



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

March 14, 2018

Ms. Laura Mancuso
Director, Cultural Resources
CBRE
4 West Red Oak Lane
White Plains, NY 10604
(via email)

Re: FCC
New Cellular Communications Tower/Stealth Mono-Pine/110 Feet/NY170
15 Rockledge Road, Nelsonville, Putnam County
17PR06164 / FCC #0007902925

Dear Ms. Mancuso:

Thank you for your continued consultation with the State Historic Preservation Office (SHPO). We continue to review the project in accordance with Section 106 of the National Historic Preservation Act of 1966 and the applicable Programmatic Agreements

I am in receipt of your letter of February 20 and more than 420 pages of material, much of which appears to be unrelated to the specific issues of Section 106.

In reviewing the multiple visual assessments for this project, we found that the visibility of the tower, based on the land covered testing, is relatively constrained. However, it is clearly in the viewshed of several historic receptors. We also do not consider a view "Screened by Evergreen" as noted in several of the simulations to be a sufficient minimization of effects.¹ A single winter storm can remove this screening leaving the tower exposed to view from the selected point.

It is the NYSHPO's opinion that the tower, albeit camouflaged to be less obtrusive, will be a visual anomaly in the landscape and thus, impact the setting of the historic resources.

However, we also realize that the placement of this tower in a heavily treed area several hundred feet from the nearest historic receptor (Cold Spring Cemetery) screens the lower two-thirds of the structure from view. The utilization of modern tree camouflage on the upper section somewhat lessens the visual starkness of the tower and panels to the casual viewer. This visual minimization is also augmented by the low height of the proposed tower at 110 feet.

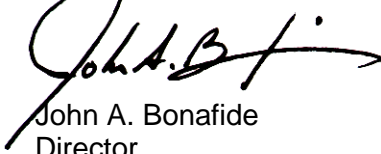
Our office therefor is seeking to alter its previous No Adverse Effect finding (October 2, 2017) to include the following conditions:

¹ Saratoga Associates letter to ZBA-February 7, 2018-VPC1, VPC4, VPC5 & VPC8.

- The tower will employ an appropriate visual camouflage method to allow it to blend more effectively into the landscape.
- The height of the tower be capped at 110 feet. Any increase over this height in this location will create a significant visual impact.

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,

A handwritten signature in black ink, appearing to read "John A. Bonafide". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

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

cc: Jill Springer, FCC *(via email)*
Hon. William O'Neill *(via email)*