further Remedial Action Planned:

CERCLIS NFRAP

An archived site is one at which EPA has determined that assessment has been completed and no further remedial action is planned under the Superfund program at this time. The Archive designation means that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL). This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Government Publication Date: Oct 25, 2013

CERCLIS Liens:

CERCLIS LIENS

A Federal Superfund lien exists at any property where EPA has incurred Superfund costs to address contamination ("Superfund site") and has provided notice of liability to the property owner. A Federal CERCLA ("Superfund") lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. This database is made available by the United States Environmental Protection Agency (EPA). This database was provided by the United States Environmental Protection Agency (EPA). Refer to SEMS LIEN as the current data source for Superfund Liens.

Government Publication Date: Jan 30, 2014

RCRA CORRACTS-Corrective Action:

RCRA CORRACTS

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. At these sites, the Corrective Action Program ensures that cleanups occur. EPA and state regulators work with facilities and communities to design remedies based on the contamination, geology, and anticipated use unique to each site.

Government Publication Date: Jan 1, 2024

RCRA non-CORRACTS TSD Facilities:

RCRA TSD

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. This database includes Non-Corrective Action sites that have indicated engagement in the treatment, storage, or disposal of hazardous waste which requires a RCRA hazardous waste permit.

Government Publication Date: Jan 1, 2024

RCRA Generator List:[RCRA LQG](#)

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRA Info replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS) and the Biennial Reporting System (BRS). A hazardous waste generator is any person or site whose processes and actions create hazardous waste (see 40 CFR 260.10). Large Quantity Generators (LQGs) generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month of acutely hazardous waste.

Government Publication Date: Jan 1, 2024

RCRA Small Quantity Generators List:[RCRA SQG](#)

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRA Info replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS) and the Biennial Reporting System (BRS). A hazardous waste generator is any person or site whose processes and actions create hazardous waste (see 40 CFR 260.10). Small Quantity Generators (SQGs) generate more than 100 kilograms, but less than 1,000 kilograms, of hazardous waste per month.

Government Publication Date: Jan 1, 2024

RCRA Very Small Quantity Generators List:[RCRA VSQG](#)

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. A hazardous waste generator is any person or site whose processes and actions create hazardous waste (see 40 CFR 260.10). Very Small Quantity Generators (VSQG) generate 100 kilograms or less per month of hazardous waste, or one kilogram or less per month of acutely hazardous waste. Additionally, VSQG may not accumulate more than 1,000 kilograms of hazardous waste at any time.

Government Publication Date: Jan 1, 2024

RCRA Non-Generators:[RCRA NON GEN](#)

RCRA Info is the U.S. Environmental Protection Agency's (EPA) comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRA Info replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS) and the Biennial Reporting System (BRS). A hazardous waste generator is any person or site whose processes and actions create hazardous waste (see 40 CFR 260.10). Non-Generators do not presently generate hazardous waste.

Government Publication Date: Jan 1, 2024

RCRA Sites with Controls:[RCRA CONTROLS](#)

List of Resource Conservation and Recovery Act (RCRA) facilities with institutional controls in place. RCRA gives the U.S. Environmental Protection Agency (EPA) the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Government Publication Date: Jan 1, 2024

Federal Engineering Controls-ECs:[FED ENG](#)

List of Engineering controls (ECs) made available by the United States Environmental Protection Agency (EPA). ECs encompass a variety of engineered and constructed physical barriers (e.g., soil capping, sub-surface venting systems, mitigation barriers, fences) to contain and/or prevent exposure to contamination on a property. The EC listing includes remedy component data from Superfund decision documents for applicable sites on the final or deleted on the National Priorities List (NPL); and sites with a Superfund Alternative Approach (SAA) Agreement in place. The only sites included that are not on the NPL; proposed for NPL; or removed from proposed NPL, are those with an SAA Agreement in place.

Government Publication Date: Feb 29, 2024

Federal Institutional Controls- ICs:[FED INST](#)

List of Institutional controls (ICs) made available by the United States Environmental Protection Agency (EPA). ICs are non-engineered instruments, such as administrative and legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of the remedy. Although it is EPA's expectation that treatment or engineering controls will be used to address principal threat wastes and that groundwater will be returned to its beneficial use whenever practicable, ICs play an important role in site remedies because they reduce exposure to contamination by limiting land or resource use and guide human behavior at a site. The IC listing includes remedy component data from Superfund decision documents for applicable sites on the final or deleted on the National Priorities List (NPL); and sites with a Superfund Alternative Approach (SAA) Agreement in place. The only sites included that are not on the NPL; proposed for NPL; or removed from proposed NPL, are those with an SAA Agreement in place.

Government Publication Date: Feb 29, 2024

Land Use Control Information System:

LUCIS

The LUCIS database is maintained by the U.S. Department of the Navy and contains information for former Base Realignment and Closure (BRAC) properties across the United States.

Government Publication Date: Sep 1, 2006

Institutional Control Boundaries at NPL sites:

NPL IC

Boundaries of Institutional Control areas at sites on the United States Environmental Protection Agency (EPA)'s National Priorities List, or Proposed or Deleted, made available by the EPA's Shared Enterprise Geodata and Services (SEGS). United States Environmental Protection Agency (EPA)'s National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial action under the Superfund program. Institutional controls are non-engineered instruments such as administrative and legal controls that help minimize the potential for human exposure to contamination and/or protect the integrity of the remedy.

Government Publication Date: Apr 22, 2024

Emergency Response Notification System:

ERNS 1982 TO 1986

Database of oil and hazardous substances spill reports controlled by the National Response Center. The primary function of the National Response Center is to serve as the sole national point of contact for reporting oil, chemical, radiological, biological, and etiological discharges into the environment anywhere in the United States and its territories.

Government Publication Date: 1982-1986

Emergency Response Notification System:

ERNS 1987 TO 1989

Database of oil and hazardous substances spill reports controlled by the National Response Center. The primary function of the National Response Center is to serve as the sole national point of contact for reporting oil, chemical, radiological, biological, and etiological discharges into the environment anywhere in the United States and its territories.

Government Publication Date: 1987-1989

Emergency Response Notification System:

ERNS

Database of oil and hazardous substances spill reports made available by the United States Coast Guard National Response Center (NRC). The NRC fields initial reports for pollution and railroad incidents and forwards that information to appropriate federal/state agencies for response. These data contain initial incident data that has not been validated or investigated by a federal/state response agency.

Government Publication Date: Feb 20, 2024

The Assessment, Cleanup and Redevelopment Exchange System (ACRES) Brownfield Database:

FED BROWNFIELDS

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and takes development pressures off greenspaces and working lands. This data is provided by the United States Environmental Protection Agency (EPA) and includes Brownfield sites from the Cleanups in My Community (CIMC) web application.

Government Publication Date: Feb 7, 2024

FEMA Underground Storage Tank Listing:

FEMA UST

The Federal Emergency Management Agency (FEMA) of the Department of Homeland Security maintains a list of FEMA owned underground storage tanks.

Government Publication Date: Dec 31, 2017

Facility Response Plan:

FRP

This listing contains facilities that have submitted Facility Response Plans (FRPs) to the U.S. Environmental Protection Agency (EPA). Facilities that could reasonably be expected to cause "substantial harm" to the environment by discharging oil into or on navigable waters are required to prepare and submit FRPs. Harm is determined based on total oil storage capacity, secondary containment and age of tanks, oil transfer activities, history of discharges, proximity to a public drinking water intake or sensitive environments. This listing includes FRP facilities from an applicable EPA FOIA file and Homeland Infrastructure Foundation-Level Data (HIFLD) data file.

Government Publication Date: May 2, 2023

Delisted Facility Response Plans:

DELISTED FRP

Facilities that once appeared in - and have since been removed from - the list of facilities that have submitted Facility Response Plans (FRP) to EPA. Facilities that could reasonably be expected to cause "substantial harm" to the environment by discharging oil into or on navigable waters are required to prepare and submit Facility Response Plans (FRPs). Harm is determined based on total oil storage capacity, secondary containment and age of tanks, oil transfer activities, history of discharges, proximity to a public drinking water intake or sensitive environments.

Government Publication Date: May 2, 2023

Historical Gas Stations:**HIST GAS STATIONS**

This historic directory of service stations is provided by the Cities Service Company. The directory includes Cities Service filling stations that were located throughout the United States in 1930.

Government Publication Date: Jul 1, 1930

Petroleum Refineries:**REFN**

List of petroleum refineries from the U.S. Energy Information Administration (EIA) Refinery Capacity Report. Includes operating and idle petroleum refineries (including new refineries under construction) and refineries shut down during the previous year located in the 50 States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, and other U.S. possessions. Survey locations adjusted using public data.

Government Publication Date: Feb 28, 2024

Petroleum Product and Crude Oil Rail Terminals:**BULK TERMINAL**

A list of petroleum product and crude oil rail terminals from the U.S. Energy Information Administration (EIA), as well as petroleum terminals sourced from the Federal Communications Commission Data hosted by the Homeland Infrastructure Foundation-Level Database. Data includes operable bulk petroleum product terminals with a total bulk shell storage capacity of 50,000 barrels or more, and/or the ability to receive volumes from tanker, barge, or pipeline; also rail terminals handling the loading and unloading of crude oil with activity between 2017 and 2018. EIA petroleum product terminal data comes from the EIA-815 Bulk Terminal and Blender Report, which includes working, shell in operation, and shell idle for several major product groupings.

Government Publication Date: Sep 22, 2023

LIEN on Property:**SEMS LIEN**

The U.S. Environmental Protection Agency's (EPA) Superfund Enterprise Management System (SEMS) provides Lien details on applicable properties, such as the Superfund lien on property activity, the lien property information, and the parties associated with the lien.

Government Publication Date: Mar 27, 2024

Superfund Decision Documents:**SUPERFUND ROD**

This database contains a list of decision documents for Superfund sites. Decision documents serve to provide the reasoning for the choice of (or) changes to a Superfund Site cleanup plan. The decision documents include completed Records of Decision (ROD), ROD Amendments, Explanations of Significant Differences (ESD) for active and archived sites stored in the Superfund Enterprise Management System (SEMS), along with other associated memos and files. This information is maintained and made available by the U.S. Environmental Protection Agency.

Government Publication Date: Mar 27, 2024

Formerly Utilized Sites Remedial Action Program:**DOE FUSRAP**

The U.S. Department of Energy (DOE) established the Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974 to remediate sites where radioactive contamination remained from the Manhattan Project and early U.S. Atomic Energy Commission (AEC) operations. The DOE Office of Legacy Management (LM) established long-term surveillance and maintenance (LTS&M) requirements for remediated FUSRAP sites. DOE evaluates the final site conditions of a remediated site on the basis of risk for different future uses. DOE then confirms that LTS&M requirements will maintain protectiveness.

Government Publication Date: Mar 4, 2017

State**Leaking Underground Storage Tanks (LUST) in Virgin Islands:****LUST**

A list of leaking underground storage tanks (LUST) in Virgin Islands that is maintained by the Department of Planning and Natural Resources. The Underground Storage Tank Program aims to protect groundwater resources by regulating underground storage tank systems pursuant to the Virgin Islands Underground Storage Tank Act (USTA) which was enacted in May 2000.

Government Publication Date: Aug 17, 2017

Underground Storage Tanks in Virgin Islands:**UST VIRGIN ISLANDS**

A list of underground storage tanks (UST) in Virgin Islands that is maintained by the Department of Planning and Natural Resources. The Underground Storage Tank Program aims to protect groundwater resources by regulating underground storage tank systems pursuant to the Virgin Islands Underground Storage Tank Act (USTA) which was enacted in May 2000.

Government Publication Date: Jan 8, 2021

Delisted Tanks:**DELISTED TANKS**

Tank facilities that once appeared on - and have since been removed from - the list of underground storage tanks (UST) made available by the Department of Planning and Natural Resources in Virgin Islands. The Underground Storage Tank Program aims to protect groundwater resources by regulating underground storage tank systems pursuant to the Virgin Islands Underground Storage Tank Act (USTA) which was enacted in May 2000.

Brownfields:

BROWNFIELDS

A list of brownfield sites made available by the Virgin Islands Department of Planning and Natural Resources (DPNR).

Government Publication Date: Jun 28, 2019

Tribal

No Tribal standard environmental record sources available for this State.

County

No County standard environmental record sources available for this State.

Additional Environmental Record Sources

Federal

PFAS Greenhouse Gas Emissions Data:

PFAS GHG

The U.S. Environmental Protection Agency's Greenhouse Gas Reporting Program (GHGRP) collects Greenhouse Gas (GHG) data from large emitting facilities (25,000 metric tons of carbon dioxide equivalent (CO₂e) per year), and suppliers of fossil fuels and industrial gases that results in GHG emissions when used. Includes GHG emissions data for facilities that emit or have emitted since 2010 chemicals identified in EPA's CompTox Chemicals Dashboard list of PFAS without explicit structures and list of PFAS structures by DSSTox. PFAS emissions data has been identified for facilities engaged in the following industrial processes: Aluminum Production (GHGRP Subpart F), HCFC-22 Production and HFC-23 Destruction (Subpart O), Electronics Manufacturing (Subpart I), Fluorinated Gas Production (Subpart L), Magnesium Production (Subpart T), Electrical Transmission and Distribution Equipment Use (Subpart DD), and Manufacture of Electric Transmission and Distribution Equipment (Subpart SS). Over time, other industrial processes with required GHGRP reporting may include PFAS emissions data and the list of reportable gases may change over time.

Government Publication Date: May 9, 2024

On-Scene Coordinator Response Sites:

OSC RESPONSE

This list of On-Scene Coordinator (OSC) Response Sites is provided by the U.S. Environmental Protection Agency (EPA). OSCs are the federal officials responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs coordinate all federal efforts with, and provide support and information to local, state, and regional response communities. An OSC is an agent of either EPA or the U.S. Coast Guard (USCG), depending on where the incident occurs. EPA's OSCs have primary responsibility for spills and releases to inland areas and waters. USCG OSCs have responsibility for coastal waters and the Great Lakes. In general, an OSC has the following key responsibilities during and after a response: Assessment, Monitoring, Response Assistance, and Evaluation.

Government Publication Date: Apr 4, 2024

Facility Registry Service/Facility Index:

FINDS/FRS

The Facility Registry Service (FRS) is a centrally managed database that identifies facilities, sites, or places subject to environmental regulations or of environmental interest. FRS creates high-quality, accurate, and authoritative facility identification records through rigorous verification and management procedures that incorporate information from program national systems, state master facility records, and data collected from EPA's Central Data Exchange registrations and data management personnel. This list is made available by the U.S. Environmental Protection Agency (EPA).

Government Publication Date: Feb 9, 2024

Toxics Release Inventory (TRI) Program:

TRIS

The U.S. Environmental Protection Agency's Toxics Release Inventory (TRI) is a database containing data on disposal or other releases of toxic chemicals from U.S. facilities and information about how facilities manage those chemicals through recycling, energy recovery, and treatment. There are currently 770 individually listed chemicals and 33 chemical categories covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual reporting forms for each chemical. Note that the TRI chemical list does not include all toxic chemicals used in the U.S. One of TRI's primary purposes is to inform communities about toxic chemical releases to the environment. This database includes TRI Reporting Data for calendar years 1987 through 2021 and Preliminary Data for 2022.

Government Publication Date: Sep 20, 2023

PFOA/PFOS Contaminated Sites:

PFAS NPL

This list of Superfund Sites with Per- and Polyfluoroalkyl Substances (PFAS) detections is made available by the U.S. Environmental Protection Agency (EPA) in their PFAS Analytic Tools data, previously the list was obtained by EPA FOIA requests. EPA's Office of Land and Emergency Management and EPA Regional Offices maintain what is known about site investigations, contamination, and remedial actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) where PFAS is present in the environment. Limitations: Detections of PFAS at National Priorities List (NPL) sites do not mean that people are at risk from PFAS, are exposed to PFAS, or that the site is the source of the PFAS. The information in the Superfund NPL and Superfund Alternative Agreement (SAA) PFAS detection site list is years old and may not be accurate today. Site information such as site name, site ID, and location has been confirmed for accuracy; however, PFAS-related information such as media sampled, drinking water being above the health advisory, or mitigation efforts has not been verified. For Federal Facilities data, the other Federal agencies (OFA) are the lead agency for their data and provided them to EPA.

Government Publication Date: Mar 19, 2024

Federal Agency Locations with Known or Suspected PFAS Detections:

PFAS FED SITES

List of Federal agency locations with known or suspected detections of Per- and Polyfluoroalkyl Substances (PFAS), made available by the U.S. Environmental Protection Agency (EPA) in their PFAS Analytic Tools data. EPA outlines that these data are gathered from several federal entities, such as the Federal Superfund program, Department of Defense (DOD), National Aeronautics and Space Administration, Department of Transportation, and Department of Energy. The dates this data was extracted for the PFAS Analytic Tools range from March 2022 to September 2023. Sites on this list do not necessarily reflect the source/s of PFAS contamination and detections do not indicate level of risk or human exposure at the site. Agricultural notifications in this data are limited to DOD sites only. At this time, the EPA is aware that this list is not comprehensive of all Federal agencies.

Government Publication Date: Sep 5, 2023

SSEHRI PFAS Contamination Sites:

PFAS SSEHRI

This PFAS Contamination Site Tracker database is compiled by the Social Science Environmental Health Research Institute (SSEHRI) at Northeastern University. According to the SSEHRI, the database records qualitative and quantitative data from each known site of PFAS contamination, including timeline of discovery, sources, levels, health impacts, community response, and government response. The goal of this database is to compile information and support public understanding of the rapidly unfolding issue of PFAS contamination. All data presented was extracted from government websites, news articles, or publicly available documents, and this is cited in the tracker. Locations for the Known PFAS Contamination Sites are sourced from the PFAS Sites and Community Resources Map, credited to the Northeastern University's PFAS Project Lab, Silent Spring Institute, and the PFAS-REACH team. Disclaimer: The source conveys the data undergoes regular updates as new information becomes available, some sites may be missing and/or contain information that is incorrect or outdated, as well as their information represents all contamination sites SSEHRI is aware of, not all possible contamination sites. This data is not intended to be used for legal purposes. Access the following source link for the most current information: <https://pfasproject.com/pfas-sites-and-community-resources/>

Government Publication Date: May 19, 2023

National Response Center PFAS Spills:

ERNS PFAS

This Per- and Poly-Fluoroalkyl Substances (PFAS) Spills dataset is made available via the U.S. Environmental Protection Agency's (EPA) PFAS Analytic Tools. The National Response Center (NRC), operated by the U.S. Coast Guard, is the designated federal point of contact for reporting all oil, chemical, and other discharges into the environment, for the United States and its territories. This dataset contains NRC spill information from 1990 to the present that is restricted to records associated with PFAS and PFAS-containing materials. Incidents are filtered to include only records with a "Material Involved" or "Incident Description" related to Aqueous Film Forming Foam (AFFF). The keywords used to filter the data included "AFFF," "Fire Fighting Foam," "Aqueous Film Forming Foam," "Fire Suppressant Foam," "PFAS," "PERFL," "PFOA," "PFOS," and "Genx." Limitations: The data from the NRC website contains initial incident data that has not been validated or investigated by a federal/state response agency. Keyword searches may misidentify some incident reports that do not contain PFAS. This dataset should also not be considered to be exhaustive of all PFAS spills/release incidents.

Government Publication Date: Apr 17, 2024

PFAS NPDES Discharge Monitoring:

PFAS NPDES

This list of National Pollutant Discharge Elimination System (NPDES) permitted facilities with required monitoring for Per- and Polyfluoroalkyl (PFAS) Substances is made available via the U.S. Environmental Protection Agency (EPA)'s PFAS Analytic Tools. Any point-source wastewater discharger to waters of the United States must have a NPDES permit, which defines a set of parameters for pollutants and monitoring to ensure that the discharge does not degrade water quality or impair human health. This list includes NPDES permitted facilities associated with permits that monitor for Per- and Polyfluoroalkyl Substances (PFAS), limited to the years 2007 - present. EPA further advises the following regarding these data: currently, fewer than half of states have required PFAS monitoring for at least one of their permittees, and fewer states have established PFAS effluent limits for permittees. For states that may have required monitoring, some reporting and data transfer issues may exist on a state-by-state basis.

Government Publication Date: May 6, 2024

Perfluorinated Alkyl Substances (PFAS) from Toxic Release Inventory:

PFAS TRI

List of Toxics Release Inventory (TRI) facilities at which the reported chemical is a per- or polyfluoroalkyl (PFAS) substance included in the U.S. Environmental Protection Agency's (EPA) consolidated PFAS Master List of PFAS Substances. Encompasses Toxics Release Inventory records included in the EPA PFAS Analytic Tools. The EPA's TRI database currently tracks information on disposal or releases of 770 individually listed toxic chemicals and 33 chemical categories from thousands of U.S. facilities and details about how facilities manage those chemicals through recycling, energy recovery, and treatment. This listing includes TRI Reporting Data for calendar years 1987 through 2021 and Preliminary Data for 2022.

Perfluorinated Alkyl Substances (PFAS) Water Quality:

[PFAS WATER](#)

The Water Quality Portal (WQP) is a cooperative service sponsored by the United States Geological Survey (USGS), the Environmental Protection Agency (EPA), and the National Water Quality Monitoring Council (NWQMC). This listing includes records from the Water Quality Portal where the characteristic (environmental measurement) is in the Environmental Protection Agency (EPA)'s consolidated Master List of PFAS Substances.

Government Publication Date: Jul 20, 2020

PFAS TSCA Manufacture and Import Facilities:

[PFAS TSCA](#)

The U.S. Environmental Protection Agency (EPA) issued the Chemical Data Reporting (CDR) Rule under the Toxic Substances Control Act (TSCA) and requires chemical manufacturers and facilities that manufacture or import chemical substances to report data to EPA. This list is specific only to TSCA Manufacture and Import Facilities with reported per- and poly-fluoroalkyl (PFAS) substances. Data file is sourced from EPA's PFAS Analytic Tools TSCA dataset which includes CDR/Inventory Update Reporting data from 1998 up to 2020. Disclaimer: This data file includes production and importation data for chemicals identified in EPA's CompTox Chemicals Dashboard list of PFAS without explicit structures and list of PFAS structures in DSSTox. Note that some regulations have specific chemical structure requirements that define PFAS differently than the lists in EPA's CompTox Chemicals Dashboard. Reporting information on manufactured or imported chemical substance amounts should not be compared between facilities, as some companies claim Chemical Data Reporting Rule data fields for PFAS information as Confidential Business Information.

Government Publication Date: Jan 5, 2023

PFAS Waste Transfers from RCRA e-Manifest :

[PFAS E-MANIFEST](#)

This Per- and Poly-Fluoroalkyl Substances (PFAS) Waste Transfers dataset is made available via the U.S. Environmental Protection Agency's (EPA) PFAS Analytic Tools. Every shipment of hazardous waste in the U.S. must be accompanied by a shipment manifest, which is a critical component of the cradle-to-grave tracking of wastes mandated by the Resource Conservation and Recovery Act (RCRA). According to the EPA, currently no Federal Waste Code exists for any PFAS compounds. To work around the lack of PFAS waste codes in the RCRA database, EPA developed the PFAS Transfers dataset by mining e-Manifest records containing at least one of these common PFAS keywords: • PFAS • PFOA • PFOS • PERFL • AFFF • GENX • GEN-X (plus the Vermont state-specific waste codes). Limitations: Amount or concentration of PFAS being transferred cannot be determined from the manifest information. Keyword searches may misidentify some manifest records that do not contain PFAS. This dataset should also not be considered to be exhaustive of all PFAS waste transfers.

Government Publication Date: Apr 29, 2024

PFAS Industry Sectors:

[PFAS IND](#)

This Per- and Poly-Fluoroalkyl Substances (PFAS) Industry Sectors dataset is made available via the U.S. Environmental Protection Agency's (EPA) PFAS Analytic Tools. The EPA developed the dataset from various sources that show which industries may be handling PFAS including: EPA's Enforcement and Compliance History Online (ECHO) records restricted to potential PFAS-handling industry sectors; ECHO records for Fire Training Sites identified where fire-fighting foam may have been used in training exercises; and 14 CFR Part 139 Airports compiled from historic and current records from the FAA Airport Data and Information Portal. Since July 2006, all certificated Part 139 Airports are required to have fire-fighting foam onsite that meet certain military specifications, which to date have been fluorinated (Aqueous Film Forming Foam). Limitations: Inclusion in this dataset does not indicate that PFAS are being manufactured, processed, used, or released by the facility. Listed facilities potentially handle PFAS based on their industrial profile, but are unconfirmed by the EPA. Keyword searches in ECHO for Fire Training sites may misidentify some facilities and should not be considered to be an exhaustive list of fire training facilities in the U.S.

Government Publication Date: Apr 15, 2024

Hazardous Materials Information Reporting System:

[HMIRS](#)

The Hazardous Materials Incident Reporting System (HMIRS) database contains unintentional hazardous materials release information reported to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration.

Government Publication Date: Nov 26, 2023

National Clandestine Drug Labs:

[NCDL](#)

The U.S. Department of Justice ("the Department"), Drug Enforcement Administration (DEA), provides this data as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy.

Government Publication Date: Nov 30, 2023

Toxic Substances Control Act:

[TSCA](#)

The U.S. Environmental Protection Agency (EPA) is amending the Toxic Substances Control Act (TSCA) section 8(a) Inventory Update Reporting (IUR) rule and changing its name to the Chemical Data Reporting (CDR) rule. The CDR enables EPA to collect and publish information on the manufacturing, processing, and use of commercial chemical substances and mixtures (referred to hereafter as chemical substances) on the TSCA Chemical Substance Inventory (TSCA Inventory). This includes current information on chemical substance production volumes, manufacturing sites, and how the chemical substances are used. This information helps the Agency determine whether people or the environment are potentially exposed to reported chemical substances. EPA publishes submitted CDR data that is not Confidential Business Information (CBI). EPA CDR collections occur approximately every four years and reporting requirements change per collection.

Government Publication Date: May 12, 2022

Hist TSCA:

[HIST TSCA](#)

The Environmental Protection Agency (EPA) is amending the Toxic Substances Control Act (TSCA) section 8(a) Inventory Update Reporting (IUR) rule and changing its name to the Chemical Data Reporting (CDR) rule.

The 2006 IUR data summary report includes information about chemicals manufactured or imported in quantities of 25,000 pounds or more at a single site during calendar year 2005. In addition to the basic manufacturing information collected in previous reporting cycles, the 2006 cycle is the first time EPA collected information to characterize exposure during manufacturing, processing and use of organic chemicals. The 2006 cycle also is the first time manufacturers of inorganic chemicals were required to report basic manufacturing information.

Government Publication Date: Dec 31, 2006

FTTS Administrative Case Listing:

[FTTS ADMIN](#)

An administrative case listing from the Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA) and Toxic Substances Control Act (TSCA), together known as FTTS. This database was obtained from the Environmental Protection Agency's (EPA) National Compliance Database (NCDB). The FTTS and NCDB was shut down in 2006.

Government Publication Date: Jan 19, 2007

FTTS Inspection Case Listing:

[FTTS INSP](#)

An inspection case listing from the Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA) and Toxic Substances Control Act (TSCA), together known as FTTS. This database was obtained from the Environmental Protection Agency's (EPA) National Compliance Database (NCDB). The FTTS and NCDB was shut down in 2006.

Government Publication Date: Jan 19, 2007

Potentially Responsible Parties List:

[PRP](#)

Early in the site cleanup process, the U.S. Environmental Protection Agency (EPA) conducts a search to find the Potentially Responsible Parties (PRPs). The EPA looks for evidence to determine liability by matching wastes found at the site with parties that may have contributed wastes to the site. This listing contains PRPs, Noticed Parties, at sites in the EPA's Superfund Enterprise Management System (SEMS).

Government Publication Date: Apr 22, 2024

State Coalition for Remediation of Drycleaners Listing:

[SCRD DRYCLEANER](#)

The State Coalition for Remediation of Drycleaners (SCRD) was established in 1998, with support from the U.S. Environmental Protection Agency (EPA) Office of Superfund Remediation and Technology Innovation. Coalition members are states with mandated programs and funding for drycleaner site remediation. Current members are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin. Since 2017, the SCRD no longer maintains this data, refer to applicable state source data where available.

Government Publication Date: Nov 08, 2017

Integrated Compliance Information System (ICIS):

[ICIS](#)

The Integrated Compliance Information System (ICIS) database contains integrated enforcement and compliance information across most of U.S. Environmental Protection Agency's (EPA) programs. The vision for ICIS is to replace EPA's independent databases that contain enforcement data with a single repository for that information. Currently, ICIS contains all Federal Administrative and Judicial enforcement actions and a subset of the Permit Compliance System (PCS), which supports the National Pollutant Discharge Elimination System (NPDES). This information is maintained by the EPA Headquarters and at the Regional offices. A future release of ICIS will completely replace PCS and will integrate that information with Federal actions already in the system. ICIS also has the capability to track other activities that support compliance and enforcement programs, including incident tracking, compliance assistance, and compliance monitoring.

Government Publication Date: Aug 26, 2023

Drycleaner Facilities:

[FED DRYCLEANERS](#)

A list of drycleaner facilities from Enforcement and Compliance History Online (ECHO) data as made available by the U.S. Environmental Protection Agency (EPA), sourced from the ECHO Exporter file. The EPA tracks facilities that possess NAIC and SIC codes that classify businesses as drycleaner establishments.

Government Publication Date: Jan 20, 2024

Delisted Drycleaner Facilities:

DELISTED FED DRY

List of sites removed from the list of Drycleaner Facilities (sites in the EPA's Integrated Compliance Information System (ICIS) with NAIC or SIC codes identifying the business as a drycleaner establishment).

Government Publication Date: Jan 20, 2024

Formerly Used Defense Sites:

FUDS

Formerly Used Defense Sites (FUDS) are properties that were formerly owned by, leased to, or otherwise possessed by and under the jurisdiction of the Secretary of Defense prior to October 1986, where the Department of Defense (DOD) is responsible for an environmental restoration. The FUDS Annual Report to Congress (ARC) is published by the U.S. Army Corps of Engineers (USACE). This data is compiled from the USACE's Geospatial FUDS data layers and Homeland Infrastructure Foundation-Level Data (HIFLD) FUDS dataset which applies to the Fiscal Year 2021 FUDS Inventory.

Government Publication Date: May 15, 2023

FUDS Munitions Response Sites:

FUDS MRS

Boundaries of Munitions Response Sites (MRS), published with the Formerly Used Defense Sites (FUDS) Annual Report to Congress (ARC) by the U.S. Army Corps of Engineers (USACE). An MRS is a discrete location within a Munitions response area (MRA) that is known to require a munitions response. An MRA means any area on a defense site that is known or suspected to contain unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC). This data is compiled from the USACE's Geospatial MRS data layers and Homeland Infrastructure Foundation-Level Data (HIFLD) MRS dataset.

Government Publication Date: May 15, 2023

Former Military Nike Missile Sites:

FORMER NIKE

This information was taken from report DRXTH-AS-IA-83A016 (Historical Overview of the Nike Missile System, 12/1984) which was performed by Environmental Science and Engineering, Inc. for the U.S. Army Toxic and Hazardous Materials Agency Assessment Division. The Nike system was deployed between 1954 and the mid-1970's. Among the substances used or stored on Nike sites were liquid missile fuel (JP-4); starter fluids (UDKH, aniline, and furfuryl alcohol); oxidizer (IRFNA); hydrocarbons (motor oil, hydraulic fluid, diesel fuel, gasoline, heating oil); solvents (carbon tetrachloride, trichloroethylene, trichloroethane, stoddard solvent); and battery electrolyte. The quantities of material a disposed of and procedures for disposal are not documented in published reports. Virtually all information concerning the potential for contamination at Nike sites is confined to personnel who were assigned to Nike sites. During deactivation most hardware was shipped to depot-level supply points. There were reportedly instances where excess materials were disposed of on or near the site itself at closure. There was reportedly no routine site decontamination.

Government Publication Date: Dec 2, 1984

PHMSA Pipeline Safety Flagged Incidents:

PIPELINE INCIDENT

This list of flagged pipeline incidents is made available by the U.S. Department of Transportation (US DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA). PHMSA regulations require incident and accident reports for five different pipeline system types. Accidents reported on hazardous liquid gravity lines (§195.13) and reporting-regulated-only hazardous liquid gathering lines (§195.15) and incidents reported on Type R gas gathering (§192.8(c)) are not included in the flagged incident file data.

Government Publication Date: Nov 6, 2023

Material Licensing Tracking System (MLTS):

MLTS

A list of sites that store radioactive material subject to the Nuclear Regulatory Commission (NRC) licensing requirements. This list is maintained by the NRC. As of September 2016, the NRC no longer releases location information for sites. Site locations were last received in July 2016.

Government Publication Date: May 11, 2021

Historic Material Licensing Tracking System (MLTS) sites:

HIST MLTS

A historic list of sites that have inactive licenses and/or removed from the Material Licensing Tracking System (MLTS). In some cases, a site is removed from the MLTS when the state becomes an "Agreement State". An Agreement State is a State that has signed an agreement with the Nuclear Regulatory Commission (NRC) authorizing the State to regulate certain uses of radioactive materials within the State.

Government Publication Date: Jan 31, 2010

Mines Master Index File:

MINES

The Master Index File (MIF) is provided by the United States Department of Labor, Mine Safety and Health Administration (MSHA). This file, which was originally created in the 1970's, contained many Mine-IDs that were invalid. MSHA removes invalid IDs from the MIF upon discovery. MSHA applicable data includes the following: all Coal and Metal/Non-Metal mines under MSHA's jurisdiction since 1/1/1970; mine addresses for all mines in the database except for Abandoned mines prior to 1998 from MSHA's legacy system (addresses may or may not correspond with the physical location of the mine itself); violations that have been assessed penalties as a result of MSHA inspections beginning on 1/1/2000; and violations issued as a result of MSHA inspections conducted beginning on 1/1/2000.

Government Publication Date: Feb 5, 2024

Surface Mining Control and Reclamation Act Sites:[SMCRA](#)

An inventory of land and water impacted by past mining (primarily coal mining) is maintained by the Office of Surface Mining Reclamation and Enforcement (OSMRE) to provide information needed to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA). This inventory contains information on the type and extent of Abandoned Mine Land (AML) impacts, as well as information on the cost associated with the reclamation of those problems. The data is based upon field surveys by State, Tribal, and OSMRE program officials. It is dynamic to the extent that it is modified as new problems are identified and existing problems are reclaimed. Disclaimer: Per the OSMRE, States and tribes who enter their data into eAMLIS (AML Inventory System) may truncate their latitude and longitude so the precise location of usually dangerous AMLs is not revealed in an effort to protect the public from searching for these AMLs, most of which are on private property. If more precise location information is needed, please contact the applicable state/tribe of interest.

Government Publication Date: Jun 13, 2023

Mineral Resource Data System:[MRDS](#)

The Mineral Resource Data System (MRDS) is a collection of reports describing metallic and nonmetallic mineral resources throughout the world. Included are deposit name, location, commodity, deposit description, geologic characteristics, production, reserves, resources, and references. This database contains the records previously provided in the Mineral Resource Data System (MRDS) of USGS and the Mineral Availability System/Mineral Industry Locator System (MAS/MILS) originated in the U.S. Bureau of Mines, which is now part of USGS. The USGS has ceased systematic updates of the MRDS database with their focus more recently on deposits of critical minerals while providing a well-documented baseline of historical mine locations from USGS topographic maps.

Government Publication Date: Mar 15, 2016

DOE Legacy Management Sites:[LM SITES](#)

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) currently manages radioactive and chemical waste, environmental contamination, and hazardous material at over 100 sites across the U.S. The LM manages sites with diverse regulatory drivers (statutes or programs that direct cleanup and management requirements at DOE sites) or as part of internal DOE or congressionally-recognized programs, such as but not limited to: Formerly Utilized Sites Remedial Action Program (FUSRAP), Uranium Mill Tailings Radiation Control Act (UMTRCA Title I, Title II), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), Decontamination and Decommissioning (D&D), Nuclear Waste Policy Act (NWPA). This site listing includes data exported from the DOE Office of LM's Geospatial Environmental Mapping System (GEMS). GEMS Data disclaimer: The DOE Office of LM makes no representation or warranty, expressed or implied, regarding the use, accuracy, availability, or completeness of the data presented herein.

Government Publication Date: Dec 12, 2023

Alternative Fueling Stations:[ALT FUELS](#)

This list of alternative fueling stations is sourced from the Alternative Fuels Data Center (AFDC). The U.S. Department of Energy's Office of Energy Efficiency & Renewable Energy launched the AFDC in 1991 as a repository for alternative fuel vehicle performance data, which provides a wealth of information and data on alternative and renewable fuels, advanced vehicles, fuel-saving strategies, and emerging transportation technologies. The data includes Biodiesel (B20 and above), Compressed Natural Gas (CNG), Electric, Ethanol (E85), Hydrogen, Liquefied Natural Gas (LNG), Propane (LPG), and Renewable Diesel (R20 and above) fuel type locations.

Government Publication Date: Apr 30, 2024

Superfunds Consent Decrees:[CONSENT DECREES](#)

This list of Superfund consent decrees is provided by the Department of Justice, Environment & Natural Resources Division (ENRD) through a Freedom of Information Act (FOIA) applicable file. This listing includes Cases filed since 2010 limited to the following: Consent Decrees for CERCLA or Superfund Sites filed and/or as proposed within the ENRD's Case Management System (CMS); and applicable ENRD's Environmental Defense Section (EDS) CERCLA Cases with "Consent" in History Note. CMS may not reflect the latest developments in a case, nor can the agency guarantee the accuracy of the data. ENRD Disclaimer: Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA; response is limited to those records that are subject to the requirements of the FOIA; however, this should not be taken as an indication that excluded records do, or do not, exist.

Government Publication Date: Sep 15, 2023

Air Facility System:[AFS](#)

This EPA retired Air Facility System (AFS) dataset contains emissions, compliance, and enforcement data on stationary sources of air pollution. Regulated sources cover a wide spectrum; from large industrial facilities to relatively small operations such as dry cleaners. AFS does not contain data on facilities that are solely asbestos demolition and/or renovation contractors, or landfills. ECHO Clean Air Act data from AFS are frozen and reflect data as of October 17, 2014; the EPA retired this system for Clean Air Act stationary sources and transitioned to ICIS-Air.

Government Publication Date: Oct 17, 2014

Registered Pesticide Establishments:[SSTS](#)

This national list of active EPA-registered foreign and domestic pesticide and/or device-producing establishments is based on data from the Section Seven Tracking System (SSTS). The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 7 requires that each producing establishment must place its EPA establishment number on the label or immediate container of each pesticide, active ingredient or device produced. An EPA establishment number on a pesticide product label identifies the EPA registered location where the product was produced. The list of establishments is made available by the U.S. Environmental Protection Agency (EPA).

Government Publication Date: Feb 29, 2024

Polychlorinated Biphenyl (PCB) Transformers:

[PCBT](#)

Locations of Transformers Containing Polychlorinated Biphenyls (PCBs) registered with the United States Environmental Protection Agency. PCB transformer owners must register their transformer(s) with EPA. Although not required, PCB transformer owners who have removed and properly disposed of a registered PCB transformer may notify EPA to have their PCB transformer de-registered. Data made available by EPA.

Government Publication Date: Oct 15, 2019

Polychlorinated Biphenyl (PCB) Notifiers:

[PCB](#)

Facilities included in the national list of facilities that have notified the United States Environmental Protection Agency (EPA) of Polychlorinated Biphenyl (PCB) activities. Any company or person storing, transporting or disposing of PCBs or conducting PCB research and development must notify the EPA and receive an identification number.

Government Publication Date: Oct 30, 2023

State

No State additional environmental record sources available for this State.

Tribal

No Tribal additional environmental record sources available for this State.

County

No County additional environmental record sources available for this State.

Definitions

Database Descriptions: This section provides a detailed explanation for each database including: source, information available, time coverage, and acronyms used. They are listed in alphabetic order.

Detail Report: This is the section of the report which provides the most detail for each individual record. Records are summarized by location, starting with the project property followed by records in closest proximity.

Distance: The distance value is the distance between plotted points, not necessarily the distance between the sites' boundaries. All values are an approximation.

Direction: The direction value is the compass direction of the site in respect to the project property and/or center point of the report.

Elevation: The elevation value is taken from the location at which the records for the site address have been plotted. All values are an approximation. Source: Google Elevation API.

Executive Summary: This portion of the report is divided into 3 sections:

'Report Summary'- Displays a chart indicating how many records fall on the project property and, within the report search radii.

'Site Report Summary'-Project Property'- This section lists all the records which fall on the project property. For more details, see the 'Detail Report' section.

'Site Report Summary-Surrounding Properties'- This section summarizes all records on adjacent properties, listing them in order of proximity from the project property. For more details, see the 'Detail Report' section.

Map Key: The map key number is assigned according to closest proximity from the project property. Map Key numbers always start at #1. The project property will always have a map key of '1' if records are available. If there is a number in brackets beside the main number, this will indicate the number of records on that specific property. If there is no number in brackets, there is only one record for that property.

The symbol and colour used indicates 'elevation': the red inverted triangle will dictate 'ERIS Sites with Lower Elevation', the yellow triangle will dictate 'ERIS Sites with Higher Elevation' and the orange square will dictate 'ERIS Sites with Same Elevation.'

Unplottables: These are records that could not be mapped due to various reasons, including limited geographic information. These records may or may not be in your study area, and are included as reference.

Appendix **D**

Historical Information



HISTORICAL AERIALS

Project Property: USVI-00230 East End
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter VI 00820
Project No: BST_228
Requested By: Lotis Environmental
Order No: 23110300488
Date Completed: June 12,2024

Aerial Maps included in this report are produced by the sources listed above and are to be used for research purposes including a phase I report. Maps are not to be resold as commercial property. ERIS provides no warranty of accuracy or liability. The information contained in this report has been produced using aerial photos listed in above sources by ERIS Information Inc. (in the US) and ERIS Information Limited Partnership (in Canada), both doing business as 'ERIS'. The maps contained in this report do not purport to be and do not constitute a guarantee of the accuracy of the information contained herein. Although ERIS has endeavored to present information that is accurate, ERIS disclaims, any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence, negligence or otherwise, and for any consequences arising therefrom. Liability on the part of ERIS is limited to the monetary value paid for this report.

Environmental Risk Information Services

A division of Glacier Media Inc.

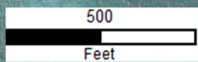
1.866.517.5204 | info@erisinfo.com | erisinfo.com

Date	Source	Scale	Comments
2019	Maxar Technologies	1" = 500'	
2007	United States Department of Agriculture	1" = 500'	
2004	United States Department of Agriculture	1" = 500'	
1999	National Oceanic And Atmospheric Admin	1" = 500'	
1977	National Oceanic And Atmospheric Admin	1" = 500'	
1971	National Oceanic And Atmospheric Admin	1" = 500'	
1954	United States Geological Survey	1" = 500'	

Environmental Risk Information Services

A division of Glacier Media Inc.

1.866.517.5204 | info@erisinfo.com | erisinfo.com



**Subject
Property**



Year: 2019
Source: MAXAR
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





**Subject
Property**

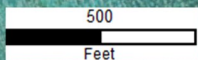


Year: 2007
Source: USDA
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





**Subject
Property**



Year: 2004
Source: USDA
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488



500
Feet

**Subject
Property**



Year: 1999
Source: NOAA
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





**Subject
Property**

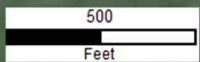


Year: 1977
Source: NOAA
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





**Subject
Property**

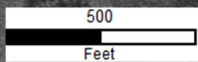


Year: 1971
Source: NOAA
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





**Subject
Property**



Year: 1954
Source: USGS
Scale: 1" = 500'
Comment:

Address: Plot 3 Estate Long Point & Cotton Garden,
Eastend B Quarter, VI
Approx Center: -64.590752,17.752397

Order No: 23110300488





FIRE INSURANCE MAPS

Project Property: USVI-00230■East End
Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter VI 00820

Project No: BST_228

Requested By: Lotis Environmental

Order No: 23110300488

Date Completed: May 28, 2024

Please note that no information was found for your site or adjacent properties.

Appendix **E**

Previous Study

A previous Phase I ESA was not provided to Lotis for review.

Appendix **F**

Client Provided Documents

None Provided

Appendix **G**

Personnel Qualifications



DAVID N. ROBINSON, P.E.

President/CEO, The Lotis Engineering Group, P.C.
President/CEO, Lotis Environmental, LLC

Professional Experience

The Lotis Engineering Group, P.C. – President/CEO
Lotis Environmental, LLC – President/CEO

8899 Main Street- Suite 107
Williamsville, New York 14221

(May 2007 – Present)

(June 2019 – Present)

Parsons Brinckerhoff – Project Manager

50 Lakefront Blvd # 111
Buffalo, New York 14202

(January 2000 – May 2007)

URS Corporation – Project Engineer

257 West Genesee Street, Suite 400
Buffalo, New York 14202

(July 1996 – July 2000)

Education

M.S., Environmental Engineering, University of Colorado at Boulder, 1995

B.S., Civil Engineering, State University of New York at Buffalo, 1994

A.A.S., Architectural Engineering, Alfred State College, 1990

Professional Affiliations

New York State Wireless Association

Professional Registrations

Professional Engineer, New York 2001 (079047)

Certifications

FEMA Public Assistance Program Operations I

OSHA 40 Hr. Hazardous Waste Site Worker Training

Nokia CMPPro Cost Control Training

Key Qualifications

David Robinson founded The Lotis Group and has served as CEO since its inception in 2007. Mr. Robinson is a New York State Professional Engineer and an ASTM-defined Environmental Professional. Over his 20 year professional career, Mr. Robinson has performed over 18,000 Phase I Environmental Site Assessments in all 50 states and Canada. As CEO of Lotis, Mr. Robinson directs the strategic direction of the company and has grown Lotis into a leader in the environmental due diligence industry.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

Telecommunications Experience

- Vertical Bridge Holdings, LLC, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites in all 50 states, the Caribbean and Canada.
- Blue Sky Towers, LLC, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites in the Northeast.
- InSite Towers, LLC, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites throughout the US and Caribbean.
- Mercury Towers, LLC, Nationwide, US (2014-2015): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites in the Northwest.
- IWG-TLA Telecom, LLC, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites throughout the US and Canada.
- Turriz Sites, Canada (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout Canada. Services include Phase I Environmental Site Assessments. David has been responsible for managing resources to complete these services on sites throughout Canada.
- Phoenix Towers International, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies. David has been responsible for managing resources to complete these services on sites throughout the US and Caribbean.
- SBA, Inc. Acquisition Services, Nationwide, US (2001-2011): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include property surveys, 2C surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on over 7,000 sites in all 50 states, the Caribbean and Canada.
- Global Tower Partners, Inc., Nationwide, US (2004-2013): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include property surveys, 2C surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on over 5,000 sites in all 50 states and the Caribbean.



- Tower Ventures, LLC, Nationwide, US (2011-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments. David has been responsible for managing resources to complete these services telecommunication sites throughout the US.
- AT&T NexGen, Nationwide, US (2004): Project Engineer for this 16,000-mile long-haul fiber-optic confidential construction project throughout the United States. David was responsible for preparing tax recording documents needed to file taxes for AT&T's fiber build.
- Nassau County Police Department Land Mobile Radio System Modernization Project (2005-2007): Project Manager for engineering services relating to the upgrade of Nassau County's public safety communication system. Services include site design, construction drawing preparation, property surveys, 1A surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on 36 sites throughout the county.
- The City of New York Department of Information Technology and Telecommunications Channel 16 Project (2005-2007): Project Manager for engineering services relating to the design and construction of a conventional/trunked radio system for FDNY and other New York City agencies. Services include site design, construction drawing preparation, property surveys, 1A surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on 7 sites in New York City.
- NorthStar Communications, Inc., Florida (2003-2004): Project Manager for services relating to the development of telecommunications tower sites throughout Florida for Nextel. Services included construction drawings, property surveys, 2C surveys, zoning issues, and structural evaluation of existing towers. David was responsible for managing resources to complete these services on over 20 sites in the state of Florida.

Other Experience

- BNMC Utilities Relocation, Buffalo, New York (2002): Civil Engineer for the design of utility relocations at Roswell Park in Buffalo. David was responsible for developing construction documents and specifications, as well as providing consulting services throughout the design process. His duties also included preparation of construction cost estimates and submittal review.
- NFTA Metro Bus – Bus Fueling Station Systems Modifications for Dual Fuel, Buffalo, New York (2002): Civil Engineer for the design and preparation of design drawings, specifications and cost estimate for the replacement of an existing single fuel system to that of a dual fuel system.
- New Jersey DPMC Underground Storage Tank Program, New Jersey (1999-2001): Civil Engineer for the design of new aboveground and underground tank fueling systems (including fuel dispensers, leak detection systems, inventory control systems, and concrete tank slabs) for various State Departments in New Jersey. David was responsible for developing design drawings, construction documents and specifications, as well as providing consulting services throughout the construction process. His duties also included creating and maintaining resource-loaded project schedules for project using Primavera® project scheduling software.



- Former Hyatt Clark Industries, Inc. Site, New Jersey (1996-1998): Civil engineer for the preparation for the closure and remediation of the Former GM Industrial site and the construction of a 9-hole golf course recreational facility (including Driving Range, Putting Course, Clubhouse and Maintenance Facilities). David was responsible for the design of the golf course drainage system which included a 5-acre retention pond to be used for irrigation during periods of drought. His duties also included preparing cost estimates for the site closure and subsequent golf course construction, and the modeling and design of the facility entrance and parking.
- Wegmans Food Pharmacy, Buffalo, New York (1998): Civil engineer for the construction of a supermarket on a former industrial site. David was responsible for and the modeling and design of the facility entrance. His duties also included field sampling of excavated soil during construction.
- USACE-Buffalo District, Cuyahoga River Bulkheads Study, Ohio (1999): Civil Engineer for the USACE's bulkhead inspection program along nine miles of the Cuyahoga River in Cleveland, Ohio. David was responsible for preparing a structural assessment of bulkhead along the river by inspecting various conditions of the sheet pile (i.e., corrosion levels, settling). His duties also included preparing remediation recommendations and subsequent cost estimates for damaged bulkhead sections.
- USACE-Buffalo District, Advance Measures Program, New York (1999): Civil Engineer for the study of high Lake Erie levels on four residential areas. David was responsible for gathering residential home elevations and comparing them to historical rain and lake level data. Based on these comparisons and a detailed cost analysis, recommendations to alleviate local residential flooding, including the design of breakwaters and levees, were made.
- FEMA Public Assistance Program, Puerto Rico (1998-1999): Civil Engineer for the inspection of public facilities damaged by Hurricane Georges. David was responsible for gathering field data on hurricane damages, designing mitigation alternatives, and preparing detailed cost analyses of damages.
- NYCDDC Underground Storage Tank Program, New York (1999-2001): Civil Engineer for the design of groundwater/soil remediation systems for the cleanup of petroleum-contaminated groundwater and soils. Groundwater remediation systems typically consisted of the design and installation of pneumatic and electric dual pumping systems for the removal of free phase and dissolved phase contamination. Soil remediation systems incorporated the design and installation of soil vapor extraction systems and bioventing systems.
- Lipari Landfill, New Jersey (1996-1997): Civil Engineer for offsite remediation work at the Lipari Superfund site. David was responsible for modeling migration rates of contaminants from the Superfund site through surrounding soil strata.





KELLY R. REIDY-KACZMAREK

Environmental Scientist, The Lotis Engineering Group, P.C.
Environmental Scientist, Lotis Environmental, LLC

Professional Experience

The Lotis Engineering Group, P.C. – Environmental Scientist
Lotis Environmental, LLC – Environmental Scientist

8899 Main Street- Suite 107
Williamsville, New York 14221

(April 2015 – Present)

(June 2019 – Present)

RJS Environmental – Environmental Specialist

4169 Allendale Parkway
Blasdell, New York 14219

(March 2010 – April 2015)

STOHL Environmental – Project Manager

4169 Allendale Parkway
Blasdell, New York 14219

(May 2009 – March 2010)

Education

B.A., Environmental Science and Biological Science, State College at Brockport, 2009

Certifications

ASTM Conference on Environmental Site Assessments for Property Transfer
New York State and EPA Certified Asbestos Air and Project Monitoring Technician (lapsed)
New York State Asbestos Inspector (lapsed)
OSHA 10-hour Construction Safety Training

Key Qualifications

Since 2010, Kelly Reidy has been involved in various aspects of the environmental field with extensive experience in environmental due diligence. She has completed hundreds of environmental site assessments and reports, including Transaction Screens, Phase I assessments, and intrusive (Phase II) studies that range from farmland, to shopping plazas, to heavy industrial sites.

Commercial Lending Experience

- First Niagara Bank, Nationwide, US (2010-2015): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout the United States. Services include Transaction Screens, Desktop Reviews, Limited Database Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.
- Lake Shore Savings Bank, Western New York, US (2012-2015): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout Western New York. Services include Transaction Screens, Desktop Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.
- M&T Bank, New York State, US (2010-2015): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout New York State. Services include Transaction Screens, Phase I Environmental Site Assessments and Phase II Intrusive studies.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

- Bank of Akron, Western New York, US (2012-2015): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout Western New York. Services include Transaction Screens, Desktop Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.

Telecommunications Experience

- Vertical Bridge Holdings, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Blue Sky Towers, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- InSite Towers, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- IWG-TLA Telecom, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Turris Sites, Canada (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Phoenix Towers International, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Tower Ventures, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.



MATTHEW J. GREEN

Environmental Professional, The Lotis Engineering Group, P.C.
Environmental Professional, Lotis Environmental, LLC

Professional Experience

The Lotis Engineering Group, P.C.
Lotis Environmental, LLC
8899 Main Street- Suite 107
Williamsville, New York 14221

(September 2015 – Present)
(June 2019 – Present)

Town of Amherst Environmental Control – Summer Help
455 Tonawanda Creek Road
Buffalo, New York 14228

(May 2015 – September 2015)

Education

B.S., Environmental Studies, State University of New York at Buffalo, 2015

Certifications

New York State Asbestos Inspector (lapsed)
New York State Lead Inspector

Key Qualifications

Since 2015, Matthew Green has been involved in various aspects of the environmental field with extensive experience in environmental due diligence. He has completed hundreds of environmental site assessments and reports, including Transaction Screens, Phase I assessments, and intrusive (Phase II) studies that range from farmland, to shopping plazas, to heavy industrial sites. He has conducted hundreds of in-field site assessments across the United States, Canada, and Puerto Rico. Matthew has also assisted in the completion of hundreds of NEPA compliance studies, specifically in the telecommunications industry.

Commercial Lending Experience

- Canandaigua National Bank, Statewide, US (2017-ongoing): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout New York State. Services include Transaction Screens, Desktop Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.
- First Niagara Bank, Nationwide, US (2016-2016): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout the United States. Services include Transaction Screens, Desktop Reviews, Limited Database Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.
- Upstate National Bank, Statewide, US (2018-ongoing): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout New York State. Services include Transaction Screens, Desktop Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.
- Pioneer Bank, Statewide, US (2017-2018): Environmental Consultant for services relating to acquisitions and commercial lending of properties throughout New York State. Services include Transaction Screens, Desktop Reviews, Phase I Environmental Site Assessments and Phase II Intrusive studies.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



Telecommunications Experience

- Vertical Bridge Holdings, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Blue Sky Towers, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- InSite Towers, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- IWG-TLA Telecom, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Turris Sites, Canada (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Phoenix Towers International, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Tower Ventures, LLC, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Weiss Towers, Nationwide, US (2017-ongoing): Environmental Consultant for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.
- Telecom Lease Advisors, Nationwide, US (2015-ongoing): Environmental Consultant for services relating to the acquisition of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments and NEPA compliance studies.

Other Experience

- Town of Amherst Environmental Control, town wide, US (Summer of 2015): Performed Fats, Oils, and Grease (FOG) inspection on various restaurants. Collected FOG samples for EPA 1664 analysis as well as assisted in the investigation and follow through of sewer blockages.
- Grand Island Central School District, Districtwide, US, East Aurora Central School District, Districtwide, US and Lancaster Central School District, Districtwide, US (2016 Testing Cycle): Conducted lead testing in potable water for district schools and facilities. Was responsible for providing guidance to faculty and staff on proper preparation of potable outlets prior to testing, collecting water samples, completing chain of custody forms, and preparing a written report for each school identifying lead levels at all outlets tested.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

BIO SURVEY AND ENDANGERED SPECIES ASSESSMENT

A biosurvey of the study site was conducted to assess the habitat types on the site and to determine if protected plants and animals were present. Lists containing the xx identified plant species are provided, as well as xx bird species, and 1 lizard. No protected species were observed or recorded.

*Plot #3 Estate Long
Point and Cotton
Garden. East End B
Quarter. St. Croix
USVI*

Table of Contents

Introduction	3
Methods	3
Results	4
Threatened and Endangered Species	4
Vegetation Surveys.....	4
Animal Species	6
Recommendations	7
References	8



Introduction

Biologists and field technicians from Geographic Consulting LLC (GC) conducted a biological survey on Plot #3 Estate Long Point and Cotton Garden, east Quarter of St. Croix, United States Virgin Islands. The subject property is on the easter north shore. The site map provided by Blue Sky Indicated property boundaries and the potential Earth Change area. These boundaries are overlaid on the map in this report. The biosurvey is a means to determine the presence or absence of endangered or threatened terrestrial plant and animal species.

This report documents this search, which is mandated by local and federal statutes. Territorial law lists plant and animal species requiring protection. We include these in Appendix I of this report. The local law applying to this project is the Virgin Islands “Endangered and Indigenous Species Act of 1990” Title 12, Virgin Islands Code, Chapter 2, Protection of Indigenous, Endangered and Threatened Fish, Wildlife and Plants. A higher order of protection for a shorter list of species is proscribed by the U.S. “Endangered Species Act of 1973”. Pub. L. 98-205, Dec 28, 1978, 81 Stat 884, and amendments thereto, codified in 16 U.S.C. section 1531 et seq. Federal protection applies to two St. Croix plants listed as “Endangered”: Vahl’s Boxwood (*Buxus vahlii*) and Tropical Lilythorn (*Catesbaea melanocarpa*). Eggers’ Agave (*Agave eggersiana*) is listed as “Candidate”. This status is preliminary to intended listing but carries less federal protection than “endangered” or “threatened” status. Two lizard species pertinent to this study are the St. Croix ground lizard (*Ameiva polops*) and the litter-dwelling gecko (*Sphaerodactylus beattyi*), which are both federally protected and have the potential to inhabit the survey site.

Methods

Geographic Consulting’s (GC) field team consisted of forest ecologist, Brian Daley PhD, and two field technicians. Site maps were prepared prior to field work and uploaded to GCs online cloud storage and accessed through ESRI ARCGIS Online (AGOL). Our team accessed these data through Galaxy tab E tablets. Field data and photographs were recorded via these tables. Paper maps were printed for the field crew to use as a reference in the field and in case cell network data was insufficient. Fieldwork was conducted between January 9 and January 25, 2024.

The field team traversed the site making observations of plants, birds and reptiles and recording these observations on the Galaxy tablets. Trees over three inches in diameter at breast height (DBH) were recorded with a photograph and their location (GPS point). These trees were identified to the species level whenever possible. Trees were also marked in the field with flagging tape in addition to being recorded in the GIS.

The subject site is characterized by steep slopes and rugged terrain. The forest on site is low, single-canopy, secondary forest. This dry forest type is characteristic of the arid east end of

St. Croix. It is slow growing, but with a closed canopy comprised of primarily native species. This is indicative of a post-agricultural land clearing, but one that occurred decades ago.

Results

Threatened and Endangered Species

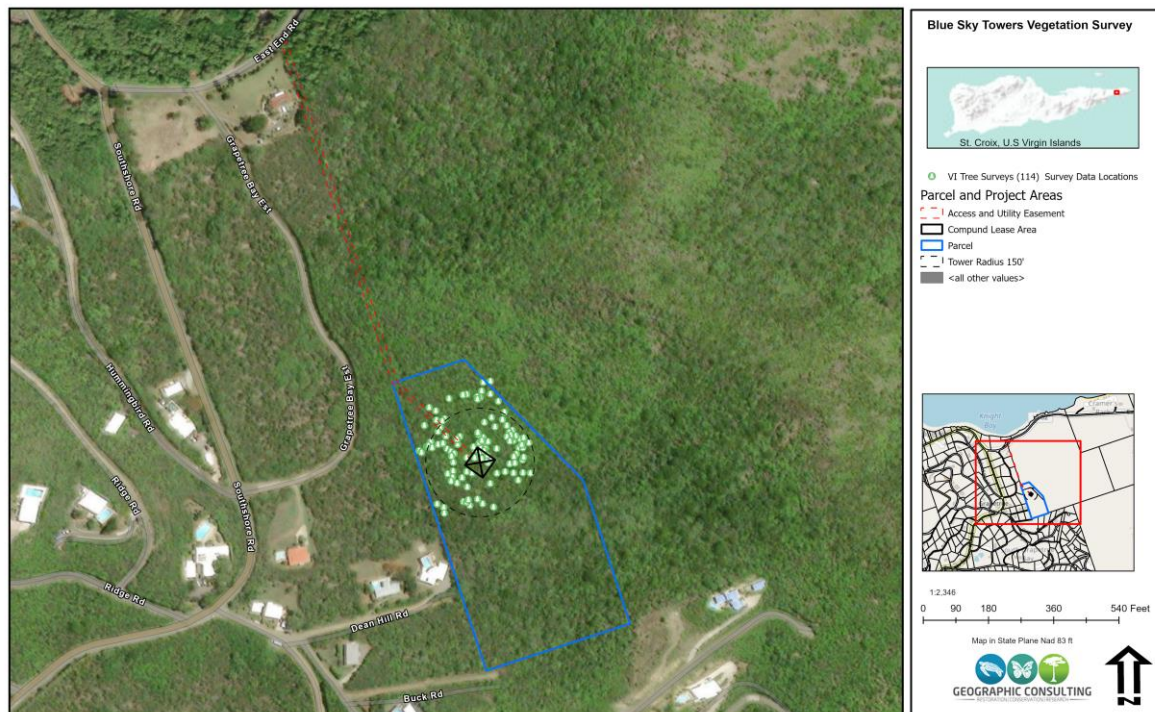
As described in the Methods Section in greater detail, a systematic search was completed of the plants and animals of the subject property. No rare plant species protected by Virgin Islands or federal statutes were encountered.

No rare vertebrate animals protected by Virgin Islands or federal statutes were observed during our comprehensive biosurvey.

Vegetation Surveys

The major plant communities of the dry forest observed were dry semi-deciduous woodlands and dry evergreen scrubland. These observations and their spatial distribution are depicted in Figure 1. The figure indicates the property boundaries in blue and the locations of the observed trees over 3 inches DBH are indicated in light green. The 15-foot access road is indicated in dashed red lines. The field team walked this line, making observations, but did not mark trees in this narrow band. No threatened or endangered species were observed in the main portion of the proposed development or in the access road. The vast majority of the species observed are native trees to the Virgin Islands dry forest. Some exotic invasive species were also observed and recorded, such as tan tan (*Leucaena leucocephala*). The method of selecting only trees above three inches dbh tends to exclude these smaller diameter plants.

Figure 1 Subject property boundary and locations of observed trees.



Trees above three inches dbh were observed across the site. The focus of this biosurvey was the area within and adjacent to the potential earth change area marked by the black dotted line in Figure 1. The trees were identified to the species level and the findings are summarized in Table 1, below.

Table 1. The classification and quantity of the woody plants observed on site.

Genus species		
<i>Bourreria succulenta</i>	Pigeonberry	47
<i>Bursera simaruba</i>	Turpentine	8
<i>Capparis cynophallophora</i>	Jamaican Caper	2
<i>Ficus benamina</i>	Ficus	1
<i>Krugiodendron ferreum</i>	Ironwood	3
<i>Leucaena leucocephala</i>	Tan-tan	7
<i>Piscidia carthagenensis</i>	Fish Poison	19
<i>Pithecellobium unguis-cati</i>	Bread and Cheese	1
<i>Randia aculeata</i>	Inkberry	5
Unknown <i>Boraginaceae</i> spp	Relative to pigeonberry	9
<i>Exostema caribaeum</i>	Princewood	9
<i>Comocladia dodonaea</i>	Christmas Bush	1
<i>Eugenia</i> Spp.	Eugenia	2
Grand Total		114

Animal Species

We observed 13 bird species across the surveyed areas, all of them native (Table 2). The most common sighted birds were the gray kingbird (*Tyrannus dominicensis*), Yellow warbler (*Setophaga petechia*), bananaquit (*Coereba flaveola*), Green-throated Carib (*Eulampis holosericeus*), Antillean crested hummingbird (*Orthorhynchus cristatus*), and Pearly-eyed thrasher (*Margarops fuscatus*). We spotted a pair of red-tailed hawks (*Buteo jamaicensis*) hunting in the air overhead, but they did not land on the property. A flock of Smooth-billed ani (*Crotophaga ani*) was heard on a single occasion, but not seen.

A single native lizard species was observed, the St. Croix anole (*Anolis acutus*). No amphibians were detected, but it is likely the Antillean tree frog (*Eleutherodactylis antillana*), and the Cuban tree frog (*Osteopilus septentrionalis*) were present.

The small Indian mongoose (*Herpestes auropunctatus*) and black rat (*Rattus rattus*) were also observed on the site. These are exotic species and not protected. No other vertebrate animals were sighted. Table 2 summarizes the bird species observed.

Table 2. Bird species observed during the biosurvey, listed by species, common name and family as well as native ranges for each.

Species name	Common name	Family	Family Relatives	Range/ Nativity
<i>Buteo jamaicensis</i>	Hawk, Red-tailed	<i>Accipitridae</i>	Eagles & Hawks	Canada to CA & WI
<i>Patagioenas squamosa</i>	Scaly-naped pigeon	<i>Columbidae</i>	Pigeons & Doves	WI except Bahamas
<i>Patagioenas leucocephala</i>	White-crowned pigeon	<i>Columbidae</i>	Pigeons & Doves	CA, S. US, Greater Antilles to Antigua
<i>Columbina passerina</i>	Common ground dove	<i>Columbidae</i>	Pigeons & Doves	WI, So USA, CA, N SA
<i>Zenaida aurita</i>	Zenaida dove	<i>Columbidae</i>	Pigeons & Doves	WI to CA coast
<i>Crotophaga ani</i>	Ani, smoothed-billed	<i>Cuculidae</i>	Cuckoos & Anis	Trop s US, WI, to Brazil
<i>Coereba flaveola</i>	Bananaquit	<i>Emberizidae</i>	Wood Warblers, Blackbirds, Tanagers	WI, except Cuba, CA, SA
<i>Margarops fuscatus</i>	Thrasher, Pearly-eyed	<i>Mimidae</i>	Mockingbirds & Thrashers	E. Bahamas, PR to St. Vincent
<i>Setophaga petechia</i>	Yellow warbler	<i>Parulidae</i>	New World warblers	NA, CA, WI
<i>Eulampis holosericeus</i>	Green-throated Carib	<i>Trochilidae</i>	Hummingbirds	E. PR, VI & LA
<i>Orthorhyncus cristatus</i>	Hummingbird, Antillean Crested	<i>Trochilidae</i>	Hummingbirds	E. PR, VI & LA
<i>Tyrannus dominicensis</i>	Kingbird, Gray	<i>Tyrannidae</i>	Tyrant Flycatchers	FL, WI, N. SA

Recommendations

No protected animal or plant species were encountered after a complete biosurvey of the subject area. Therefore, we recommend that the land clearing activity on the site may proceed as planned within the boundaries presented to us. The native forest growing of the property is relatively diverse and represents decades of growth. We further recommend minimizing the impact to the forest outside the proposed area and monitoring the work closely during the land clearing process.

References

- Acevedo-Rodriguez, P. 1996. Flora of St. John. Memoirs of the New York Botanical Garden, Vol. 78. Bronx, NY. 582 pp.
- Daley, B., J. Valiulis, & R. Slatton. 2012. Exotic Invasive Species; US Virgin Islands; Species Affecting Forests. Doc.#GS-VIDA-1201. St. Croix, US Virgin Islands.
- Daley, Brian and Jennifer Valiulis. 2013 Rapid Assessment of Four Endangered Plant Populations of St. Croix, US Virgin Islands, *Buxus vahlii* and *Catesbaea melanocarpa*. For the Virgin Islands Department of Planning and Natural Resources, Frederiksted, St. Croix, US Virgin Islands. 14pp.
- Encyclopedia of Life*. Web. <http://www.eol.org> Accessed: March 24, 2024.
- Flora of the West Indies*. Web. <http://botany.si.edu/antilles/WestIndies/catalog.htm>. National Museum of Natural History. Smithsonian Institution. Accessed: March 25, 2024.

APPENDIX J: FEDERAL COMMUNICATIONS COMMISSION (FCC)

- FCC NEPA SUMMARY REPORT



June 26, 2024

Ms. Laurie Plaisance
Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864

**RE: FCC NEPA Summary Report for:
East End Site (USVI-00230; BST_228)
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820**

Dear Ms. Plaisance,

Lotis Environmental, LLC (Lotis), has completed a Federal Communications Commission (FCC) NEPA investigation relative to the referenced proposed undertaking and issues the following Summary Report. Based on the information presented in this report, no further action is required under 47 CFR Subpart 1, Chapter 1, Sections 1.1301-1.1319 of the National Environmental Policy Act.

The accuracy of the species list, provided by the Information, Planning, and Conservation (IPaC) website, should be verified every 90 days. This verification can be completed formally or informally as desired. The United States Fish and Wildlife Services (USFWS) 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 initial list. If the list is determined to have been modified to include additional species of concern, an evaluation of those species should be conducted and consultation with the USFWS may have to be re-initiated, depending on the determination of effect or previous response(s) from the USFWS.

The applicant/tower builder must immediately notify all interested consulting parties if archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

Should you have any questions or comments, please do not hesitate to contact our office at (716)-580-7000.

Sincerely,

Lotis Environmental, LLC

A handwritten signature in blue ink, appearing to read "D. N. Robinson", is written over a horizontal line.

David N. Robinson, P.E.
President / CEO
Robinson@TheLotisGroup.com

Attachments



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

NEPA SUMMARY REPORT



USVI-00230 - East End

near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, Virgin Islands 00820

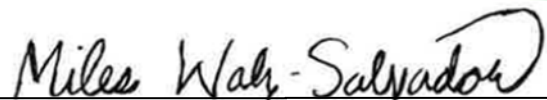
Prepared for:

Blue Sky Towers III, LLC
352 Park Street, Suite 106
North Reading, Massachusetts 01864

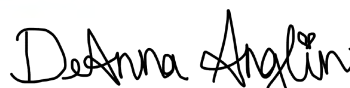
Prepared by:

Lotis Environmental, LLC
Williamsville, New York

June 26, 2024



Reviewed By: Miles Walz-Salvador.
Nationwide NEPA / NHPA Manager



Prepared By: DeAnna Anglin
Senior Biologist/NEPA Project Lead

FCC NEPA CHECKLIST

Applicant Name: Blue Sky Towers III, LLC

Site Number: USVI-00230

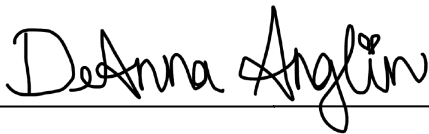
Site Name: East End

Potential Effect

LAND USE SCREENING

Yes No

1.	Facility will be located in an officially designated wilderness area.		X
2.	Facility will be located in an officially designated wildlife preserve.		X
3.	Facility may affect listed threatened or endangered species or designated critical habitats; or is likely to jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.		X
4.	Facility may 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.		X
5.	Facility may affect Native American religious site(s).		X
6.	Facility will be located in a floodplain if the facility will not be placed at least one foot above the base flood elevation of the floodplain. *EA not required under FCC Wireless Telecommunications Docket No. 17-79 effective July 2, 2018, as long as the applicant can show that the facility and/or associated equipment will be installed 1 foot above the determined BFE.		X
7.	Facility construction will involve significant change in surface features (e.g., wetland fill, deforestation, significant tree removal, or water diversion).		X
8.	Facility (antenna tower and/or supporting structures) will be equipped with high intensity white lights which are to be located in residential neighborhoods, as defined by the applicable zoning law.		X
9.	Facility would cause human exposure to levels of radiofrequency radiation in excess of Commission-adopted guidelines		X
10.	Facility will be over 450 feet above ground level (AGL)		X



Prepared By: DeAnna Anglin
Senior Biologist/NEPA Specialist

DOCUMENTATION FOR FCC NEPA CHECKLIST RESPONSES 1-9:

1. Is the proposed undertaking located in an officially designated wilderness area?

Based on maps published by the Bureau of Land Management (BLM), United States Fish and Wildlife Service (USFWS), United States Forest Service (USFS), and National Park Service (NPS), as compiled in the on-line **nationalatlas.gov** and **wilderness.net** websites, no designated wilderness areas are located at or near the proposed undertaking. A copy of the Wilderness Map is included in Appendix A.

2. Is the proposed undertaking located in an officially designated wildlife preserve?

Based on maps published by the USFWS, no wildlife refuges or wildlife preserves are located at or near the proposed undertaking. A copy of the USFWS Wildlife Refuge Map is included in Appendix A.

3. Will the proposed undertaking likely affect threatened or endangered species or designated critical habitats; or is likely to jeopardize the continued existence of any proposed endangered or threatened species; or is likely to result in the destruction or adverse modification of proposed critical habitats (as determined by the Endangered Species Act of 1973)?

A Lotis staff biologist conducted an informal biological assessment (IBA) at the site of the proposed undertaking. Based on information reviewed, site reconnaissance, and the proposed scope of work, Lotis has determined that the proposed undertaking would “*not likely adversely affect*” designated critical habitats or listed federal species of concern. A copy of the USFWS Critical Habitat Map is included in Appendix A.

The accuracy of the species list, provided by the Information, Planning, and Conservation (IPaC) website, should be verified every 90 days. This verification can be completed formally or informally as desired. The USFWS 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 initial list. If the list is determined to have been modified to include additional species of concern, an evaluation of said species should be conducted and consultation under USFWS guidelines may have to be re-initiated, depending on the determination of effect or previous response from the USFWS.

Lotis submitted the proposed undertaking summary package to the USFWS, Caribbean Ecological Services Field Office on May 24, 2024, for informal Section 7 consultation under the Endangered Species Act (50 CFR Part 402.01). In the submission, Lotis requested the USFWS to determine if the proposed undertaking would have an effect on any wildlife refuges or if the proposed undertaking would have an adverse impact on: 1) any listed and/or proposed threatened or endangered species; or 2) any designated and/or proposed critical habitats. On June 7, 2024, Lotis received a response, via email, indicating “*We have reviewed the information provided in your letter and our files, and concur with your determination that the proposed project may affect, but is not likely to adversely affect the green, hawksbill and leatherback sea turtles with the implementation of the conservation measures provided by IPaC.*” Copies of the USFWS submission cover letter and USFWS response are included in Appendix B.

Additionally, the USFWS has established interim guidelines for recommendations on communication tower siting, construction, operation, and decommissioning as new and existing towers have been determined to significantly impact species which are protected under the Migratory Bird Treaty Act (MBTA), **<http://www.fws.gov/laws/lawsdigest/migtrea.html>**, (16 U.S.C. 703-712). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. While the Act has no provision for allowing unauthorized take, it must be recognized that some birds may be killed at structures such as communications towers even if all reasonable measures to avoid it are implemented. While it is not possible under the Act to absolve individuals or companies from liability if they follow these recommended guidelines, the Division of Law Enforcement and Department of Justice have used enforcement and prosecutorial discretion in the past regarding individuals or companies who have made good faith efforts to avoid the take of migratory birds. A copy of the 2021 Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning is included in Appendix B.

BST has taken these recommended interim guidelines into consideration and has mitigated the potential effect on migratory birds by siting the proposed undertaking away from sensitive locations such as critical habitats, wilderness areas, wildlife refuges, and wetlands, where species of concern are more likely to be present. Additionally, BST proposes a tower height of no more than 199 feet with a tower design to be that of a self-supporting monopole tower. If lighting is required, BST will complete request the use of dual medium white or red strobe lights with the minimum number, minimum intensity, and minimum number of flashes per minute allowable by the FAA.

The USFWS also regulates and enforces the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c). *"This Act provides criminal penalties for persons who 'take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof.' The Act defines 'take' as 'pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.' 'Disturb' means 'to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.' In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment. A violation of the Act can result in a fine of \$100,000 (\$200,000 for organizations), imprisonment for one year, or both, for a first offense. Penalties increase substantially for additional offenses, and a second violation of this Act is a felony."* USFWS: The Bald and Golden Eagle Protection Act, www.govinfo.gov/content/pkg/USCODE-2010-title16/pdf/USCODE-2010-title16-chap5A-subchapII.pdf (accessed January 2024). A copy of the Bald and Golden Eagle Protection Act is included in Appendix B.

The USFWS has recommended voluntary minimization/mitigation as indicated above. These are recommendations and should be treated as such unless issued as a requirement to complete Section 7 consultation. Should failure to abide by these recommendations occur, the applicant is assuming responsibility for its failure to comply with the above-mentioned Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and The Bald and Golden Eagle Protection Act (BGEA). It is ultimately the responsibility of the applicant to prevent the "take" of a species of concern regardless of whether or not it has completed Section 7 consultation. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or to attempt to engage in any such conduct. The taking of a listed species of concern (threatened/Endangered), without a federal/state permit, is a severe crime punishable by large fine(s) and confinement.

In addition, Lotis contacted the Virgin Islands Conservation Society (VICS) on May 24, 2024, and requested a review of the potential adverse effect on state protected habitats and state listed species of concern. As of the date of this report, no response has been received from VICS. A copy of the submission letter is included in Appendix B.

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

The United States Virgin Islands Department of Planning & Natural Resources (VISHPO) is the lead State Historic Preservation Office (SHPO) for the State of Virgin Islands. Lotis contracted CocoSol International Inc. to determine the potential effect of the proposed undertaking on historic properties (archaeological sites and eligible/listed historic properties) within the Direct and ½-mile Visual Area of Potential Effect (APE) designated by the Federal Communications Commission (FCC). CocoSol International Inc. completed a Phase I (A&B) Archaeological Survey and conducted research to identify historic properties using resources specified by the VISHPO. Additionally, CocoSol International Inc. researched the National Register of Historic Places (NRHP) at <http://www.nps.gov/nr/> and identified one (1) historic property within the ½-mile radius APE of the proposed undertaking. A copy of the Phase I (A&B) Archaeological Survey is included in Attachment 3.

Lotis prepared and submitted a new tower submission packet (FCC Form 620) through the FCC's E-106 electronic filing protocol. Section 106 review was initially submitted via E-106 to the Virgin Islands SHPO on May 28, 2024. However, the Virgin Islands SHPO does not participate in E-106 electronic filing and requested that materials be sent via email for review. On May 24, 2024, Lotis forwarded the requested emailed submission via

david.brewer@dpnr.vi.gov and sean.krigger@dpnr.vi.gov. On June 26, 2024, Lotis received an email response from the VISHPO indicating “*The VISHPO has no objection to the proposed monopole cell tower.*” Copies of the VISHPO submission cover letter, FCC Form 620, and the VISHPO response are included in Appendix C.

In furtherance of Section 106 consultation efforts, Lotis attempted to identify the jurisdiction's Certified Local Government (CLG), by using the National Parks Service's (NPS) website, http://grantsdev.cr.nps.gov/CLG_Review/search.cfm. Unfortunately, the NPS's website did not identify a CLG within the local jurisdiction, therefore, Lotis contacted the local jurisdiction for comment. On May 24, 2024, Lotis invited the Department of Planning and Natural Resources to comment on whether the proposed undertaking would have an effect on historic properties within the general vicinity. To date, Lotis has not received a response from Department of Planning and Natural Resources regarding the proposed undertaking. Copies of the submission cover letter, and email submission included in Attachment 6.

Lotis attempted to locate a non-government affiliated group who had invested interest in historic preservation but was unable to do so. Therefore, no additional parties were contacted for the opportunity to comment on the proposed undertaking's potential impact on local historic properties which may not have been determined eligible for listing on the National Register for Historic Places (NRHP).

Finally, Lotis contacted the Virgin Islands Daily News and published a legal public notice in the classified section on May 29, 2024. The proposed undertaking was detailed in the ad and calls for public concerns regarding potential adverse effect on historic properties in the area were solicited. To date, Lotis has not received any public response from the public notice publication concerning the proposed undertaking's potential effect on historic properties. Copies of the legal public notice text, tear sheet, and Affidavit of Publication are included in Attachment 7.

5. Will the undertaking affect Indian religious site(s)?

Lotis utilized the FCC's Tower Construction Notification System (TCNS) to identify tribal entities with interest in the proposed undertaking. The initial TCNS filing was submitted on October 31, 2023. The FCC responded via e-mail on November 3, 2023, indicating that no nationally recognized tribes were forwarded information regarding the location of the proposed undertaking via electronic or regular mail. Copies of the Federal Lands Map and Indian Reservations Map are included in Appendix A. Copies of the TCNS documentation and NOO are included in Appendix D.

6. Is the proposed undertaking located within a flood plain (100-year)?

According to the Flood Insurance Rate Map (FIRM) for the Virgin Island, Terr / St. Croix,S, Virgin Islands (Map Number 7800000075G) published by the Federal Emergency Management Agency (FEMA) effective on April 16, 2007 and exported on November 1, 2023, the proposed undertaking is not located within a 100-year floodplain. A copy of the FIRMette (flood plain map) is included in Appendix E..

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

According to the online United States Fish and Wildlife Service National Wetlands Inventory Map (NWIM), <http://www.fws.gov/wetlands/Data/Mapper.html>, no mapped wetlands are located at or within close proximity to the proposed undertaking. A copy of the National Wetlands Inventory Map is included in Appendix F.

8. Is the proposed undertaking located in a residential neighborhood and is it required to be equipped with high intensity white lights (as defined by local zoning law)?

Lotis was informed that the proposed undertaking is not to be equipped with high intensity white lights nor located within a zoned residential neighborhood.

9. a.) Will the antenna structure equal or exceed total power (of all channels) of 2000 Watts ERP (3280 Watts EIRP) and have antenna located less than 10 meters above ground level?

Per the applicant, the antenna structure will comply with the established criteria regarding radio frequency exposure limits in accordance with FCC rules, including those rules found at 47 CFR § 1.1307 and § 1.1310, as published at the time of this report.

b.) Will the antenna structure equal or exceed total power (of all channels) of 2000 Watts ERP (3280 Watts EIRP) and have antenna located less than 10 meters above floor level?

Per the applicant, the antenna structure will comply with the established criteria regarding radio frequency exposure limits in accordance with FCC rules, including those rules found at 47 CFR § 1.1307 and § 1.1310, as published at the time of this report.

10. Facility will be over 450 feet above ground level (AGL)?

The proposed undertaking is not above 450 feet AGL.

National Historic and Scenic Trail Review

Per the 1999 "Siting of Wireless Telecommunications facilities Near National Scenic Trails Resolution" early notification is not necessary if the *"Proposed sites that are more than one mile from a National Scenic Trail are outside the scope of this Resolution. Under certain circumstances, MSTOs and Applicants may find it mutually beneficial to have a cooperative working relationship on proposed sites that are more than one mile but less than four miles from a National Scenic Trail, particularly when constructing new or expanded towers 200 feet or higher above ground level which require lighting. While the signatories to this Resolution strongly encourage the formation of such alliances, the MSTO and the Applicant are not obligated to do so."*

The proposed undertaking is located more than four miles from the closest national scenic historic trail. Therefore, no additional consultation is required. A copy of the National Historic and Scenic Trail Map is included in Appendix A.

National Scenic Riverway Review

Congress enacted the Wild and Scenic Rivers Act (WSRA) in 1968, declaring it the "policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." 16 U.S.C. § 1271. As originally enacted, the WSRA named specific rivers or segments of rivers for inclusion in the Wild and Scenic River System ("WSRS"). Id. § 1274(a)(1)-(a)(8).

The proposed undertaking is located more than one mile from the closest national scenic riverway. Therefore, no additional consultation is required. A copy of the National Scenic Riverway Map is included in Appendix A.

National Scenic Byway Review

The National Scenic Byways Program was established under the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 and is part of the Department of Transportation's (DOT) Federal Highway Administration (FHWA). The program is a grass-roots collaborative effort established to help recognize, preserve, and enhance selected roads throughout the United States. Pursuant to the program, the Secretary of Transportation recognizes certain roads as All-American Roads or National Scenic Byways based on one or more archeological, cultural, historic, natural, recreational, and scenic qualities.

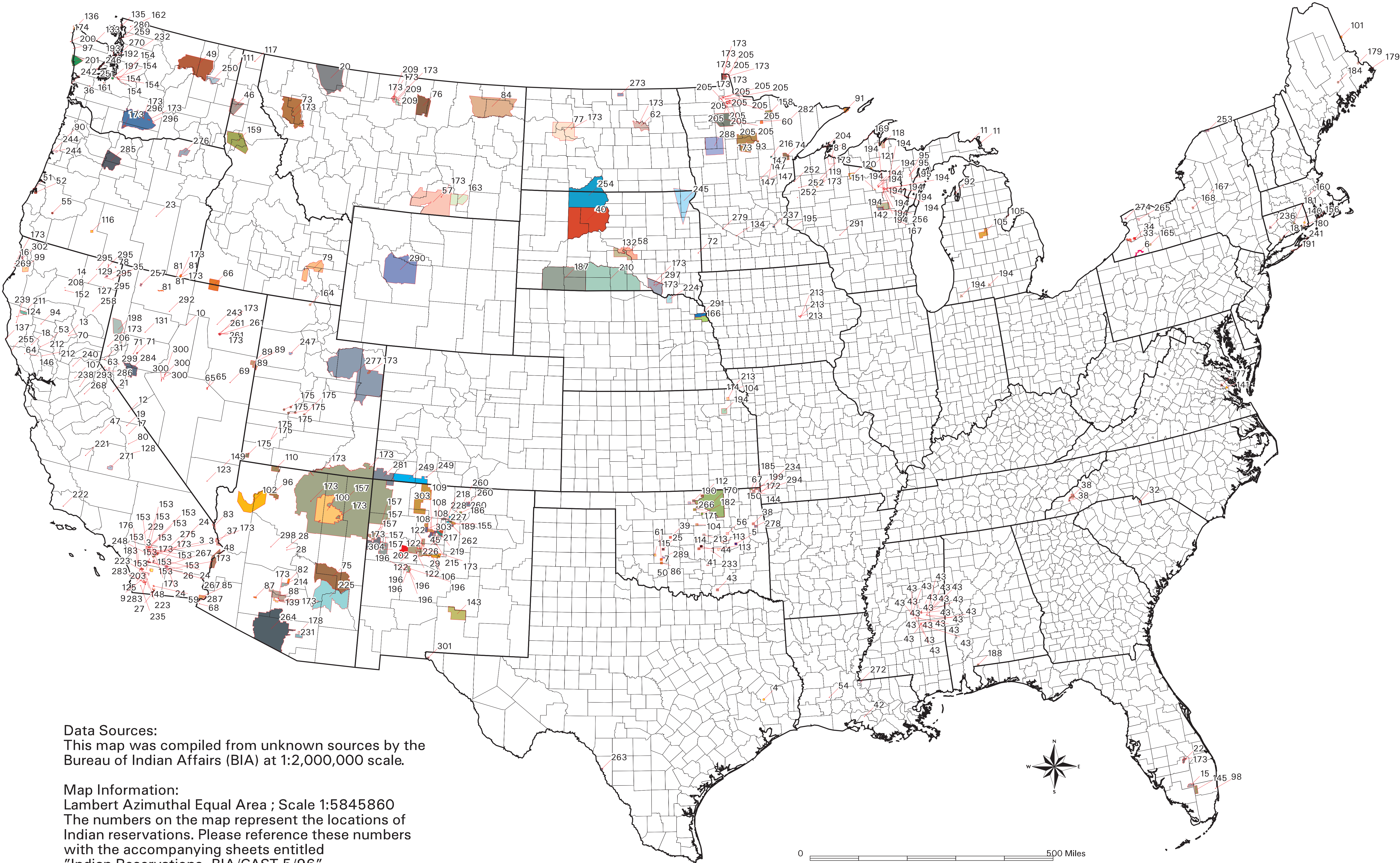
The proposed undertaking is located more than one mile from the closest national byway. Therefore, no additional consultation is required. A copy of the National Scenic Byway Map is included in Appendix A.

Appendix **A**

Maps

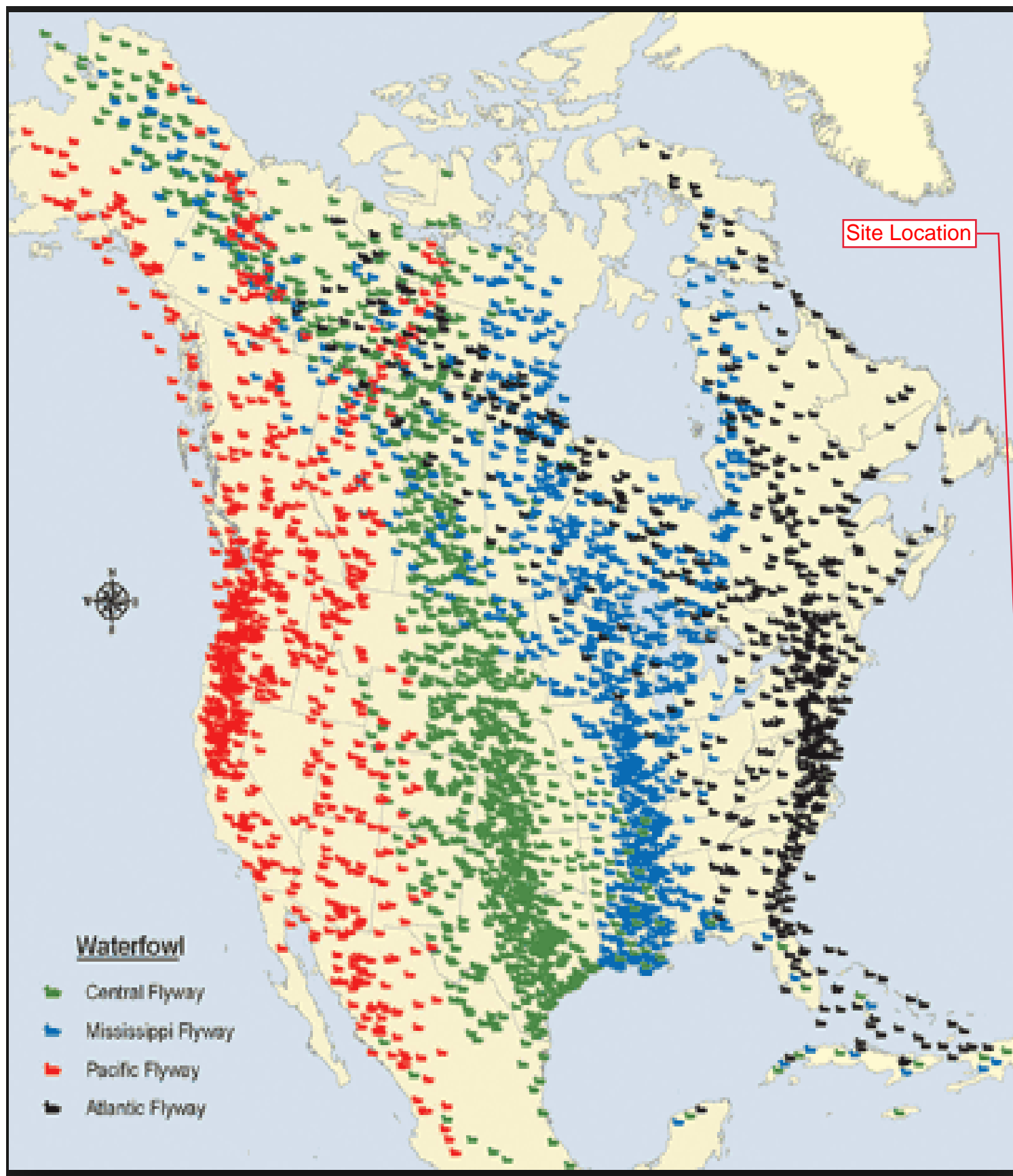
Indian Reservations in the Continental United States

Site Location



Data Sources:
This map was compiled from unknown sources by the Bureau of Indian Affairs (BIA) at 1:2,000,000 scale.

Map Information:
Lambert Azimuthal Equal Area ; Scale 1:5845860
The numbers on the map represent the locations of Indian reservations. Please reference these numbers with the accompanying sheets entitled "Indian Reservations- BIA/CAST 5/96".



Note: Abbreviations at right are for federal lands shown on this map. In many places, exact trail locations have not yet been determined. Portions of the trails indicated on this map may not be accessible for public use. Please check with individual trail clubs and managing offices for the latest available trail locations.

National Park System

MEM	Memorial	NP	National Park
NB	National Battlefield	N PRES	National Preserve
NHP	National Historic Park	NRA	National Recreation Area
NHS	National Historic Site	NRR	National River
NL	National Lakeshore	N RES	National Reserve
NM	National Monument	NS	National Seashore
N MEM	National Memorial	NSR	National Scenic Riverway
NMP	National Military Park	PKWY	Parkway

National Forest System

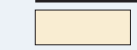
NF	National Forest
NG	National Grassland

Only national park, forest areas, and wildlife refuges that relate to the National Trails System are shown.

Fish and Wildlife Service

NWR	National Wildlife Refuge
-----	--------------------------

Bureau of Land Management



Site Location



- Chesapeake Bay area
National Wildlife Refuges
- 1 Blackwater
 - 2 Eastern Neck
 - 3 Eastern Shore of Virginia
 - 4 Featherstone
 - 5 Fisherman Island
 - 6 James River
 - 7 Martin
 - 8 Mason Neck
 - 9 Nansemond
 - 10 Occoquan Bay
 - 11 Plum Tree Island
 - 12 Presqu Shore
 - 13 Rappahannock River Valley
 - 14 Susquehanna
- National Park sites
- 15 Colonial NHP
 - 16 Fort Mifflin NM
 - 17 George Washington Birthplace NM
 - 18 Piscataway Park
 - 19 Prince William Forest Park
 - 20 Richmond NBP

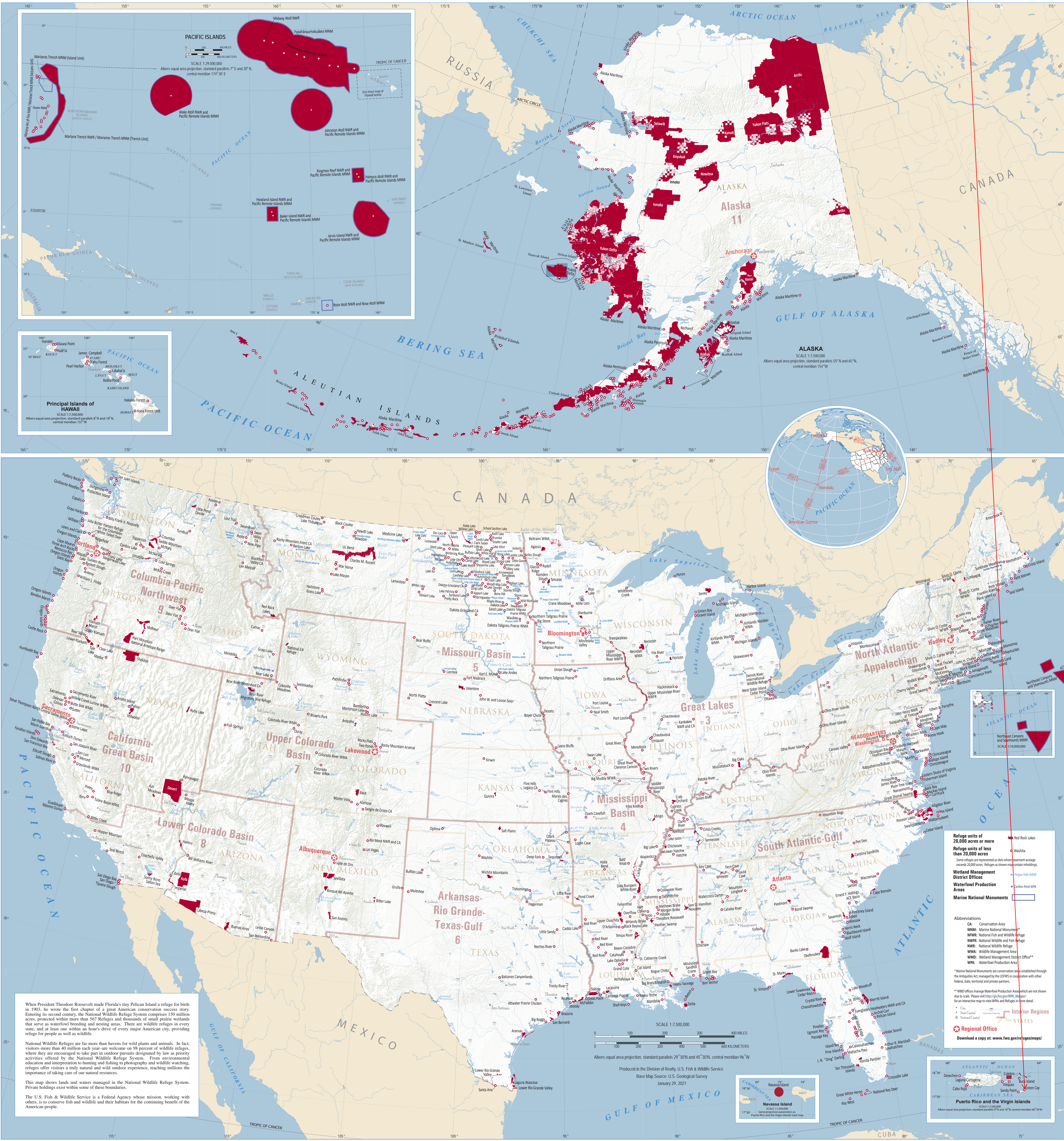


Scale for all areas except Alaska
0 100 200 Kilometers
0 100 200 Miles
Map revised April 2010.



U.S. Fish & Wildlife Service

National Wildlife Refuge System



National Wild and Scenic Rivers System

U.S. Department of Agriculture
Forest Service

U.S. Department of the Interior
Bureau of Land Management
Fish and Wildlife Service
National Park Service

Clackamas
Collawash
Crooked
Eagle Creek
East Fork Hood
Elkhorn Creek
Fifteenmile Creek
Fish Creek
Middle Fork Hood
McKenzie
Metolius
Molalla
North Fork Crooked
Quartzville Creek
Roaring
Salmon
Sandy
South Fork Clackamas
South Fork Roaring
White
Whychus Creek
Zigzag

Chetco
Elk Creek
Illinois
Jenny Creek
North Fork Silver Creek
North Fork Smith
River Styx
Rogue
Spring Creek
Upper Rogue



0 200 400 Kilometers
0 200 400 Miles

0 100 200 300 400 Kilometers
0 100 200 300 400 Miles

Cartography by National Park Service, Harpers Ferry Center, September 2018, updated by National Information Services Center, February 2023.



National Wild and Scenic Rivers System

Established by Congress under the Wild and Scenic Rivers Act of 1968, the National Wild and Scenic Rivers System was created to preserve the free flow, water quality, and outstanding natural, cultural, and recreational values of select rivers for the enjoyment of present and future generations. The Act is notable for safeguarding the special character of these rivers, while also recognizing the potential for their appropriate use and development. It encourages river management that crosses political boundaries and promotes public participation in developing goals for river protection.

For more information about the National Wild and Scenic Rivers System or specific designated rivers, visit the Interagency Wild and Scenic Rivers Coordinating Council's website, www.rivers.gov, or contact one of the federal river-administering agencies:

US Forest Service
www.fs.usda.gov
National Park Service
www.nps.gov
Bureau of Land Management
www.blm.gov
US Fish and Wildlife Service
www.fws.gov



0 25 50 Kilometers
0 25 50 Miles

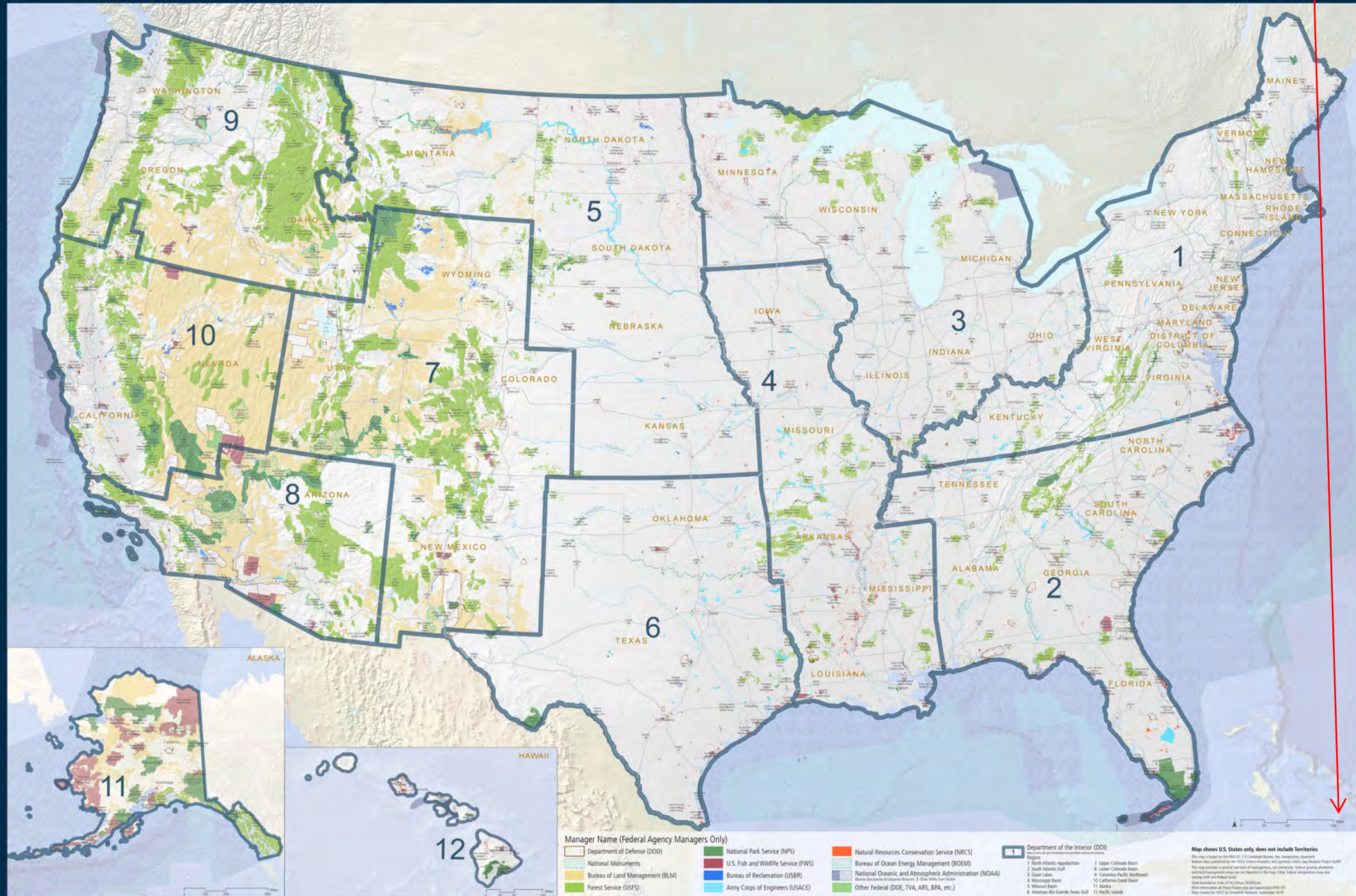
...the time has also come to identify and preserve free-flowing stretches of our great rivers before growth and development make the beauty of the unspoiled waterway a memory.

—President Lyndon B. Johnson, 1965

Site Location

Protected Areas Database of the U.S. (PAD-US) - Federal Managers

Site Location









nationalatlas.gov™
Where We Are

PUERTO RICO AND THE U.S. VIRGIN ISLANDS

Site Location

FEDERAL LANDS AND INDIAN RESERVATIONS

-  Department of Defense (includes Army Corps of Engineers lakes)
-  Fish and Wildlife Service / Wilderness
-  Forest Service / Wilderness
-  National Park Service / Wilderness

Some small sites are not shown, especially in urban areas.



Albers equal area projection

Abbreviations

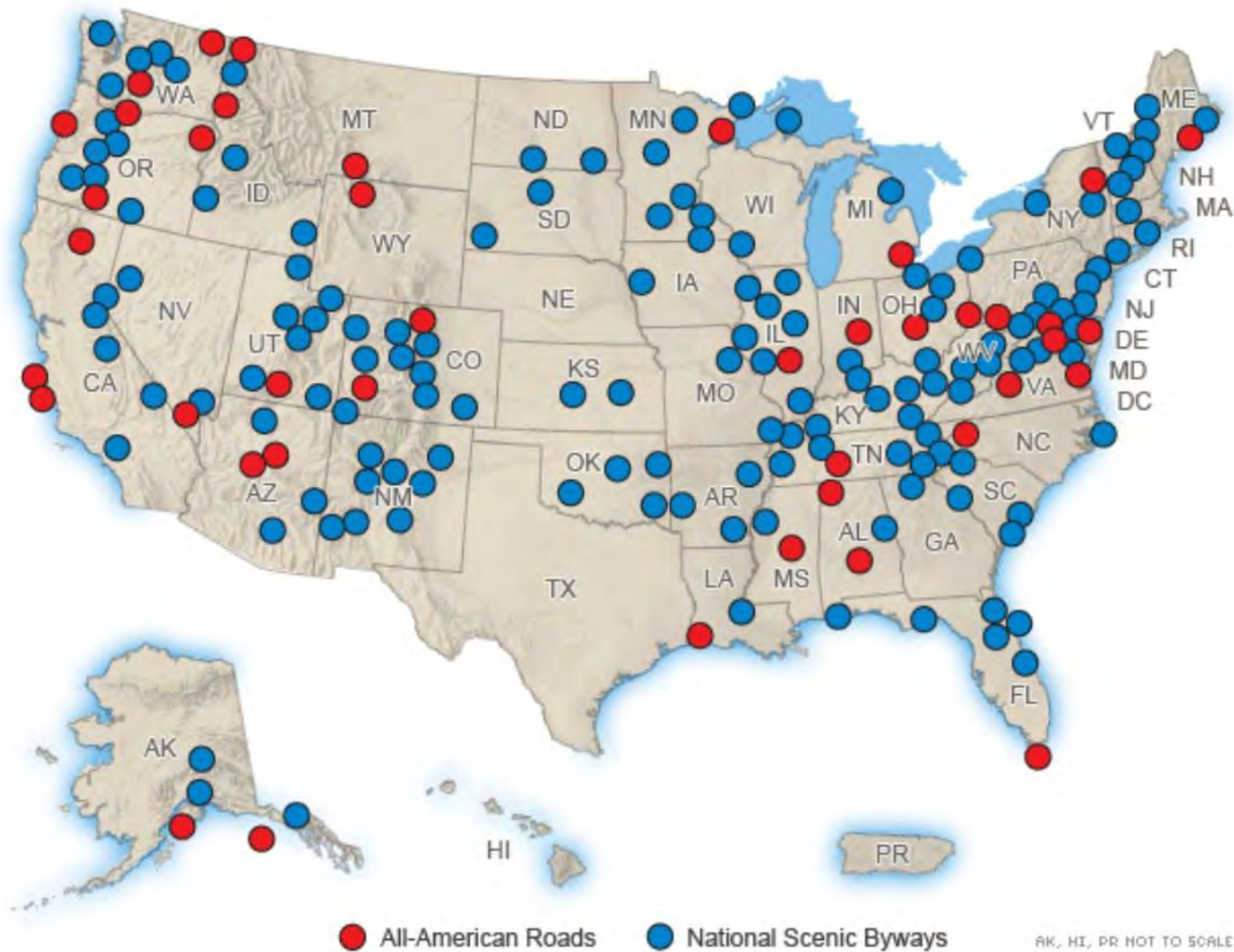
- NM National Monument
- NWR National Wildlife Refuge



U.S. Department of the Interior
U.S. Geological Survey

The National Atlas of the United States of America®

Site Location

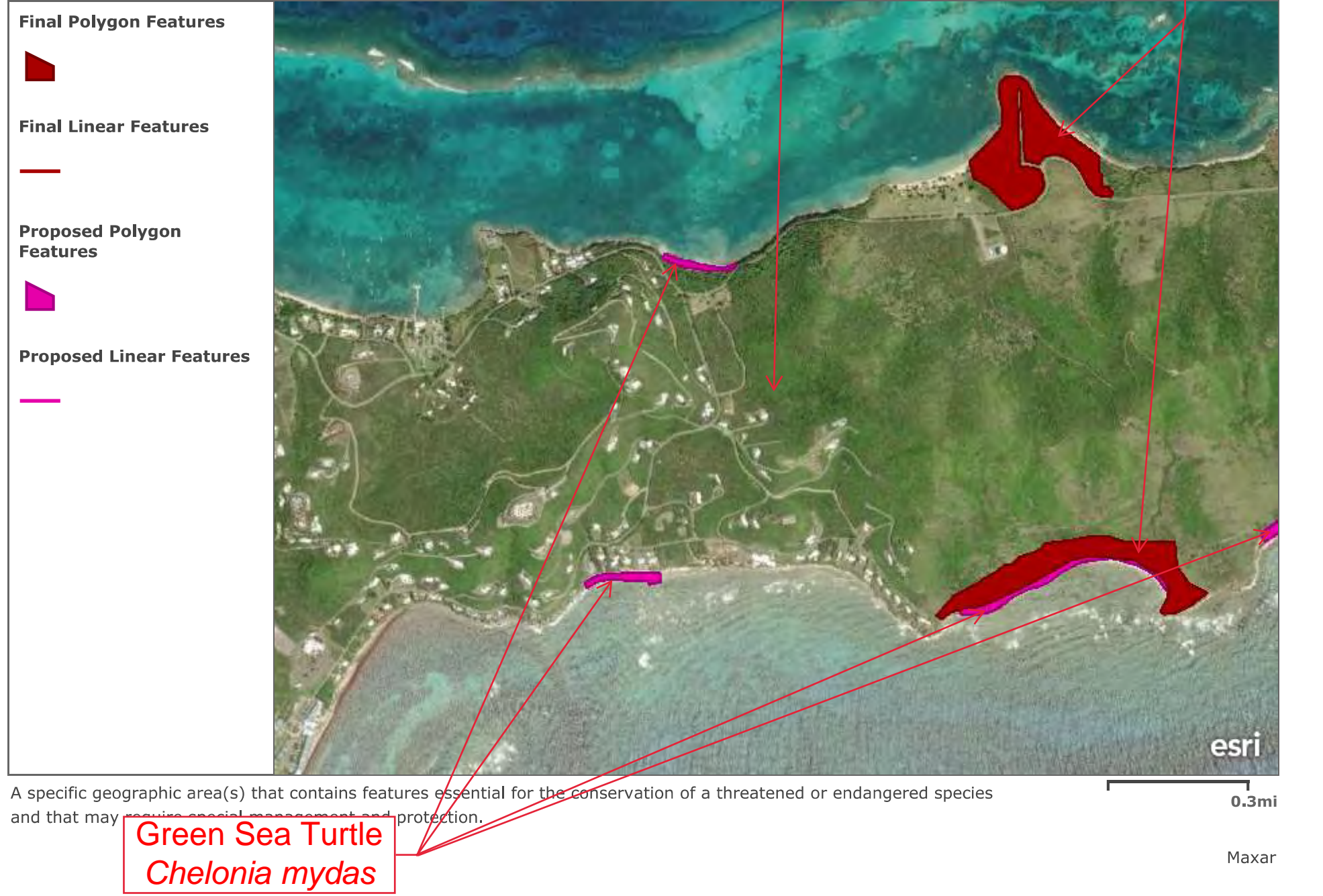


Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

Critical Habitat for Threatened & Endangered Species [USFWS]



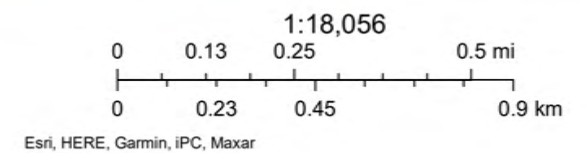
A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

Wilderness Map

Site Location

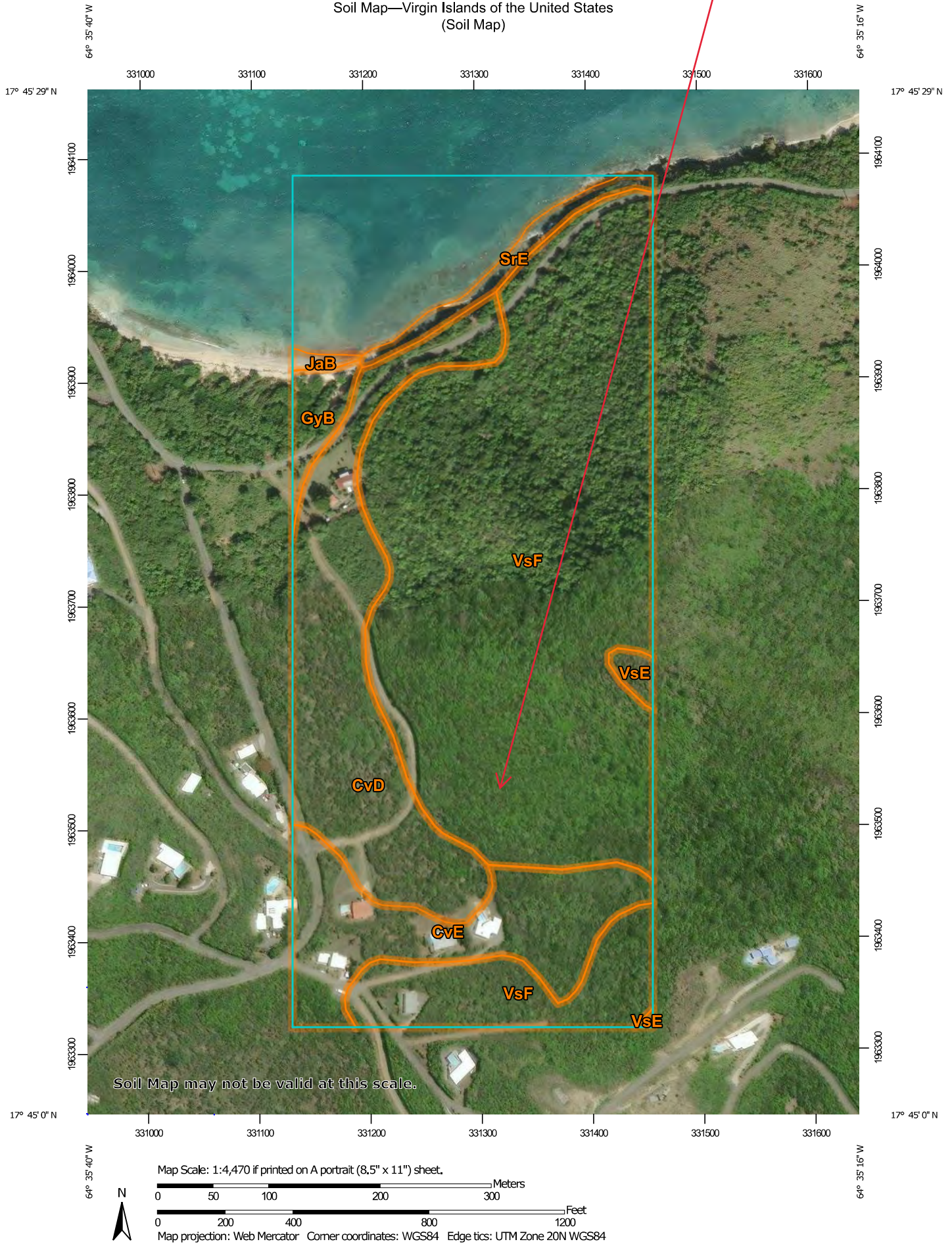


11/1/2023, 12:39:44 PM



Site Location

Soil Map—Virgin Islands of the United States
(Soil Map)



Natural Resources
Conservation Service


Web Soil Survey
National Cooperative Soil Survey

5/10/2024
Page 1 of 3

Soil Map—Virgin Islands of the United States (Soil Map)

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 1:12,000.

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: Virgin Islands of the United States

Survey Area Data: Version 5, Sep 13, 2023

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

Date(s) aerial images were photographed: Jan 14, 2014—May 27, 2020

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
CvD	Cramer-Victory complex, 12 to 20 percent slopes, very stony	10.4	17.0%
CvE	Cramer-Victory complex, 20 to 40 percent slopes, very stony	6.4	10.5%
GyB	Glynn gravelly loam, 2 to 5 percent slopes	1.1	1.8%
JaB	Jaucas sand, 0 to 5 percent slopes	0.2	0.3%
SrE	Southgate-Rock outcrop complex, 20 to 40 percent slopes	1.1	1.9%
VsE	Victory-Southgate complex, 20 to 40 percent slopes, very stony	0.4	0.6%
VsF	Victory-Southgate complex, 40 to 70 percent slopes, very stony	34.5	56.4%
Totals for Area of Interest		61.2	100.0%

Virgin Islands of the United States

CvD—Cramer-Victory complex, 12 to 20 percent slopes, very stony

Map Unit Setting

National map unit symbol: c7qj

Elevation: 160 to 4,920 feet

Mean annual precipitation: 40 to 48 inches

Mean annual air temperature: 79 to 81 degrees F

Frost-free period: 365 days

Farmland classification: Not prime farmland

Map Unit Composition

Cramer and similar soils: 50 percent

Victory and similar soils: 30 percent

Minor components: 20 percent

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

Description of Cramer

Setting

Landform: Ridges, mountain slopes, hills

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountaintop, mountainflank, side slope, crest, head slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Parent material: Weathered material

Typical profile

H1 - 0 to 9 inches: gravelly clay loam

H2 - 9 to 19 inches: gravelly clay

H3 - 19 to 32 inches: weathered bedrock

H4 - 32 to 60 inches: unweathered bedrock

Properties and qualities

Slope: 12 to 20 percent

Depth to restrictive feature: 10 to 20 inches to paralithic bedrock; 15 to 36 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 0.38 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 10.0

Available water supply, 0 to 60 inches: Very low (about 2.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 6s

Hydrologic Soil Group: D

Hydric soil rating: No

Description of Victory

Setting

Landform: Ridges, hillslopes

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Crest, side slope, head slope

Down-slope shape: Concave

Across-slope shape: Convex, linear

Parent material: Weathered material

Properties and qualities

Slope: 12 to 20 percent

Depth to restrictive feature: 20 to 40 inches to paralithic bedrock; 40 to 60 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 1.42 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 5.0

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 6s

Hydrologic Soil Group: C

Hydric soil rating: No

Minor Components

Maho bay

Percent of map unit: 10 percent

Landform: Ridges, mountain slopes, hillslopes

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountainflank, mountaintop, crest, head slope, side slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Hydric soil rating: No

Parasol

Percent of map unit: 10 percent

Landform: Ridges, hillslopes

Landform position (two-dimensional): Footslope, backslope
Landform position (three-dimensional): Base slope, side slope
Down-slope shape: Convex
Across-slope shape: Linear
Hydric soil rating: No

Data Source Information

Soil Survey Area: Virgin Islands of the United States
Survey Area Data: Version 5, Sep 13, 2023

Virgin Islands of the United States

CvE—Cramer-Victory complex, 20 to 40 percent slopes, very stony

Map Unit Setting

National map unit symbol: c7qk

Elevation: 160 to 4,920 feet

Mean annual precipitation: 40 to 51 inches

Mean annual air temperature: 79 to 81 degrees F

Frost-free period: 365 days

Farmland classification: Not prime farmland

Map Unit Composition

Cramer and similar soils: 50 percent

Victory and similar soils: 30 percent

Minor components: 20 percent

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

Description of Cramer

Setting

Landform: Hills, mountain slopes, ridges

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountaintop, mountainflank, side slope, crest, head slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Parent material: Weathered material

Typical profile

H1 - 0 to 9 inches: gravelly clay loam

H2 - 9 to 19 inches: gravelly clay

H3 - 19 to 32 inches: weathered bedrock

H4 - 32 to 60 inches: unweathered bedrock

Properties and qualities

Slope: 20 to 40 percent

Depth to restrictive feature: 10 to 20 inches to paralithic bedrock; 15 to 36 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 0.38 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 10.0

Available water supply, 0 to 60 inches: Very low (about 2.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 6s

Hydrologic Soil Group: D

Hydric soil rating: No

Description of Victory

Setting

Landform: Hillslopes, ridges

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Crest, side slope, head slope

Down-slope shape: Concave

Across-slope shape: Convex, linear

Parent material: Weathered material

Properties and qualities

Slope: 20 to 40 percent

Depth to restrictive feature: 20 to 40 inches to paralithic bedrock; 40 to 60 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 1.42 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 5.0

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 6s

Hydrologic Soil Group: C

Hydric soil rating: No

Minor Components

Parasol

Percent of map unit: 10 percent

Landform: Hillslopes, ridges

Landform position (two-dimensional): Footslope, backslope

Landform position (three-dimensional): Base slope, side slope

Down-slope shape: Convex

Across-slope shape: Linear

Hydric soil rating: No

Maho bay

Percent of map unit: 10 percent

Landform: Hillslopes, mountain slopes, ridges

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountainflank, mountaintop, crest, head slope, side slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Hydric soil rating: No

Data Source Information

Soil Survey Area: Virgin Islands of the United States

Survey Area Data: Version 5, Sep 13, 2023

Virgin Islands of the United States

VsF—Victory-Southgate complex, 40 to 70 percent slopes, very stony

Map Unit Setting

National map unit symbol: c7rz

Elevation: 160 to 4,920 feet

Mean annual precipitation: 40 to 47 inches

Mean annual air temperature: 79 to 81 degrees F

Frost-free period: 365 days

Farmland classification: Not prime farmland

Map Unit Composition

Victory and similar soils: 45 percent

Southgate and similar soils: 40 percent

Minor components: 15 percent

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

Description of Victory

Setting

Landform: Ridges, hillslopes

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Crest, side slope, head slope

Down-slope shape: Concave

Across-slope shape: Convex, linear

Parent material: Weathered material

Typical profile

H1 - 0 to 11 inches: loam

H2 - 11 to 20 inches: very gravelly loam

H3 - 20 to 33 inches: very gravelly loam

H4 - 33 to 50 inches: bedrock

H5 - 50 to 60 inches: bedrock

Properties and qualities

Slope: 40 to 70 percent

Depth to restrictive feature: 20 to 40 inches to paralithic bedrock; 40 to 60 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 1.42 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 5.0

Available water supply, 0 to 60 inches: Low (about 3.7 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: C

Hydric soil rating: No

Description of Southgate

Setting

Landform: Ridges, mountain slopes, hillslopes

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

Landform position (three-dimensional): Mountaintop, mountainflank, crest, head slope, side slope

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Weathered material

Typical profile

H1 - 0 to 5 inches: gravelly loam

H2 - 5 to 10 inches: very gravelly loam

H3 - 10 to 17 inches: weathered bedrock

H4 - 17 to 60 inches: unweathered bedrock

Properties and qualities

Slope: 40 to 70 percent

Depth to restrictive feature: 10 to 20 inches to lithic bedrock

Drainage class: Well drained

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to moderately high (0.14 to 1.42 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 5.0

Available water supply, 0 to 60 inches: Very low (about 1.0 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: D

Hydric soil rating: No

Minor Components

Cramer

Percent of map unit: 5 percent

Landform: Ridges, mountain slopes, hills

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountaintop, mountainflank, side slope, crest, head slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Hydric soil rating: No

Jealousy

Percent of map unit: 5 percent

Landform: Ridges, mountain slopes, hills

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountainflank, mountaintop, crest, head slope, side slope

Down-slope shape: Convex

Across-slope shape: Linear

Hydric soil rating: No

Maho bay

Percent of map unit: 3 percent

Landform: Ridges, mountain slopes, hillslopes

Landform position (two-dimensional): Backslope, shoulder, summit

Landform position (three-dimensional): Mountainflank, mountaintop, crest, head slope, side slope

Down-slope shape: Concave, convex

Across-slope shape: Linear

Hydric soil rating: No

Parasol

Percent of map unit: 2 percent

Landform: Ridges, hillslopes

Landform position (two-dimensional): Footslope, backslope

Landform position (three-dimensional): Base slope, side slope

Down-slope shape: Convex

Across-slope shape: Linear

Hydric soil rating: No

Data Source Information

Soil Survey Area: Virgin Islands of the United States

Survey Area Data: Version 5, Sep 13, 2023

Appendix **B**

United States Fish and Wildlife Service (USFWS): Caribbean Ecological Services Field Office and Virgin Islands Conservation Society (VICS) Consultation

Lotis' Informal Biological Assessment (IBA)



Informal Biological Assessment

Applicant: Blue Sky Towers III, LLC

Site Name: "East End"; Site Number: "USVI-00230"; Lotis Task ID: "BST_228"

Latitude : 17° 45' 08.6297" N ; Longitude : -64° 35' 26.7075" W

Lotis was contracted by the applicant to complete an informal biological assessment (IBA) for the proposed undertaking (which includes the tower, associated equipment, lease area, and access/utility/guy wire easements; or a combination of the mentioned). The purpose of this IBA is to assess and document whether the proposed undertaking will potentially affect species of concern, designated critical habitats, wetlands, and migratory birds identified by the United States Fish and Wildlife Services (USFWS) Information for Planning and Conservation (IPaC) tool and the Virgin Islands Conservation Society (VICS). The proposed undertaking's scope of work (SOW), site photographs, site location maps, the official IPaC species list/Section 7 guidance, and the relevant species listed by the Virgin Islands are included in this report.

The Proposed Undertaking's Scope of Work:

The proposed undertaking is located near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix County, Virgin Islands 00820 and consists of a 157-foot-tall monopole telecommunication tower and associated equipment contained within a 60-foot by 60-foot lease area at the above property. The undertaking includes a 15-foot wide by 1,285.84-foot-long access/utility easement that extends northwest connecting with East End Road. Also included is a 15-foot wide by 369.6-foot-long access/utility easement that extends southwest connecting with existing utilities. In total the proposed undertaking is approximately 28,431.60 square feet. The proposed tower site is approximately 148.2 feet above mean sea level (AMSL).

Site and Surrounding Habitat:

The proposed undertaking is currently located in forested/shrubland. Per the scope of work, several shrubs/trees within the proposed undertaking are identified to be removed/impacted. The surrounding habitats within a 0.5-mile radius of the proposed undertaking consist of commercial and residential properties with associated roadways, forested/shrubland and large wetlands. To the north, habitat consists of forested/shrubland followed by East End Road, a forested beach area and the Knight Bay (a large wetland). To the east, habitat consists of forested/shrubland. To the south, habitat consists of forested/shrubland followed by commercial and residential properties with associated roadways and Grapetree Bay (a large wetland). To the west, habitat consists of forested/shrubland followed by commercial and residential properties with associated roadways and forested/shrubland. Per USFWS Critical Habitat Mapper (<http://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8ddb77>) the proposed undertaking is approximately 140 feet of mapped proposed critical habitat and qualifies as preferred habitat for the Green Sea Turtle (*Chelonia mydas*) which is a federally listed species. However, due to the scope of work, habitat should not be adversely affected during construction.

Wetlands:

Lotis has reviewed the United States Geological Survey's (USGS) topographic map as well as the USFWS National Wetlands Inventory Map (NWIM) to determine if the lease area and easements would have an impact on any wetlands. Lotis determined that the proposed undertaking is not located in a recognized national wetland area but due to the proximity of wetlands in all directions the undertaking, Lotis recommends best management practices be incorporated to protect adjacent habitats and wetlands from runoff caused by impervious surfaces. The closest USFWS identified wetland is approximately 0.04 miles northwest of the proposed undertaking's access/utility easement. A wetlands map is included in this report to show all wetlands in the surrounding area.

Threatened or Endangered Species:

Lotis has researched threatened or endangered species and designated critical habitat for the action area. This is exclusive to any such species that have been reported to exist within the area where the proposed undertaking is located. The following list of federally threatened or endangered species was acquired through the USFWS IPaC website.

FEDERAL SPECIES

Species Name	Status	Preferred Habitat	Habitat Presence	Recommendation of Effect
Green Sea Turtle (<i>Chelonia mydas</i>)	Threatened	Shallow waters offshore	Habitat assessment indicated preferred habitat may be present.	Not Likely to Adversely Affect (NLAA)
Hawksbill Sea Turtle (<i>Eretmochelys imbricata</i>)	Endangered	Nearshore foraging grounds, especially healthy coral reef habitats	Habitat assessment indicated preferred habitat may be present.	Not Likely to Adversely Affect (NLAA)
Leatherback Sea Turtle (<i>Dermochelys coriácea</i>)	Endangered	Marine waters	Habitat assessment indicated preferred habitat may be present.	Not Likely to Adversely Affect (NLAA)

Migratory Birds:

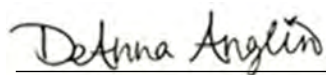
The USFWS has indicated its concern of the impact of towers on migrating bird populations. The proposed undertaking and design process for this undertaking could not conform to all the USFWS recommendations to decrease potential effects on migratory birds. Lotis has assessed the potential habitat for migratory birds and has determined that potential habitat is present at and around the proposed undertaking. This habitat includes a few wetlands, and forested/shrubland in the surrounding area. The siting of this proposed undertaking has placed it within disturbed habitat. It should also be noted that the proposed undertaking is located within 3.07 miles of an existing 80-foot monopole telecommunication tower to the southwest.

Based upon the efforts during this IBA as well as the current data made available, surrounding habitat has the potential to support migratory birds; however, potential negative effects of a nearby tower are unknown and the addition of another tower may or may not negatively affect migratory birds.

Conclusions:

In conclusion, all species preferred habitats identified by the USFWS have been observed surrounding the proposed undertaking's location. However, due to the small scale of the project and quality of habitat located at the project site, there is little potential for the proposed undertaking to have a significant impact on the sea turtles mentioned above. Therefore, based on the documents reviewed, and the SOW outlined above, identified threatened/endangered species may be affected, but are not likely to be impacted as a whole. Lotis' recommends following all preventative recommendations presented by the USFWS and the VICS.

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).




DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
Enclosures

Wetlands within 0.50 mile radius

Closest wetland 0.04 miles from access/utility easement

Legend

 BST_228 - East End USVI-00230



Google Earth

***Geographic Consulting's
Bio Survey and Endangered Species Assessment***

BIO SURVEY AND ENDANGERED SPECIES ASSESSMENT

A biosurvey of the study site was conducted to assess the habitat types on the site and to determine if protected plants and animals were present. Lists containing the xx identified plant species are provided, as well as xx bird species, and 1 lizard. No protected species were observed or recorded.

*Plot #3 Estate Long
Point and Cotton
Garden. East End B
Quarter. St. Croix
USVI*

Table of Contents

Introduction	3
Methods	3
Results	4
Threatened and Endangered Species	4
Vegetation Surveys.....	4
Animal Species	6
Recommendations	7
References	8



Introduction

Biologists and field technicians from Geographic Consulting LLC (GC) conducted a biological survey on Plot #3 Estate Long Point and Cotton Garden, east Quarter of St. Croix, United States Virgin Islands. The subject property is on the easter north shore. The site map provided by Blue Sky Indicated property boundaries and the potential Earth Change area. These boundaries are overlaid on the map in this report. The biosurvey is a means to determine the presence or absence of endangered or threatened terrestrial plant and animal species.

This report documents this search, which is mandated by local and federal statutes. Territorial law lists plant and animal species requiring protection. We include these in Appendix I of this report. The local law applying to this project is the Virgin Islands “Endangered and Indigenous Species Act of 1990” Title 12, Virgin Islands Code, Chapter 2, Protection of Indigenous, Endangered and Threatened Fish, Wildlife and Plants. A higher order of protection for a shorter list of species is proscribed by the U.S. “Endangered Species Act of 1973”. Pub. L. 98-205, Dec 28, 1978, 81 Stat 884, and amendments thereto, codified in 16 U.S.C. section 1531 et seq. Federal protection applies to two St. Croix plants listed as “Endangered”: Vahl’s Boxwood (*Buxus vahlii*) and Tropical Lilythorn (*Catesbaea melanocarpa*). Eggers’ Agave (*Agave eggersiana*) is listed as “Candidate”. This status is preliminary to intended listing but carries less federal protection than “endangered” or “threatened” status. Two lizard species pertinent to this study are the St. Croix ground lizard (*Ameiva polops*) and the litter-dwelling gecko (*Sphaerodactylus beattyi*), which are both federally protected and have the potential to inhabit the survey site.

Methods

Geographic Consulting’s (GC) field team consisted of forest ecologist, Brian Daley PhD, and two field technicians. Site maps were prepared prior to field work and uploaded to GCs online cloud storage and accessed through ESRI ARCGIS Online (AGOL). Our team accessed these data through Galaxy tab E tablets. Field data and photographs were recorded via these tables. Paper maps were printed for the field crew to use as a reference in the field and in case cell network data was insufficient. Fieldwork was conducted between January 9 and January 25, 2024.

The field team traversed the site making observations of plants, birds and reptiles and recording these observations on the Galaxy tablets. Trees over three inches in diameter at breast height (DBH) were recorded with a photograph and their location (GPS point). These trees were identified to the species level whenever possible. Trees were also marked in the field with flagging tape in addition to being recorded in the GIS.

The subject site is characterized by steep slopes and rugged terrain. The forest on site is low, single-canopy, secondary forest. This dry forest type is characteristic of the arid east end of

St. Croix. It is slow growing, but with a closed canopy comprised of primarily native species. This is indicative of a post-agricultural land clearing, but one that occurred decades ago.

Results

Threatened and Endangered Species

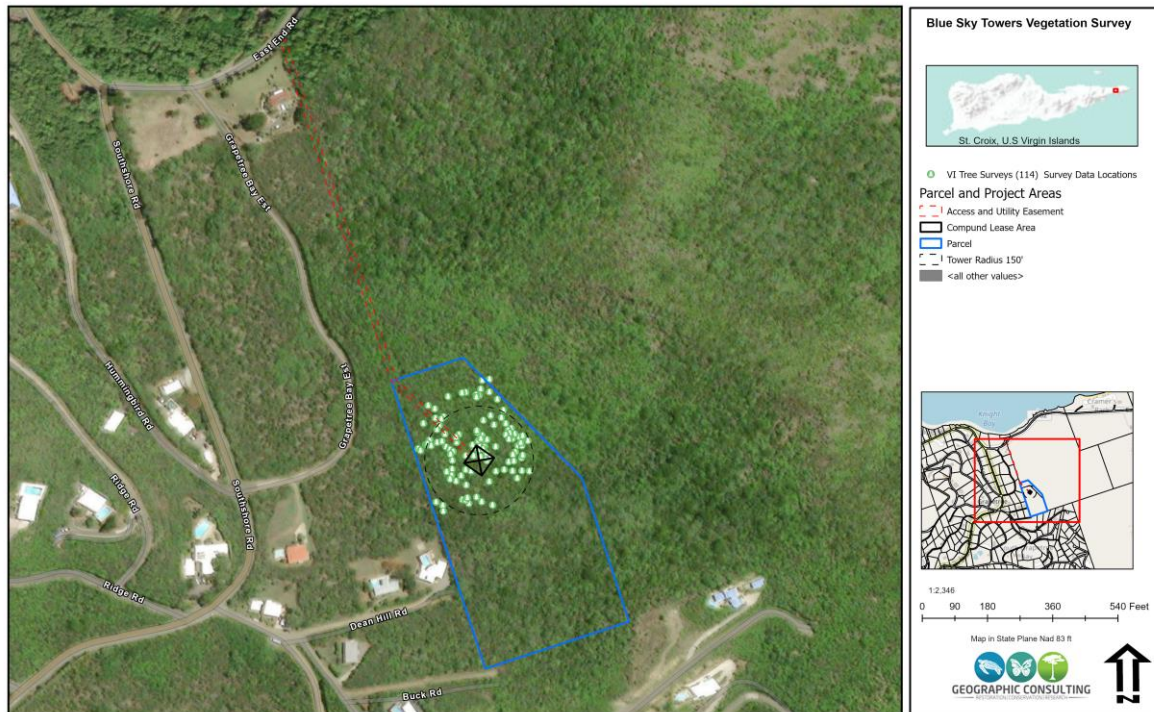
As described in the Methods Section in greater detail, a systematic search was completed of the plants and animals of the subject property. No rare plant species protected by Virgin Islands or federal statutes were encountered.

No rare vertebrate animals protected by Virgin Islands or federal statutes were observed during our comprehensive biosurvey.

Vegetation Surveys

The major plant communities of the dry forest observed were dry semi-deciduous woodlands and dry evergreen scrubland. These observations and their spatial distribution are depicted in Figure 1. The figure indicates the property boundaries in blue and the locations of the observed trees over 3 inches DBH are indicated in light green. The 15-foot access road is indicated in dashed red lines. The field team walked this line, making observations, but did not mark trees in this narrow band. No threatened or endangered species were observed in the main portion of the proposed development or in the access road. The vast majority of the species observed are native trees to the Virgin Islands dry forest. Some exotic invasive species were also observed and recorded, such as tan tan (*Leucaena leucocephala*). The method of selecting only trees above three inches dbh tends to exclude these smaller diameter plants.

Figure 1 Subject property boundary and locations of observed trees.



Trees above three inches dbh were observed across the site. The focus of this biosurvey was the area within and adjacent to the potential earth change area marked by the black dotted line in Figure 1. The trees were identified to the species level and the findings are summarized in Table 1, below.

Table 1. The classification and quantity of the woody plants observed on site.

Genus species		
<i>Bourreria succulenta</i>	Pigeonberry	47
<i>Bursera simaruba</i>	Turpentine	8
<i>Capparis cynophallophora</i>	Jamaican Caper	2
<i>Ficus benjamina</i>	Ficus	1
<i>Krugiodendron ferreum</i>	Ironwood	3
<i>Leucaena leucocephala</i>	Tan-tan	7
<i>Piscidia carthagenensis</i>	Fish Poison	19
<i>Pithecellobium unguis-cati</i>	Bread and Cheese	1
<i>Randia aculeata</i>	Inkberry	5
Unknown <i>Boraginaceae</i> spp	Relative to pigeonberry	9
<i>Exostema caribaeum</i>	Princewood	9
<i>Comocladia dodonaea</i>	Christmas Bush	1
<i>Eugenia</i> Spp.	Eugenia	2
Grand Total		114

Animal Species

We observed 13 bird species across the surveyed areas, all of them native (Table 2). The most common sighted birds were the gray kingbird (*Tyrannus dominicensis*), Yellow warbler (*Setophaga petechia*), bananaquit (*Coereba flaveola*), Green-throated Carib (*Eulampis holosericeus*), Antillean crested hummingbird (*Orthorhynchus cristatus*), and Pearly-eyed thrasher (*Margarops fuscatus*). We spotted a pair of red-tailed hawks (*Buteo jamaicensis*) hunting in the air overhead, but they did not land on the property. A flock of Smooth-billed ani (*Crotophaga ani*) was heard on a single occasion, but not seen.

A single native lizard species was observed, the St. Croix anole (*Anolis acutus*). No amphibians were detected, but it is likely the Antillean tree frog (*Eleutherodactylis antillana*), and the Cuban tree frog (*Osteopilus septentrionalis*) were present.

The small Indian mongoose (*Herpestes auropunctatus*) and black rat (*Rattus rattus*) were also observed on the site. These are exotic species and not protected. No other vertebrate animals were sighted. Table 2 summarizes the bird species observed.

Table 2. Bird species observed during the biosurvey, listed by species, common name and family as well as native ranges for each.

Species name	Common name	Family	Family Relatives	Range/ Nativity
<i>Buteo jamaicensis</i>	Hawk, Red-tailed	<i>Accipitridae</i>	Eagles & Hawks	Canada to CA & WI
<i>Patagioenas squamosa</i>	Scaly-naped pigeon	<i>Columbidae</i>	Pigeons & Doves	WI except Bahamas
<i>Patagioenas leucocephala</i>	White-crowned pigeon	<i>Columbidae</i>	Pigeons & Doves	CA, S. US, Greater Antilles to Antigua
<i>Columbina passerina</i>	Common ground dove	<i>Columbidae</i>	Pigeons & Doves	WI, So USA, CA, N SA
<i>Zenaida aurita</i>	Zenaida dove	<i>Columbidae</i>	Pigeons & Doves	WI to CA coast
<i>Crotophaga ani</i>	Ani, smoothed-billed	<i>Cuculidae</i>	Cuckoos & Anis	Trop s US, WI, to Brazil
<i>Coereba flaveola</i>	Bananaquit	<i>Emberizidae</i>	Wood Warblers, Blackbirds, Tanagers	WI, except Cuba, CA, SA
<i>Margarops fuscatus</i>	Thrasher, Pearly-eyed	<i>Mimidae</i>	Mockingbirds & Thrashers	E. Bahamas, PR to St. Vincent
<i>Setophaga petechia</i>	Yellow warbler	<i>Parulidae</i>	New World warblers	NA, CA, WI
<i>Eulampis holosericeus</i>	Green-throated Carib	<i>Trochilidae</i>	Hummingbirds	E. PR, VI & LA
<i>Orthorhyncus cristatus</i>	Hummingbird, Antillean Crested	<i>Trochilidae</i>	Hummingbirds	E. PR, VI & LA
<i>Tyrannus dominicensis</i>	Kingbird, Gray	<i>Tyrannidae</i>	Tyrant Flycatchers	FL, WI, N. SA

Recommendations

No protected animal or plant species were encountered after a complete biosurvey of the subject area. Therefore, we recommend that the land clearing activity on the site may proceed as planned within the boundaries presented to us. The native forest growing of the property is relatively diverse and represents decades of growth. We further recommend minimizing the impact to the forest outside the proposed area and monitoring the work closely during the land clearing process.

References

- Acevedo-Rodriguez, P. 1996. Flora of St. John. Memoirs of the New York Botanical Garden, Vol. 78. Bronx, NY. 582 pp.
- Daley, B., J. Valiulis, & R. Slatton. 2012. Exotic Invasive Species; US Virgin Islands; Species Affecting Forests. Doc.#GS-VIDA-1201. St. Croix, US Virgin Islands.
- Daley, Brian and Jennifer Valiulis. 2013 Rapid Assessment of Four Endangered Plant Populations of St. Croix, US Virgin Islands, *Buxus vahlii* and *Catesbaea melanocarpa*. For the Virgin Islands Department of Planning and Natural Resources, Frederiksted, St. Croix, US Virgin Islands. 14pp.
- Encyclopedia of Life*. Web. <http://www.eol.org> Accessed: March 24, 2024.
- Flora of the West Indies*. Web. <http://botany.si.edu/antilles/WestIndies/catalog.htm>. National Museum of Natural History. Smithsonian Institution. Accessed: March 25, 2024.

United States Fish and Wildlife Service (USFWS): Caribbean Ecological Services Field Office Submission

Note:

In the interest of efficiency and economy, attachments included in the original submission under this section are not duplicated throughout this NEPA Summary. The following attachment(s), found at the conclusion of this report, were included in the original submission:

- *Proposed Project Summary*
- *Informal Biological Assessment*
- *USFWS IPaC Document*
- *Attachment 1 - Maps*
- *Attachment 2 – Photographs*
- *Attachment 3 – FCC ESA Delegation Letter*



May 24, 2024

United States Fish & Wildlife Service: Caribbean Ecological Services Field Office
Attn: Marisa Rivera
P.O. Box 491
Boquerón, P.R. 00622
Submitted via email: marelisa_rivera@fws.gov

RE: Proposed Telecommunications Tower Undertaking "East End" in St. Croix, Virgin Islands; Blue Sky Towers III, LLC; BST_228

To Whom It May Concern:

Blue Sky Towers III, LLC (BST), is proposing to construct a tower installation near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820. Lotis Environmental, LLC (Lotis), a designated non-federal representative of the FCC, is preparing an environmental review on behalf of BST as part of its permit process and regulatory review by the Federal Communications Commission (FCC). Lotis' review is focused on compliance with Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307. In addition, Lotis will be considering the possible impact on wetlands, critical habitat, wildlife refuges, wilderness areas, state listed species of concern, as well as species protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Act. Consultation with the state will also be initiated to mitigate potential impact to species of concern.

Attached, please find information pertaining to the proposed undertaking known as East End. The information package includes the proposed project summary, site maps, results from our search of threatened or endangered species within the action area (provided by the IPaC website) and the state species list and site photographs of the proposed undertaking and adjacent habitat. Lotis has completed an informal biological assessment of the proposed undertaking's action area using available maps, documentation, and site reconnaissance. We have determined that the proposed undertaking would "*not likely adversely affect*" federal listed species, their designated habitat, or designated critical habitat. Lotis came to this conclusion for the sea turtles in the area due to the access easement proposed measuring less than 150 meters from the shore. In addition, this project exists just outside proposed critical habitat for the Green Sea Turtle as well as the *Agave eggersiana*.

We would appreciate your assistance in determining if, in your opinion, the proposed undertaking is found to affect a wildlife refuge or will have an adverse impact on any listed and/or proposed species of concern or any designated and/or proposed critical habitats. We request your concurrence with our determination of "*not likely to adversely affect*" federally listed species.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



On behalf of BST, I would solicit your comments on this proposed undertaking. Kindly forward to the undersigned via email (Anglin@thelotisgroup.com) or by regular mail to 8899 Main Street - Suite 107, Williamsville, NY 14221.

Thank you for your consideration and cooperation in this matter.

Sincerely,

Lotis Environmental, LLC

A handwritten signature in black ink that reads "DeAnna Anglin". The signature is written in a cursive style and is positioned above a horizontal line.

DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
Anglin@thelotisgroup.com

Enclosures



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

***Federal Communications Commission (FCC)
Designation Letter for FCC licensees, applicants, tower
companies and their representatives when they request
informal consultations and/or request species lists
pursuant to Section 7 of the Endangered Species Act of
1973, as amended (16 U.S.C. Â§Â§ 1531-1543) (ESA)***



Federal Communications Commission
Washington, D.C. 20554

July 9, 2003

Mr. Steve Williams, Director
U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

BY FIRST CLASS MAIL AND FACSIMILE (202) 208-6965

Dear Mr. Williams:

We have received requests from various U.S. Fish and Wildlife Service (FWS) field offices for a designation letter from the Federal Communications Commission (FCC) for FCC licensees, applicants, tower companies and their representatives when they request informal consultations and/or request species lists pursuant to Section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. §§ 1531-1543) (ESA). Pursuant to 50 C.F.R. § 402.08 and in accordance with FCC rules, this letter formally designates all FCC licensees, applicants, tower companies and their representatives as non-federal representatives for purposes of Section 7 consultation. We recognize that the Commission retains ultimate responsibility for Section 7 obligations. *See* 47 C.F.R. §§ 1.1308(b), 1.1312(b).

In accordance with the interagency cooperation regulations at 50 C.F.R. § 402.08, non-Federal representatives may be involved in an informal consultation process and may request and receive species lists, prepare the biological assessment, and provide information for a formal consultation. Because the FCC has deregulated the construction of communications facilities, the Commission is not involved in most of its regulatees' planning and construction activities unless they affect certain categories of environmental concerns. (The FCC still does issue construction permits for broadcast facilities.) Thus, the FCC does not individually authorize and does not require notice of most communications towers. The FCC's rules require its licensees, applicants, and tower companies to determine, in the first instance, the environmental effects of their proposed towers. *See* 47 C.F.R. § 1.1312(a).

In accordance with this policy, the FCC's environmental rules require that all licensees and applicants prepare and file with the FCC an Environmental Assessment (EA) if, among other things, their proposed facilities "may affect" or "are likely to jeopardize" listed or proposed threatened or endangered species or designated critical habitats.¹ In order to

¹ 47 C.F.R. § 1.1307(a)(3) requires the preparation of an EA for facilities that: "(i) May affect listed threatened or endangered species or designated critical habitats; or (ii) are likely to jeopardize the continued

Williams Letter

page 2

determine whether an EA is required, an applicant may need to request information from and informally consult with FWS. Moreover, the Note to Section 1.1307(a)(3) of the FCC's environmental rules² specifically authorizes FCC licensees and applicants and their representatives to contact FWS to determine whether their proposed facilities will affect threatened or endangered species or designated critical habitats. We understand that the FWS rules require parties that are engaged in informal consultation to include the information described in 50 C.F.R. § 402.12, which may be different from information required under the National Environmental Policy Act. Once it is established that threatened or endangered species or their critical habitats may be affected, licensees and applicants are required to base their analysis on the "best scientific and commercial data available." See 47 C.F.R. § 1.1311(a)(6).

Accordingly, under the FCC's environmental rules, all FCC licensees, applicants, tower companies and their representatives have a blanket designation and are authorized to contact and work with the FWS to ensure that any effects on threatened and endangered species and their critical habitats are evaluated in siting proposed communications facilities. The FCC intends to post this letter on the FCC website, <http://wireless.fcc.gov/siting>.

Sincerely,



Susan H. Steiman
Associate General Counsel

Cc: Richard Sayers, Endangered Species Division

existence of any proposed endangered or threatened species or 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."

² 47 C.F.R. § 1.1307(a)(3) Note.

***Proof of United States Fish and Wildlife Service
(USFWS): Caribbean Ecological Services Field Office
Submission***

DeAnna Anglin

From: DeAnna Anglin
Sent: Friday, May 24, 2024 2:15 PM
To: caribbean_es@fws.gov
Cc: NEPA NHPA
Subject: USFWS Section 7 informal consultation regarding a proposed telecommunication build BST_228 - East End USVI-00230
Attachments: Request for assistance ; USVI-00230 East End - Bio Survey and Endangered species assessment - April 2024.pdf; USFWS sub 5.24.24.pdf; BST_228 - East End USVI-00230.kmz
Importance: High

To Whom It May Concern,

Please see the attached request for informal Section 7 review for the potential effect on Federally listed threatened and endangered species. We have determined a "May Affect, but Not Likely to Adversely Affect (MANLAA)" on one or more listed species of concern or their corresponding habitat(s).

You will find the official letter of request, site maps, site photos, and an informal biological assessment which has been completed by Lotis to aid you in your review. Lastly, I have attached a KMZ file which will give you the pin point location of the proposed undertaking on Google Earth. Should you need additional information please feel free to contact me by phone or by responding to this email.

Thank you for your time and consideration.

Warmly,

DeAnna Anglin

Senior Biologist/NEPA Specialist



8899 Main Street – Suite 107
Williamsville, NY 14221

www.thelotisgroup.com

Find us on LinkedIn 

Office: 716.580.7000
Mobile: 417.840.5008

Anglin@thelotisgroup.com

Find me on LinkedIn 

Please consider the environment before printing this email

“If you wish to know the divine, feel the wind on your face
and the warm sun on your hand.” — Buddha

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake,

***United States Fish and Wildlife Service (USFWS):
Caribbean Ecological Services Field Office's Information
for Planning and Conservation (IPaC) Letter(s)***



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
Post Office Box 491
Boqueron, PR 00622-0491
Phone: (939) 320-3135 Fax: (787) 851-7440
Email Address: CARIBBEAN_ES@FWS.GOV

In Reply Refer To:

06/26/2024 20:56:45 UTC

Project Code: 2024-0090905

Project Name: East End USVI-00230

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 FOLLOWING SPECIES LIST IS NOT A SECTION 7 CONSULTATION. PLEASE CONTACT OUR OFFICE TO COMPLETE THE CONSULTATION PROCESS

The purpose of the Endangered Species Act (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 those species and/or their designated critical habitat.

Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action". The enclosed species list provides information to assist with the U.S. Fish and Wildlife Service (Service) consultation process under section 7 of the Act. However, **the enclosed species list does not complete the required consultation process**. The species list identifies threatened, endangered, proposed and candidate species, as well as proposed and designated critical habitats, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. A discussion between the Federal agency and the Service should include what types of listed species may occur in the proposed action area and what effect the proposed action may have on those species. This process initiates informal consultation.

Once a species list is obtained for the proposed project, an effect determination for endangered and threatened species should be made. The applicant could make an effect determination by using available keys on IPaC for specific species. For species with no determination keys, the applicant should request concurrence from the Service by sending a project package

to caribbean_es@fws.gov. To obtain guidance for completing this process and the minimum requirements for project packages, please visit:

<https://www.fws.gov/sites/default/files/documents/consultation-under-section-7-of-the-endangered-species-act-with-the-caribbean-ecological%20Services-field-office-template-letter.pdf>

When a federal agency, after discussions with the Service, determines that the proposed action is not likely to adversely affect any listed species, or adversely modify any designated critical habitat, and the Service concurs, the informal consultation is complete, and the proposed project moves ahead. If the proposed action is suspected to affect a listed species or modify designated critical habitat, the Federal agency may then prepare a Biological Assessment (B.A.) to assist in its determination of the project's effects on species and their habitat. However, a B.A. 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 B.A. where the agency provides the Service with an evaluation on the likely effects of the action to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a B.A. are described at 50 CFR 402.12.

If a federal agency determines, based on its B.A. or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to further 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 process. 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>

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.

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". Please use this list to determine whether your project requires consultation and to make your effects determination. For more guidance, use the Guideline for Consultation under Section 7 of the Endangered Species Act with the Caribbean Ecological Services Field Office by clicking [here](#).

This species list is provided by:

Caribbean Ecological Services Field Office

caribbean_es@fws.gov

Post Office Box 491

Boqueron, PR 00622-0491

(786) 244-0081

Attachment(s):

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

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:

Caribbean Ecological Services Field Office

Post Office Box 491

Boqueron, PR 00622-0491

(939) 320-3135

PROJECT SUMMARY

Project Code: 2024-0090905

Project Name: East End USVI-00230

Project Type: Communication Tower New Construction

Project Description: The proposed undertaking is located near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix County, Virgin Islands 00820 and consists of a 157-foot-tall monopole telecommunication tower and associated equipment contained within a 60-foot by 60-foot lease area at the above property. The undertaking includes a 15-foot wide by 1,285.84-foot-long access/utility easement that extends northwest connecting with East End Road. Also included is a 15-foot wide by 369.6-foot-long access/utility easement that extends southwest connecting with existing utilities. In total the proposed undertaking is approximately 28,431.60 square feet. The proposed tower site is approximately 148.2 feet above mean sea level (AMSL).

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@17.7532656,-64.59146592492468,14z>



Counties: St. Croix County, Virgin Islands

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 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.

REPTILES

NAME	STATUS
Green Sea Turtle <i>Chelonia mydas</i> Population: South Atlantic DPS There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6199 General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7134.pdf	Threatened
Hawksbill Sea Turtle <i>Eretmochelys imbricata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3656 General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7131.pdf	Endangered
Leatherback Sea Turtle <i>Dermochelys coriacea</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1493 General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7132.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 Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, 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"](#).

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)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ 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"](#).

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)

THERE ARE NO FWS MIGRATORY BIRDS OF CONCERN WITHIN THE VICINITY OF YOUR PROJECT AREA.

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: Lotis Environmental
Name: Miles Walz-Salvador
Address: 8899 Main St
Address Line 2: 107
City: Williamsville
State: NY
Zip: 14221
Email: nepa.nhpa@thelotisgroup.com
Phone: 3149130505

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
Post Office Box 491
Boqueron, PR 00622-0491
Phone: (939) 320-3135 Fax: (787) 851-7440
Email Address: CARIBBEAN_ES@FWS.GOV

In Reply Refer To:

05/15/2024 16:17:17 UTC

Project Code: 2024-0090905

Project Name: East End USVI-00230

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 FOLLOWING SPECIES LIST IS NOT A SECTION 7 CONSULTATION. PLEASE CONTACT OUR OFFICE TO COMPLETE THE CONSULTATION PROCESS

The purpose of the Endangered Species Act (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 those species and/or their designated critical habitat.

Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action". The enclosed species list provides information to assist with the U.S. Fish and Wildlife Service (Service) consultation process under section 7 of the Act. However, **the enclosed species list does not complete the required consultation process**. The species list identifies threatened, endangered, proposed and candidate species, as well as proposed and designated critical habitats, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. A discussion between the Federal agency and the Service should include what types of listed species may occur in the proposed action area and what effect the proposed action may have on those species. This process initiates informal consultation.

Once a species list is obtained for the proposed project, an effect determination for endangered and threatened species should be made. The applicant could make an effect determination by using available keys on IPaC for specific species. For species with no determination keys, the applicant should request concurrence from the Service by sending a project package

to caribbean_es@fws.gov. To obtain guidance for completing this process and the minimum requirements for project packages, please visit:

<https://www.fws.gov/sites/default/files/documents/consultation-under-section-7-of-the-endangered-species-act-with-the-caribbean-ecological%20Services-field-office-template-letter.pdf>

When a federal agency, after discussions with the Service, determines that the proposed action is not likely to adversely affect any listed species, or adversely modify any designated critical habitat, and the Service concurs, the informal consultation is complete, and the proposed project moves ahead. If the proposed action is suspected to affect a listed species or modify designated critical habitat, the Federal agency may then prepare a Biological Assessment (B.A.) to assist in its determination of the project's effects on species and their habitat. However, a B.A. 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 B.A. where the agency provides the Service with an evaluation on the likely effects of the action to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a B.A. are described at 50 CFR 402.12.

If a federal agency determines, based on its B.A. or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to further 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 process. 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>

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.

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". Please use this list to determine whether your project requires consultation and to make your effects determination. For more guidance, use the Guideline for Consultation under Section 7 of the Endangered Species Act with the Caribbean Ecological Services Field Office by clicking [here](#).

This species list is provided by:

Caribbean Ecological Services Field Office

caribbean_es@fws.gov

Post Office Box 491

Boqueron, PR 00622-0491

(786) 244-0081

Attachment(s):

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

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:

Caribbean Ecological Services Field Office

Post Office Box 491

Boqueron, PR 00622-0491

(939) 320-3135

PROJECT SUMMARY

Project Code: 2024-0090905

Project Name: East End USVI-00230

Project Type: Communication Tower New Construction

Project Description: The proposed undertaking is located near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix County, Virgin Islands 00820 and consists of a 157-foot-tall monopole telecommunication tower and associated equipment contained within a 60-foot by 60-foot lease area at the above property. The undertaking includes a 15-foot wide by 1,285.84-foot-long access/utility easement that extends northwest connecting with East End Road. Also included is a 15-foot wide by 369.6-foot-long access/utility easement that extends southwest connecting with existing utilities. In total the proposed undertaking is approximately 28,431.60 square feet. The proposed tower site is approximately 148.2 feet above mean sea level (AMSL).

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@17.7532656,-64.59146592492468,14z>



Counties: St. Croix County, Virgin Islands

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 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.

REPTILES

NAME	STATUS
<p>Green Sea Turtle <i>Chelonia mydas</i></p> <p>Population: South Atlantic DPS</p> <p>There is proposed critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/6199</p> <p>General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7134.pdf</p>	Threatened
<p>Hawksbill Sea Turtle <i>Eretmochelys imbricata</i></p> <p>There is final critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/3656</p> <p>General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7131.pdf</p>	Endangered
<p>Leatherback Sea Turtle <i>Dermochelys coriacea</i></p> <p>There is final critical habitat for this species. Your location does not overlap the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/1493</p> <p>General project design guidelines: https://ipac.ecosphere.fws.gov/project/OV6KHUXQVNHFTBCL7HQHNPFK7A/documents/generated/7132.pdf</p>	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 Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, 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"](#).

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)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ 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"](#).

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)

THERE ARE NO FWS MIGRATORY BIRDS OF CONCERN WITHIN THE VICINITY OF YOUR PROJECT AREA.

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: Lotis Environmental
Name: Miles Walz-Salvador
Address: 8899 Main St
Address Line 2: 107
City: Williamsville
State: NY
Zip: 14221
Email: nepa.nhpa@thelotisgroup.com
Phone: 3149130505

***United States Fish and Wildlife Service's (USFWS)
Information for Planning and Conservation (IPaC)
Determination Key(s)***



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
Post Office Box 491
Boqueron, PR 00622-0491
Phone: (939) 320-3135 Fax: (787) 851-7440
Email Address: CARIBBEAN_ES@FWS.GOV

In Reply Refer To:
Project code: 2024-0090905
Project Name: East End USVI-00230

05/15/2024 16:19:27 UTC

Subject: Concurrence letter for the project named 'East End USVI-00230' for specified threatened and endangered species, that may occur in your proposed project location, pursuant to the IPaC determination key titled Caribbean Determination Key (DKey).

Dear Applicant:

Thank you for using the assisted evaluation keys in IPaC. This letter is provided pursuant to the Service's authority under the Endangered Species Act of 1973, as amended (ESA) (87 Stat. 884; 16 U.S.C. 1531et seq.). On May 15, 2024, Miles Walz-Salvador used the Caribbean DKey; dated April 03, 2024, in the U.S. Fish and Wildlife Service's online [IPaC application](#) to evaluate potential impacts to federally listed species, from a project named 'East End USVI-00230'. The project is located in St. Croix County, Virgin Islands (shown below).

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@17.7532656,-64.59146592492468,14z>



The following description was provided for the project 'East End USVI-00230':

The proposed undertaking is located near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix County, Virgin Islands 00820 and consists of a 157-foot-tall monopole telecommunication tower and associated equipment contained within a 60-foot by 60-foot lease area at the above property. The undertaking includes a 15-foot wide by 1,285.84-foot-long access/utility easement that extends northwest connecting with East End Road. Also included is a 15-foot wide by 369.6-foot-long access/utility easement that extends southwest connecting with existing utilities. In total the proposed undertaking is approximately 28,431.60 square feet. The proposed tower site is approximately 148.2 feet above mean sea level (AMSL).

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

Species	Listing Status	Determination
Green Sea Turtle (<i>Chelonia mydas</i>)	Threatened	NLAA
Hawksbill Sea Turtle (<i>Eretmochelys imbricata</i>)	Endangered	NLAA
Leatherback Sea Turtle (<i>Dermochelys coriacea</i>)	Endangered	NLAA

Based on the answers provided in IPaC, the proposed project is consistent with a “may affect but is not likely to adversely affect” (NLAA) for the species listed above because your project impacts to the species will be avoided or minimized using the **Conservation Measures** you agreed to implement. These conservation measures must be implemented during the project development to ensure compliance with Section 7(a)(2) of the ESA.

No further action is required for the species listed above. However, be aware that reinitiation of consultation may be necessary if later modifications are made to the project so that it no longer meets the criteria or outcome described above, or if new information reveals effects of the action that could affect listed species or critical habitat in a manner or to an extent not previously considered, or if a new species is listed.

The Service will notify you within 30 calendar days if we determine that this proposed Action does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for federally listed species in the Caribbean. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the Caribbean Ecological Services Field Office to apply local knowledge to evaluate the Action, as we may identify a small subset of actions having unanticipated impacts. In such instances, the Caribbean Ecological Services Field Office may request additional information to verify the effects determination reached through the DKey.

If the proposed project is located within species range where a DKey has not been developed for those species, please follow the established guidance for initiating section 7 consultation Caribbean Ecological Services Field Office.

We appreciate your interest in protecting endangered species and their habitats. It is the Service's mission to work with others to conserve, protect, and enhance fish, wildlife, and plants and their

habitats for the continuing benefit of our people. If you have any questions or require additional information, please contact our office at Caribbean_es@fws.gov.

QUALIFICATION INTERVIEW

1. Is the proposed project an EPA Multi-Sector General Permit (MSGP) renewal for an existing project? ([MSGP Fact Sheet](#))

No

2. Is the proposed project within an urban developed area? (i.e., cities, downtowns, shopping malls etc.)

Note: Urban and developed areas has one or more of the following characteristics: Presence of existing buildings, residential areas, and commercial establishments. Well-established infrastructure including roads, utilities, and urban facilities. High population density. Established neighborhoods and urban amenities ("urbanizaciones"). Developed landscape with paved surfaces, parking lots, and industrial areas. Signs of human activity and urbanization, such as shopping centers and recreational facilities. Location within the boundaries of a city or town ("casco urbano"). High concentration of built-up structures and limited open spaces. Aerial imagery might be requested to the applicant. .

No

3. Will the proposed project modify sea turtle habitat?

Note: Examples of activities that could modify sea turtle habitat include beach nourishment, excavation, sand extraction, mechanized beach cleaning, fencing, removal of coastal vegetation, riprap, or construction of any other permanent structures within 70 meters setback from hightide line.

No

4. Will the proposed project include lighting that is visible (directly or indirectly) from the beach?

Note: Examples of lighting are Street lighting, security lighting, landscape lighting.

Yes

5. Will the proposed project implement the U.S. Fish and Wildlife Service Conservation Measures for sea turtles in Puerto Rico and the U.S. Virgin Islands Sea Turtle conservation measures and a comprehensive lighting plan? ([Conservation Measures](#))

Yes

6. [Hidden Semantic] Does the proposed project intersect the leatherback sea turtle area of influence?

Automatically answered

Yes

7. [Hidden Semantic] Does the proposed project intersect the Hawksbill sea turtle area of influence?

Automatically answered

Yes

8. [Hidden Semantic] Does the proposed project intersect the Green sea turtle area of influence?

Automatically answered

Yes

9. Are you the Federal agency or designated non-federal representative for the proposed action?

Yes

IPAC USER CONTACT INFORMATION

Agency: Lotis Environmental
Name: Miles Walz-Salvador
Address: 8899 Main St
Address Line 2: 107
City: Williamsville
State: NY
Zip: 14221
Email: nepa.nhpa@thelotisgroup.com
Phone: 3149130505

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission

***United States Fish and Wildlife Service (USFWS):
Caribbean Ecological Services Field Office's Response***



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
Bayamón | Mayagüez | Maricao | Río Grande | St Croix
P.O. Box 491
Boquerón, Puerto Rico 00622



In Reply Refer To:
FWS/R4/CESFO/78010-033

Submitted Via Electronic Mail: anglin@thelotisgroup.com

Ms. DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
8899 Main Street – Suite 107
Williamsville, NY 14221

Re: East End Telecommunication Tower,
St. Croix, USVI

Dear Ms. Anglin:

Thank you for your letter dated May 24, 2024, requesting informal consultation on the above referenced project. As per your request, our comments are provided under the Endangered Species Act (Act) (87 Stat. 884, as amended; 16 United States Code 1531 et seq.), and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

Blue Sky Towers III (BST), LLC (the Applicant), is proposing to construct a 150 feet monopole telecommunication tower in addition to a 15 feet wide by 1,286 feet long easement road that will connect with East End Road. The project area of approximately 0.7 acres is located near Plot 3 Estate Long Point and Cotton Garden Eastend B Quarter, St. Croix, U.S. Virgin Islands (17° 45' 0.86297" N, -64° 35' 26.7075" W). Lotis Environmental (Lotis), LCC, is the designated non-federal representative and submitted the consultation for this project on behalf of BST.

Using the U.S. Fish and Wildlife Service's (Service) Information for Planning and Consultation (IPaC) system, Lotis determined that the proposed project lies within the range of the threatened green sea turtle (*Chelonia mydas*), and the endangered hawksbill (*Eretmochelys imbricata*) and leatherback (*Dermochelys coriacea*) sea turtles. According to the information provided, the proposed project is on the landward side of East End Road approximately 140 feet south from the proposed Green sea turtle critical habitat unit USVI-04 on Knight's Bay.

Based on the nature of the project, scope of work, and location, available information, and implementation of the Service's sea turtle conservation measures, Lotis determined that the proposed project may affect, but is not likely to adversely affect the above mentioned sea turtles. Lotis also determined that sea turtle critical habitat would not be adversely affected. The sea turtle conservation measures provided by IPaC will be implemented.

We have reviewed the information provided in your letter and our files, and concur with your determination that the proposed project may affect, but is not likely to adversely affect the green, hawksbill and leatherback sea turtles with the implementation of the conservation measures provided by IPaC.

In view of this, we believe that requirements of section 7 of the Endangered Species Act (Act) have been satisfied. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impact of this identified action that may affect listed species or critical habitat in a manner that was not previously considered; (2) this action is subsequently modified in a manner not previously considered in this assessment; or (3) a new species is listed, or critical habitat determined that may be affected by the identified action.

Telecommunication and other towers can have impacts to migratory birds not protected under the Act. For instance, lighting can attract birds during migration. We would be glad to assist in design and planning for future towers on the Island. For best management practices related to migratory birds and towers, please visit:

- <https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf>
- <https://www.fws.gov/library/collections/bird-friendly-communication-tower-toolkit>

Thank you for the opportunity to comment on this project. If you have any questions or require additional information, please contact us via email at caribbean_es@fws.gov or by phone at (786) 244-0081.

Sincerely,

Silmarie Padrón
Acting Field Supervisor

jpz

Virgin Islands Conservation Society (VICS) Submission

Note:

In the interest of efficiency and economy, attachments included in the original submission under this section are not duplicated throughout this NEPA Summary. The following attachment(s), found at the conclusion of this report, were included in the original submission:

- *Proposed Project Summary*
- *Informal Biological Assessment*
- *State Species List (if applicable)*
- *Attachment 1 - Maps*
- *Attachment 2 - Photographs*



May 24, 2024

Virgin Islands Conservation Society
Virgin Islands Conservation Society, 4126 Anna's Retreat, Suite 102
St. Thomas VI 00802-1760

RE: Proposed Telecommunications Tower Undertaking "East End" in St. Croix, Virgin Islands; Blue Sky Towers III, LLC; BST_228

To Whom It May Concern:

Blue Sky Towers III, LLC (BST), is proposing to construct a tower installation near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820. Lotis Environmental, LLC (Lotis) is preparing an environmental review on behalf of BST as part of its permit process and regulatory review by the Federal Communications Commission (FCC). Lotis' review is focused on compliance with Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307. The environmental review will include the consideration of possible impact on wetlands, critical habitat, wildlife refuges, wilderness areas, state and federal listed species of concern, as well as species protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Act. Consultation with the USFWS will also be initiated to mitigate potential impact on species of concern.

Attached, please find information pertaining to the proposed undertaking known as East End. The information package includes the proposed project summary, site maps, results from our search of threatened or endangered species within the action area (provided by the IPaC website) and site photographs of the proposed undertaking and adjacent habitat. Lotis has completed an informal biological assessment of the proposed undertaking's action area using available maps, documentation, and site reconnaissance. We have determined that the proposed undertaking would "*not likely adversely affect*" federal listed species, their designated habitat, or designated critical habitat. Lotis came to this conclusion for the sea turtles in the area due to the access easement proposed measuring less than 150 meters from the shore. In addition, this project exists just outside proposed critical habitat for the Green Sea Turtle as well as the *Agave eggersiana*.

We would appreciate your assistance in determining if, in your opinion, the proposed undertaking is found to have an adverse impact on any listed and/or proposed species of concern or any designated and/or proposed critical habitats.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



On behalf of BST, I would solicit your comments on this proposed undertaking. Kindly forward to the undersigned via email (Anglin@thelotisgroup.com) or by regular mail to 8899 Main Street - Suite 107, Williamsville, NY 14221.

Thank you for your consideration and cooperation in this matter.

Sincerely,

Lotis Environmental, LLC

A handwritten signature in black ink that reads "DeAnna Anglin". The signature is written in a cursive style and is positioned above a horizontal line.

DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
Anglin@thelotisgroup.com

Enclosures



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

***Proof of Virgin Islands Conservation Society (VICS)
Submission***

**UNITED STATES
POSTAL SERVICE®**

Click-N-Ship®

P

usps.com

\$8.50

US POSTAGE

Insured

05/24/2024

9405 8301 0935 5099 5167 70 0085 0001 0000 0802



Mailed from 14221 174327252076853

PRIORITY MAIL®

LOTIS ENVIRONMENTAL, LLC

KELLY R REIDY

8899 MAIN ST STE 107

WILLIAMSVILLE NY 14221-7628

05/29/2024

RDC 03

C004



VIRGIN ISLANDS CONSERVATION SOCIETY
4126 ANNAS RETREAT STE 102
ST THOMAS VI 00802-1760

USPS TRACKING #



9405 8301 0935 5099 5167 70





Cut on dotted line.

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9405 8301 0935 5099 5167 70

Print Date: 2024-05-24

Ship Date: 2024-05-24

PRIORITY MAIL®

Extra Services:

Fees:

Total:

\$8.50

\$0.00

\$0.00

\$8.50

From:

LOTIS ENVIRONMENTAL, LLC

KELLY R REIDY

8899 MAIN ST STE 107

WILLIAMSVILLE NY 14221-7628

To:

VIRGIN ISLANDS CONSERVATION SOCIETY

4126 ANNAS RETREAT STE 102

ST THOMAS VI 00802-1760

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

***2021 Recommended Best Practices for Communication
Tower Design, Siting, Construction, Operation,
Maintenance, and Decommissioning***

Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning

Migratory Bird Program
U. S. Fish and Wildlife Service
Falls Church, Virginia
March 2021

NOTE: These recommendations replace all previous recommendations for communication tower construction and operation. These recommendations have been modified and updated from previous versions to incorporate the state of the science and the 2020 Federal Aviation Administration [Obstruction Marking and Lighting Advisory Circular AC 70/7460-1M](#).

Communication towers are some of the tallest structures across the landscape and birds are regularly found dead around these towers (Longcore et al. 2012a). It is not definitively understood why this mortality occurs, but evidence suggests that night-migrating songbirds are either attracted to or disoriented by tower obstruction warning lighting systems, especially during overcast (i.e., low cloud ceiling), foggy, or other low visibility conditions (Cochran and Graber 1958, Avery et al. 1976, Ball et al. 1995, Erickson et al. 2005, Evans et al. 2007, Manville 2014, Gehring et al. 2009 and 2011, Longcore et al. 2012a). Birds aggregate in larger numbers at towers with non-flashing lights compared to those with flashing lights, although birds aggregate at flashing lights during the “on” phase, they disperse during the “off” phase (Larkin and Frase 1988; Gauthreaux and Belser 1999, 2006; Evans et al. 2007; Poot et al. 2008). Additionally, birds moving across the landscape at night (e.g., owls and seabirds) can collide with communication tower wires when they are placed in high movement areas.

Given the height, structural engineering needs (i.e., guy wires), and obstruction lighting requirements, communication towers may cause direct and indirect bird mortality through:

1. Collisions - Birds that are attracted to tower lights and aggregate in the lighting zone, circle the tower and collide with the tower, guy wires, other birds, or fall to the ground from exhaustion (Longcore et al. 2012b, Gauthreaux and Belser 2006, Erickson et al. 2005).
2. Construction, operation, and maintenance activities - Adults, eggs, or nestlings can experience direct mortality through:
 - a. Trauma or death during vegetation removal;
 - b. Trauma or death during tower maintenance; and
 - c. Death of eggs or nestlings when actions or activities cause adults to abandon nests.
3. Significant loss of fat reserves in adults due to the energy expenditure of circling towers, leading to reduced survival during long migrations (Norris and Taylor 2006, Gehring and Walker 2012).

The following avoidance and minimization measures, when used comprehensively, reduce the risk of bird mortality at communication towers:

SITING AND CONSTRUCTION OF NEW TOWERS

1. Contact with USFWS Field Office. Communicate project plans to nearest USFWS Field Office. <http://www.fws.gov/offices/index.html>
2. Co-location. Co-locate communications equipment on existing communication towers or other structures (e.g., billboard, water and transmission tower, distribution pole, or building mounts). This recommendation is intended to reduce the number of towers across the landscape.

3. Placement. All new towers should be sited to minimize environmental impacts to the maximum extent practicable.
 - a. Place new towers within existing "antenna farms" (i.e., clusters of towers) when possible;
 - b. Select already degraded areas for tower placement;
 - c. Towers should not be sited in or near wetlands, other known bird concentration areas (e.g., state or federal refuges, staging areas, rookeries, and Important Bird Areas), or in known migratory bird movement routes, daily movement flyways, areas of breeding concentration, in habitat of threatened or endangered species, key habitats for [Birds of Conservation Concern](#), or near the breeding areas ("leks") of prairie grouse;
 - d. Towers should avoid ridgelines, coastal areas, wetlands or other known bird concentration areas; and
 - e. Towers and associated facilities should be designed, sited, and constructed so as to avoid or minimize habitat loss within and adjacent to the tower "footprint". In addition, several shorter, un-guyed towers may be preferable to one, tall guyed, lit tower.
4. Construction. During construction, the following considerations can reduce the risk of take of birds:
 - a. Schedule all vegetation removal and maintenance (e.g., general landscaping activities, trimming, grubbing) activities outside of the peak bird breeding season to reduce the risk of bird take. Breeding seasons can be determined using online tools (e.g., [Avian Knowledge Network \[AKN\]](#), [Information for Planning and Conservation system \[IPaC\]](#), [Birds of North America Online](#)) or by contacting qualified experts (e.g., local Audubon or birding groups);
 - b. When vegetation removal activities cannot avoid the bird breeding season, conduct nest clearance surveys:
 - i. Surveys should be conducted no more than five days prior to the scheduled activity to ensure recently constructed nests are identified;
 - ii. Timing and dimensions of the area to be surveyed vary and will depend on the nature of the project, location, and expected level of vegetation disturbance; and
 - iii. If active nests are identified within or in the vicinity of the project site, avoid the site until nestlings have fledged or the nest fails. If the activity must occur, establish a buffer zone around the nest and no activities will occur within that zone until nestlings have fledged. The dimension of the buffer zone will depend on the proposed activity, habitat type, and species present. The buffer should be a distance that does not elicit a flight response by the adult birds and can be 0.5 – 1 mile for hawks and eagles.
 - c. Prevent the introduction of invasive plants during construction to minimize vegetation community degradation by:
 - i. Use only native and local (when possible) seed stock for all temporary and permanent vegetation establishment; and
 - ii. Use vehicle wash stations prior to entering sensitive habitat areas to prevent accidental introduction of non-native plants.
5. Tower Design. Tower design should consider the following attributes:
 - a. Tower Height. It is recommended that new towers should be not more than 199 ft. above ground level (AGL). This height increases the mean free airspace between the top of the tower and average bird flight height, even in weather conditions with reduced cloud ceiling;
 - b. Guy Wires. We recommend using free standing towers such as lattice towers or monopole structures. If guy wires are required for tower design:
 - i. The minimum number of guy wires necessary should be used; and
 - ii. Guy wired towers that are proposed to be located in known raptor or waterbird concentrations areas, daily movement routes, major daytime migratory bird movement routes, staging areas, or stopover sites should have daytime visual markers or bird flight diverters installed on the guy wires to attempt to prevent daytime collisions.

- c. Lighting System. Lights are a primary source of bird aggregation around towers, thus minimizing all light is recommended:
 - i. No tower lighting is the preferred option if Federal Aviation Administration (FAA) regulations and lighting standards (FAA 2015, 2020, Patterson 2012) permit.
 - ii. For some towers, the FAA can permit an Aircraft Detection Lighting System (ADLS), which maintains a communication tower of any height to be unlit until the ADLS radars detect nearby aircraft, at which time the tower lighting system is triggered to illuminate until the aircraft is out of radar range.
 - iii. If taller (> 199 ft. AGL) towers requiring lights for aviation safety must be constructed, the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA should be used. Unless otherwise required by the FAA, only white or red flashing lights should be used at night, and these should follow FAA obstruction and marking standards with regards to the minimum number of lights, minimum intensity (< 2,000 candela), and minimum number of flashes per minute (i.e., longest duration between flashes and "dark phase"). Avoid using non-flashing warning lights at night (FAA 2015, 2020, Patterson 2012). Owners of existing towers lit with lighting systems that include non-flashing lights should submit plans to the FAA explaining how and when they will transition to the new standards.
 - iv. Security lighting for on-ground facilities, equipment, and infrastructure should be motion- or heat-sensitive, down-shielded, and of a minimum intensity to reduce nighttime bird attraction and eliminate constant nighttime illumination while still allowing safe nighttime access to the site.

OPERATION AND MAINTENANCE OF ALL TOWERS

1. Existing Tower Lighting. We recommend that towers be unlit, when allowed by FAA regulations. Light impacts can be minimized by:
 - a. Extinguishing L-810 non-flashing red lights (USFWS 2007, 2011) on towers >350 ft. AGL or reconfiguring L-810 non-flashing red lights to flash at 30 FPM (+/- 3 FPM) in synchrony with other flashing obstruction lights on towers 150-350 ft. AGL (FAA 2015, 2020);
 - b. Extinguishing L-810 red lights and reprogramming LED L-810 lights; this can be done from the tower transmission building or remotely and does not require climbing the tower (FCC 2020). A "lighting deviation" can be used to extinguish or eliminate L-810 steady-burning side lights from an existing registered tower taller than 350 ft. AGL and to reprogram L-810 steady-burning side lights to flash on registered towers 150-350 ft. AGL.

The following steps are necessary:

1. [File a Marking and Lighting study](#) electronically with the FAA requesting the elimination or omission non-flashing/steady-burning lights (L-810) or requesting that steady-burning lights flash with [Form 7460-1](#), Notice of Proposed Construction or Alteration. Designate structure type: "Deviation from Red Obstruction Light Standards."
2. Once the FAA has approved the request and assigned a FAA Study Number, file [Form 854](#) with the FCC via the Antenna Registration System (ASR). Please select "MD – Modification" and choose the appropriate FAA Lighting Style. The FCC typically will approve the application and modify the registration within 24 hours.
3. Once the lighting change for a tower has been granted by the FCC via ASR, the L-810 steady-burning side lights can be extinguished on towers taller than 350 ft. AGL and reprogrammed to flash in concert with L-864 lights on towers 150-350 ft. AGL. Extinguishing L-810 lights and reprogramming lights are typically accomplished in the tower transmission building and do not ordinarily require climbing the tower. Per the FAA requirements, flashing red lights should flash at 30 FPM (+/- 3 FPM).

2. Infrastructure Lighting. We recommend that existing infrastructure be unlit. If associated buildings require security or operational lighting, minimize light trespass using motion sensors and down-shielding with minimum intensity light (USFWS 2011; Poot et al. 2008; Manville 2013; FCC 2014).
3. Vegetation Management. When management of facility infrastructure is required:
 - a. Schedule all vegetation removal and maintenance (e.g., general landscaping activities, trimming, grubbing, etc.) activities outside of the peak bird breeding season to reduce the risk of bird take. Breeding seasons can be determined using online tools (e.g., [Avian Knowledge Network \[AKN\]](#), [Information for Planning and Conservation system \[IPaC\]](#), [Birds of North America Online](#)) or by contacting qualified experts (e.g., local Audubon or birding groups);
 - b. When vegetation removal activities cannot avoid the bird breeding season, conduct nest clearance surveys:
 - i. Surveys should be conducted no more than five days prior to the scheduled activity to ensure recently constructed nests are identified;
 - ii. Timing and dimensions of the area to be surveyed should depend on the nature of the project, location, and expected level of vegetation disturbance; and
 - iii. If active nests are identified within or in the vicinity of the project site, the site should be avoided until nestlings have fledged or the nest fails. If the activity must occur, a buffer zone should be established around the nest and no activities should occur within that zone until nestlings have fledged. The dimension of the buffer zone depends on the proposed activity, habitat type, and species present. The buffer should be a distance that does not elicit a flight response by the adult birds and can be 0.5 – 1 mile for hawks and eagles.
4. Birds Nesting on Towers: If birds are nesting on communication towers that require maintenance activities, contact the state natural resource protection agency and/or the USFWS for permits, recommendations, and requirements. Schedule construction and maintenance activities around the nesting and activity schedule of protected birds. Minimize excess wires and securely attach wires to the tower structure to reduce the likelihood of birds becoming entangled on the tower. Consider installing a bird nest exclusion device on the towers where birds frequently nest.
5. Tower Access: Representatives from the USFWS or researchers should be allowed access to the site to evaluate bird use, conduct dead-bird searches, and conduct other research, as necessary.

DECOMMISSIONING

Tower Removal. Towers no longer in use, not re-licensed by the FCC for use, or determined to be obsolete should be removed from the site within 12 months of cessation of use, preferably sooner.

REFERENCES

- Avery, M., P.F. Springer, and J.F. Cassel. 1976. The effects of a tall tower on nocturnal bird migration – a portable ceilometer study. *Auk* 93: 281-292.
- Ball, L.G., K. Zyskowski, and G. Escalona-Segura. 1995. Recent bird mortality at a Topeka television tower. *Kansas Ornithological Society Bulletin* 46: 33-36.
- Cochran, W.W. and R.R. Graber. 1958. Attraction to nocturnal migrants by lights on a television tower. *Wilson Bulletin* 70: 378-380.
- Erickson W.P., G.D. Johnson, and D.P. Young. 2005. A summary and comparison of bird mortality from anthropogenic causes with emphasis on collisions. USFS Tech. Rep. PSWGTR-191. Pp. 1029-1042.

Evans, W.R., Y. Akashi, N.S. Altman, and A.M. Manville. 2007. Response of night-migrating songbirds in cloud to colored and flashing light. *North American Birds* 60(4): 476-488.

Federal Aviation Administration. 2015. Obstruction marking and lighting. Advisory Circular AC 70/7460-1L. U.S. Department of Transportation.

Federal Aviation Administration. 2016. FAA Acts to Reduce Bird Fatalities. <http://www.faa.gov/news/updates/?newsId=85204>

Federal Aviation Administration. 2020. Obstruction marking and lighting. Advisory Circular AC 70/7460-1M. U.S. Department of Transportation.

Federal Communications Commission. 2015. Opportunities to reduce bird collisions with communication towers while reducing tower lighting costs. http://wireless.fcc.gov/migratory-birds/Light_Changes_Information_Update_120415.pdf

Gauthreaux, S.A. and C.G. Belser. 1999. The behavioral responses of migrating birds to different lighting systems on tall towers. In *Transactions of the proceedings of the workshop on avian mortality at communication towers* (eds. W.R. Evans and A.M. Manville).

Gauthreaux, S.A. and C.G. Belser. 2006. Effects of artificial night lighting on migrating birds. In *Ecological Consequences of Artificial Night Lighting* (eds. C. Rich and T. Longcore), pp. 67-93. Covelo, California: Island Press.

Gehring, J., P. Kerlinger, and A.M. Manville. 2009. Communication towers, lights, and birds: Successful methods of reducing the frequency of avian collisions. *Ecological Applications* 19(2): 505–514.

Gehring, J., P. Kerlinger, and A.M. Manville. 2011. The role of tower height and guy wires on avian collisions with communication towers. *Journal of Wildlife Management* 75(4): 848-855.

Gehring, J. and K. Walter. 2012. Studies of avian collisions with communication towers: a quantification of a bird night flight calls at towers with different structural supports and the use of acoustics as an index of tower fatalities. Progress Report for U.S. Fish and Wildlife Service. MNFI Report Number: 2012-29.

Larkin, R.P. and B.A. Frase. 1988. Circular paths of birds flying near a broadcasting tower in cloud. *Journal of Comparative Psychology* 102: 90-93.

Longcore, T., C. Rich, P. Mineau, B. MacDonald, D.G. Bert, L.M. Sullivan, E. Mutrie, S.A. Gauthreaux, M.L. Avery, R.L. Crawford, A.M. Manville, E.R. Travis, and D. Drake. 2012a. An estimate of avian mortality at communication towers in the United States and Canada. *PLoS One* 7(4): 1-17.

Longcore, T., C. Rich, P. Mineau, B. MacDonald, D.G. Bert, L.M. Sullivan, E. Mutrie, S.A. Gauthreaux, M.L. Avery, R.L. Crawford, A.M. Manville, E.R. Travis, and D. Drake. 2012b. Avian mortality at communication towers in the United States and Canada: which species, how many, and where? *Biological Conservation* 158: 410-419.

Manville, A.M. 2009. Towers, turbines, power lines, and buildings – steps being taken by the U.S. Fish and Wildlife Service to avoid or minimize take of migratory birds at these structures. In *Tundra to tropics: Connecting habitats and people. Proceedings of the 4th International Partners in Flight Conference* (eds. T.D. Rich, C. Arizendi, D. Demarest, and C. Thompson). Pp. 1-11.

Manville, A.M. 2013. Recommended Lighting Standards and Lighting Protocols for Structures Requiring Pilot Warning Lighting, and for Security Lighting Purposes. Technical Report, Division of Migratory Bird Management, U.S. Fish and Wildlife Service.

Manville, A.M. 2014. Status of U.S. Fish and Wildlife Service developments with communication towers with a focus on migratory birds: Updates to Service staff involved with tower issues. Webinar Summary Talking Points. Pp. 14.

Norris, D.R. and C.M. Taylor. 2006. Predicting the consequences of carry-over effects for migratory populations. *Biology Letters* 2006(2): 148-151.

Patterson, J.W. 2012. Evaluation of new obstruction lighting techniques to reduce avian fatalities. Technical Note: DOT/FAA/TC-TN12/9.

Poot, H., B.J. Ens, H. de Vries, M.A.H. Donners, M.R. Wernand, and J.M. Marquenie. 2008. Green light for nocturnally migrating birds. *Ecology and Society* 13(2): 47.

U.S. Fish and Wildlife Service. 2007. Comments of the U.S. Fish and Wildlife Service Submitted Electronically to the FCC on 47 CFR Parts 1 and 17, WT Docket No. 03-187, FCC 06-164, Notice of Proposed Rulemaking, "Effects of Communication Towers on Migratory Birds." February 2, 2007. 32 pp.

U.S. Fish and Wildlife Service. 2011. Comments of the U.S. Fish and Wildlife Service's Division of Migratory Bird Management Filed Electronically on WT Docket NO. 08-61 and WT Docket No. 03-187, Regarding the Environmental Effects of the Federal Communication Commission's Antenna Structure Registration Program. January 14, 2011. 12 pp.

Migratory Bird Treaty Act of 1918

Digest of Federal Resource Laws of Interest to the U.S. Fish and Wildlife Service

Migratory Bird Treaty Act of 1918

[Migratory Bird Treaty Act of 1918](#) (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

The original 1918 statute implemented the 1916 Convention between the U.S. and Great Britain (for Canada) for the protection of migratory birds. Later amendments implemented treaties between the U.S. and Mexico, the U.S. and Japan, and the U.S. and the Soviet Union (now Russia).

Specific provisions in the statute include:

- Establishment of a Federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703)

This prohibition applies to birds included in the respective international conventions between the U.S. and Great Britain, the U.S. and Mexico, the U.S. and Japan, and the U.S. and the Russia.

- Authority for the Secretary of the Interior to determine, periodically, when, consistent with the Conventions, "hunting, taking, capture, killing, possession, sale, purchase, shipment, transportation, carriage, or export of any . . . bird, or any part, nest or egg" could be undertaken and to adopt regulations for this purpose. These determinations are to be made based on "due regard to the zones of temperature and to the distribution, abundance, economic value, breeding habits, and times of migratory flight." (16 U.S.C. 704)
- A decree that domestic interstate and international transportation of migratory birds which are taken in violation of this law is unlawful, as well as importation of any migratory birds which are taken in violation of Canadian laws. (16 U.S.C. 705)
- Authority for Interior officials to enforce the provisions of this law, including seizure of birds illegally taken which can be forfeited to the U.S. and disposed of as directed by the courts. (16 U.S.C. 706)
- Establishment of fines for violation of this law, including misdemeanor charges. (16 U.S.C. 707)
- Authority for States to enact and implement laws or regulations to allow for greater protection of migratory birds, provided that such laws are consistent with the respective Conventions and that open seasons do not extend beyond those established at the national level. (16 U.S.C. 708)

- A repeal of all laws inconsistent with the provisions of this Act. (16 U.S.C. 710)
- Authority for the continued breeding and sale of migratory game birds on farms and preserves for the purpose of increasing the food supply. (16 U.S.C. 711)

The 1936 statute implemented the Convention between the U.S. and Mexico for the Protection of Migratory Birds and Game Mammals. Migratory bird import and export restrictions between Mexico and the U.S. were also authorized, and in issuing any regulations to implement this section, the Secretary of Agriculture was required to consider U.S. laws forbidding importation of certain mammals injurious to agricultural and horticultural interests. Monies for the Secretary of Agriculture to implement these provisions were also authorized.

The 1960 statute (P.L. 86-732) amended the MBTA by altering earlier penalty provisions. The new provisions stipulated that violations of this Act would constitute a misdemeanor and conviction would result in a fine of not more than \$500 or imprisonment of not more than six months. Activities aimed at selling migratory birds in violation of this law would be subject to fine of not more than \$2000 and imprisonment could not exceed two years. Guilty offenses would constitute a felony. Equipment used for sale purchases was authorized to be seized and held, by the Secretary of the Interior, pending prosecution, and, upon conviction, be treated as a penalty.

Section 10 of the 1969 amendments to the Lacey Act (P.L. 91-135) repealed the provisions of the MBTA prohibiting the shipment of wild game mammals or parts to and from the U.S. or Mexico unless permitted by the Secretary of the Interior. The definition of "wildlife" under these amendments does not include migratory birds, however, which are protected under the MBTA.

The 1974 statute (P.L. 93-300) amended the MBTA to include the provisions of the 1972 Convention between the U.S. and Japan for the Protection of Migratory Birds and Birds in Danger of Extinction. This law also amended the title of the MBTA to read: "An Act to give effect to the conventions between the U.S. and other nations for the protection of migratory birds, birds in danger of extinction, game mammals, and their environment."

Section 3(h) of the Fish and Wildlife Improvement Act of 1978 (P.L. 95-616) amended the MBTA to authorize forfeiture to the U.S. of birds and their parts illegally taken, for disposal by the Secretary of the Interior as he deems appropriate. These amendments also authorized the Secretary to issue regulations to permit Alaskan natives to take migratory birds for their subsistence needs during established seasons. The Secretary was required to consider the related migratory bird conventions with Great Britain, Mexico, Japan, and the Soviet Union in establishing these regulations and to establish seasons to provide for the preservation and maintenance of migratory bird stocks.

Public Law 95-616 also ratified a treaty with the Soviet Union specifying that both nations will take measures to protect identified ecosystems of special importance to migratory birds against pollution, detrimental alterations, and other environmental degradations. (See entry for the Convention Between the United States of America and the Union of Soviet Socialist Republics Concerning the Conservation of Migratory Birds and Their Environment; T.I.A.S. 9073; signed on November 19, 1976, and approved by the Senate on July 12, 1978; 92 Stat. 3110.)

Public Law 99-645, the 1986 Emergency Wetlands Resources Act, amended the Act to require that felony violations under the MBTA must be "knowingly" committed.

P.L. 105-312, Migratory Bird Treaty Reform Act of 1998, amended the law to make it unlawful to take migratory game birds by the aid of bait if the person knows or reasonably should know that the area is

baited. This provision eliminates the "strict liability" standard that was used to enforce Federal baiting regulations and replaces it with a "know or should have known" standard. These amendments also make it unlawful to place or direct the placement of bait on or adjacent to an area for the purpose of taking or attempting to take migratory game birds, and makes these violations punishable under title 18 United States Code, (with fines up to \$100,000 for individuals and \$200,000 for organizations), imprisonment for not more than 1 year, or both. The new amendments require the Secretary of Interior to submit to the Senate Committee on Environment and Public Works and the House Committee on Resources a report analyzing the effect of these amendments and the practice of baiting on migratory bird conservation and law enforcement. The report to Congress is due no later than five years after enactment of the new law.

P.L. 105-312 also amends the law to allow the fine for misdemeanor convictions under the Migratory Bird Treaty Act to be up to \$15,000 rather than \$5000.

[Return to Resource Laws](#)

***2007 U.S. Fish and Wildlife Service (USFWS) National
Bald Eagle Guidelines***

NATIONAL BALD EAGLE MANAGEMENT GUIDELINES

U.S. Fish and Wildlife Service

May 2007

TABLE OF CONTENTS

INTRODUCTION	1
LEGAL PROTECTIONS FOR THE BALD EAGLE	2
The Bald and Golden Eagle Protection Act.....	2
The Migratory Bird Treaty Act	3
State laws and regulations	3
Where do bald eagles nest?	4
When do bald eagles nest?	5
Chronology of typical reproductive activities of bald eagles in the United States.....	6
How many chicks do bald eagles raise?	7
What do bald eagles eat?.....	7
The impact of human activity on nesting bald eagles.....	7
The impact of human activity on foraging and roosting bald eagles	8
RECOMMENDATIONS FOR AVOIDING DISTURBANCE AT NEST SITES	9
Existing Uses	10
ACTIVITY-SPECIFIC GUIDELINES.....	10
Alternate nests.....	11
Temporary Impacts	11
RECOMMENDATIONS FOR AVOIDING DISTURBANCE AT FORAGING AREAS AND COMMUNAL ROOST SITES.....	14
ADDITIONAL RECOMMENDATIONS TO BENEFIT BALD EAGLES.....	15
CONTACTS	16
GLOSSARY	17
RELATED LITERATURE.....	19

INTRODUCTION

The bald eagle (*Haliaeetus leucocephalus*) is protected by the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act (MBTA). The MBTA and the Eagle Act protect bald eagles from a variety of harmful actions and impacts. The U.S. Fish and Wildlife Service (Service) developed these National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the Eagle Act may apply to their activities. A variety of human activities can potentially interfere with bald eagles, affecting their ability to forage, nest, roost, breed, or raise young. The Guidelines are intended to help people minimize such impacts to bald eagles, particularly where they may constitute “disturbance,” which is prohibited by the Eagle Act.

The Guidelines are intended to:

- (1) Publicize the provisions of the Eagle Act that continue to protect bald eagles, in order to reduce the possibility that people will violate the law,
- (2) Advise landowners, land managers and the general public of the potential for various human activities to disturb bald eagles, and
- (3) Encourage additional nonbinding land management practices that benefit bald eagles (see Additional Recommendations section).

While the Guidelines include general recommendations for land management practices that will benefit bald eagles, the document is intended primarily as a tool for landowners and planners who seek information and recommendations regarding how to avoid disturbing bald eagles. Many States and some tribal entities have developed state-specific management plans, regulations, and/or guidance for landowners and land managers to protect and enhance bald eagle habitat, and we encourage the continued development and use of these planning tools to benefit bald eagles.

Adherence to the Guidelines herein will benefit individuals, agencies, organizations, and companies by helping them avoid violations of the law. However, the Guidelines themselves are not law. Rather, they are recommendations based on several decades of behavioral observations, science, and conservation measures to avoid or minimize adverse impacts to bald eagles.

The U.S. Fish and Wildlife Service strongly encourages adherence to these guidelines to ensure that bald and golden eagle populations will continue to be sustained. The Service realizes there may be impacts to some birds even if all reasonable measures are taken to avoid such impacts. Although it is not possible to absolve individuals and entities from liability under the Eagle Act or the MBTA, the Service exercises enforcement discretion to focus on those individuals, companies, or agencies that take migratory birds without regard for the consequences of their actions and the law, especially when conservation measures, such as these Guidelines, are available, but have not been implemented. The Service will prioritize its enforcement efforts to focus on those individuals or entities who take bald eagles or their parts, eggs, or nests without implementing appropriate measures recommended by the Guidelines.

The Service intends to pursue the development of regulations that would authorize, under limited circumstances, the use of permits if “take” of an eagle is anticipated but unavoidable. Additionally, if the bald eagle is delisted, the Service intends to provide a regulatory mechanism to honor existing (take) authorizations under the Endangered Species Act (ESA).

During the interim period until the Service completes a rulemaking for permits under the Eagle Act, the Service does not intend to refer for prosecution the incidental “take” of any bald eagle under the MBTA or Eagle Act, if such take is in full compliance with the terms and conditions of an incidental take statement issued to the action agency or applicant under the authority of section 7(b)(4) of the ESA or a permit issued under the authority of section 10(a)(1)(B) of the ESA.

The Guidelines are applicable throughout the United States, including Alaska. The primary purpose of these Guidelines is to provide information that will minimize or prevent violations only of *Federal* laws governing bald eagles. In addition to Federal laws, many states and some smaller jurisdictions and tribes have additional laws and regulations protecting bald eagles. In some cases those laws and regulations may be more protective (restrictive) than these Federal guidelines. If you are planning activities that may affect bald eagles, we therefore recommend that you contact both your nearest U.S. Fish and Wildlife Service Field Office (see the contact information on p.16) and your state wildlife agency for assistance.

LEGAL PROTECTIONS FOR THE BALD EAGLE

The Bald and Golden Eagle Protection Act

The Eagle Act (16 U.S.C. 668-668c), enacted in 1940, and amended several times since then, prohibits anyone, without a permit issued by the Secretary of the Interior, from “taking” bald eagles, including their parts, nests, or eggs. The Act provides criminal and civil penalties for persons who “take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof.” The Act defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” “Disturb” means:

"Disturb means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle=s return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

A violation of the Act can result in a criminal fine of \$100,000 (\$200,000 for organizations), imprisonment for one year, or both, for a first offense. Penalties increase substantially for additional offenses, and a second violation of this Act is a felony.

The Migratory Bird Treaty Act

The MBTA (16 U.S.C. 703-712), prohibits the taking of any migratory bird or any part, nest, or egg, except as permitted by regulation. The MBTA was enacted in 1918; a 1972 agreement supplementing one of the bilateral treaties underlying the MBTA had the effect of expanding the scope of the Act to cover bald eagles and other raptors. Implementing regulations define “take” under the MBTA as “pursue, hunt, shoot, wound, kill, trap, capture, possess, or collect.”

Copies of the Eagle Act and the MBTA are available at: <http://permits.fws.gov/ltr/ltr.shtml>.

State laws and regulations

Most states have their own regulations and/or guidelines for bald eagle management. Some states may continue to list the bald eagle as endangered, threatened, or of special concern. If you plan activities that may affect bald eagles, we urge you to familiarize yourself with the regulations and/or guidelines that apply to bald eagles in your state. Your adherence to the Guidelines herein does not ensure that you are in compliance with state laws and regulations because state regulations can be more specific and/or restrictive than these Guidelines.

NATURAL HISTORY OF THE BALD EAGLE

Bald eagles are a North American species that historically occurred throughout the contiguous United States and Alaska. After severely declining in the lower 48 States between the 1870s and the 1970s, bald eagles have rebounded and re-established breeding territories in each of the lower 48 states. The largest North American breeding populations are in Alaska and Canada, but there are also significant bald eagle populations in Florida, the Pacific Northwest, the Greater Yellowstone area, the Great Lakes states, and the Chesapeake Bay region. Bald eagle distribution varies seasonally. Bald eagles that nest in southern latitudes frequently move northward in late spring and early summer, often summering as far north as Canada. Most eagles that breed at northern latitudes migrate southward during winter, or to coastal areas where waters remain unfrozen. Migrants frequently concentrate in large numbers at sites where food is abundant and they often roost together communally. In some cases, concentration areas are used year-round: in summer by southern eagles and in winter by northern eagles.

Juvenile bald eagles have mottled brown and white plumage, gradually acquiring their dark brown body and distinctive white head and tail as they mature. Bald eagles generally attain adult plumage by 5 years of age. Most are capable of breeding at 4 or 5 years of age, but in healthy populations they may not start breeding until much older. Bald eagles may live 15 to 25 years in the wild. Adults weigh 8 to 14 pounds (occasionally reaching 16 pounds in Alaska) and have wingspans of 5 to 8 feet. Those in the northern range are larger than those in the south, and females are larger than males.

Where do bald eagles nest?

Breeding bald eagles occupy “territories,” areas they will typically defend against intrusion by other eagles. In addition to the active nest, a territory may include one or more alternate nests (nests built or maintained by the eagles but not used for nesting in a given year). The Eagle Act prohibits removal or destruction of both active and alternate bald eagle nests. Bald eagles exhibit high nest site fidelity and nesting territories are often used year after year. Some territories are known to have been used continually for over half a century.

Bald eagles generally nest near coastlines, rivers, large lakes or streams that support an adequate food supply. They often nest in mature or old-growth trees; snags (dead trees); cliffs; rock promontories; rarely on the ground; and with increasing frequency on human-made structures such as power poles and communication towers. In forested areas, bald eagles often select the tallest trees with limbs strong enough to support a nest that can weigh more than 1,000 pounds. Nest sites typically include at least one perch with a clear view of the water where the eagles usually forage. Shoreline trees or snags located in reservoirs provide the visibility and accessibility needed to locate aquatic prey. Eagle nests are constructed with large sticks, and may be lined with moss, grass, plant stalks, lichens, seaweed, or sod. Nests are usually about 4-6 feet in diameter and 3 feet deep, although larger nests exist.



Copyright *Birds of North America*, 2000

The range of breeding bald eagles in 2000 (shaded areas). This map shows only the larger concentrations of nests; eagles have continued to expand into additional nesting territories in many states. The dotted line represents the bald eagle's wintering range.

When do bald eagles nest?

Nesting activity begins several months before egg-laying. Egg-laying dates vary throughout the U.S., ranging from October in Florida, to late April or even early May in the northern United States. Incubation typically lasts 33-35 days, but can be as long as 40 days. Eaglets make their first unsteady flights about 10 to 12 weeks after hatching, and fledge (leave their nests) within a few days after that first flight. However, young birds usually remain in the vicinity of the nest for several weeks after fledging because they are almost completely dependent on their parents for food until they disperse from the nesting territory approximately 6 weeks later.

The bald eagle breeding season tends to be longer in the southern U.S., and re-nesting following an unsuccessful first nesting attempt is more common there as well. The following table shows the timing of bald eagle breeding seasons in different regions of the country. The table represents the range of time within which the majority of nesting activities occur in each region and does not apply to any specific nesting pair. Because the timing of nesting activities may vary within a given region, you should contact the nearest U.S. Fish and Wildlife Service Field Office (see page 16) and/or your state wildlife conservation agency for more specific information on nesting chronology in your area.

Chronology of typical reproductive activities of bald eagles in the United States.

Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	March	April	May	June	July	Aug.
SOUTHEASTERN U.S. (FL, GA, SC, NC, AL, MS, LA, TN, KY, AR, eastern 2 of TX)											
Nest Building											
		Egg Laying/Incubation									
			Hatching/Rearing Young								
					Fledging Young						
CHESAPEAKE BAY REGION (NC, VA, MD, DE, southern 2 of NJ, eastern 2 of PA, panhandle of WV)											
		Nest Building									
				Egg Laying/Incubation							
					Hatching/Rearing Young						
								Fledging Young			
NORTHERN U.S. (ME, NH, MA, RI, CT, NY, northern 2 of NJ, western 2 of PA, OH, WV exc. panhandle, IN, IL, MI, WI, MN, IA, MO, ND, SD, NB, KS, CO, UT)											
			Nest Building								
					Egg Laying/Incubation						
						Hatching/Rearing Young					
								Fledging Young			
PACIFIC REGION (WA, OR, CA, ID, MT, WY, NV)											
				Nest Building							
					Egg Laying/Incubation						
						Hatching/Rearing Young					
								Fledging Young			
SOUTHWESTERN U.S. (AZ, NM, OK panhandle, western 2 of TX)											
		Nest Building									
				Egg Laying/Incubation							
					Hatching/Rearing Young						
							Fledging Young				
ALASKA											
					Nest Building						
							Egg Laying/Incubation				
								Hatching/Rearing Young			
Ing Young											Fledg-
Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	March	April	May	June	July	Aug.

How many chicks do bald eagles raise?

The number of eagle eggs laid will vary from 1-3, with 1-2 eggs being the most common. Only one eagle egg is laid per day, although not always on successive days. Hatching of young occurs on different days with the result that chicks in the same nest are sometimes of unequal size. The overall national fledging rate is approximately one chick per nest, annually, which results in a healthy expanding population.

What do bald eagles eat?

Bald eagles are opportunistic feeders. Fish comprise much of their diet, but they also eat waterfowl, shorebirds/colonial waterbirds, small mammals, turtles, and carrion. Because they are visual hunters, eagles typically locate their prey from a conspicuous perch, or soaring flight, then swoop down and strike. Wintering bald eagles often congregate in large numbers along streams to feed on spawning salmon or other fish species, and often gather in large numbers in areas below reservoirs, especially hydropower dams, where fish are abundant. Wintering eagles also take birds from rafts of ducks at reservoirs and rivers, and congregate on melting ice shelves to scavenge dead fish from the current or the soft melting ice. Bald eagles will also feed on carcasses along roads, in landfills, and at feedlots.

During the breeding season, adults carry prey to the nest to feed the young. Adults feed their chicks by tearing off pieces of food and holding them to the beaks of the eaglets. After fledging, immature eagles are slow to develop hunting skills, and must learn to locate reliable food sources and master feeding techniques. Young eagles will congregate together, often feeding upon easily acquired food such as carrion and fish found in abundance at the mouths of streams and shallow bays and at landfills.

The impact of human activity on nesting bald eagles

During the breeding season, bald eagles are sensitive to a variety of human activities. However, not all bald eagle pairs react to human activities in the same way. Some pairs nest successfully just dozens of yards from human activity, while others abandon nest sites in response to activities much farther away. This variability may be related to a number of factors, including visibility, duration, noise levels, extent of the area affected by the activity, prior experiences with humans, and tolerance of the individual nesting pair. The relative sensitivity of bald eagles during various stages of the breeding season is outlined in the following table.

Nesting Bald Eagle Sensitivity to Human Activities

Phase	Activity	Sensitivity to Human Activity	Comments
I	Courtship and Nest Building	Most sensitive period; likely to respond negatively	Most critical time period. Disturbance is manifested in nest abandonment. Bald eagles in newly established territories are more prone to abandon nest sites.
II	Egg laying	Very sensitive period	Human activity of even limited duration may cause nest desertion and abandonment of territory for the breeding season.
III	Incubation and early nestling period (up to 4 weeks)	Very sensitive period	Adults are less likely to abandon the nest near and after hatching. However, flushed adults leave eggs and young unattended; eggs are susceptible to cooling, loss of moisture, overheating, and predation; young are vulnerable to elements.
IV	Nestling period, 4 to 8 weeks	Moderately sensitive period	Likelihood of nest abandonment and vulnerability of the nestlings to elements somewhat decreases. However, nestlings may miss feedings, affecting their survival.
V	Nestlings 8 weeks through fledging	Very sensitive period	Gaining flight capability, nestlings 8 weeks and older may flush from the nest prematurely due to disruption and die.

If agitated by human activities, eagles may inadequately construct or repair their nest, may expend energy defending the nest rather than tending to their young, or may abandon the nest altogether. Activities that cause prolonged absences of adults from their nests can jeopardize eggs or young. Depending on weather conditions, eggs may overheat or cool too much and fail to hatch. Unattended eggs and nestlings are subject to predation. Young nestlings are particularly vulnerable because they rely on their parents to provide warmth or shade, without which they may die as a result of hypothermia or heat stress. If food delivery schedules are interrupted, the young may not develop healthy plumage, which can affect their survival. In addition, adults startled while incubating or brooding young may damage eggs or injure their young as they abruptly leave the nest. Older nestlings no longer require constant attention from the adults, but they may be startled by loud or intrusive human activities and prematurely jump from the nest before they are able to fly or care for themselves. Once fledged, juveniles range up to ¼ mile from the nest site, often to a site with minimal human activity. During this period, until about six weeks after departure from the nest, the juveniles still depend on the adults to feed them.

The impact of human activity on foraging and roosting bald eagles

Disruption, destruction, or obstruction of roosting and foraging areas can also negatively affect bald eagles. Disruptive activities in or near eagle foraging areas can interfere with feeding, reducing chances of survival. Interference with feeding can also result in reduced productivity (number of young successfully fledged). Migrating and wintering bald eagles often congregate at specific sites for purposes of feeding and sheltering. Bald eagles rely on established roost sites because of their proximity to sufficient food sources. Roost sites are usually in mature trees where the eagles are somewhat sheltered from the wind and weather. Human activities near or within communal roost sites may prevent eagles

from feeding or taking shelter, especially if there are not other undisturbed and productive feeding and roosting sites available. Activities that permanently alter communal roost sites and important foraging areas can altogether eliminate the elements that are essential for feeding and sheltering eagles.

Where a human activity agitates or bothers roosting or foraging bald eagles to the degree that causes injury or substantially interferes with breeding, feeding, or sheltering behavior and causes, or is likely to cause, a loss of productivity or nest abandonment, the conduct of the activity constitutes a violation of the Eagle Act's prohibition against disturbing eagles. The circumstances that might result in such an outcome are difficult to predict without detailed site-specific information. If your activities may disturb roosting or foraging bald eagles, you should contact your local Fish and Wildlife Service Field Office (see page 16) for advice and recommendations for how to avoid such disturbance.

RECOMMENDATIONS FOR AVOIDING DISTURBANCE AT NEST SITES

In developing these Guidelines, we relied on existing state and regional bald eagle guidelines, scientific literature on bald eagle disturbance, and recommendations of state and Federal biologists who monitor the impacts of human activity on eagles. Despite these resources, uncertainties remain regarding the effects of many activities on eagles and how eagles in different situations may or may not respond to certain human activities. The Service recognizes this uncertainty and views the collection of better biological data on the response of eagles to disturbance as a high priority. To the extent that resources allow, the Service will continue to collect data on responses of bald eagles to human activities conducted according to the recommendations within these Guidelines to ensure that adequate protection from disturbance is being afforded, and to identify circumstances where the Guidelines might be modified. These data will be used to make future adjustments to the Guidelines.

To avoid disturbing nesting bald eagles, we recommend (1) keeping a distance between the activity and the nest (distance buffers), (2) maintaining preferably forested (or natural) areas between the activity and around nest trees (landscape buffers), and (3) avoiding certain activities during the breeding season. The buffer areas serve to minimize visual and auditory impacts associated with human activities near nest sites. Ideally, buffers would be large enough to protect existing nest trees and provide for alternative or replacement nest trees.

The size and shape of effective buffers vary depending on the topography and other ecological characteristics surrounding the nest site. In open areas where there are little or no forested or topographical buffers, such as in many western states, distance alone must serve as the buffer. Consequently, in open areas, the distance between the activity and the nest may need to be larger than the distances recommended under Categories A and B of these guidelines (pg. 12) if no landscape buffers are present. The height of the nest above the ground may also ameliorate effects of human activities; eagles at higher nests may be less prone to disturbance.

In addition to the physical features of the landscape and nest site, the appropriate size for the distance buffer may vary according to the historical tolerances of eagles to human activities in particular localities, and may also depend on the location of the nest in relation

to feeding and roosting areas used by the eagles. Increased competition for nest sites may lead bald eagles to nest closer to human activity (and other eagles).

Seasonal restrictions can prevent the potential impacts of many shorter-term, obtrusive activities that do not entail landscape alterations (e.g. fireworks, outdoor concerts). In proximity to the nest, these kinds of activities should be conducted only outside the breeding season. For activities that entail both short-term, obtrusive characteristics and more permanent impacts (e.g., building construction), we recommend a combination of both approaches: retaining a landscape buffer *and* observing seasonal restrictions.

For assistance in determining the appropriate size and configuration of buffers or the timing of activities in the vicinity of a bald eagle nest, we encourage you to contact the nearest U.S. Fish and Wildlife Service Field Office (see page 16).

Existing Uses

Eagles are unlikely to be disturbed by routine use of roads, homes, and other facilities where such use pre-dates the eagles' successful nesting activity in a given area. Therefore, in most cases *ongoing* existing uses may proceed with the same intensity with little risk of disturbing bald eagles. However, some *intermittent, occasional, or irregular* uses that pre-date eagle nesting in an area may disturb bald eagles. For example: a pair of eagles may begin nesting in an area and subsequently be disturbed by activities associated with an annual outdoor flea market, even though the flea market has been held annually at the same location. In such situations, human activity should be adjusted or relocated to minimize potential impacts on the nesting pair.

ACTIVITY-SPECIFIC GUIDELINES

The following section provides the Service's management recommendations for avoiding bald eagle disturbance as a result of new or intermittent activities proposed in the vicinity of bald eagle nests. Activities are separated into 8 categories (A – H) based on the nature and magnitude of impacts to bald eagles that usually result from the type of activity. Activities with similar or comparable impacts are grouped together.

In most cases, impacts will vary based on the visibility of the activity from the eagle nest and the degree to which similar activities are already occurring in proximity to the nest site. Visibility is a factor because, in general, eagles are more prone to disturbance when an activity occurs in full view. For this reason, we recommend that people locate activities farther from the nest structure in areas with open vistas, in contrast to areas where the view is shielded by rolling topography, trees, or other screening factors. The recommendations also take into account the existence of similar activities in the area because the continued presence of nesting bald eagles in the vicinity of the existing activities indicates that the eagles in that area can tolerate a greater degree of human activity than we can generally expect from eagles in areas that experience fewer human impacts. To illustrate how these factors affect the likelihood of disturbing eagles, we have incorporated the recommendations for some activities into a table (categories A and B).

First, determine which category your activity falls into (between categories A – H). If the activity you plan to undertake is not specifically addressed in these guidelines, follow the recommendations for the most similar activity represented.

If your activity is under A or B, our recommendations are in table form. The vertical axis shows the degree of visibility of the activity from the nest. The horizontal axis (header row) represents the degree to which similar activities are ongoing in the vicinity of the nest. Locate the row that best describes how visible your activity will be from the eagle nest. Then, choose the column that best describes the degree to which similar activities are ongoing in the vicinity of the eagle nest. The box where the column and row come together contains our management recommendations for how far you should locate your activity from the nest to avoid disturbing the eagles. The numerical distances shown in the tables are the closest the activity should be conducted relative to the nest. In some cases we have included additional recommendations (other than recommended *distance* from the nest) you should follow to help ensure that your activity will not disturb the eagles.

Alternate nests

For activities that entail permanent landscape alterations that may result in bald eagle disturbance, these recommendations apply to both active and alternate bald eagle nests. Disturbance becomes an issue with regard to alternate nests if eagles return for breeding purposes and react to land use changes that occurred while the nest was inactive. The likelihood that an alternate nest will again become active decreases the longer it goes unused. If you plan activities in the vicinity of an alternate bald eagle nest and have information to show that the nest has not been active during the preceding 5 breeding seasons, the recommendations provided in these guidelines for avoiding disturbance around the nest site may no longer be warranted. The nest itself remains protected by other provisions of the Eagle Act, however, and may not be destroyed.

If special circumstances exist that make it unlikely an inactive nest will be reused before 5 years of disuse have passed, and you believe that the probability of reuse is low enough to warrant disregarding the recommendations for avoiding disturbance, you should be prepared to provide all the reasons for your conclusion, including information regarding past use of the nest site. Without sufficient documentation, you should continue to follow these guidelines when conducting activities around the nest site. If we are able to determine that it is unlikely the nest will be reused, we may advise you that the recommendations provided in these guidelines for avoiding disturbance are no longer necessary around that nest site.

This guidance is intended to minimize disturbance, as defined by Federal regulation. In addition to Federal laws, most states and some tribes and smaller jurisdictions have additional laws and regulations protecting bald eagles. In some cases those laws and regulations may be more protective (restrictive) than these Federal guidelines.

Temporary Impacts

For activities that have temporary impacts, such as the use of loud machinery, fireworks displays, or summer boating activities, we recommend seasonal restrictions. These types of activities can generally be carried out outside of the breeding season without causing disturbance. The recommended restrictions for these types of activities can be lifted for alternate nests within a particular territory, including nests that were attended during the current breeding season but not used to raise young, after eggs laid in another nest within the territory have hatched (depending on the distance between the alternate nest and the active nest).

In general, activities should be kept as far away from nest trees as possible; loud and disruptive activities should be conducted when eagles are not nesting; and activity between the nest and the nearest foraging area should be minimized. If the activity you plan to undertake is not specifically addressed in these guidelines, follow the recommendations for the most similar activity addressed, or contact your local U.S. Fish and Wildlife Service Field Office for additional guidance.

If you believe that special circumstances apply to your situation that increase or diminish the likelihood of bald eagle disturbance, or if it is not possible to adhere to the guidelines, you should contact your local Service Field Office for further guidance.

Category A:

Building construction, 1 or 2 story, with project footprint of ½ acre or less.
Construction of roads, trails, canals, power lines, and other linear utilities.
Agriculture and aquaculture – new or expanded operations.
Alteration of shorelines or wetlands.
Installation of docks or moorings.
Water impoundment.

Category B:

Building construction, 3 or more stories.
Building construction, 1 or 2 story, with project footprint of more than ½ acre.
Installation or expansion of marinas with a capacity of 6 or more boats.
Mining and associated activities.
Oil and natural gas drilling and refining and associated activities.

	<i>If there is no similar activity within 1 mile of the nest</i>	<i>If there is similar activity closer than 1 mile from the nest</i>
<i>If the activity will be visible from the nest</i>	660 feet. Landscape buffers are recommended.	660 feet, or as close as existing tolerated activity of similar scope. Landscape buffers are recommended.
<i>If the activity will not be visible from the nest</i>	Category A: 330 feet. Clearing, external construction, and landscaping between 330 feet and 660 feet should be done outside breeding season. Category B: 660 feet.	330 feet, or as close as existing tolerated activity of similar scope. Clearing, external construction and landscaping within 660 feet should be done outside breeding season.

The numerical distances shown in the table are the closest the activity should be conducted relative to the nest.

Category C. Timber Operations and Forestry Practices

- Avoid clear cutting or removal of overstory trees within 330 feet of the nest at any time.
- Avoid timber harvesting operations, including road construction and chain saw and yarding operations, during the breeding season within 660 feet of the nest. The distance may be decreased to 330 feet around alternate nests within a particular territory, including nests that were attended during the current breeding season but not used to raise young, after eggs laid in another nest within the territory have hatched.
- Selective thinning and other silviculture management practices designed to conserve or enhance habitat, including prescribed burning close to the nest tree, should be undertaken outside the breeding season. Precautions such as raking leaves and woody debris from around the nest tree should be taken to prevent crown fire or fire climbing the nest tree. If it is determined that a burn during the breeding season would be beneficial, then, to ensure that no take or disturbance will occur, these activities should be conducted only when neither adult eagles nor young are present at the nest tree (i.e., at the beginning of, or end of, the breeding season, either before the particular nest is active or after the young have fledged from that nest). Appropriate Federal and state biologists should be consulted before any prescribed burning is conducted during the breeding season.
- Avoid construction of log transfer facilities and in-water log storage areas within 330 feet of the nest.

Category D. Off-road vehicle use (including snowmobiles). No buffer is necessary around nest sites outside the breeding season. During the breeding season, do not operate off-road vehicles within 330 feet of the nest. In open areas, where there is increased visibility and exposure to noise, this distance should be extended to 660 feet.

Category E. Motorized Watercraft use (including jet skis/personal watercraft). No buffer is necessary around nest sites outside the breeding season. During the breeding season, within 330 feet of the nest, (1) do not operate jet skis (personal watercraft), and (2) avoid concentrations of noisy vessels (e.g., commercial fishing boats and tour boats), except where eagles have demonstrated tolerance for such activity. Other motorized boat traffic passing within 330 feet of the nest should attempt to minimize trips and avoid stopping in the area where feasible, particularly where eagles are unaccustomed to boat traffic. Buffers for airboats should be larger than 330 feet due to the increased noise they generate, combined with their speed, maneuverability, and visibility.

Category F. Non-motorized recreation and human entry (e.g., hiking, camping, fishing, hunting, birdwatching, kayaking, canoeing). No buffer is necessary around nest sites outside the breeding season. If the activity will be visible or highly audible from the nest, maintain a 330-foot buffer during the breeding season, particularly where eagles are unaccustomed to such activity.

Category G. Helicopters and fixed-wing aircraft.

Except for authorized biologists trained in survey techniques, avoid operating aircraft within 1,000 feet of the nest during the breeding season, except where eagles have demonstrated tolerance for such activity.

Category H. Blasting and other loud, intermittent noises.

Avoid blasting and other activities that produce extremely loud noises within 1/2 mile of active nests, unless greater tolerance to the activity (or similar activity) has been demonstrated by the eagles in the nesting area. This recommendation applies to the use of fireworks classified by the Federal Department of Transportation as Class B explosives, which includes the larger fireworks that are intended for licensed public display.

RECOMMENDATIONS FOR AVOIDING DISTURBANCE AT FORAGING AREAS AND COMMUNAL ROOST SITES

1. Minimize potentially disruptive activities and development in the eagles' direct flight path between their nest and roost sites and important foraging areas.
2. Locate long-term and permanent water-dependent facilities, such as boat ramps and marinas, away from important eagle foraging areas.
3. Avoid recreational and commercial boating and fishing near critical eagle foraging areas during peak feeding times (usually early to mid-morning and late afternoon), except where eagles have demonstrated tolerance to such activity.
4. Do not use explosives within 1/2 mile (or within 1 mile in open areas) of communal roosts when eagles are congregating, without prior coordination with the U.S. Fish and Wildlife Service and your state wildlife agency.
5. Locate aircraft corridors no closer than 1,000 feet vertical or horizontal distance from communal roost sites.

ADDITIONAL RECOMMENDATIONS TO BENEFIT BALD EAGLES

The following are additional management practices that landowners and planners can exercise for added benefit to bald eagles.

1. Protect and preserve potential roost and nest sites by retaining mature trees and old growth stands, particularly within ½ mile from water.
2. Where nests are blown from trees during storms or are otherwise destroyed by the elements, continue to protect the site in the absence of the nest for up to three (3) complete breeding seasons. Many eagles will rebuild the nest and reoccupy the site.
3. To avoid collisions, site wind turbines, communication towers, and high voltage transmission power lines away from nests, foraging areas, and communal roost sites.
4. Employ industry-accepted best management practices to prevent birds from colliding with or being electrocuted by utility lines, towers, and poles. If possible, bury utility lines in important eagle areas.
5. Where bald eagles are likely to nest in human-made structures (e.g., cell phone towers) and such use could impede operation or maintenance of the structures or jeopardize the safety of the eagles, equip the structures with either (1) devices engineered to discourage bald eagles from building nests, or (2) nesting platforms that will safely accommodate bald eagle nests without interfering with structure performance.
6. Immediately cover carcasses of euthanized animals at landfills to protect eagles from being poisoned.
7. Do not intentionally feed bald eagles. Artificially feeding bald eagles can disrupt their essential behavioral patterns and put them at increased risk from power lines, collision with windows and cars, and other mortality factors.
8. Use pesticides, herbicides, fertilizers, and other chemicals only in accordance with Federal and state laws.
9. Monitor and minimize dispersal of contaminants associated with hazardous waste sites (legal or illegal), permitted releases, and runoff from agricultural areas, especially within watersheds where eagles have shown poor reproduction or where bioaccumulating contaminants have been documented. These factors present a risk of contamination to eagles and their food sources.

CONTACTS

The following U.S. Fish and Wildlife Service Field Offices provide technical assistance on bald eagle management:

<u>Alabama</u>	Daphne	(251) 441-5181	<u>New Hampshire</u>	Concord	(603) 223-2541
<u>Alaska</u>	Anchorage	(907) 271-2888	<u>New Jersey</u>	Pleasantville	(609) 646-9310
	Fairbanks	(907) 456-0203	<u>New Mexico</u>	Albuquerque	(505) 346-2525
	Juneau	(907) 780-1160	<u>New York</u>	Cortland	(607) 753-9334
<u>Arizona</u>	Phoenix	(602) 242-0210		Long Island	(631) 776-1401
<u>Arkansas</u>	Conway	(501) 513-4470	<u>North Carolina</u>	Raleigh	(919) 856-4520
<u>California</u>	Arcata	(707) 822-7201		Asheville	(828) 258-3939
	Barstow	(760) 255-8852	<u>North Dakota</u>	Bismarck	(701) 250-4481
	Carlsbad	(760) 431-9440	<u>Ohio</u>	Reynoldsburg	(614) 469-6923
	Red Bluff	(530) 527-3043	<u>Oklahoma</u>	Tulsa	(918) 581-7458
	Sacramento	(916) 414-6000	<u>Oregon</u>	Bend	(541) 383-7146
	Stockton	(209) 946-6400		Klamath Falls	(541) 885-8481
	Ventura	(805) 644-1766		La Grande	(541) 962-8584
	Yreka	(530) 842-5763		Newport	(541) 867-4558
<u>Colorado</u>	Lakewood	(303) 275-2370		Portland	(503) 231-6179
	Grand Junction	(970) 243-2778		Roseburg	(541) 957-3474
<u>Connecticut</u>	(See New Hampshire)		<u>Pennsylvania</u>	State College	(814) 234-4090
<u>Delaware</u>	(See Maryland)		<u>Rhode Island</u>	(See New Hampshire)	
<u>Florida</u>	Panama City	(850) 769-0552	<u>South Carolina</u>	Charleston	(843) 727-4707
	Vero Beach	(772) 562-3909	<u>South Dakota</u>	Pierre	(605) 224-8693
	Jacksonville	(904) 232-2580	<u>Tennessee</u>	Cookeville	(931) 528-6481
<u>Georgia</u>	Athens	(706) 613-9493	<u>Texas</u>	Clear Lake	(281) 286-8282
	Brunswick	(912) 265-9336	<u>Utah</u>	West Valley City	(801) 975-3330
	Columbus	(706) 544-6428	<u>Vermont</u>	(See New Hampshire)	
<u>Idaho</u>	Boise	(208) 378-5243	<u>Virginia</u>	Gloucester	(804) 693-6694
	Chubbuck	(208) 237-6975	<u>Washington</u>	Lacey	(306) 753-9440
<u>Illinois/Iowa</u>	Rock Island	(309) 757-5800		Spokane	(509) 891-6839
<u>Indiana</u>	Bloomington	(812) 334-4261		Wenatchee	(509) 665-3508
<u>Kansas</u>	Manhattan	(785) 539-3474	<u>West Virginia</u>	Elkins	(304) 636-6586
<u>Kentucky</u>	Frankfort	(502) 695-0468	<u>Wisconsin</u>	New Franken	(920) 866-1725
<u>Louisiana</u>	Lafayette	(337) 291-3100	<u>Wyoming</u>	Cheyenne	(307) 772-2374
<u>Maine</u>	Old Town	(207) 827-5938		Cody	(307) 578-5939
<u>Maryland</u>	Annapolis	(410) 573-4573			
<u>Massachusetts</u>	(See New Hampshire)				
<u>Michigan</u>	East Lansing	(517) 351-2555			
<u>Minnesota</u>	Bloomington	(612) 725-3548			
<u>Mississippi</u>	Jackson	(601) 965-4900			
<u>Missouri</u>	Columbia	(573) 234-2132			
<u>Montana</u>	Helena	(405) 449-5225			
<u>Nebraska</u>	Grand Island	(308) 382-6468			
<u>Nevada</u>	Las Vegas	(702) 515-5230			
	Reno	(775) 861-6300			

<u>National Office</u> U.S. Fish and Wildlife Service Division of Migratory Bird Management 4401 North Fairfax Drive, MBSP-4107 Arlington, VA 22203-1610 (703) 358-1714 http://www.fws.gov/migratorybirds

State Agencies

To contact a state wildlife agency, visit the Association of Fish & Wildlife Agencies' website at http://www.fishwildlife.org/where_us.html

GLOSSARY

The definitions below apply to these National Bald Eagle Management Guidelines:

Communal roost sites – Areas where bald eagles gather and perch overnight – and sometimes during the day in the event of inclement weather. Communal roost sites are usually in large trees (live or dead) that are relatively sheltered from wind and are generally in close proximity to foraging areas. These roosts may also serve a social purpose for pair bond formation and communication among eagles. Many roost sites are used year after year.

Disturb – To agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

In addition to immediate impacts, this definition also covers impacts that result from human-caused alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

Fledge – To leave the nest and begin flying. For bald eagles, this normally occurs at 10-12 weeks of age.

Fledgling – A juvenile bald eagle that has taken the first flight from the nest but is not yet independent.

Foraging area – An area where eagles feed, typically near open water such as rivers, lakes, reservoirs, and bays where fish and waterfowl are abundant, or in areas with little or no water (i.e., rangelands, barren land, tundra, suburban areas, etc.) where other prey species (e.g., rabbit, rodents) or carrion (such as at landfills) are abundant.

Landscape buffer – A natural or human-made landscape feature that screens eagles from human activity (e.g., strip of trees, hill, cliff, berm, sound wall).

Nest – A structure built, maintained, or used by bald eagles for the purpose of reproduction. An **active** nest is a nest that is attended (built, maintained or used) by a pair of bald eagles during a given breeding season, whether or not eggs are laid. An **alternate** nest is a nest that is not used for breeding by eagles during a given breeding season.

Nest abandonment – Nest abandonment occurs when adult eagles desert or stop attending a nest and do not subsequently return and successfully raise young in that nest for the duration of a breeding season. Nest abandonment can be caused by altering habitat near a nest, even if the alteration occurs prior to the breeding season. Whether the eagles migrate during the non-breeding season, or remain in the area throughout the non-breeding season, nest abandonment can occur at any point between the time the eagles return to the nesting site for the breeding season and the time when all progeny from the breeding season have

dispersed.

Project footprint – The area of land (and water) that will be permanently altered for a development project, including access roads.

Similar scope – In the vicinity of a bald eagle nest, an existing activity is of similar scope to a new activity where the types of impacts to bald eagles are similar in nature, and the impacts of the existing activity are of the same or greater magnitude than the impacts of the potential new activity. Examples: (1) An existing single-story home 200 feet from a nest is similar in scope to an additional single-story home 200 feet from the nest; (2) An existing multi-story, multi-family dwelling 150 feet from a nest has impacts of a greater magnitude than a potential new single-family home 200 feet from the nest; (3) One existing single-family home 200 feet from the nest has impacts of a lesser magnitude than three single-family homes 200 feet from the nest; (4) an existing single-family home 200 feet from a communal roost has impacts of a lesser magnitude than a single-family home 300 feet from the roost but 40 feet from the eagles' foraging area. The existing activities in examples (1) and (2) are of similar scope, while the existing activities in example (3) and (4) are not.

Vegetative buffer – An area surrounding a bald eagle nest that is wholly or largely covered by forest, vegetation, or other natural ecological characteristics, and separates the nest from human activities.

RELATED LITERATURE

Andrew, J.M. and J.A. Mosher. 1981. Bald eagle nest site selection and nesting habitat in Maryland. *Journal of Wildlife Management* 46:382-390.

Anonymous. 1977. Bald Eagle Habitat Management Guidelines, Forest Service – California Region. U.S Forest Service, San Francisco, CA.

Anthony, R.G. 2001. Low productivity of bald eagles on Prince of Wales Island, southeast Alaska. *Journal of Raptor Research* 35:1-8.

Anthony, R.G., R.W. Frenzel, F.B. Isaacs, and M.G. Garrett. 1994. Probable causes of nesting failures in Oregon's bald eagle population. *Wildlife Society Bulletin* 22:576-582.

Anthony, R.G. and F.B. Isaacs. 1989. Characteristics of bald eagle nest sites in Oregon. *Journal of Wildlife Management* 53:148-158.

Arizona Game and Fish Department. 1999. Bald Eagle Conservation Assessment and Strategy (draft).

Avian Power Line Interaction Committee (APLIC). 1996. Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996. Edison Electric Institute, Raptor Research Foundation, Washington, D.C.

Bangs, E.E., T.N. Bailey and V.D. Berns. Ecology of nesting bald eagles on the Kenai National Wildlife Refuge, Alaska. (USFWS staff)

Becker, J.M. 2002. Response of wintering bald eagles to industrial construction in southeastern Washington. *Wildlife Society Bulletin* 30:875-878.

Brauning, D.W. and J.D. Hassinger. 2000. Pennsylvania Recovery and Management Plan for the Bald Eagle (draft). Pennsylvania Game Commission. Harrisburg, PA.

Brown, B.T., G.S. Mills, C. Powels, W.A. Russell, G.D. Therres and J.J. Pottie. 1999. The influence of weapons-testing noise on bald eagle behavior. *Journal of Raptor Research* 33:227-232.

Brown, B.T. and L.E. Stevens. 1997. Winter bald eagle distribution is inversely correlated with human activity along the Colorado River, Arizona. *Journal of Raptor Research* 31:7-10.

Buehler, D.A. 2000. Bald Eagle (*Haliaeetus leucocephalus*). In *The Birds of North America*, No. 506 (A. Poole and F. Gill, eds.). The Birds of North America, Inc., Philadelphia, PA.

Buehler, D.A., T.J. Mersmann, J.D. Fraser, and J.K.D. Seegar. 1991. Effects of human activity on bald eagle distribution on the northern Chesapeake Bay. *Journal of Wildlife Management* 55:282-290.

Buehler, D.A., T.J. Mersmann, J.D. Fraser, and J.K.D. Seegar. 1991. Nonbreeding bald eagle communal and solitary roosting behavior and roost habitat on the northern Chesapeake Bay. *Journal of Wildlife Management* 55:273-281.

- Chandler, SK., J.D. Fraser, D.A. Buehler and J.K.D. Seegar. 1995. Perch trees and shoreline development as predictors of bald eagle distribution on the Chesapeake Bay. *Journal of Wildlife Management* 59:325-332.
- Cline, K. 1985. Bald Eagles in the Chesapeake: A Management Guide for Landowners. National Wildlife Federation. Washington, D.C.
- Dell, D.D. and P.J. Zwank. 1986. Impact of a high-voltage transmission line on a nesting pair of southern bald eagles in southeast Louisiana. *Journal of Raptor Research* 20(3/4):117-119.
- Dunwiddie, P.W. and R.C. Kuntz. 2001. Long-term trends of bald eagles in winter on the Skagit River, Washington. *Journal of Wildlife Management* 65(2):290-299.
- Fletcher, R.J. et. al. 1999. Effects of recreational trails on wintering diurnal raptors along riparian corridors in a Colorado grassland. *Journal of Raptor Research* 33(3):233-239.
- Fraser, J.D. 1981. The breeding biology and status of the bald eagle on the Chippewa National Forest. PhD. Dissertation, University of Minnesota.
- Fraser, J.D., LD. Frenzel and J.E. Mathisen. 1985. The impact of human activities on breeding bald eagles in north-central Minnesota. *Journal of Wildlife Management* 49(3):585-592.
- Garrett, M.G., J.W. Watson, and R.G. Anthony. 1993. Bald eagle home range and habitat use in the Columbia River Estuary. *Journal of Wildlife Management* 57(1):19-27.
- Gerrard J.M. and G.R. Bortolotti. 1988. The Bald Eagle: Haunts and Habits of a Wilderness Monarch. Smithsonian Institution Press. Washington, D.C.
- Grier, J.W. 1969. Bald eagle behavior and productivity responses to climbing to nests. *Journal of Wildlife Management* 33:961-966.
- Grier, J.W. and J.E. Guinn. 2003. Bald eagle habitats and responses to human disturbance in Minnesota. Report to the Minnesota Department of Natural Resources.
- Grubb, T.G. 1976. Survey and analysis of bald eagle nesting in western Washington. M.S. thesis, Univ. of Washington, Seattle.
- Grubb, T.G. and R.M. King. 1991. Assessing human disturbance of breeding bald eagles with classification tree models. *Journal of Wildlife Management* 55:500-511.
- Grubb, T.G., W.L. Robinson and W.W. Bowerman. 2002. Effects of watercraft on bald eagles nesting in Voyagers National Park, Minnesota. *Wildlife Society Bulletin* 30:156-161.
- Grubb, T.G. and W.W. Bowerman. 1997. Variations in breeding bald eagle response to jets, light planes and helicopters. *Journal of Raptor Research* 31:213-222.

- Grubb, T.G., W.W. Bowerman, A.J. Bath, J.P. Giesy, D.V.C. Weseloh. 2003. Evaluating Great Lakes bald eagle nesting habitat with Bayesian inference. RMRS-RP-45. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fort Collins, CO, 10 pp.
- Hansen, J.A. 1977. Population dynamics and night roost requirements of bald eagles wintering in the Nooksack River Valley, WA. Huxley College of Environmental Studies, Western Washington State College, Bellingham, WA. (Problem Series)
- Hansen, J.A., M.V. Stalmaster and J.R. Newman. 1980. Habitat characteristics, function, and destruction of bald eagle communal roosts in western Washington. Huxley college of Environmental Studies, Western Washington University.
- Hunt, W.G., D.E. Driscoll, E.W. Bianchi, and R.E. Jackman. 1992. Ecology of bald eagles in Arizona. Report to U.S. Bureau of Reclamation, Contract 6-CS-30-04470. BioSystems Analysis Inc., Santa Cruz, California.
- Isaacs, F.B and R.G. Anthony. 1987. Abundance, foraging, and roosting of bald eagles wintering in the Harney Basin, Oregon. Northwest Science 61(2), pp. 114-121.
- Juenemann, B.G. 1973. Habitat evaluations of selected bald eagle nest sites on the Chippewa National Forest. M.S. thesis, University of Minnesota, Minneapolis.
- Keister, G.P., R.G. Anthony and E.J. O'Neill. 1987. Use of communal roosts and foraging area by bald eagles wintering in the Klamath Basin. Journal of Wildlife Management 51(2):415-420.
- Knight, R. and S.K. Knight. 1984. Responses of wintering bald eagles to boating activity. Journal of Wildlife Management 48:999-1004.
- Linscombe, J.T., T.J. Hess, Jr., and V.L. Wright. 1999. Effects of seismic operations on Louisiana's nesting bald eagles. Proceedings of the Southeastern Association of Fish and Wildlife Agencies. 54:235-242.
- Maine (State of) Inland Fisheries and Wildlife Rules. Chapter 8.05 Essential Habitat for Species Listed as Threatened or Endangered.
- Mathisen, J.E. 1968. Effects of human disturbance on nesting bald eagles. Journal of Wildlife Management 32(1): 1-6.
- McGarigal, K., R.G. Anthony and F.B. Isaacs. 1991. Interactions of humans and bald eagles on the Columbia River estuary. Wildlife Monographs 115:1-47.
- McKay, K.J., J.W. Stravers, B.R. Conklin, U. Konig, S. Hawks, C.J. Kohrt, J.S. Lundh and G.V. Swenson. 2001. Potential human impacts on bald eagle reproductive success along the Upper Mississippi River.
- McKewan, L.C. and D.H. Hirth. 1979. Southern bald eagle productivity and nest site selection. Journal of Wildlife Management 43:585-594.

Millsap, B.A. Status of wintering bald eagles in the conterminous 48 States. 1986. Wildlife Society Bulletin 14:433-440.

Millsap, B.A, T. Breen, E. McConnell, T. Steffer, L. Phillips, N. Douglass, and S. Taylor. In Press. Comparative fecundity and survival of bald eagles fledged from suburban and rural natal areas in Florida. Journal of Wildlife Management 68(4).

Montana Bald Eagle Working Group. 1986. Montana Bald Eagle Management Plan. Department of the Interior, Bureau of Land Management. Billings, MT.

Nesbitt, S.A., M.J. Folk and D.A. Wood. 1993. Effectiveness of bald eagle habitat protection guidelines in Florida. Proceedings of the Annual Conference of the Southeast Association of Fish and Wildlife Agencies.

Newman, J.R., W.H. Brennan and L.M. Smith. 1977. Twelve-year changes in nesting patterns of bald eagles on San Juan Island, Washington. The Murrelet 58(2):37-39.

Postapulsky, S. 1974. Raptor reproductive success: some problems with methods, criteria, and terminology. Pages 21-31 in F.N. Hammerstrom, Jr., B.E. Harrell, and R.R. Olendorff, eds. Management of raptors. Raptor Res. Found., Vermillion, S.D.

Rodgers, J.A. and Schwikert, S.T. 2003. Buffer zone distances to protect foraging and loafing waterbirds from disturbance by airboats in Florida. Waterbirds 26(4): 437-443.

Russell, D. 1980. Occurrence and human disturbance sensitivity of wintering bald eagles on the Sauk and Suiattle Rivers, Washington. In R.L. Knight, G.T. Allen, M.V. Stalmaster and C.W. Servheen [eds.]. Proceedings of the Washington Bald Eagle Symposium. Nature Conservancy, Seattle, Washington, pp. 165-174.

Shapiro, A.E., F. Montalbano, and D. Mager. 1982. Implications of construction of a flood control project upon bald eagle nesting activity. Wilson Bulletin 94(1), pp. 55-63.

Skagen, S.K. 1980. Behavioral responses of wintering bald eagles to human activity on the Skagit River, Washington. In R.L. Knight, G.T. Allen, M.V. Stalmaster and C.W. Servheen [eds.]. Proceedings of the Washington Bald Eagle Symposium. Nature Conservancy, Seattle, Washington, pp. 231-241.

Skagen, S.K., R.L. Knight and G.J.H. Orians. 1991. Human disturbance of an avian scavenging guild. Ecological Applications 1:215-225. (Internet)

Stalmaster, M.V. 1976 Winter ecology and effects of human activity on bald eagles in the Nooksack River Valley, Washington. MS Thesis, Western Washington State College, Bellingham.

Stalmaster, M.V. 1980. Management strategies for wintering bald eagles in the Pacific Northwest. Proceedings of the Washington Bald Eagle Symposium, pp 49-67.

Stalmaster, M.V. and J.L. Kaiser. 1998. Effects of recreational activity on wintering bald eagles. Wildlife Monographs 137:1-46.

- Stalmaster, M.V. and J.L. Kaiser. 1997. Flushing responses of wintering bald eagles to military activity. *Journal of Wildlife Management* 61:1307-1313.
- Stalmaster, M.V. and J.R. Newman. 1978. Behavioral responses of wintering bald eagles to human activity. *Journal of Wildlife Management* 42:506-513.
- Steenhof, K. 1978. Management of Wintering Bald Eagles. FWS/OBS-78/79. U.S. Fish and Wildlife Service, Department of the Interior, Washington D.C.
- Steidl, R.J. and R.G. Anthony. 2000. Experimental Effects of Human Activity on Breeding Bald Eagles. *Ecological Applications* 10(1), pp. 258-268.
- Therres, G.D., M.A. Byrd and D.S. Bradshaw. 1993. Effects of development on nesting bald eagles: case studies from Chesapeake Bay. *Transactions of the North American Wildlife and Natural Resources Conference* 58:62-69.
- U.S. Fish and Wildlife Service. 1979. Bald Eagle Management Guidelines: Oregon – Washington. Portland. OR.
- U.S. Fish and Wildlife Service. 1983. Northern States bald eagle recovery plan. Appendices E, F, and G. U.S. Fish and Wildlife Service, Region 6, Denver, CO.
- U.S. Fish and Wildlife Service. 1987. Habitat Management Guidelines for the Bald Eagle in the Southeast Region. U.S Fish and Wildlife Service, Region 4. Atlanta, GA.
- U.S. Fish and Wildlife Service. 1993. Bald Eagle Basics. Anchorage, AK.
- U.S. Fish and Wildlife Service. 1993. Habitat Management Guidelines for Bald Eagles in Texas. Austin, TX.
- U.S. Fish and Wildlife Service and Virginia Department of Game and Inland Fisheries. 2001. Bald Eagle Protection Guidelines for Virginia. Gloucester and Richmond, VA.
- Watson, J.W. 1993. Responses of nesting bald eagles to helicopter surveys. *Wildlife Society Bulletin* 21:171-178.
- Watson, J.W. 2004. Responses of nesting bald eagles to experimental pedestrian activity. *Journal of Raptor Research* 38:295-305.
- Wood, P.B. 1999. Bald eagle response to boating activity in northcentral Florida. *Journal of Raptor Research* 33:97-101.
- Wood, P.B., T.C. Edwards Jr. and M.W. Collopy. 1989. Characteristics of bald eagle nesting habitat in Florida. *Journal of Wildlife Management* 53(2):441-449.
- Young, L.S. 1980. A quantitative evaluation of human disturbance impacts on breeding eagle ecology of bald eagles in the San Juan Islands, Washington. Washington Department of Game, Olympia.

Appendix **C**

United States Virgin Islands Department of Planning & Natural Resources (VISHPO) Consultation

United States Virgin Islands Department of Planning & Natural Resources (VISHPO) Submission

Note:

In the interest of efficiency and economy, attachments included in the original submission under this section are not duplicated throughout this NEPA Summary. The following attachment(s), found at the conclusion of this report, were included in the original submission:

- ***Proposed Project Summary***
- ***Form 620/621***
- ***Attachment 1 - Maps***
- ***Attachment 2 - Photographs***
- ***Attachment 3 - Areas of Potential Effects (Cultural Resource Report)***
- ***Attachment 4 - Historic Properties Identified in the APE for Direct Effects***
- ***Attachment 5 - Historic Properties Identified in the APE for Visual Effects***
- ***Attachment 6 - Tribal/NHO Involvement***
- ***Attachment 7 - Local Government Involvement***
- ***Attachment 8 - Public Involvement***
- ***Attachment 9 - Curricula Vitae***
- ***Attachment 10 - SHPO Specific Documentation (If required)***



May 24, 2024

United States Virgin Islands Department of Planning & Natural Resources
Attn: Sean L. Krigger
Fort Christian National Historic Landmark Site, 5064 Fort's Straede 1, Charlotte Amalie
St. Thomas, VI 00802
Sent via email: sean.krigger@dpnr.vi.gov; David.Brewer@dpnr.vi.gov

RE: **Proposed Telecommunications Tower Undertaking "East End" in St. Croix, Virgin Islands, Blue Sky Towers III, LLC; TCNS #: 273361; BST_228**

To Whom It May Concern:

Blue Sky Towers III, LLC (BST), is proposing to construct a tower installation and associated equipment near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820. Lotis Environmental, LLC (Lotis), is preparing a cultural resource and environmental review on behalf of BST as part of its permit process and regulatory review by the Federal Communications Commission (FCC). Please consider this correspondence an invitation to the VISHPO to comment on the possible direct or visual effects the proposed undertaking may have on eligible/listed sites or structures of historic significance within the Area of Potential Effect (APE).

By providing your signature or stamp of approval, you concur with Lotis' recommendation finding of *No effect* on eligible/listed sites or structures of historic significance within the APE.

Attached, please find the Federal Communications Commission's (FCC) completed Form 620 and corresponding attachments for the proposed undertaking.

Should you require further information, please do not hesitate to contact me at (417) 840-5008 or Anglin@thelotisgroup.com. Thank you for your time and consideration in these regards.

Sincerely,

Lotis Environmental, LLC

A handwritten signature in dark ink that reads "DeAnna Anglin".

DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
Anglin@thelotisgroup.com

Enclosures



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

***Advisory Council on Historic Preservation (ACHP)
Delegation of Authority for the Section 106 Review of
Telecommunication Projects***

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

September 21, 2000

MEMORANDUM

TO: Federal Communications Commission
State Historic Preservation Officers (SHPOs)
Tribal Historic Preservation Officers (THPOs)

From: Executive Director

Subject: Delegation of Authority for the Section 106 Review of Telecommunications Projects

As a result of ongoing discussions with the Federal Communications Commission (FCC) and other stakeholders involved in the coordination and implementation of telecommunications projects, the Council has determined that it is consistent with 36 CFR Section 800.2(c)(5) of our regulations, "Protection of Historic Properties" (36 CFR Part 800), for licensees, applicants, and their authorized representatives¹ to act on behalf of FCC when complying with certain provisions of our regulations. Accordingly, effective immediately, applicants, licensees, tower construction companies, and their authorized representatives may consult with the State Historic Preservation Officers (SHPOs) and Tribal Historic Preservation Officers (THPOs) to initiate the Section 106 review process; identify and evaluate historic properties; and assess effects. FCC, however, will remain responsible for participating in the consultation process when:

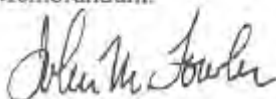
- it is determined that the *Criteria of Adverse Effect* apply to an undertaking;
- there is a disagreement between the licensee, applicant, tower construction company, or their authorized representatives and the SHPO/THPO regarding identification and evaluation, and/or assessment of effects;
- there is an objection from consulting parties or the public regarding findings and determinations, the implementation of agreed upon provisions, or their

¹When consulting with SHPOs/THPOs, authorized representatives of applicants, licensees and tower construction companies should identify the organization they are representing, including an appropriate contact person within the organization, and the undertaking for which they have been hired to coordinate the Section 106 review.

- involvement in a Section 106 review; or,
- there is the potential for a foreclosure situation or anticipatory demolition as specified in Section 110(k) of the National Historic Preservation Act.

In accordance with 36 CFR Section 800.2(c)(3), FCC shall ensure that all consultations with Indian Tribes are conducted in a sensitive manner respectful of tribal sovereignty and the government to government relationship between the Federal government and Indian Tribes. This Memorandum, therefore, is not intended to modify or limit such requirements nor mandate that Indian Tribes consult with licensees and applicants or provide information if the Indian Tribes conclude that consultation should be directly with FCC.

It, therefore, is important that Section 106 reviews be conducted within the time frames set forth within 36 CFR Part 800, and that the exchange of documentation and consultations between the consulting parties be carried out in a consistent and predictable manner. To this end, FCC should coordinate with the telecommunications industry to carry out the process set forth in this Memorandum.



John M. Fowler

***Proof of United States Virgin Islands Department of
Planning & Natural Resources (VISHPO) Submission***

DeAnna Anglin

From: DeAnna Anglin
Sent: Friday, May 24, 2024 3:13 PM
To: David.Brewer@dpr.vi.gov
Cc: Carlos Solis; NEPA NHPA
Subject: SHPO Section 106 Consultation request for BST_228 - East End USVI-00230
Attachments: BST_228 - East End USVI-00230.kmz

Importance: High

To Whom It May Concern,

Please see the Dropbox link for the submission of the above addressed TCNS project known as "East End" located in the USVI for the proposed undertaking. Once you have selected the link a tab will open in your browser and load our PDF submission. This PDF submission will include a cover letter, project summary, site photos, site maps, and a cultural resource survey report which will detail the investigation conducted on identifying cultural resources/properties located in both the Direct and Visual APE of the proposed undertaking. Additionally, it will have a recommendation of effect which we are providing to you as an opportunity to review and comment. Lastly, I have also attached a file (.kmz). Once selected, this file will upload to Google Earth program (in the temporary folder) and bring you directly to the "pinpoint" coordinates of the proposed tower location. I have included this file so you can review the surrounding habitat/area in its current state (or near current state) without the confined limitations of the aerial photos provided in Attachment 2.

Submittal Link: <https://www.dropbox.com/scl/fi/mal13xim8zaiz6ubstzs/SHPO-sub-5.24.24.pdf?rlkey=47oskkv26ar8oujp7ac9g80gu&dl=0>

Should you have an additional request for information, please feel free to contact me via phone or by responding all to this email. We will do our best to supplement you with any additional documentation or information regarding the proposed undertaking.

Warmly,

DeAnna Anglin

Senior Biologist/NEPA Specialist



8899 Main Street – Suite 107
Williamsville, NY 14221


www.thelotisgroup.com

Find us on LinkedIn 

Office: 716.580.7000

Mobile: 417.840.5008

Anglin@thelotisgroup.com

Find me on LinkedIn 

Please consider the environment before printing this email

“If you wish to know the divine, feel the wind on your face
and the warm sun on your hand.” — Buddha

Federal Communications Commission (FCC) Form 620

Notification Date: **7AM EST 05/28/2024****New Tower ("NT") Submission Packet**File Number: **0011090882**See instructions for
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): 0029091170
4) Name: Blue Sky Towers III LLC

Contact Name

5) First Name: Laurie	6) MI:	7) Last Name: Plaisance	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	And /Or	11) Street Address: 352 Park Street, Suite 106	
12) City: North Reading		13) State: MA	14) Zip Code: 01846
15) Telephone Number: (314)913-0505		16) Fax Number:	
17) E-mail Address: NEPA.NHPA@thelotisgroup.com			

Consultant Information

18) FCC Registration Number (FRN): 0031051642
19) Name: Lotis Environmental, LLC

Principal Investigator

20) First Name: Carlos	21) MI:	22) Last Name: Solis	23) Suffix:
24) Title:			

Principal Investigator Contact Information

25) P.O. Box:	And /Or	26) Street Address: 8899 Main Street Suite 107	
27) City: Williamsville		28) State: NY	29) Zip Code: 14221
30) Telephone Number: (716)580-7000		31) Fax Number:	
32) E-mail Address: NEPA.NHPA@thelotisgroup.com			

Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
34) Areas of Professional Qualification: (<input checked="" type="checkbox"/>) 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 (<input checked="" type="checkbox"/>) <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: **273361**

Site Information

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

3) Site Name: **East End**

4) Site Address: **near 3 Long Point & Cotton Garden, Eastend B Quarter**

5) Detailed Description of Project:

A proposed telecommunication tower known as EAST END and associated equipment within a leased area that includes an access, utility, and guy wire (if applicable) easements.

6) City: **Christiansted**

7) State: **VI**

8) Zip Code: **00820**

9) County/Borough/Parish: **ST. CROIX**

10) Nearest Crossroads: **East End Road and South Shore Road**

11) **NAD 83** Latitude (DD-MM-SS.S): **17-45-08.6** (**X**) N or () S

12) **NAD 83** Longitude (DD-MM-SS.S): **064-35-26.7** () E or (**X**) W

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **48.8** () Feet (**X**) Meters

14) Tower Type (Select One):

() Guyed lattice tower

() Self-supporting lattice

(**X**) 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 (X) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>273361</u> Number of Tribes/NHOs: <u>0</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:

Contact Name

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

Dates & Response

10) Date Contacted _____	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?	(<input checked="" type="checkbox"/>) <u>Y</u> es () <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 (<input checked="" type="checkbox"/>) <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 (<input checked="" type="checkbox"/>) <u>N</u> o

Historic Property

4) Property Name: Cramer Park
5) SHPO Site Number:

Property Address

6) Street Address: East End Rd		
7) City: Eastend	8) State: VI	9) Zip Code: 00820
10) County/Borough/Parish: ST. CROIX		

Status & Eligibility

11) Is this property listed on the National Register? Source: _____	() <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: Phase I (A&B) Archaeological Survey	(<input checked="" type="checkbox"/>) <u>Y</u> es () <u>N</u> o
13) Is this property a National Historic Landmark?	() <u>Y</u> es (<input checked="" type="checkbox"/>) <u>N</u> o

14) Direct Effects (Select One): (<input checked="" type="checkbox"/>) 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): (<input checked="" type="checkbox"/>) 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: Department of Planning and Natural Resources

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: 45 Estate Mars Hill	
10) City: Frederiksted		11) State: VI	12) Zip Code: 00840
13) Telephone Number: (340)773-1082		14) Fax Number:	
15) E-mail Address: none@none.com			
16) Preferred means of communication: (<input checked="" type="checkbox"/>) E-mail () Letter () Both			

Dates & Response

17) Date Contacted 05/24/2024	18) Date Replied _____
(<input checked="" type="checkbox"/>) No Reply	
() Replied/No Interest	
() Replied/Have Interest	
() Replied/Other	

Additional Information

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

Other Consulting Parties

Other Consulting Parties Contacted

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

Consulting Party

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

Contact Name

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

Contact Information

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

Dates & Response

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

Additional Information

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

Designation of SHPO/THPO

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

SHPO/THPO

Name: **Virgin Islands Department of Planning & Natural Resources**

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: **Virgin Islands Department of Planning and Natural Resources**

SHPO/THPO Name: **Virgin Islands State Historic Preservation Office-DPNR**

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: **DeAnna**

MI: **N**

Last Name: **Anglin**

Suffix:

Signature: **DeAnna N Anglin**

Date: **05/24/2024**

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
Map Documents	Maps	05/24/2024
Photographs	Photos	05/24/2024
Area of Potential Effects	APE	05/24/2024
Historic Properties for Direct Effects	HPDE	05/24/2024
Historic Properties for Visual Effects	HPVE	05/24/2024
Local Government Involvement	Local Gov	05/24/2024
Public Involvement	Public Involvement	05/24/2024
Resumes/Vitae	Resumes	05/24/2024
Tribal/NHO Involvement	Tribal/NHO Involvement	05/24/2024

***Electronic Section 106 (E-106) Submission
Confirmation Email***

NEPA NHPA

From: towernotifyinfo@fcc.gov
Sent: Friday, May 24, 2024 4:16 PM
To: NEPA NHPA
Subject: Section 106 New Filing Submitted- Email ID #9758457

The following new Section 106 filing has been submitted:

File Number: 0011090882
TCNS Number: 273361
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 05/28/2024

Applicant: Blue Sky Towers III LLC
Consultant: Lotis Environmental, LLC
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: East End
Site Address: near 3 Long Point & Cotton Garden, Eastend B Quarter
Detailed Description of Project: A proposed telecommunication tower known as EAST END and associated equipment within a leased area that includes an access, utility, and guy wire (if applicable) easements.
Site Coordinates: 17-45-8.6 N, 64-35-26.7 W
City: Christiansted
County: ST. CROIX
State:VI
Lead SHPO/THPO: Virgin Islands Department of Planning & Natural Resources

Consultant Contact Information:
Name: Lotis Environmental, LLC
Title:
PO Box:
Address: 8899 Main Street Suite 107
City: Williamsville
State: NY
Zip: 14221
Phone: 716-580-7000
Fax:
Email: NEPA.NHPA@thelotisgroup.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.

***United States Virgin Islands Department of Planning &
Natural Resources's (VISHPO) Response***

DeAnna Anglin

From: David Brewer <David.Brewer@dpnr.vi.gov>
Sent: Wednesday, June 26, 2024 12:05 PM
To: DeAnna Anglin
Cc: Carlos Solis; Miles Walz-Salvador; NEPA NHPA; Sean L. Krigger; Eboni Powell
Subject: Re: [EXTERNAL MAIL] SHPO Section 106 Consultation request for BST_228 - East End USVI-00230
Attachments: BST_228 - East End USVI-00230.kmz

Ms. Anglin:

I reviewed the many pages of data and the cultural survey contained in the Dropbox below. I also discussed the project with both the archaeological consultant and my Director. **The VISHPO has no objection to the proposed monopole cell tower.**

By the way, the SHPO has 45 days to respond, and in the Virgin Islands it sometimes may go beyond that – marking something as "High Importance" does not necessarily make it so, and the amount of information contained in the Dropbox was unnecessary. You may wish to consult with your co-worker Miles, with whom we have interacted successfully on these type of projects for quite a while. It is our understanding that both the Lotis Group and we (VISHPO) want to make this operation quick and smooth and painless as possible, in anticipation of the other ones wherein serious issues might arise.

Finally, I am retiring, so be sure to copy my Director, Sean L. Krigger, on any forthcoming correspondence (please tell Miles as well, since he and Sean have already developed a productive working relationship).

David M. Brewer
Senior Archaeologist
Virgin Islands State Historic Preservation Office
Fort Frederik Museum
198 Strand St.
Frederiksted, St. Croix
U.S. Virgin Islands 00840

E-mail: david.brewer@dpnr.vi.gov
Phone: (340) 719-7089

From: DeAnna Anglin <Anglin@thelotisgroup.com>
Sent: Friday, May 24, 2024 4:13 PM
To: David Brewer <David.Brewer@dpnr.vi.gov>
Cc: Carlos Solis <cmsolis@gmail.com>; NEPA NHPA <NEPA.NHPA@thelotisgroup.com>
Subject: [EXTERNAL MAIL] SHPO Section 106 Consultation request for BST_228 - East End USVI-00230

To Whom It May Concern,

Please see the Dropbox link for the submission of the above addressed TCNS project known as "East End" located in the USVI for the proposed undertaking. Once you have selected the link a tab will open in your browser and load our PDF submission. This PDF submission will include a cover letter, project summary, site photos, site maps, and a cultural resource survey report which will detail the investigation conducted on identifying cultural resources/properties located in both the Direct and Visual APE of the proposed undertaking. Additionally, it will have a recommendation of effect which we are providing to you as an opportunity to review and comment. Lastly, I have also attached a file (.kmz). Once selected, this file will upload to Google Earth program (in the temporary folder) and bring you directly to the "pinpoint" coordinates of the proposed tower location. I have included this file so you can review the surrounding habitat/area in its current state (or near current state) without the confined limitations of the aerial photos provided in Attachment 2.

Submittal Link: <https://www.dropbox.com/scl/fi/mal13xim8zaiz6ubstzs/SHPO-sub-5.24.24.pdf?rlkey=47oskkv26ar8oujp7ac9g80gu&dl=0>

Should you have an additional request for information, please feel free to contact me via phone or by responding all to this email. We will do our best to supplement you with any additional documentation or information regarding the proposed undertaking.

Warmly,

DeAnna Anglin

Senior Biologist/NEPA Specialist



8899 Main Street – Suite 107
Williamsville, NY 14221
www.thelotisgroup.com

Find us on LinkedIn 

Office: 716.580.7000
Mobile: 417.840.5008
Anglin@thelotisgroup.com

Find me on LinkedIn 

Please consider the environment before printing this email

“If you wish to know the divine, feel the wind on your face
and the warm sun on your hand.” — Buddha

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Caution: This e-mail has originated outside of GVI network. Do not click on links or open any attachment (s) that might look suspicious unless you have knowledge of who the sender is.

Appendix **D**

Tribal/NHO Consultation(s)

Tribal/NHO Involvement

Lotis utilized the Federal Communications Commission (FCC) Tower Construction Notification System (TCNS) to identify federal tribal entities with interest in the proposed undertaking's location. This identification phase was conducted on October 31, 2023 (TCNS Number 273361). The FCC responded, via e-mail, on November 3, 2023, indicating no groups were forwarded information regarding the location of the proposed project, via electronic mail. The document forwarded can be viewed in the *FCC's Notice of Organizations (NOO)*.

***Federal Communications Commission's (FCC) Tower
Construction Notification System (TCNS) Proposed
Tower Structure (PTS) Info Email***

NEPA NHPA

From: towernotifyinfo@fcc.gov
Sent: Tuesday, October 31, 2023 11:36 AM
To: NEPA NHPA
Subject: Proposed Tower Structure Info - Email ID #8701421

Dear Laurie Plaisance,

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

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

Notification Received: 10/31/2023

Notification ID: 273361

Tower Owner Individual or Entity Name: Blue Sky Towers III, LLC

Consultant Name: Miles C Walz Salvador

Street Address: 8899 Main Street, Suite 107

City: Williamsville

State: NEW YORK

Zip Code: 14221

Phone: 716-580-7000

Email: NEPA.NHPA@TheLotisGroup.com

Structure Type: MTOWER - Monopole

Latitude: 17 deg 45 min 8.6 sec N

Longitude: 64 deg 35 min 26.7 sec W

Location Description: near 3 Long Point & Cotton Garden, Eastend B Quarter

City: Christiansted

State: VIRGIN ISLANDS

County: ST. CROIX

Detailed Description of Project: A proposed telecommunication tower known as EAST END and associated equipment within a leased area that includes an access, utility, and guy wire (if applicable) easements.

Ground Elevation: 45.2 meters

Support Structure: 45.7 meters above ground level

Overall Structure: 48.8 meters above ground level

Overall Height AMSL: 94 meters above mean sea level

***Federal Communications Commission's (FCC) Tower
Construction Notification System (TCNS) Notice of
Organizations (NOO) Email***

NEPA NHPA

From: towernotifyinfo@fcc.gov
Sent: Friday, November 3, 2023 3:02 AM
To: NEPA NHPA
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #8703938

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).

None

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.

1. Acting Director/Deputy SHPO Sean L Krigger - Virgin Islands State Historic Preservation Office-DPNR - Dronningens Gade 71&72A Charlotte Amalie, VI - sean.krigger@dpnr.gov.vi - 340-776-8605 - electronic mail

2. Deputy SHPO Lorna Thomas - Virgin Islands Department of Planning & Natural Resources - Cyril E. King Airport Terminal Building - 2nd Floor St. Thomas, VI - lorna_thomas@vishpo.com - 340-776-8605 - electronic mail

3. SHPO Robert Mathes - Virgin Islands Department of Planning and Natural Resources - Cyril E. King Airport Terminal Bldg - 2nd Floor St. Thomas, VI - robert_mathes@vishpo.com - 340-776-8605 - 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 tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 10/31/2023

Notification ID: 273361

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Blue Sky Towers III, LLC

Consultant Name: Miles C Walz Salvador

Street Address: 8899 Main Street, Suite 107

City: Williamsville

State: NEW YORK

Zip Code: 14221

Phone: 716-580-7000

Email: NEPA.NHPA@TheLotisGroup.com

Structure Type: MTOWER - Monopole

Latitude: 17 deg 45 min 8.6 sec N

Longitude: 64 deg 35 min 26.7 sec W

Location Description: near 3 Long Point & Cotton Garden, Eastend B Quarter

City: Christiansted

State: VIRGIN ISLANDS

County: ST. CROIX

Detailed Description of Project: A proposed telecommunication tower known as EAST END and associated equipment within a leased area that includes an access, utility, and guy wire (if applicable) easements.

Ground Elevation: 45.2 meters
Support Structure: 45.7 meters above ground level
Overall Structure: 48.8 meters above ground level
Overall Height AMSL: 94.0 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://www.fcc.gov/wireless/available-support-services>

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

Thank you,
Federal Communications Commission

Appendix **E**

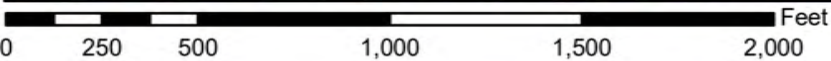
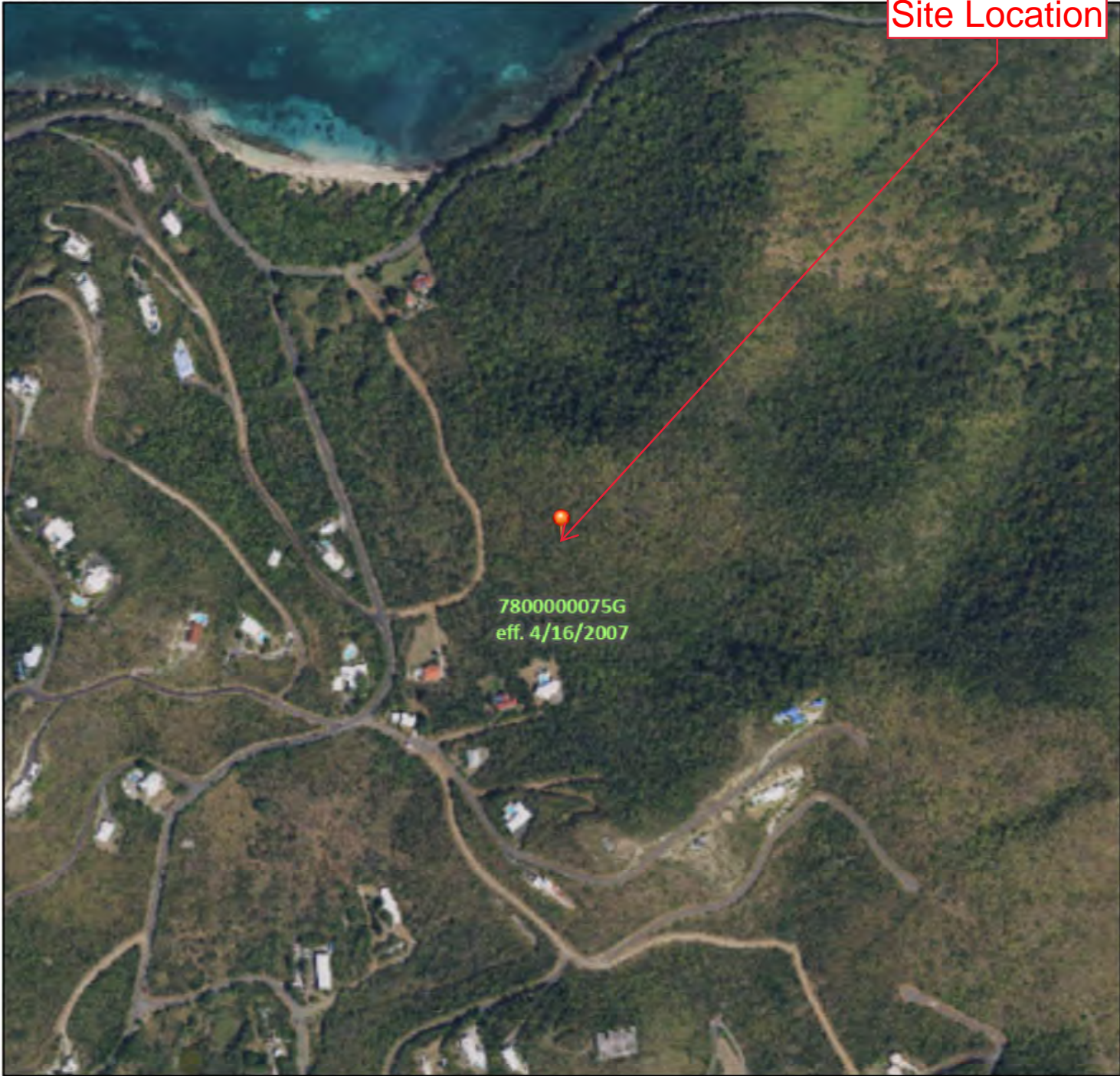
Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRMette)

National Flood Hazard Layer FIRMette



64°35'46"W 17°45'27"N

Site Location



1:6,000

64°35'9"W 17°44'53"N

Basemap Imagery Source: USGS National Map 2023

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
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		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 **11/1/2023 at 12:05 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.









Appendix **F**

United States Fish and Wildlife Service (USFWS) National Wetland Inventory Map (NWIM)



November 1, 2023

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.

PROPOSED PROJECT SUMMARY

Site Name: **East End**

Site Address: **near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, Virgin Islands 00820**

Latitude/Longitude: **17° 45' 08.6297" ±N / -64° 35' 26.7075" ±W**

Municipality: **St. Croix**

UTM: **Zone: 20Q East: 331347 North: 1963506**

Consultant Information: **Company: Lotis Environmental, LLC (Lotis)
Consultant: DeAnna Anglin
Email: Anglin@thelotisgroup.com
Address: 8899 Main Street - Suite 107,
Williamsville, NY 14221
Phone: 417 840 5008**

Project Description: **Proposed construction of a 150' (157' including all appurtenances)' monopole telecommunication tower within a 60' by 60' lease area. A proposed 15' by 1285.84' access/utility easement will extend northwest connecting with East End Road.**

Project Impacts: **Excavation and grade work to install tower foundation, utilities and access easements.**

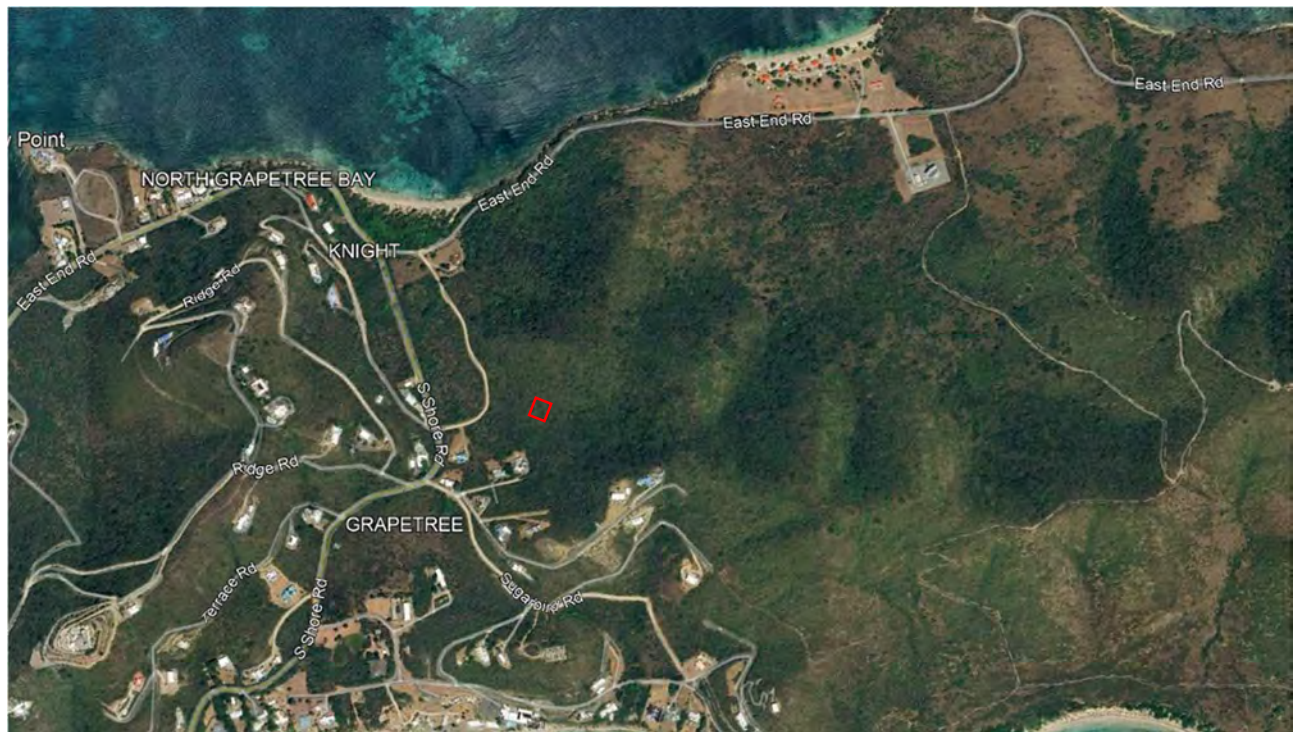
Project Area: **Square Footage: ~28,431.60 / Acres: ~0.653**

Present Land Use: **Forested land**

Past Land Use: **Forested land**

Attachment **1**

Maps and Survey



Lease Area (Far)



Lease Area (Close)

Aerial Images – Vicinity Maps

Blue Sky Towers III, LLC

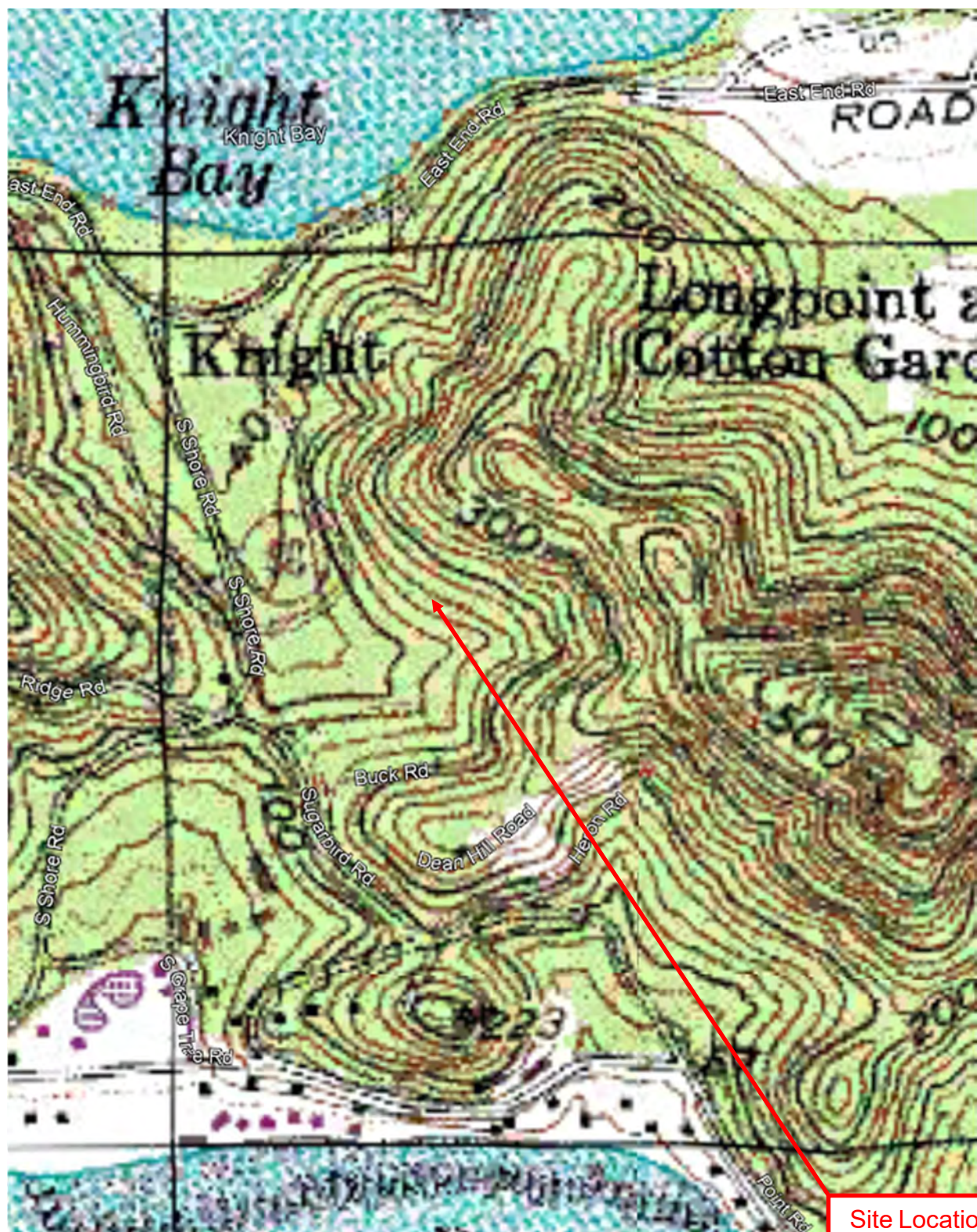
East End

near Plot 3 Estate Long Point & Cotton Garden

Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed
2023





USGS 7.5 Minute Topographic Map
 Blue Sky Towers III, LLC
 East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820



5001-12 Chandlers Wharf
Christiansted, Saint Croix
Virgin Islands of the US
jeff@thegreenpiece.us



PO Box 25105
Gallows Bay, VI 00824
Phone: 340.778.7474
www.thegreenpiece.us

1A Certification of Location and Elevation

Date of Survey: 16 August 2023

Prepared For: Blue Sky Towers, III LLC

Site Reference: East End STX USVI 00230

Site Address: Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, US Virgin Islands 00820

The elevation of the ground at the tower center referenced hereon are based on VIVD09, and are accurate to within 3 feet as determined by our field survey of the subject property. The elevation is as follows:

Ground Elevation of Site: 148.2'

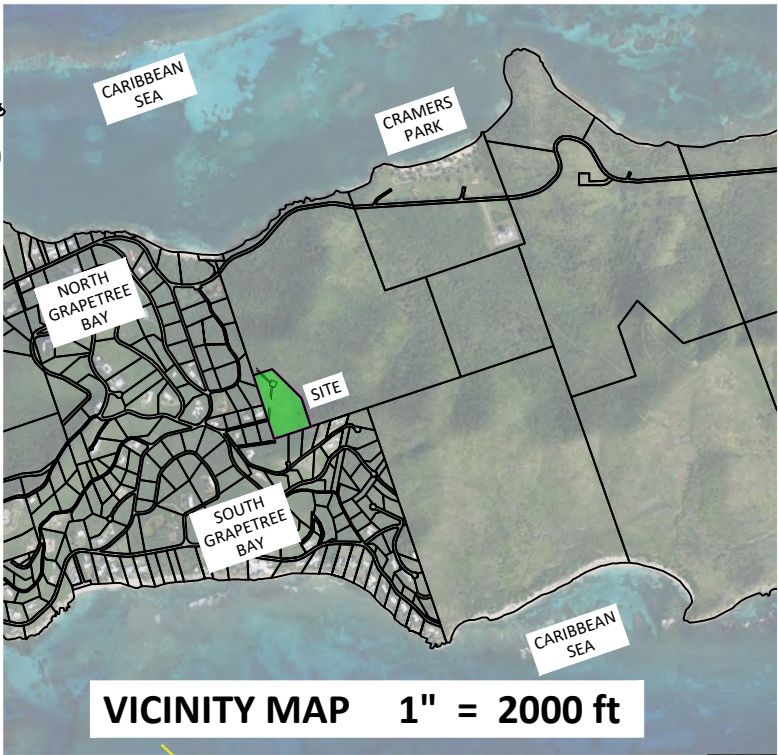
The horizontal values of the above referenced point, and the geodetic coordinates thereof, were established by taking multiple readings with Global Positioning Satellite receivers and are hereby certified to be within 15 feet. The values are based on NAD 1983 and are as follows:

Latitude: 17° 45' 08.6297"
Longitude: -64° 35' 26.7075"

Jeffrey Bateman, PLS
VI PLS 1053-LS



SPACE RESERVED FOR
CERTIFICATIONS

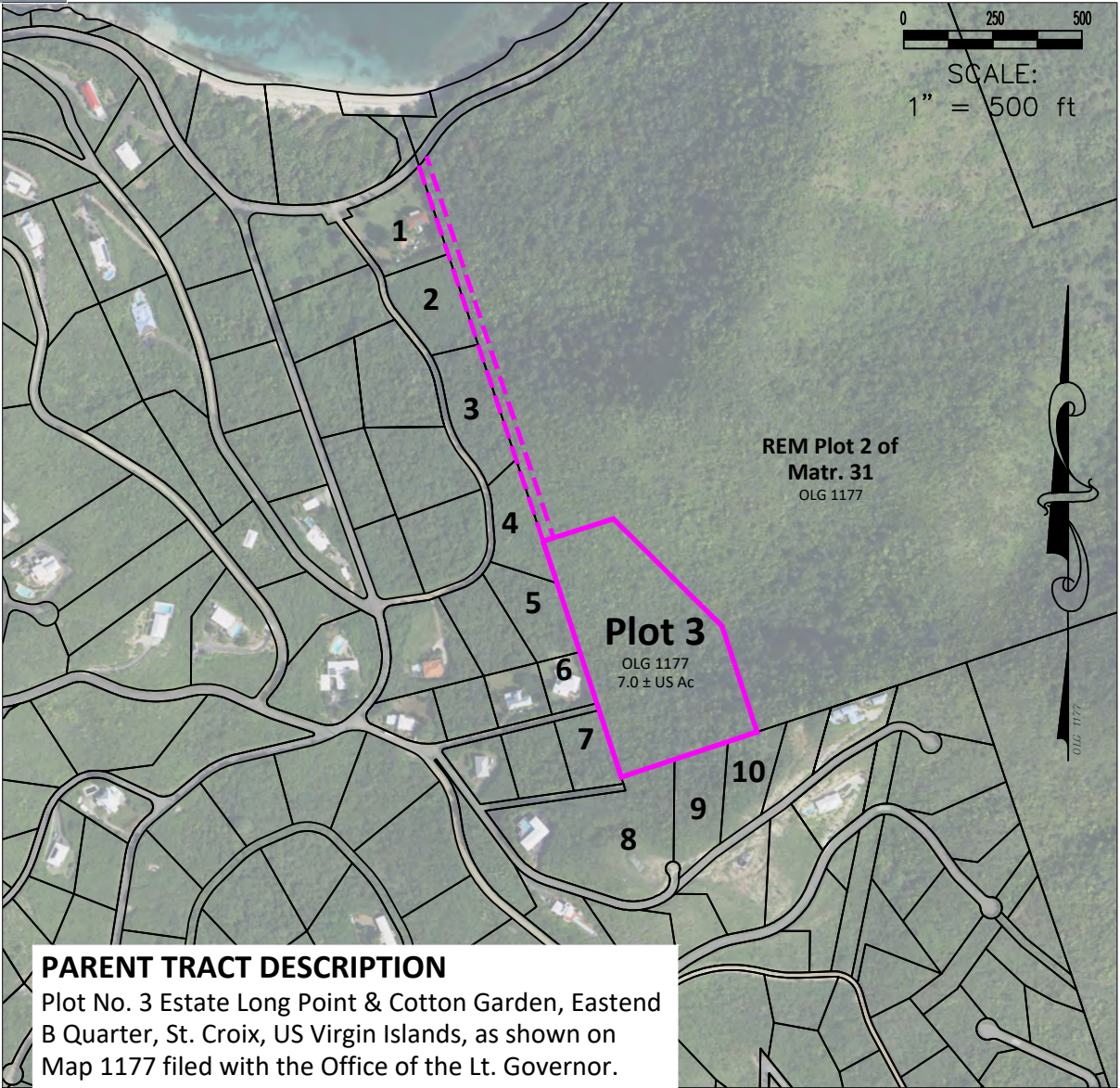


GENERAL NOTES

- 1. THIS SURVEY WAS PREPARED BY BCSC DOSPIVA, LLC., UNDER THE SUPERVISION OF JEFFREY BATEMAN, PLS.
- 2. THIS PLAN HAS BEEN PREPARED FOR LAYOUT AND PERMITTING PURPOSES ONLY.
- 3. THIS IS NOT A BOUNDARY SURVEY. PROPERTY LINES SHOWN WERE TAKEN FROM EXISTING FIELD EVIDENCE, EXISTING DEEDS AND PLATS OF PUBLIC RECORD, AND INFORMATION SUPPLIED TO THE SURVEYOR BY THE CLIENT.
- 4. VERTICAL DATUM IS VIVD09. LATITUDE, LONGITUDE AND STATE PLANE COORDINATES, IF SHOWN, ARE GIVEN IN NORTH AMERICAN DATUM OF 1983 (NAD83) AND ARE DERIVED BY OPUS SOLUTION BASED ON ZONE 5200 .
- 5. FIELD EQUIPMENT USED: TRIMBLE GNSS GPS.
- 6. ALL DISTANCES ARE HORIZONTAL GROUND DISTANCES AND ALL BEARINGS ARE PUERTO RICO / US VIRGIN ISLANDS COORDINATE SYSTEM UNLESS OTHERWISE SHOWN.
- 7. PROPERTY OWNER: MIKE LOHMAN
- 8. THIS MAP IS NOT A CERTIFIED SURVEY AND HAS NOT BEEN REVIEWED BY A LOCAL GOVERNMENT AGENCY FOR COMPLIANCE WITH ANY APPLICABLE LAND DEVELOPEMENT REGULATIONS.
- 9. THE PROPERTY LIES IN ZONE "X", PER NATIONAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP 7800000075G, DATED APRIL 16, 2007 AND IS ZONED R-1.

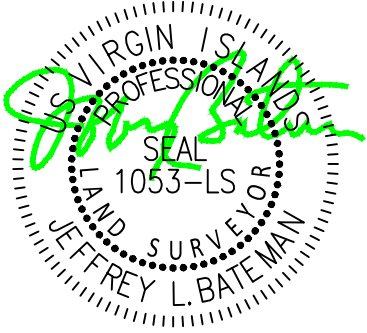
SPACE RESERVED FOR
TITLE EXCEPTIONS

ADJOINERS




PARENT TRACT DESCRIPTION

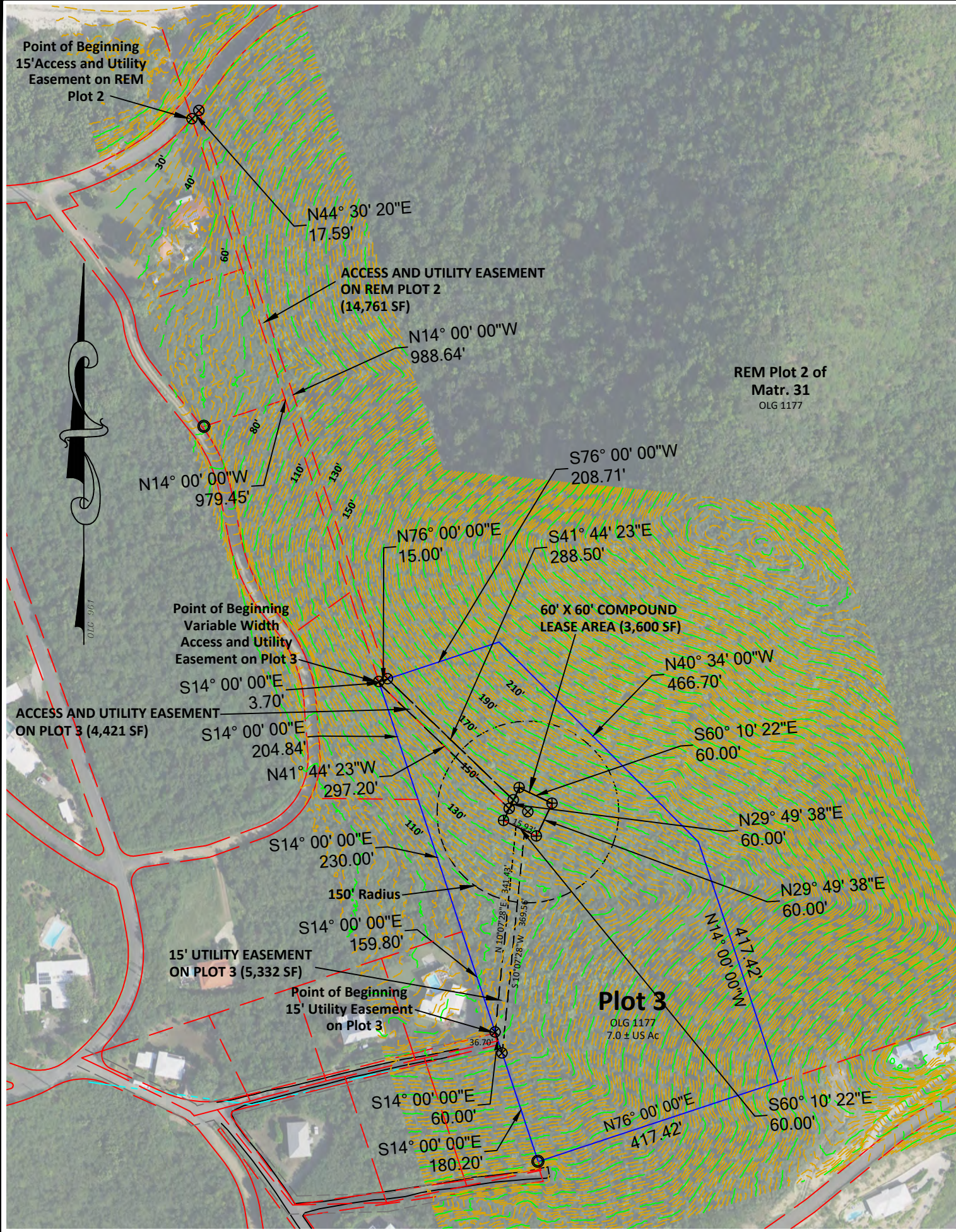
Plot No. 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, US Virgin Islands, as shown on Map 1177 filed with the Office of the Lt. Governor.



August 17, 2023

Jeffrey L. Bateman, PLS

SITE NAME: EAST END	
SITE NUMBER: USVI-00230	
SITE ADDRESS: 3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820	
AREA: ST CROIX US VIRGIN ISLANDS	
SITE OWNER: BLUE SKY TOWERS, III LLC	
PROPERTY OWNER: MIKE LOHMAN	
1A LOCATION LATITUDE:N 17° 45' 08.6297" NAD83 LONGITUDE:W 64°35' 26.7075" NAD83 ELEVATION: 148.2' VIVD09	
LEGEND ⤿ EXIST. UTILITY POLE ⦿ EXIST. TELE PED ○ IRON FOUND ● CHISEL MARK FOUND ⊗ COMPUTED POINT	
NO.	REVISION/ISSUE
	DATE
	
The Green Piece Engineering + Environment, LLC 5001-12 Chandler's Wharf Christiansted, Virgin Islands 00820 Ph: 340.778.7474 www.thegreenpiece.us	
PREPARED FOR: Blue Sky Towers, LLC 352-106 Park Street North Reading, MA 01864	
PROJECT NUMBER: 23X092	
SITE SURVEY	SHEET
	S-1



15' ACCESS AND UTILITY EASEMENT ON REM PLOT 2

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as REM Plot 2 of Matr. 31, and being more particularly described as follows:

Beginning at a point at the intersection of the Western boundary line of said REM Plot 2 and the southern Right-of-Way of Eastend Road, a paved public road, thence along said western boundary line S14°00'00"E 979.45' to a point, said point also being known as Point of Beginning on the referenced drawing of the herein described Variable Width Access and Utility Easement, said point also being the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence N14°00'00"W 988.64' to a point, said point being on the southern Right-of-Way of Eastend Road, thence along the Right-of-Way S44°30'20"W 17.59' to a point, said point being the Point of Beginning of the herein described 15' Wide Access and Utility Easement Area, said Easement Area contains 14,761 square feet, more or less.

15' ACCESS AND UTILITY EASEMENT ON PLOT 3

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:

Beginning at a point at the northwest corner of Plot 3 Long Point & Cotton Grove, thence N76°00'00"E 15.00' to a point, thence S41°44'23"E 288.50' to a point, said point being on the herein described 60' x 60' Lease Area, said point also being the Point of Beginning of said 60' x 60' lease area, thence along the Lease Area S29°49'38"W 15.81' to a point, thence N41°44'23"W 297.20' to a point, thence N14° 00'00"W 3.70' to a point, said point being the Point of Beginning of the herein described Variable Width Access and Utility Easement Area, said Easement Area contains 4,421 square feet, more or less.

60' x 60' COMPOUND LEASE AREA

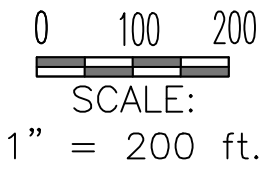
All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:


Beginning at a point on the referenced drawing of the herein described 60' x 60' Compound Lease Area and as described in the Variable Width Access and Utility Easement, thence N29°49'38"E 22.50' to a point, thence S60°10'22"E 60.00' to a point, thence S29°49'38"E 60.00' to a point, thence N60°10'22"E 60.00' to a point, thence N29°49'38"W 37.50' to a point, said point being the Point of Beginning of the herein described 60' x 60' Compound Lease Area, said Lease Area contains 3,600 square feet, more or less.

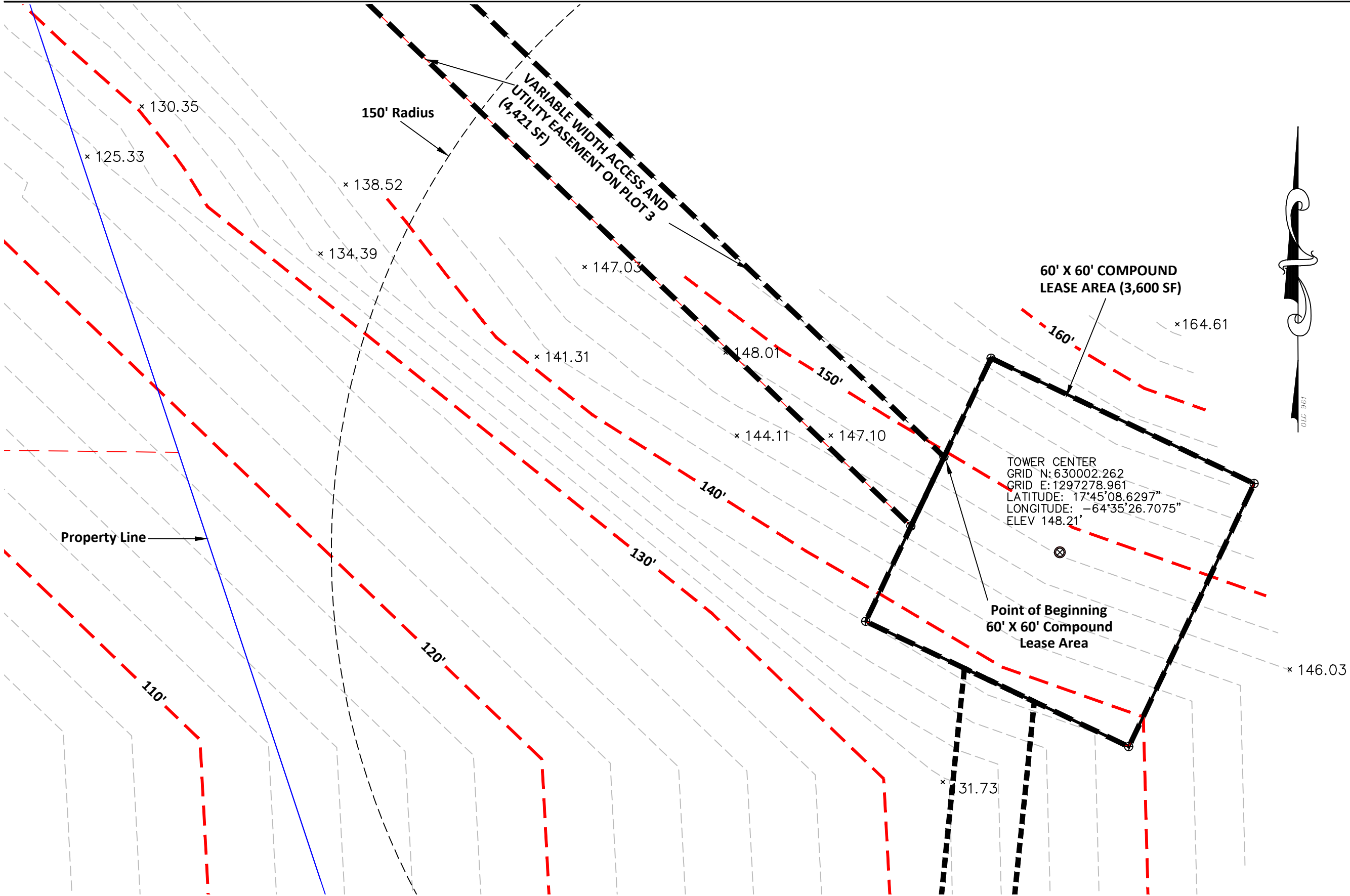
15' UTILITY EASEMENT

All that certain parcel of land, situate on the island of Saint Croix in Estate Long Point & Cotton Garden, Eastend B Quarter, being on the lands as described in Public Works Drawing 1177, Virgin Islands Cadastral Records as Plot 3, and being more particularly described as follows:

Beginning at a point, said point being the southeast corner of Plot 64 Estate North Grapetree Bay, thence N10°07'28"E 341.43' to a point, said point being on the 60' x 60' Compound Lease Area, thence along the 60'x60' Compound Lease Area, S60°10'22"E 15.93' to a point, thence S10°07'28"W 369.56' to a point, thence N14°00'00"W 36.70' to a point, said point being the Point of Beginning of the herein described 15' Utility Easement, said Easement contains 5,332 square feet, more or less.



SITE NAME:		EAST END
SITE NUMBER:		USVI--00230
SITE ADDRESS: 3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820		
AREA: ST CROIX US VIRGIN ISLANDS		
SITE OWNER: BLUE SKY TOWERS, III LLC		
PROPERTY OWNER: MIKE LOHMAN		
1A LOCATION LATITUDE:N 17° 45' 08.6297" NAD83 LONGITUDE:W 64°35' 26.7075" NAD83 ELEVATION: 148.2" VIVD09		
<div>LEGEND</div> <div><div>⤿</div>EXIST. UTILITY POLE</div> <div><div>⦿</div>EXIST. TELE PED</div> <div><div>◯</div>IRON FOUND</div> <div><div>◉</div>CHISEL MARK FOUND</div> <div><div>⊗</div>COMPUTED POINT</div>		
NO.	REVISION/ISSUE	DATE
1	ADJUST LEASE AREA AND ACCESS	10.05.23
1	ADD UTILITY ESMNT	04.18.24
<div></div>		
<div>The Green Piece Engineering + Environment, LLC</div> <div>5001-12 Chandler's Wharf</div> <div>Christiansted, Virgin Islands 00820</div> <div>Ph: 340.778.7474</div> <div>www.thegreenpiece.us</div>		
<div>Liberty Mobile USVI, Inc</div> <div>Blue Sky Towers, III LLC</div> <div>352-106 Park Street</div> <div>North Reading, MA 01864</div>		
PROJECT NUMBER:		23X092
SITE SURVEY		SHEET
		S-2



SITE NAME:	EAST END
SITE NUMBER:	USVI-00230
SITE ADDRESS:	3 LONG POINT & COTTON GARDEN EASTEND B QUARTER CHRISTIANSTED, ST CROIX, VI 00820
AREA:	ST CROIX US VIRGIN ISLANDS
SITE OWNER:	BLUE SKY TOWERS, III LLC
PROPERTY OWNER:	MIKE LOHMAN

1A LOCATION
LATITUDE: N 17° 45' 08.6297" NAD83
LONGITUDE: W 64° 35' 26.7075" NAD83
ELEVATION: 148.2' VIVD09

- LEGEND**
- EXIST. UTILITY POLE
 - EXIST. TELE PED
 - IRON FOUND
 - CHISEL MARK FOUND
 - COMPUTED POINT

NO.	REVISION/ISSUE	DATE
1	ADJUST LEASE AREA AND ACCESS	10.05.23



The Green Piece Engineering + Environment, LLC
5001-12 Chandler's Wharf
Christiansted, Virgin Islands 00820
Ph: 340.778.7474
www.thegreenpiece.us

Liberty Mobile USVI, Inc
Blue Sky Towers, III LLC
352-106 Park Street
North Reading, MA 01864

PROJECT NUMBER:	23X092
SITE SURVEY	SHEET

0 10 20
SCALE:
1" = 20 ft.

Attachment **2**

Site Photographs



Site Photograph 1 – Looking north toward the proposed undertaking



Site Photograph 2 – Looking north away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 3 – Looking east toward the proposed undertaking



Site Photograph 4 – Looking east away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 5 – Looking south toward the proposed undertaking



Site Photograph 6 – Looking south away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 7 – Looking west toward the proposed undertaking



Site Photograph 8 – Looking west away from the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024





Site Photograph 9 – Looking north along the proposed access/utility easement



Site Photograph 10 – Looking south along the proposed access/utility easement

Site Photographs

Blue Sky Towers III, LLC – East End
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
May 16, 2024





Site Photograph 11– Looking south along the proposed utility easement



Site Photograph 12 – Looking north along the proposed utility easement

Site Photographs
Blue Sky Towers III, LLC – East End
near Plot 3 Estate Long Point & Cotton Garden
Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
May 16, 2024





Site Photograph 13 – General view of the proposed undertaking

Site Photographs
Blue Sky Towers III, LLC – East End
 near Plot 3 Estate Long Point & Cotton Garden
 Eastend B Quarter, St. Croix, Virgin Islands 00820

Photographed:
 May 16, 2024



Attachment **3**

Areas of Potential Effect (APE)

Areas of Potential Effects

The term Area of Potential Effects (APE) is defined in Section II.A.3 of the *Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission*. For purposes of this project, the APE for direct effects and visual effects are further defined below.

Selection of APE for DIRECT EFFECTS

The DIRECT area of potential effect is defined as being “limited to the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the Undertaking”.

Proposed Lease Area(s) – A 60’ x 60’ lease area around the 150’ (157’ including all appurtenances)’ monopole tower and associated equipment.

Proposed Access Easement(s) – A 15-foot wide by ~1,285.84-foot-long easement extending generally northwest from the proposed lease area connecting with East End Road through forested land.

Proposed Utility Easement(s) – A 15-foot wide by ~369.6-foot-long easement extending generally southwest from the proposed lease area connecting with existing utilities through forested land.

Selection of APE for VISUAL EFFECTS

The VISUAL area of potential effects is defined as “the geographic area in which the undertaking 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.”

APE for this site based on NPA - Within ½-mile radius from the tower site if the proposed tower is less than or equal to 200’ in overall height.

**PHASE I (A&B) ARCHAEOLOGICAL SURVEY
ACCESS ROAD AND MONOPOLE COMPOUND LEASE AREA
LOCATED ON PORTIONS OF
2 and 3 LONG POINT AND COTTON GARDEN
ST. CROIX, US VIRGIN ISLANDS**

Prepared for:

**Lotis Environmental, LLC
8899 Main Street - Suite 107
Williamsville, NY
14221**

CocoSol International Inc. Project 231101

Prepared by:

**CocoSol International Inc.
777 Brickell Ave
#500-97996
Miami, Florida
33131**

May 23, 2024

TABLE OF CONTENTS

TABLE OF CONTENTS	i
TABLE OF FIGURES.....	i
1.0 INTRODUCTION	1
1.1 Proposed Project.....	1
1.2 Regulatory Framework	4
1.3 Environmental Setting.....	4
1.4 Cultural Setting	5
1.4.1 Precolonial Setting.....	5
1.4.2 Colonial Setting.....	6
2.0 SURVEY METHODS.....	7
3.0 FINDINGS.....	9
3.1 Literature and Records Search	9
3.2 Field Survey.....	12
4.0 CONCLUSIONS AND RECOMMENDATIONS.....	13
4.1 Conclusions	13
4.2 Recommendations.....	13

TABLE OF FIGURES

Figure 1: Google Earth image of East End, St. Croix, USVI depicting the location of the survey area	1
Figure 2: Map depicting the general location of the Survey's general location, the proposed access road and Plot 3, Estate Long Point & Cotton Garden.....	2
Figure 3: Segment of Google Earth image with topography, access road and monopole compound overlay: Image source: Lotis.....	2
Figure 4: Photograph of the location where the access road will connect to the public road.....	3
Figure 5: Photograph depicting the dense vegetation in the general area where the monopole would be erected.....	3
Figure 6: Photograph depicting steep slope gradient.....	4
Figure 7: Photograph depicting the typical dense vegetation of the project area (s).....	5
Figure 8: Photograph of example shovel test along the less steep parts of the access road	7
Figure 9: Photograph of example shovel test in the monopole compound	8
Figure 10: Google Earth image depicting the 1/2-mile APE for visual effects and the location of the Cramer Park.....	9
Figure 11: Segment of the 1750 Cronenberg-Jagaesberg map depicting the approximate location (red arrow) of the monopole compound.....	10
Figure 12: Segment of the 1799 Oxholm map depicting the approximate location (red arrow) of the monopole compound.....	11
Figure 13: Segment of the 1923 US Coastal Geodetic map of St. Croix depicting the approximate location (red arrow) of the monopole compound.....	11

Figure 14: Image of the access road and monopole compound depicting the location of the negative shovel tests. 12

1.0 INTRODUCTION

CocoSol International Inc., performed a Phase IA and B Cultural Resources Survey (Survey) for a telecommunications monopole compound lease area and access road, located on portions of 2 and 3 Long Point and Cotton Garden, St. Croix, USVI, (Figure 1). The Survey was performed for the Lotis Engineering Group (Lotis) of East Amherst, New York. The work was performed during the month of May 2024.



Figure 1: Google Earth image of East End, St. Croix, USVI depicting the location of the survey area

1.1 Proposed Project

The project consists of the erection of a 150/157-foot-tall telecommunications monopole, and related amenities contained within an area measuring 60 by 60 feet and located on Plot 3, Estate Long Point and Cotton Garden, St. Croix. A 15' wide by 1,300' long unimproved road easement along the western parts of Rem. 2 Estate Long Point and Cotton Garden is also proposed. The proposed access road starts at the public road (East End Road) and continues south for 1,300 feet through dense vegetation until reaching the site where the monopole will be erected. Figures 2 to 5 depict the proposed plans and the general site conditions at the time of our Survey.

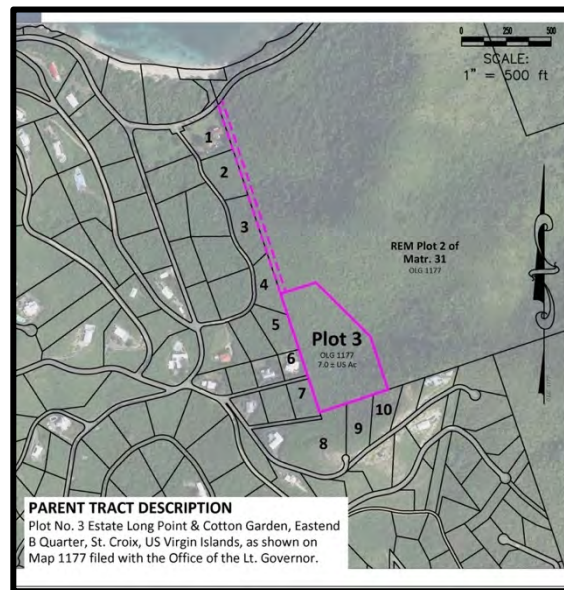


Figure 2: Map depicting the general location of the survey area, the proposed access road and Plot 3, Estate Long Point & Cotton Garden.

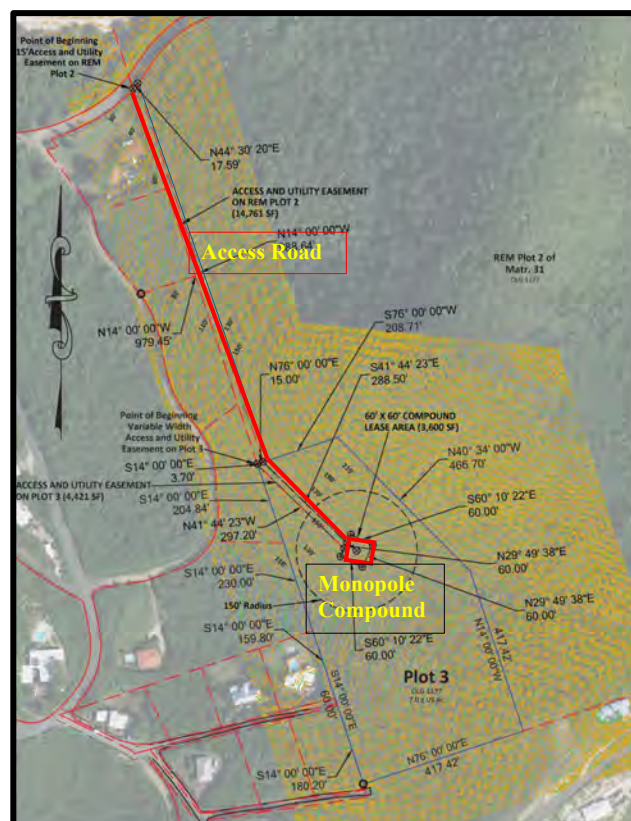


Figure 3: Segment of Google Earth image with topography, access road and monopole compound overlay: Image source: Lotis.



Figure 4: Photograph of the general location where the access road will connect to the public road.



Figure 5: Photograph depicting the dense vegetation in the general area where the monopole would be erected.

1.2 Regulatory Framework

Because of the earth change activities required to develop the site, the project is required to comply with Title 29, Chapter 17, Section 959, of the Virgin Islands Code, also known as the Virgin Islands Antiquities and Cultural Properties Act, and Section 106 of the National Historic Preservation Act of 1966, as amended.

1.3 Environmental Setting

The proposed access road and monopole compound are in the eastern parts of St. Croix (Figure 6). The topography is moderately to steeply sloping along the access road and moderately sloping for the monopole compound.



Figure 6: Photograph depicting steep slope gradient

The soil for the access road and the monopole compound consists of gravelly loam extending from the surface to 14 to 40 centimeters below surface and are underlain by very gravelly loams.

The vegetation along the proposed access road and monopole compound consists of dense vegetation composed of tan-tan, various cacti, though prominently trumpet cactus, inkberry, turpentine tree and grasses (Figure 7).



Figure 7: Photograph depicting the typical dense vegetation of the project area (s)

1.4 Cultural Setting

The following provides a brief description of the archaeology and history of the USVI.

1.4.1 Precolonial Setting

The U.S. Virgin Islands (USVI) contains a rich milieu of cultural resources that offer testimony to over three thousand years of human experience. These cultural resources range from habitation sites established during the Archaic Period at Krum Bay and the Magens Bay Arboretum Complex on St. Thomas approximately three thousand years ago, to the multiple village and farmstead sites on all the islands, to chiefly ceremonial centers such as the Salt River Site on St. Croix, which is the site of the first encounter between the Taino and Europeans.

After the Archaic Period, the indigenous people of the Virgin Islands participated in a geographically vast network of social and economic relationships. More recent archaeological research indicates that the insular landscapes were dotted with small and large villages along the coastal section fringes of the islands as well as the uplands. Additionally, small settlements herein characterized as farmsteads or homesteads are now being discovered in the uplands. These small upland settlements were previously mostly unrecognized in the archaeological record; however recent archaeological surveys for development projects have resulted in the identification of such sites.

The indigenous people of the Virgin Islands participated within a larger social, religious, and economic network (s), as evidenced by shared stylistic attributes of ceramics from the Saladoid, Ostionan and Chican

culture periods across a significant part of the Antilles. Shared cosmological ideas are also evidenced by the presence of cemís and other religious paraphernalia in the Virgin Islands and across large areas of the Caribbean Archipelago.

Long distance trade is evidenced by the presence of jadeite artifacts manufactured from raw lithic sources found in Central America and chert from Puerto Rico and down island. A whole host of cultigens with origins in the continent became part of the quotidian diet; more exotic items such as guinea pig, an Andean domesticate, have been found in Puerto Rico and St. John, and are likely to be documented by future archaeological studies elsewhere in Virgin Islands.

1.4.2 Colonial Setting

Following the brief European incursion on St. Croix in 1493, the islands came to be in the possession of several European nations including Spain, England, Malta, the Netherlands, and France. The colonies that these nations attempted to establish largely failed. Not until Denmark's Danish West Indies Company settled in St. Thomas in 1672 and on St. John in 1694, did these colonies become viable enterprises to the Europeans. The Danes purchased St. Croix from the French in 1733 and the island, with its larger size, gentler topography, fertile soils, and surface streams, became a dynamic sugarcane-based enterprise that lasted for a century.

The Danes divided the islands into estates that were mainly dedicated to agriculture. Although largely owned by Danes, British managers often administered the estates. The early plantations, particularly on St. Thomas and St. John were primarily dedicated to the production of cotton and indigo, but because of competition from the continent, particularly the southern United States, these two agricultural pursuits were largely abandoned in favor of sugar cane. The economies of St. Croix and St. John were primarily based on sugar cane agriculture and the production of muscovado sugar and rum. In contrast, the economy of St. Thomas was primarily based on trade, although agricultural pursuits also formed an integral part of its economy.

2.0 SURVEY METHODS

The methods employed during the Survey are presented below.

2.1 Literature and Records Review

The literature and records review included the following:

- Review of the archaeological site files through consultation with the VISHPO
- Review of historic and modern cartographic sources
- Review of readily available published and unpublished literature

The findings obtained during the literature and records search are presented in Section 3.0 of this report.

2.2 Field Survey

The less steep slopes along the proposed access road alignment were shovel tested along a single transect that because of the dense vegetation meandered within an approximately 20-meter-wide area and was shovel tested at 30-meter intervals. Each corner and the center of the 60 by 60-foot monopole compound was shovel tested. The shovel tests measured approximately 30 centimeters in diameter and were excavated to depths no longer considered to have the potential of containing non-random artifact bearing matrices.

Generally, the shovel tests were extended to between 14 and 40 centimeters below the ground surface, the depths at which the artifactually sterile, gravelly loam substrata was encountered. Test locations that were on steeply sloping ground (30+% slope) were raked back to assess for the presence of cultural materials that might be eroding from higher elevations. The soil from each shovel test was screened through ¼ inch hardware cloth to recover artifacts, if any (Figures 8 and 9).



Figure 8: Photograph of example shovel test along the less steep parts of the access road



Figure 9: Photograph of example shovel test in the monopole compound

3.0 FINDINGS

No cultural resources were identified along the proposed access road and monopole compound during our Survey. The results of the Survey are presented below.

3.1 Literature and Records Search

The literature and records review performed did not identify potentially significant cultural resources within the survey areas. The VISHPO informed us that no cultural resources of record were listed in the archaeological site files or the VI Registry for the subject property, i.e. the access road alignment easement and the proposed monopole compound. The VISHPO did provide information regarding cultural resources of record for the general area. One precolonial archaeological site (12VAm1-17) *aka* Cramer Park Site which is listed in the Virgin Islands Inventory of Historic Places is partially contained within the ½ mile visual area of potential effects (APE) radius of the monopole, (Figure 10). No sites listed on the National Register of Historic Places (NRHP) exist within the ½ mile APE shown below.

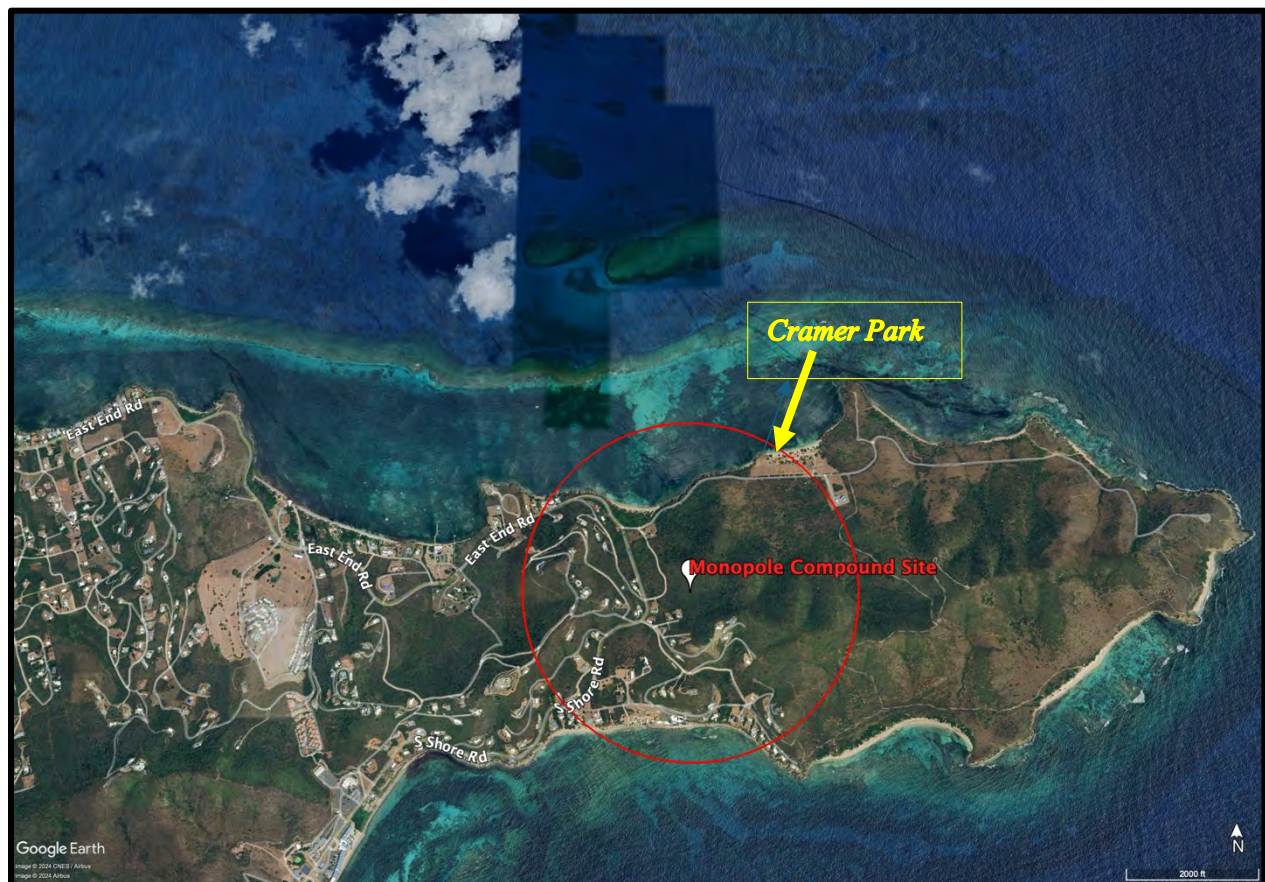


Figure 10: Google Earth image depicting the 1/2-mile APE for visual effects and the location of the Cramer Park.

Our review of historic cartographic sources indicates no settlements were located along the proposed access road or the monopole compound. The 1750 Cronenberg-Jaegesberg map (Figure 11) depicts a structure located approximately 400 meters to the northeast of the monopole compound that likely depicts the location of the Cotton Garden plantation settlement.

No structures are shown along the proposed access road or monopole compound and their immediate vicinity on the 1799 Oxholm map (Figure 12), though the Cotton Garden plantation settlement is shown to the northeast of the monopole compound. Neither the 1766 I.M. Beck map nor the 1863 Parsons Admiralty Chart, nor do 20th century USCGS (Figure 13) or USGS quadrangles depict settlements or structures within the monopole site, the access road, or their immediate vicinity.



Figure 11: Segment of the 1750 Cronenberg-Jaagesberg map depicting the approximate location (red arrow) of the monopole compound. Source: courtesy of the Danish Geodata Agency.

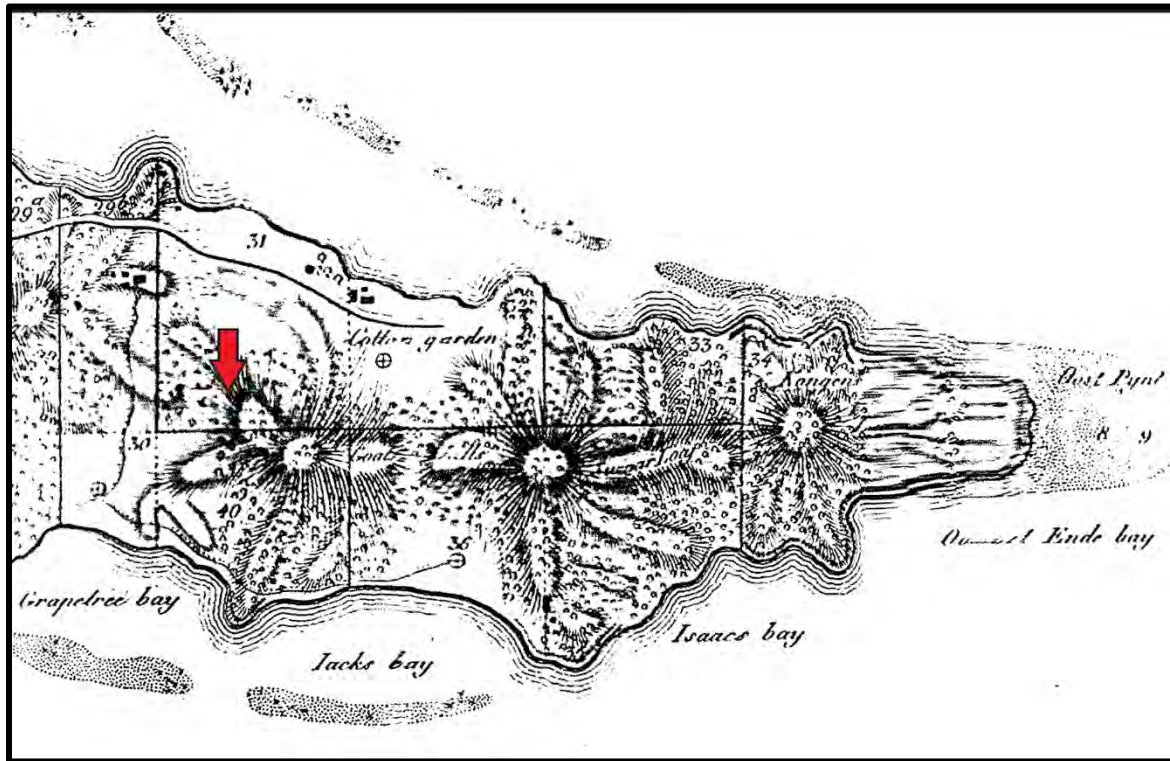


Figure 12: Segment of the 1799 Oxholm map depicting the approximate location (red arrow) of the monopole compound

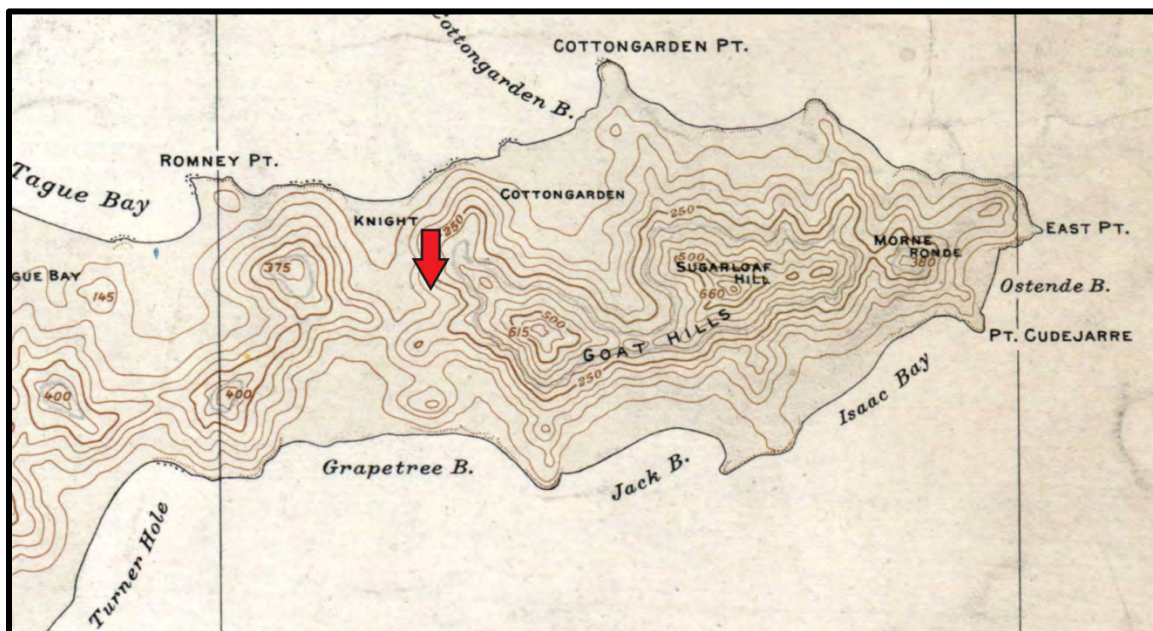


Figure 13: Segment of the 1923 US Coastal Geodetic map of St. Croix depicting the approximate location (red arrow) of the monopole compound.

3.2 Field Survey

No cultural resources were identified during the field survey performed for the access road and monopole compound. All the fourteen shovel tests performed as well as the raking of surface litter along steep slopes to assess for the presence of artifacts that might be eroding from higher elevations were negative. Figure 14 depicts the locations of all the shovel tests and the steep slopes.

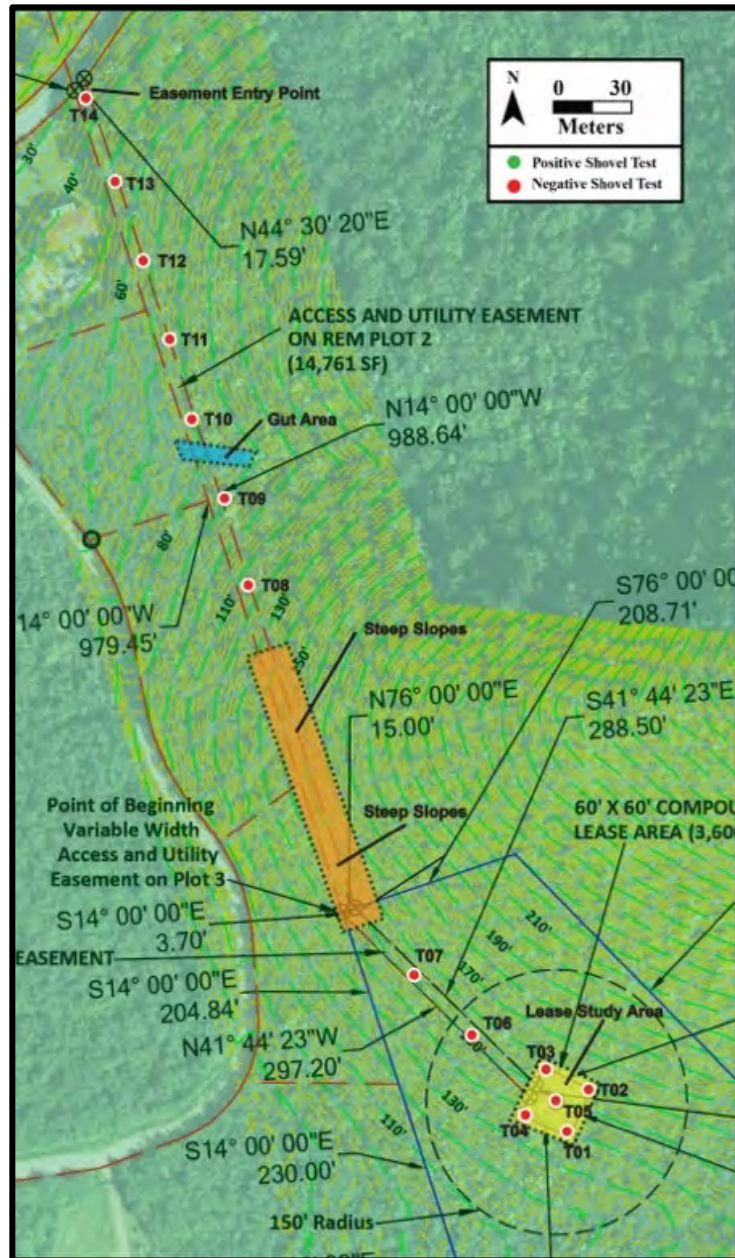


Figure 14: Image of the access road and monopole compound depicting the location of the negative shovel tests and very steep slopes.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Our concluding remarks and recommendations are provided below.

4.1 Conclusions

No cultural resources were identified during the Phase I (A&B) Cultural Resources Survey for the proposed 1,300-foot-long access road or the 60 by 60-foot monopole compound site. The literature and records search resulted in the identification of one archaeological site of record (12VAm1-17 *aka* Cramer Park Site) as partially contained within the ½ mile APE (Figure 10). Because of elevation differences, no direct line of vision is possible from the proposed access road or monopole compound to Cramer Park and vice versa. We note that the massive Long Base Array Antenna is located approximately 150 meters from the archaeological site. We also note that based on our past observations and recent testing for part of the site, that the contextual integrity of the archaeological site appears to have been compromised by past agricultural practices and more recent clearing and landscape maintenance activities.

4.2 Recommendations

CocoSol recommends that the Virgin Islands Department of Planning and Natural Resources: Virgin Islands State Historic Preservation Office issue a finding of ***no objection*** to the proposed project to build the proposed unimproved road and the monopole compound and its related appurtenances. If cultural resources are identified during clearing and/or construction activities, work should be stopped in the area of concern, the cultural resources protected, and the Department of Planning and Natural Resources: Virgin Islands State Historic Preservation Office notified immediately.

REFERENCES

- Dookhan, Isaac
1994 A History of the Virgin Islands of the United States. Canoe Press, Kingston, Florida Museum of Natural History
- Hardy, Meredith
2008 Saladoid Economy and Complexity on the Arawakan Frontier. Unpublished Ph.D. Dissertation, Department of Anthropology, Florida State University, Tallahassee.
- Hatt, Gudmund
1924 Archaeology of the Virgin Islands. In Proceedings of the 21st International Congress of Americanists (Part 1), 29-42. The Hague.
- Keegan, William F.
2000 West Indian Archaeology. 3. Ceramic Age. Journal of Archaeological Research, 8:135-167.
- Morse, Birgit Faber
1989 Saladoid Remains and Adaptive Strategies in St. Croix, Virgin Islands. In Early Ceramic Population Lifeways and Adaptive Strategies in the Caribbean, edited by Peter E. Siegel, pp. 29-42. British Archaeological Reports, BAR International Series 506. Oxford.
- 1978 National Register of Historic Places Nomination Form for Estate Hogensborg.
<https://npgallery.nps.gov/NRHP/AssetDetail/2e2edad7-71a4-44c3-83ac-c00245bea4e6>
- Rouse, Irving B.
1992 The Tainos: Rise and Decline of the People Who Greeted Columbus. Yale University Press, New Haven.
- United States Department of Agriculture
1994 Soil Survey of the United States Virgin Islands. Natural Resources Conservation Service, U.S.D.A., Washington, DC

Attachment **4**

Historic Properties Identified in the APE for Direct Effects

Historic Properties Identified in the APE for Direct Effects

Lotis contracted CocoSol International Inc. to perform a Cultural Resource Assessment to determine the potential effect on historic properties within the Direct Area of Potential Effect (APE). CocoSol International Inc. conducted a records review and completed site reconnaissance, per SHPO and tribal protocols, and did not locate any archaeological sites within the Direct APE. CocoSol International Inc. has recommended that the proposed undertaking be allowed to proceed as planned without further surveying. A copy of the Phase I (A&B) Archaeological Survey from CocoSol International Inc. is included in Attachment 3.

Attachment **5**

Historic Properties Identified in the APE for Visual Effects

Historic Properties Identified in the APE for Visual Effects

Lotis contracted CocoSol International Inc. to perform a Cultural Resource Assessment to determine the potential effect of the proposed undertaking on historic properties within the Visual Area of Potential Effect (APE). CocoSol International Inc. completed a records review, within the ½-mile radius, per the VISHPO's protocols (either online or physical records research) as well as reviewing the online National Register of Historic Places (NRHP) at <http://www.nps.gov/nr/> and found one (1) eligible/listed historic property within the Visual APE. CocoSol International Inc. have recommended that the proposed undertaking will have No effect on the identified historic property within the Visual APE and recommends that the project be allowed to proceed as planned without further surveying. A copy of the Phase I (A&B) Archaeological Survey from CocoSol International Inc. is included in Attachment 3.

Attachment **6**

Local Government Involvement

Department Of Planning And Natural Resources Submission

Note:

In the interest of efficiency and economy, attachments included in the original submission under this section are not duplicated throughout this NEPA Summary. The following attachment(s), found at the conclusion of this report, were included in the original submission:

- **Proposed Project Summary**
- **Attachment 1 - Maps**
- **Attachment 2 - Photographs**



May 24, 2024

Department Of Planning And Natural Resources
45 Estate Mars Hill
Frederiksted, Virgin Islands 00840
Submitted via mailed hardcopy

RE: Proposed Telecommunications Tower Undertaking "East End" in St. Croix, Virgin Islands; Blue Sky Towers III, LLC; BST_228

To Whom It May Concern:

Blue Sky Towers III, LLC (BST), is proposing to construct a tower installation near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820. Lotis Environmental, LLC (Lotis), is preparing an environmental and cultural resource review on behalf of BST as part of its permit process and regulatory review by the Federal Communications Commission (FCC). Please consider this correspondence as an invitation to the Department Of Planning And Natural Resources to comment on the possible effects the proposed undertaking may have on sites or structures of historic significance within the general vicinity.

Attached, please find information pertaining to the proposed undertaking. This information includes a project summary, an aerial photograph, a topographic map, and photographs of the proposed undertaking's site and adjacent properties. As part of our research, Lotis is consulting with the United States Virgin Islands Department of Planning & Natural Resources and will forward any concerns of the Department Of Planning And Natural Resources regarding historic properties to the United States Virgin Islands Department of Planning & Natural Resources.

Lotis respectfully requests that you provide comment within 30 days regarding the possible effects of this undertaking on historic properties. If a response is not received within 30 days, Lotis will assume you have no interest/concern with the proposed undertaking. Should you require additional information, please do not hesitate to contact me at (417) 840-5008. Thank you for your time and consideration in this regard.

Sincerely,

Lotis Environmental, LLC

A handwritten signature in black ink that reads "DeAnna Anglin".

DeAnna Anglin
Senior Biologist/NEPA Specialist
Lotis Environmental, LLC
Anglin@thelotisgroup.com

Enclosures



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

***Proof of Department Of Planning And Natural
Resources Submission***



UNITED STATES
POSTAL SERVICE®

Click-N-Ship®

P

usps.com
\$8.50
US POSTAGE
Insured

9405 8301 0935 5099 4748 58 0085 0001 0000 0840

U.S. POSTAGE PAID

Click-N-Ship®



05/24/2024

Mailed from 14221 083811112049566

PRIORITY MAIL®

LOTIS ENVIRONMENTAL, LLC
KELLY R REIDY
8899 MAIN ST STE 107
WILLIAMSVILLE NY 14221-7628

05/29/2024

RDC 03

C001



DEPARTMENT OF PLANNING AND NATURAL RESOURCES
45 MARS HL
FREDERIKSTED VI 00840-3775

USPS TRACKING #



9405 8301 0935 5099 4748 58



Cut on dotted line.

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9405 8301 0935 5099 4748 58

Print Date: 2024-05-24

Ship Date: 2024-05-24

PRIORITY MAIL®

Extra Services:

Fees:

Total:

\$8.50

\$0.00

\$0.00

\$8.50

From:

LOTIS ENVIRONMENTAL, LLC
KELLY R REIDY
8899 MAIN ST STE 107
WILLIAMSVILLE NY 14221-7628

To:

DEPARTMENT OF PLANNING AND NATURAL RESOURCES
45 MARS HL
FREDERIKSTED VI 00840-3775

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



UNITED STATES
POSTAL SERVICE®

Thank you for shipping with the United States Postal Service!

Check the status of your shipment on the USPS Tracking® page at usps.com

***Department Of Planning And Natural Resources's
Response
(NONE)***

Attachment **7**

Public Involvement

***Legal Public Notice Text and Affidavit of Publication &
Tear Sheet***

Lotis contacted the Virgin Islands Daily News and published a legal public notice in the classified section. The proposed undertaking is detailed in the notice and calls for the recognition of public concerns on any historic property impacts caused by the proposed undertaking. A copy of the legal notice text and Affidavit of Publication are attached.

"Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). If lighting is required the applicant will request the use of dual red/white, medium intensity lighting (but will ultimately use lighting/markings required by the FAA), located at 17°45'08.6297" N & 64°35'26.7075" W near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127. The application for this proposed project can be viewed at www.fcc.gov/asr/applications by entering the ASR file number. If you have environmental concerns about the proposed structure, a Request for Environmental Review may be filed with the FCC at www.fcc.gov/asr/environmentalrequest or by writing to FCC Requests for Environmental Review, ATTN: Ramon Williams, 445 12th St SW, Washington, DC 20554. If you have any concerns of any historic properties that may be affected by this proposed undertaking, please write to: DeAnna Anglin, Lotis Environmental, LLC, Legals@TheLotisGroup.com.

The Virgin Islands
DAILY NEWS

A Pulitzer Prize-Winning Newspaper

ST. CROIX

ST. JOHN

ST. THOMAS

TORTOLA

9155 Estate Thomas, St. Thomas, VI 00802 • 340-774-8772

CustomerService@DailyNews.vi

**VIRGIN ISLANDS OF THE UNITED STATES
JUDICIAL DISTRICT OF ST. CROIX**

In the matter of: **Public Notice Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). Near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127.**

I, Aimee Laplace of St Thomas, Virgin Islands of the United States, being duly sworn, deposes and says as follows:

✓ 1. I am the Accounting Department Representative of The Virgin Islands Daily News, a daily newspaper of general circulation printed and published in English in St. Thomas and distributed in St. Croix, United States Virgin Islands

✓ 2. The advertisement as described above of which the annexed is a printed copy was published in said newspapers(s) on:

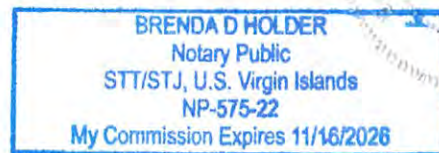
Product	Category	Classification	Insertions Period
Daily News Classified	LEGAL CL	LEGAL NOTICES	05/29/24

Dated 6-7-24

Aimee LaPlace
Accounting Department Representative

Sworn and executed on this date: 6-7-24

Brenda D. Holder
NOTARY PUBLIC



The Virgin Islands
DAILY NEWS

A Pulitzer Prize-Winning Newspaper

ST. CROIX

ST. JOHN

ST. THOMAS

TORTOLA

9155 Estate Thomas, St. Thomas, VI 00802 • 340-774-8772

CustomerService@DailyNews.vi

Public Notice Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). If lighting is required the applicant will request the use of dual red/white, medium intensity lighting (but will ultimately use lighting/marking required by the FAA), located at 17°45'08.6297" N & 64°35'26.7075" W near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127. The application for this proposed project can be viewed at www.fcc.gov/asr/applications by entering the ASR file number. If you have environmental concerns about the proposed structure, a Request for Environmental Review may be filed with the FCC at www.fcc.gov/asr/environmentalrequest or by writing to FCC Requests for Environmental Review, ATTN: Ramon Williams, 445 12th St SW, Washington, DC 20554. If you have any concerns of any historic properties that may be affected by this proposed undertaking, please write to: DeAnna Anglin, Lotis Environmental, LLC, Legals@TheLotisGroup.com

Cars / SUVs

2004 TOYOTA- MODEL SEQU. WAS \$3500. SALE PRICE \$2,900. 2012 CHEVR SILVER WAS \$8,500 SALE PRICE \$7,800. FOR MORE INFORMATION CALL 407-443-0963 OR 340-201-4279.

Legal Notices

Legal Ads: Please email Classifieds@DailyNews.vi or call 340-714-2222. Thank you.

Abandoned Boat Sunseeker 58' Power "Colichi", gray and white, Contact Independent Boat Yard & Marina (340) 473-9423

In the Superior Court of the Virgin Islands Division of St. Croix In the Matter of the Estate of: **Erich K. Harkna, Deceased.** Probate No. SX-2022-PB-00093 **Notice of Hearing On Final Account** It is hereby brought to the public notice that a Hearing on Final Account is scheduled for June 28, 2024 at 10:00 a.m. via Zoom video conferencing before the Honorable Judge Ernest E. Morris, Jr., Superior Court Magistrate Judge. All creditors or heirs wishing to file any objections to said Final Account may contact the undersigned or the Clerk of the Court at the Superior Court of the Virgin Islands, Kingshill, St. Croix, U.S. Virgin Islands. Dated: May 21, 2024 By: /s/ Scott A. Burton, **Scott A. Burton, Esq., Attorney For the Estate Dudley Newman Feuerzeig LLP, 1131 King Street, Suite 204, Christianssted, VI 00820-4971 Tel: 340-773-3200 ext. 227 Email: sburton@dnfvi.com**

Public Notice Blue Sky Towers III, LLC proposes to construct a 157' monopole tower (East End). If lighting is required the applicant will request the use of dual red/white, medium intensity lighting (but will ultimately use lighting/marketing required by the FAA), located at 17°45'08.6297" N & 64°35'26.7075" W near Plot 3 Estate Long Point & Cotton Garden, Eastend B Quarter, St. Croix, Virgin Islands 00820, ASR File #A1284127. The application for this proposed project can be viewed at www.fcc.gov/asr/applications by entering the ASR file number. If you have environmental concerns about the proposed structure, a Request for Environmental Review may be filed with the FCC at www.fcc.gov/asr/environmentalrequest or by writing to FCC Requests for Environmental Review, ATTN: Ramon Williams, 445 12th St SW, Washington, DC 20554. If you have any concerns of any historic properties that may be affected by this proposed undertaking, please write to: **DeAnna Anglin, Lotis Environmental, LLC, Legals@TheLotisGroup.com**



Worth Noting

DAILY NEWS
A Pulitzer Prize-Winning Newspaper
ST. CROIX ST. JOHN ST. THOMAS TORTOLA

Bi-Rite Grocery

SOLD HERE

105-106 Est. Richmond
St. Croix

Legal Notices

Legal Notices

Legal Notices

VIHFA
VIRGIN ISLANDS
Housing Finance Authority

3203 Demarara Plaza, Suite 200
St. Thomas, USVI, 00802-6447
(340) 777-4432
vihfa@vihfa.gov

100 Lagoon Complex Ste. 4
St. Croix, VI 00840
(340) 772-4432
www.vihfa.gov

INVITATION FOR BIDS
IFB 001-2024-STX - R1
DEMOLITION OF THE LINDON B. JOHNSON APARTMENTS

The Virgin Islands Housing Finance Authority (VIHFA) is soliciting sealed bids from only V.I. licensed General Construction Contractors and/or Heavy Equipment companies to provide services to demolish a total of twenty-three (23) apartment buildings, of which includes (15) single story buildings and Eight (8) two-story buildings. There is approximately (99 units total) with six (6) above/partially below-grade cisterns, concrete stairs, concrete curbs, roads, and walkways, located in Plot No. 15-A and Plot No. 15-B, Estate Penitentiary Land on the island of St. Croix U.S. Virgin Islands. The buildings have been abated of all hazardous materials (Lead Base Paint and Asbestos Containing Materials) and pose no known health threat to the successful demolition contractor. All work shall be performed in conformance with local.

Interested respondents may register and download a complete Invitation for bid package at <https://www.vihfa.gov/procurement>.

The virtual Pre-Bid Conference is scheduled for **May 22, 2024 at 11:00 a.m.** Atlantic Standard Time (AST). You may join the meeting at <https://us02web.zoom.us/j/7499112112?omn=88090372496>.

The bid packages are due no later than **June 3, 2024, at 1:00 p.m. AST.**

Virtual Bid Opening is scheduled for **June 3, 2024 at 3:00 p.m. (AST).** You may join the meeting at <https://us02web.zoom.us/j/7499112112?omn=82324207847>.

The VIHFA reserves the right to waive any irregularities in, or to reject any or all companies, or to terminate the IFB process at any time, if deemed to be in its best interest. For additional information about this IFB, please contact Bilinda Fontaine at (340) 777-4432 ext. 2234.



Land For Sale

Land for sale in Tortola. 13 Sub-division, Est Lambert, East End. Call Annie Shaw 954-806-7694.

Business Space For Rent

St. Croix commercial suites available at Princess Plaza. Centrally located and plenty of available parking. Please call **340-713-0264**.

Apt For Rent - North

Northside large 2 and a 1 bedroom, 1 Bath apartment/Airbnb. Fully furnished, overlooking Magen's Bay, private parking. Includes electricity Security, deposit required. \$1,400/mo Call 340-690-0385.

Short or long-term rental located on St. Thomas. Large 2 bedrooms, 1 large bathroom. Fully furnished. TV, Dish Network WIFI, AC in bedrooms. Parking. Outstanding ocean view. \$200/night 4 nights minimum stay. \$3,500/MO. Call 340-690-4498.

2 Bedroom unfurnished apartment at 1B2-2 Wintberg, St Thomas VI 00802. Call 340-514-1842 for more info.

Spacious Mahogany Run furnished 1 bedroom apartment. Utilities not included. Six month lease with option. Move in ready. References require. \$2,000/mo. First, last and security. Call 340-690-4812.

Apt For Rent - St. Croix

Located on St. Croix. 2 bedroom/2 bath apartments for rent. Ocean Terrace Apartments, centrally located and gated. \$1,300/MO unfurnished. Please call 340-713-0264 or 305-330-4433.



Legal Public Notice Response(s)
(NONE)

Attachment **8**

Curricula Vitae



DAVID N. ROBINSON, P.E.

President/CEO, Lotis Environmental, LLC

Years of Experience

28+

Education

M.S., Environmental Engineering, University of Colorado at Boulder, 1995

B.S., Civil Engineering, State University of New York at Buffalo, 1994

A.A.S., Architectural Engineering, Alfred State College, 1990

Professional Affiliations

New York State Wireless Association

Professional Registrations

Professional Engineer, New York 2001 (079047)

Certifications

FEMA Public Assistance Program Operations I

OSHA 40 Hr. Hazardous Waste Site Worker Training

Nokia CMPPro Cost Control Training

Key Qualifications

David Robinson founded The Lotis Engineering Group/Lotis Environmental, LLC and has served as CEO since its inception in 2007. Mr. Robinson is a New York State Professional Engineer and an ASTM-recognized Environmental Professional. Over his 28-year professional career, Mr. Robinson has performed over 18,000 Phase I Environmental Site Assessments in all 50 states and Canada. As CEO of Lotis, Mr. Robinson directs the strategic direction of the company. Under his leadership, Lotis has flourished into a leader in the Environmental Due Diligence industry.

Telecommunications Experience

- Vertical Bridge Holdings, Nationwide, US (2014-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include Phase I Environmental Site Assessments. David has been responsible for managing resources to complete these services on hundreds of telecommunication sites.
- Tower Ventures, LLC, Nationwide, US (2011-ongoing): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



Phase I Environmental Site Assessments. David has been responsible for managing resources to complete these services on many telecommunication sites.

- Global Tower Partners, Inc., Nationwide, US (2004-2013): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include property surveys, 2C surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on over 5,000 sites in all 50 states and the Caribbean.
- SBA, Inc. Acquisition Services, Nationwide, US (2001-2011): Project Manager/Engineer for services relating to the acquisition and development of telecommunications tower sites throughout the United States. Services include property surveys, 2C surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on over 7,000 sites in all 50 states, the Caribbean and Canada.
- AT&T NexGen, Nationwide, US (2004): Project Engineer for this 16,000-mile long-haul fiber-optic confidential construction project throughout the United States. David was responsible for preparing tax recording documents needed to file taxes for AT&T's fiber build.
- Nassau Police Department Land Mobile Radio System Modernization Project (2005-2007): Project Manager for engineering services relating to the upgrade of Nassau's public safety communication system. Services include site design, construction drawing preparation, property surveys, 1A surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on 36 sites throughout the .
- The City of New York Department of Information Technology and Telecommunications Channel 16 Project (2005-2007): Project Manager for engineering services relating to the design and construction of a conventional/trunked radio system for FDNY and other New York City agencies. Services include site design, construction drawing preparation, property surveys, 1A surveys, Phase I Environmental Site Assessments, NEPA compliance studies, zoning issues, and structural evaluation of existing towers. David has been responsible for managing resources to complete these services on 7 sites in New York City.
- NorthStar Communications, Inc., Florida (2003-2004): Project Manager for services relating to the development of telecommunications tower sites throughout Florida for Nextel. Services included construction drawings, property surveys, 2C surveys, zoning issues, and structural evaluation of existing towers. David was responsible for managing resources to complete these services on over 20 sites in the state of Florida.

Other Experience

- BNMC Utilities Relocation, Buffalo, New York (2002): Civil Engineer for the design of utility relocations at Roswell Park in Buffalo. David was responsible for developing construction documents and specifications, as well as providing consulting services throughout the design process. His duties also included preparation of construction cost estimates and submittal review.
- NFTA Metro Bus – Bus Fueling Station Systems Modifications for Dual Fuel, Buffalo, New York (2002): Civil Engineer for the design and preparation of design drawings, specifications and cost estimate for the replacement of an existing single fuel system to that of a dual fuel system.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

- New Jersey DPMC Underground Storage Tank Program, New Jersey (1999-2001): Civil Engineer for the design of new aboveground and underground tank fueling systems (including fuel dispensers, leak detection systems, inventory control systems, and concrete tank slabs) for various State Departments in New Jersey. David was responsible for developing design drawings, construction documents and specifications, as well as providing consulting services throughout the construction process. His duties also included creating and maintaining resource-loaded project schedules for project using Primavera project scheduling software.
- Former Hyatt Clark Industries, Inc. Site, New Jersey (1996-1998): Civil engineer for the preparation for the closure and remediation of the Former GM Industrial site and the construction of a 9-hole golf course recreational undertaking (including Driving Range, Putting Course, Clubhouse and Maintenance Facilities). David was responsible for the design of the golf course drainage system which included a 5-acre retention pond to be used for irrigation during periods of drought. His duties also included preparing cost estimates for the site closure and subsequent golf course construction, and the modeling and design of the undertaking entrance and parking.
- Wegmans Food Pharmacy, Buffalo, New York (1998): Civil engineer for the construction of a supermarket on a former industrial site. David was responsible for the modeling and design of the undertaking entrance. His duties also included field sampling of excavated soil during construction.
- USACE-Buffalo District, Cuyahoga River Bulkheads Study, Ohio (1999): Civil Engineer for the USACE's bulkhead inspection program along nine miles of the Cuyahoga River in Cleveland, Ohio. David was responsible for preparing a structural assessment of bulkhead along the river by inspecting various conditions of the sheet pile (i.e., corrosion levels, settling). His duties also included preparing remediation recommendations and subsequent cost estimates for damaged bulkhead sections.
- USACE-Buffalo District, Advance Measures Program, New York (1999): Civil Engineer for the study of high Lake Erie levels on four residential areas. David was responsible for gathering residential home elevations and comparing them to historical rain and lake level data. Based on these comparisons and a detailed cost analysis, recommendations to alleviate local residential flooding, including the design of breakwaters and levees, were made.
- FEMA Public Assistance Program, Puerto Rico (1998-1999): Civil Engineer for the inspection of public facilities damaged by Hurricane Georges. David was responsible for gathering field data on hurricane damages, designing mitigation alternatives, and preparing detailed cost analyses of damages.
- NYCDDC Underground Storage Tank Program, New York (1999-2001): Civil Engineer for the design of groundwater/soil remediation systems for the cleanup of petroleum-contaminated groundwater and soils. Groundwater remediation systems typically consisted of the design and installation of pneumatic and electric dual pumping systems for the removal of free phase and dissolved phase contamination. Soil remediation systems incorporated the design and installation of soil vapor extraction systems and bioventing systems.
- Lipari Landfill, New Jersey (1996-1997): Civil Engineer for offsite remediation work at the Lipari Superfund site. David was responsible for modeling migration rates of contaminants from the Superfund site through surrounding soil strata.





MILES C. WALZ-SALVADOR

Nationwide NEPA/NHPA Manager, Lotis Environmental, LLC

Years of Experience

10+

Education

Bachelor of Science in Fisheries & Wildlife, the University of Missouri - Columbia, 2011

Bachelor of Science in Forestry, the University of Missouri - Columbia, 2011

Minor in Biological Science, the University of Missouri - Columbia, 2011

Certifications

EPA Asbestos Certification

Colorado State Asbestos Building Inspector Certification

OSHA 10-Hr Safety & Health – Construction Certification

ACOE 38-Hr Wetland Delineation Certification of completion

OSHA 40-Hr Hazardous Waste Operations and Emergency Response Certification

Key Qualifications

Mr. Walz-Salvador has gained experience performing informal biological assessments for Section 7 compliance under the Endangered Species Act (ESA), wetland impact determinations, floodplain determinations, threatened and endangered species determinations, critical habitat research, as well as writing National Environmental Policy Act (NEPA) environmental assessments for wireless telecommunication projects. He has conducted research regarding Section 106 compliance under the Federal Communications Commission standards. Under Section 106, he has experience with 620 and 621 Form submittals to the State Historical Preservation Offices and consultation with federally recognized tribes all over the United States. Mr. Walz-Salvador has experience performing Phase I & II environmental site assessments, indoor air quality assessments, asbestos building inspections and sampling, wetland delineations, and migratory bird evaluations.

In addition, Mr. Walz-Salvador has experience with the United States Geological Survey (USGS) as a biological science aid, where he conducted field research on the Missouri River capturing and tracking Pallid Sturgeon. He also worked with the Missouri Department of Conservation (MDC) as a field technician conducting research on endangered and endemic fish species within the waterways of the Missouri Ozarks. Additionally, he has also worked in a variety of fields such as wetland biology, avian ecology, and ungulate research and management for the MDC. While attending the University of Missouri-Columbia, Mr. Walz-Salvador participated in the Undergraduate Mentoring for Environmental Biology (UMEB) Program which aided him in gaining experience with migratory bird research underneath the guidance of Dr. John Faaborg and Dr. Andrew Cox. UMEB also allowed Mr. Walz-Salvador to work with the Missouri Botanical Garden, a partner company, to observe endangered plant research and gain experience with working with private entities.

Mr. Walz-Salvador's schooling and work experience has enabled him to identify and understand the biology of trees, birds, fish, and mammalian species in addition to technical skills with the Delorme Topographic USA mapping program, ArcGIS, several of the Microsoft Office Programs, Adobe Acrobat Pro, and Google Earth.



(716)580-7000



www.thelotisgroup.com



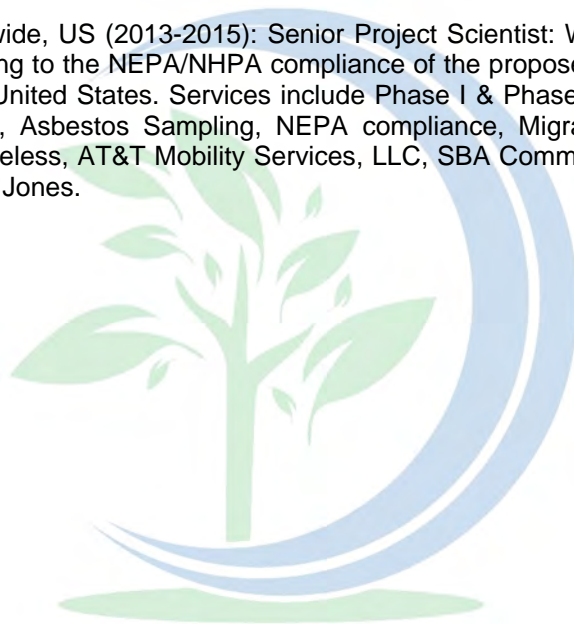
Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



Telecommunications Experience

- Lotis Environmental, LLC. Nationwide, US (2020-ongoing): Nationwide NEPA/NHPA Manager / Biologist for services relating to compliance of NEPA, NHPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance for Vertical Bridge Land Holdings, LLC, Tower Ventures, Tower Lease Advisors, Phoenix Towers International, InSite Towers, and BlueSky Tower.
- The Lotis Engineering Group, PC. Nationwide, US (2015-2020): Nationwide NEPA/NHPA Manager / Biologist for services relating to compliance of NEPA, NHPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance for Vertical Bridge Land Holdings, LLC, Tower Ventures, Tower Lease Advisors, Phoenix Towers International, InSite Towers, and BlueSky Tower.
- Trileaf Corporation, Nationwide, US (2013-2015): Senior Project Scientist: Wetland Ecologist and Migratory Bird Specialist for services relating to the NEPA/NHPA compliance of the proposed construction of telecommunication tower sites throughout the United States. Services include Phase I & Phase 2 Environmental Site Assessments, Indoor Air Quality Surveys, Asbestos Sampling, NEPA compliance, Migratory Bird Evaluations and Wetland delineations for Verizon Wireless, AT&T Mobility Services, LLC, SBA Communications, Crown Castle Towers, T-Mobile, Nextel, and Edward Jones.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221



DeAnna N. Anglin

Senior Biologist/NEPA Specialist, The Lotis Engineering Group, P.C.
Senior Biologist/NEPA Specialist, Lotis Environmental, LLC

Professional Experience

The Lotis Engineering Group, P.C.

Lotis Environmental, LLC

6465 Transit Road - Suite 23
East Amherst, New York 14051

(March 2016 – Present)

(June 2019 – Present)

Education

B.S., Fisheries and Wildlife Sciences, University of Missouri in Columbia, 2012
Minors in Captive Wild Animal Management, Biological Sciences, and Theatre

Key Qualifications

DeAnna Anglin has gained experience performing informal biological assessments (IBA) for Section 7 compliance under the Endangered Species Act (ESA), wetland impact determinations, floodplain determinations, threatened and endangered species determinations, critical habitat research, as well as writing National Environmental Policy Act (NEPA) environmental assessments for wireless telecommunication projects. She has conducted research regarding Section 106 compliance under the Federal Communications Commission (FCC) standards. Under Section 106, She has experience with 620 and 621 Form submittals to the State Historical Preservation Offices (SHPO) and consultation with federally recognized tribes all over the United States and Puerto Rico. Ms. Anglin has experience performing Phase I environmental site assessments, migratory bird evaluations and NEPA report writing.

In addition, Ms. Anglin has experience with the University of Missouri-Columbia, where she participated in graduate scientific research pertaining to the Red-bellied Woodpecker. Specifically, she sought potential nesting bird pairs and observed their nesting behavior and success rates. Ms. Anglin also has experience identifying, mist netting, and handling bats of North America.

Ms. Anglin's schooling and work experience has enabled her to identify and understand the biology of trees, birds, fish, and mammalian species in addition to technical skills with the Delorme Topographic USA mapping program, ArcGIS, several of the Microsoft Office Programs, Adobe Acrobat Pro, and Google Earth.

Telecommunications Experience

- Trileaf Corporation, Missouri (2013 – 2015): Volunteer site surveyor, particularly for migratory bird evaluations.
- Vertical Bridge Holdings, LLC, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Blue Sky Towers, LLC, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.



(716)580-7000



www.thelotisgroup.com



Lotis Environmental, LLC

8899 Main Street, Suite 107
Williamsville, NY 14221

- InSite Towers, LLC, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- IWG-TLA Telecom, LLC, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Turris Sites, Canada (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Phoenix Towers International, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Tower Ventures, LLC, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Weiss Towers, Nationwide, US (2017-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.
- Telecom Lease Advisors, Nationwide, US (2015-ongoing): NEPA Writer/Environmental Biologist for services relating to compliance of NEPA, NPA, and the ESA for the construction/acquisition of telecommunication towers throughout the United States including Puerto Rico, Canada, and Mexico. Services include Phase I & Phase 2 Environmental Site Assessments, and NEPA compliance.

