



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

April 16, 2018

Ms. Pauline T. Minners
Village Clerk/Board Secretary
Village of Nelsonville
258 Main Street
Nelsonville, NY 10516
(via email only)

Re: FCC
New Cellular Communications Tower/Stealth Mono-Pine/110 Feet/15 Rockledge Road
Nelsonville, Putnam County
17PR06164 /FCC# 0007902925

Dear Ms. Minners:

I am in receipt of your correspondence dated March 30, 2018, which included a copy of the March 21 report completed by Saratoga Associates for Nelsonville's Zoning Board of Appeals.

As you may know, our office is involved in this review as part of the Federal Communications Commission's ("FCC") responsibilities under Section 106 of the National Historic Preservation Act of 1966 ("NEPA"). This agency and your municipality are both classified as Consulting Parties under the federal statute and are provided with the ability to comment to the FCC on the direct and indirect effects of a proposed communications project.

As part of a separate 2004 agreement, executed between the states and the FCC, project sponsors were delegated the authority to act in the stead of the federal agency for new communication tower reviews.

Under NEPA and the subsequent Programmatic Agreement, the material that was submitted directly to my office should be directed to the project sponsor as part of the Section 106 record.

That stated, I have had an opportunity to review the four alternatives that were presented in the report. Based on this review, the NYSHPO would recommend to the FCC (and its designee) that alternatives 2 and 3 (single 110-foot or single 120-foot pole alternatives) would have No Adverse Effect on the historic resources within the project's area of potential effect ("APE"). This recommendation is based on 3 factors:

- The single-pole enclosing the panel array be painted in a neutral sky based color to minimize visual intrusion.
- No flag or other attachments be placed on the pole. Movement at these heights will call more attention to the structure and become a visual intrusion.
- No future extension or attachments or changes in height of the structure once constructed.

Division for Historic Preservation

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Either of these options, as well as the original stealth tree option (with no future height change) would be acceptable to the NYSHPO.

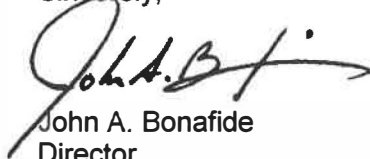
Based on our review, we have also determined that the use of a second pole (option 1), the use a dark color on the structure (single or double poles), or the introduction of an obelisk enclosure (option 4) would have an Adverse Effect on the historic resources within the project's APE.

While the idea of camouflaging a cellular array as a 125-foot obelisk near a cemetery would appear to be a viable option we believe it poses several issues:

- The proposal would introduce a structure much large than what is required to meet the needs of the project.
- The large, light color structure would be visually out of character and context within the view shed of the surrounding historic resources. A 125-foot obelisk is clearly not funerary in nature.
- To the casual observer the structure could be misinterpreted as a commemorative or monument, which it is not. Although not a historic preservation issue, efforts by the public to access the site of the "monument" might pose security or safety risks.
- Unlike a stealth tree option, which allows light to pass through the branch-work and appear less solid, the obelisk is a solid structure.

We appreciate your request for our comments, which we are also providing to the FCC and the project applicant for their Section 106 file. If I can be of any further assistance, please do not hesitate to contact me at (518) 268-2166 or john.bonafide@parks.ny.gov.

Sincerely,



John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Laura Mancuso, CRBE
Jill Springer, FCC