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TO: FCC Applicants, Consultants, and Interested Parties

FROM: State Historic Preservation Office

DATE: June 3, 2026

RE: Federal Communication Commission (FCC) Review Guidance Regarding Areas of Potential Effect (APE) and Project Submissions

Purpose

This memorandum outlines new streamlining efforts for the review of Federal Communications Commission (FCC) undertakings involving small cell telecommunications structures under 50 ft in height and provides updated guidance on project submissions. Our goals are to modify the Area of Potential Effects (APE) for visual effects for certain classes of installations with minimal potential for visual effects to historic properties in urban and suburban environments, clarify findings of effect, and standardize project submissions to alleviate the administrative burden on our staff.

Project Context

SHPO has noted a significant increase in undertakings involving "stealth" telecommunications structures—specifically light pole replacements featuring small cell antennas within concealment shrouds. These structures typically:

- Are less than 50 feet in height.
- Maintain a minimal physical footprint (pole location, utility connections, and established access routes).
- Occur within developed urban or suburban rights-of-way.

Updated Area of Potential Effects (APE) Guidelines

Under the FCC's Nationwide Programmatic Agreements (NPAs), applicants and SHPO must consider both direct and visual effects on historic properties. While the APE for direct effects remains limited to the area of ground disturbance, SHPO is refining the APE for visual effects for structures under 50 feet to better reflect the limited visibility of stealth installations:

- **Suburban/Standard Urban Areas:** In areas with moderate to dense residential and commercial development, the APE for visual effects is reduced to 0.25 mile. This excludes areas with large lot size, agricultural fields, and open desert or undeveloped spaces.

- **Densely Built Urban Environments:** In areas with tall, high-density buildings that provide significant screening, the APE for visual effects is reduced to 1,000 feet.

For structures exceeding 50 feet, please refer to the standard APE for visual effects in the Nationwide Programmatic Agreements (NPAs) and the technical guidance provided in our January 30, 2023 presentation, available on the SHPO website (<https://azstateparks.com/shpo-consultation-on-historic-preservation-compliance>).

Findings of Effect

To ensure administrative consistency, SHPO provides the following guidance (Table 1) on findings of effect applicable for all FCC undertakings. Consultants should ensure that project descriptions and effect determinations align with these streamlined parameters to avoid unnecessary delays in the review process. Note that SHPO will only concur with one finding of effect for the undertaking.

Table 1: Findings of Effects

Presence of Historic Properties	Finding of Effect
No historic properties are present in the APE for direct or visual effects.	No Historic Properties Affected
Historic properties, such as historic buildings or structures, are present in the APE for direct effects upon which antennas will be collocated.	No Adverse Effect (provided the effects are minimized and the work is reversable)
Historic properties are present in the APE for visual effects, but viewshed is not a contributing element to these properties' NRHP eligibility (including eligible or listed historic buildings, historic in-use structures, and archaeological sites).	No Adverse Effect
Historic properties (archaeological sites) are present and previous investigations have occurred	Conditional No Adverse Effect with monitoring
Historic properties (archaeological sites) or unevaluated sites are present where no previous investigations have occurred	Adverse Effect (continue consultation with SHPO and Tribes to minimize or mitigate effects)
Historic properties are present and viewshed is a contributing element to their NRHP eligibility	Adverse Effect (continue consultation with SHPO and Tribes to minimize or mitigate effects)

Submissions to SHPO

With the influx of projects, our office has noticed inconsistencies across companies. The following recommendations are to standardize submission packets and SHPO's expectations.

1. Include the structure name and number in the email subject line.
2. Separate packets into at least three documents.:
 - a. FCC-SHPO Form
 - b. FCC Form 620/621
 - c. Class I report and Visual Assessment or Class III report, as applicable
3. Do not repeat figures, photographs, or exhibits in multiple documents.
 - a. Photographs and maps of the APE should only be in the Class I or Class III report.
 - b. Project plans and resumes should only be in the Form 620/621.
4. If a document is overly large, please flatten the file, but do not compress the maps or photographs.
5. If historic properties or unevaluated sites are present in the APE for visual effects, provide the distance between the pole location and the historic property and whether the pole will be visible from the historic property.
 - a. Reminder: Sites that have not been reviewed by SHPO for eligibility determinations are considered unevaluated. Unevaluated sites should be treated as eligible.
6. Please note that the Arizona State Museum no longer recognizes historic in-use structures as archaeological sites. If a structure has a site number, it should be listed by the structure name and note that it was formerly AZ AA:##:##(ASM).
7. SHPO will accept Google images in lieu of photographs for the Visual Assessment when an area is fully developed, such as suburban and urban streetscapes. However, we do require site visits and in-person visual assessments for rural areas and areas where the ground surface is visible.

If you have any questions regarding an undertaking, defining an APE for visual effects, or formulating a finding of effect, please contact:

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