

UPDATED FCC GUIDANCE FOR SUBMITTALS TO SHPO

Email to consultants dated Friday, July 6, 2018 at 3:58 pm.

Greetings all,

Please read this email in its entirety, and see the attached memorandum about submittals to SHPO; this is essentially an update to Appendix E of SHPO's 2016 Survey Report Standards. Regarding report submittals, SHPO discussed this with Jill Springer, the FCC Federal Preservation Officer, who agreed that it is within the SHPO's purview to identify the level of documentation for SHPO review. The purpose of the changes are to streamline consultation review times.

Also, the AZ SHPO sponsored a ½ day workshop at this year's Historic Preservation Conference (June 6-8 in Scottsdale). The workshop was specifically intended for NEPA planners, archaeologists, and local government. Thanks to those of you who attended. One theme of the workshop was Best Practices, some of which are highlighted below. Note that some of these Best Practices should be considered requirements (*)

1. *Projects within the City of Phoenix require a records search by the City of Phoenix Archaeologist – the Archaeology office will provide you with a cultural resources assessment that should be included in your submittal to SHPO – but not as part of the survey report.
2. *Likewise, please include the City of Tucson Historic Preservation Office review form with your submittal to SHPO.
3. *AZSITE reviews for projects within the City of Phoenix metropolitan area (esp. Phoenix, Tempe, Mesa, Scottsdale, Chandler), must include Howard & Huckleberry canal maps. Also note that all sites within the City of Phoenix have a 250 ft buffer around the reported boundary.
4. For those projects that don't require Section 106 review with SHPO, tribal consultation is still mandated. We recommend that consultants should minimally conduct a search of AZSITE in order to inform Tribes of National Register eligible archaeological sites in the project vicinity. If you don't hear from a Tribe within 3 weeks of the notification, we recommend following up with an email or phone call.
5. Be aware that projects in vast open spaces (on ridges, etc.) may have Tribal concerns due to line of site to traditional cultural places.
6. Please use Google Earth to assess impacts to National Monuments – we recommend a 4 mile radius if there is open land between the monument and cell tower location.
7. For those projects that don't require review with local governments but have a public scoping period, we recommend you reach out and contact the local governments to identify any concerns at the beginning of the scoping period.
8. The SHPO website (see link below) includes a link to certified local governments on the "Additional Resources" tab.
9. Make use of local government websites to identify historical buildings and districts, as well as archaeologically sensitive areas.
10. *Changes to the visual APE and study area must be made in consultation with the SHPO per the Nationwide Programmatic Agreement, not at the discrepancy of the NEPA planner/consultant; please send an email with your request on a case-by-case basis.

Last, you may have heard that Verizon has prepared a statewide PA and Historic Properties Treatment Plan for FCC undertakings on private land. This is still in review, as the FCC has now indicated that they want to participate.

Please forward this information to all relevant people in your firm and especially your archaeological consultants. Don't hesitate to contact me if you have any questions.

Thanks,
Mary-Ellen

P. S. At this point I believe I am caught up through June 6 submittals, so contact me if you are missing a response.

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<https://azstateparks.com/shpo>

<https://sites.google.com/view/az-consultation-toolkit/home>

Attachments:

1. Memorandum – Update to Appendix E of the Survey Report Standards (2016) (screenshot)
2. Letter report template (screenshot)

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Doug Ducey
Governor

ARIZONA STATE PARKS & TRAILS

Celebrating 60 Years!

Sue Black
Executive Director



Date: July 6, 2018

From: Arizona State Historic Preservation Office (AZ SHPO)
Mary-Ellen Walsh, M.A., RPA
Archaeological Compliance Specialist

RE: FCC Cell Tower Submittals to AZ SHPO; Update to Appendix E of the Survey Report Standard (2016)

Effective immediately, the following guidelines should be used for all FCC cell tower submittals to the AZ SHPO for Section 106 review.

1. Submittals to SHPO must be electronic only. The full 620/621 packet must include all of the attachment pages; note that we cannot access the hyperlinks. Survey reports (other than letter reports) should be submitted as a separate pdf (in the same email).
2. Cover letters must include: project description; description of the area of potential effects (APE) (dimensions, including depth of ground disturbance if possible); identification of any historic properties within the direct APE and the visual APE, and a request for SHPO concurrence on the finding of project effect.
3. A letter report only should be submitted for a Class I survey and visual assessment. An intensive field (Class III) survey **should not be conducted** if the APE is paved, landscaped or is otherwise highly disturbed, and where it is possible to justify that an intensive field survey is not necessary. The finding of effect must be "No Historic Properties Affected" or "No Adverse Effect" (with or without a recommendation for monitoring). Use of AZSITE screenshots is permitted for background research results. No photographs are necessary. See the email attachment for a good example of what should be included in a letter report.
4. A Survey Report Summary Form (SRSF) must be submitted for all Class III surveys with no cultural resources identified within the direct APE (negative survey) and a finding of effect that is either "No Historic Properties Affected" or "No Adverse Effect" for the visual APE. Use of AZSITE screenshots is permitted for background research results. The SRSF can be modified to address resources in the visual APE, or you can include an attachment.
5. A technical report must be submitted for all surveys resulting in the identification of cultural resources within the direct APE, regardless of the finding of project effect. Photographs to and from cell tower locations to historic properties should be included as part of the 620/621 packet rather than in the survey report. Technical reports must include professional quality maps, not AZSITE screen shots.
6. Do not attach/append project plans to the cultural report; they are part of the 620/621 packet.

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Email to consultants dated Friday, July 6, 2018 at 3:58 pm.

June 5, 2018

Re: Class I Records Search for 4 W. University Avenue, Tucson

Dear ,

In response to your request, I have performed a Class I records search of the Arizona State Museum's (ASM's) online database, AZSITE, under ASM Blanket Permit Number 2018-0188b, to determine the extent of archaeological work performed and whether any archaeological sites, historic districts, historic structures, or archaeological sensitivity zones have been recorded within a 0.5-mile (0.8-km) buffer zone surrounding the project location. In legal terms, the project area is located in Section 12, Township 14 S, Range 13 E, Gila and Salt River Baseline and Meridian in Tucson, Arizona, on the Tucson (1995) 7.5-minute USGS quadrangle map (Figures 1 and 2). The project area is in the City of Tucson right-of-way (ROW) near the northwest corner of W. University Blvd. and N. Stone Ave. at 32°13'54.155" N, 110°58'19.010" W.

The project will entail the installation of an omni-directional antenna, a UE relay, and RRH on top of a replacement street light pole (45-ft in height) and the installation of a ground-mounted pedestal (4-ft in height) adjacent to the pole within a 20-by-20-ft (6.096-by-6.096-m) direct area of potential effect (Direct APE). The vertical Direct APE is estimated to extend to a depth of 11 feet (3.35 m) for the pole foundation and 4 feet (1.2 m) for the meter pedestal and conduit placement (see Appendix B). Based on Appendix B of the Nationwide Programmatic Agreement for Review of Effects on Historic Properties (FCC 2004-B17), the resulting APE for visual impact (Visual APE) for towers less than 200 feet (61-m) in height is within a 0.5-mile (0.8-km) radius from the tower site.

The Class I search found that 62 surveys have been conducted within a 0.5-mile buffer prior to the current project (Table 1; Figure A.1); Table 1, however, only lists the one survey that was conducted partially within the current Direct APE (per an agreement with Allison Diehl, Acting Historic Preservation Officer with the City of Tucson). There are also 16 previously recorded sites present within the Class I study area (Table 2; Figure A.2), and six historic districts and no properties listed on the National Register of Historic Places (NRHP) present within the Class I buffer (see Figure A.3). The search indicates that the project area was surveyed in 2000 by Desert Archaeology, Inc. (Diehl 2000) and that AZ 17:9:17(ASM) (historic SR 80) is within 25 ft of the Direct APE.

General Land Office (GLO) maps for Township 14 South, Range 13 East were also examined for indications of historic properties within the vicinity of the Direct APE. GLO Map No. 2048, filed on March 21, 1871, shows multiple historic roads to the west of and historic structures to the south of the Direct APE within the Class I buffer area, but no features or structures are present within the immediate vicinity of the project (Figure 3).

Although the 20-by-20-ft Direct APE has not been surveyed since 2000, I commend that a Class III pedestrian survey is unnecessary prior to any ground-disturbing activities. The Direct APE has been previously disturbed when the original street light pole was installed, and when the City of Tucson ROW was landscaped (see Figure 2). I do, however, recommend that an archaeological monitor be present during the pole replacement because the Direct APE is surrounded by historic districts in downtown Tucson.

If you have any questions, please feel free to contact

Sincerely,