

**Telecommunications Installations & SHSI Review under Section 106  
FCC Project Documentation  
Memorandum**

**Effective December 1, 2005**

To: Federal Communications Commission, Wireless Communication Companies, and Consultants

From: Lowell Soike, Deputy State Historic Preservation Officer, State Historical Society of Iowa

Re: Telecommunications Installations and SHSI project review under Section 106 of the National Historic Preservation Act of 1966 (revised, effective August 5, 2004), the Nationwide Programmatic Agreement for collocations (effective March 16, 2001), and the Nationwide Programmatic Agreement for FCC undertakings (effective March 7, 2005).

\*Copies of this document, future updates, and addenda can be obtained from the State Historical Society of Iowa web site (<http://www.iowahistory.org>)

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The State Historical Society of Iowa, State Historic Preservation Office (SHPO) reviews telecommunication projects receiving a license from the Federal Communications Commission (FCC) pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. 470, et seq.), as amended. Review procedures are stipulated in the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission* (effective March 7, 2005). The Iowa SHPO is providing the following Iowa-specific guidance to facilitate accurate and timely project reviews. This guidance should be used in conjunction with the *Nationwide Programmatic Agreement* (NPA), its forms (FCC Form 620 for New Tower Construction and FCC Form 621 for Collocations), and the 2001 *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*. These agreements and forms can be found online at the FCC's website (<http://wireless.fcc.gov/siting/environment.html>). Any specific questions regarding the agreements, forms, or FCC compliance with Section 106 under these agreements should be directed to the FCC. Contact information can be found online at <http://www.fcc.gov/contacts.html>.

**Additional Site Information (Form 621 Attachment 2)**

For collocations on historic properties, please provide detailed information regarding how and where the antenna(s) will be attached to the property, including roof plans, engineering drawings, and specifications, as appropriate. If the antenna(s) will be visible from the ground, please provide a photo-simulation of the proposed installation.

**Public Participation/Interested Parties (NPA Stipulation V, Forms 620/621 Attachments 5 & 6)**

The Iowa SHPO recommends that public notices be published early enough in the planning process so that any comments gathered can be included with the initial submittal to our office. Pursuant to NPA Stipulation V.D, we request that applicants contact any preservation organizations or historical societies that are associated with the specific city or county in which the project is located or that have an interest in any property within the Area of Potential Effects (APE) for visual or direct effects. We maintain a list of Certified Local Governments (CLG) and other local historic preservation commissions at

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[http://www.iowahistory.org/preservation/clg\\_program/clg\\_cities\\_counties\\_list.htm](http://www.iowahistory.org/preservation/clg_program/clg_cities_counties_list.htm). Additional preservation and historical organizations may be found online, in telephone directories, or through inquiries conducted locally.

Also pursuant to PA Stipulation V.D., we request that the applicant contact Iowa's Main Street communities if their downtown commercial area falls within the APE for visual or direct effects. Main Street Iowa maintains a list of local contacts for Iowa's Main Street communities at <http://www.iowalifechanging.com/community/mainstreetiowa/msitext.html>.

Notifications to these groups should include a description of the undertaking, a summary of identification/evaluation efforts, an assessment of effects, and a request for information on any other historic properties that may be affected by the undertaking, along with the applicant's contact information and a deadline for comments. Keep in mind that commissions and Main Street communities may need to schedule a meeting to discuss the project. In these cases, they may need additional time to provide comment on a project. In Attachment 6 of your submittal to our office, provide us with a list of organizations you contacted and a copy of your letter to them. Note that if adverse effects are found, these organizations must be invited into consultation to resolve the adverse effect(s).

#### **Exclusion of Specific Geographic Areas from Review (NPA Stipulation VI.B)**

The Iowa SHPO has not identified any geographical areas to be excluded from review for direct or visual effects. Please refer to the NPA for specific kinds of projects that are excluded from SHPO review.

#### **Area of Potential Effects (APE) (NPA Stipulation VI.C, Forms 620/621 Attachment 7)**

For certain undertakings, the APE for visual effects provided by the NPA may be inadequate. For example, in dense urban areas, the APE could be reduced due to intervening buildings interrupting the viewshed. In expansive rural areas, the APE could be enlarged due to flat landscape and lack of vegetation. If the applicant adjusts the APE for visual effects, the adjusted APE must be described and justified in a narrative explanation provided in Attachment 7.b of the submission packet. The adjusted APE should also be delineated on appropriate maps (preferably 7.5 min USGS topographic quadrangle maps) included with the submission packet.

#### **Properties in APE for Visual Effects (NPA Stipulation VI.D.1, Forms 620/621 Attachment 8)**

As part of the NPA, the identification and evaluation of historic properties in the APE for visual effects requires the applicant to review records available at SHPO. The Iowa Site Inventory is open to the public for review Monday through Friday from 9am until 4:30pm, except on State holidays. If you are unable to review the inventory in person, you can request a list of properties for any given municipality or for a rural area in a county. A fee will be charged for Iowa Site Inventory database searches conducted by SHPO staff. The base fee is \$30/hour, with one hour minimum charged and 30-minute increments thereafter. Paper copies or digital PDF files of individual Iowa Site Inventory files can also be obtained for a per-page fee of 25¢. Please email SHPO Inventory Coordinator Berry Bennett ([Berry.Bennett@iowa.gov](mailto:Berry.Bennett@iowa.gov)) with specific database or copy requests. Be sure to mention that the database search is for the purposes of a Section 106 FCC undertaking.

It is important to note that many areas of the state have incomplete or no survey information. Iowa Site Inventory database reports provide the following eligibility recommendations: "Listed on NRHP", "Determination of Eligibility", "Opinion of Eligibility", "Not Eligible", "Contributing in a District" (or "a Potential District"), "Not Contributing in a District" (or "a Potential District"), "More Research

Recommended”, “No Opinion”, or “Not Evaluated”. In some cases, no recommendation is made and that line of the database report is left blank. *Unless noted as “Not Eligible” or “Not Contributing in a Potential District”, all properties given an Iowa Site Inventory number should be considered eligible for inclusion in the National Register of Historic Places for the purposes of Section 106 review.* Applicants should use the most recent eligibility recommendation made by a consultant and/or the SHPO eligibility recommendation for compiling their lists for Attachment 8. In many cases, it may be advantageous to obtain a copy of the Iowa Site Inventory file or review associated survey reports to understand the evaluations provided. Please understand that some restrictions may apply. The SHPO Inventory Coordinator can assist you in determining whether a survey report exists.

As part of a good faith effort to identify historic resources in the APE for visual effects, we recommend a field survey of the APE conducted by a consultant meeting the Secretary of the Interior’s Professional Qualifications Standards (36 CFR Part 61) for history or architectural history. If this is done, we request that Iowa Site Inventory forms be filled out for any newly identified properties and for any properties identified in Attachment 8.c as no longer being eligible for listing on the National Register. This will update our database and ensure that future reviews take into account all historic properties in a given area.

Architectural Properties listed in Attachment 8 should be identified by name, address, *and Iowa Site Inventory Number* to facilitate our review. Please include a copy of your correspondence with the Inventory Coordinator in Attachment 8, as well. There is no need to include a copy of the Iowa Site Inventory database report in the attachment.

**Properties in APE for Direct Effects (NPA Stipulation VI.D.2, Forms 620/621 Attachment 9)**

Identification and evaluation of historic properties within the APE for direct effects shall be undertaken by a professional who meets the Secretary of the Interior’s Professional Qualification Standards in the appropriate discipline. Identification and evaluation relating to archaeological resources shall be performed by an individual meeting the standards for archaeology. This includes any finding that an archeological field survey is not required. The best recommended procedures for archaeological survey and reporting can be found in the *Guidelines for Archaeological Investigations in Iowa* (Kaufmann 1999). Evaluation of architectural resources should be performed by an individual who meets the standards for history or architectural history.

**Assessment of Effects (NPA Stipulation VI.E, Forms 620/621 Attachment 10)**

According to the NPA, the Assessment of Effects must be performed by a professional who meets the Secretary of the Interior’s Professional Qualifications Standards. For archaeological properties, the individual must meet the standards for prehistoric or historic archeology, as appropriate. For architectural properties, the individual must meet the standards for history or architectural history.

In some situations, the Iowa SHPO may request a balloon test or photo simulations to more accurately assess visual effects. For direct effects to architectural properties, such as in collocations on historic buildings, photo simulations and a complete description of the antenna/equipment design and installation procedure is critical for SHPO to provide meaningful comments on the project.

**Submission Packets (NPA Stipulation VII.A, Forms 620/621)**

According to the NPA, applicants are required to use FCC Form 620 (New Towers) or FCC Form 621 (Collocations). As of December 1, 2005, the Iowa SHPO will only accept submittals using the

appropriate FCC Forms. Any submittals provided according to our 2001 guidance memorandum will be returned.

Because much of our rural inventory and survey information is organized by Section, Township, and Range, please provide the legal description of the proposed tower location to ensure an expeditious review. This should be provided in a cover letter accompanying the submission packet.

The State Historical Society of Iowa cannot accept submittals by fax or email at this time. Submittals should be directed to:

Review and Compliance Coordinator  
State Historic Preservation Office  
600 East Locust Street  
Des Moines, Iowa 50319

You will receive an email notifying you that we received your submission packet and indicating when our 30-day review period will end. In most cases, comments or concurrence will be provided by email. *Be sure to include an appropriate email address in the submission packet (Question #1).*

The Iowa SHPO will not provide status checks on submitted projects, nor will we accept requests for expedited review. If applicants do not receive a response from SHPO within 30 days, then the applicant may proceed by following the procedures provided in the NPA (Stipulation VII.B).

**Questions or comments regarding this document should be directed as appropriate to:**

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