

## Guidelines for Section 106 FCC Tower Applicants

Applicants for certain Federal Communications Commission (FCC) licenses related to communications tower construction are required to follow 47 CFR Part 1, Nationwide Programmatic Agreement (NPA) for Review Under the National Historic Preservation Act – for detailed information, see the [FCCs website](#).

Submittal packages must be in a format determined by the FCC (FCC Form 620 or 621 with attachments), not the ER form. The following is not intended to interpret FCC regulations or forms, but to provide researchers with information for utilizing files at the Georgia Historic Preservation Division (HPD). Please note that HPD has not identified areas to be excluded from review, other than those designated by the FCC. For other specific questions, please refer to the federal regulations or forms or contact the FCC at (202) 418-0896.

### Archaeological Assessment:

For information on known archaeological resources in the project area, a Georgia Archaeological Site File (GASF) search must be conducted at 110 Riverbend Road, Athens, Georgia 30602. This is the current database of all identified sites in Georgia, along with manuscripts and research reports. Only a qualified archaeologist or GASF staff may undertake this research. To contact GASF, please call (706) 542-8737.

For information on whether an archaeological field survey is required, please see the federal regulations. **Identification and evaluation relating to archaeological resources, including archaeological fieldwork or a determination that a survey is not necessary, must be performed by a professional who meets the Secretary of Interior's Professional Qualifications Standards in archaeology (see 36 CFR Part 61).**

All archaeological submissions should conform to the [Georgia Standards and Guidelines for Archaeological Surveys](#).

Additionally, please visit our website for [Archaeological Assessment Report Guidelines and Components](#).

Since archaeological reports are sent to the GASF for permanent retention, please submit one electronic copy of the tower submission. Please ensure the electronic copy is an optical character enabled .pdf.

## Identification of Buildings, Structures, and Districts:

Background research within a proposed area of potential effect (APE) should be undertaken at HPD. At a minimum, this should include County and City Survey, National Register of Historic Places, Identified Sites, Centennial Farms, Topical Files, and Environmental Review files, along with GNAHRGIS. ***If the APE falls into more than one county, the researcher is responsible for researching files in all counties.*** To make an appointment please contact the National Register specialist and the assigned Environmental Review historian. Please sign in with the National Register specialist and identify that you are working on a tower project. Please follow any guidelines provided by HPD staff. While not required by the FCC, we strongly recommend that research be conducted by a historian or architectural historian who meets the Secretary of Interior's Professional Qualifications Standards.

***Documentation within our files may not always include eligibility information. Unless otherwise noted, it is HPD policy to consider all resources within our files eligible for inclusion in the National Register of Historic Places for the purposes of Section 106, and should be field-checked for additional information to validate any determinations, using the National Register Criteria for Evaluation (36 CFR Part 60).***

***\*\*Please note: the APE is defined under 36 CFR Part 800.16 as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist." The FCC has suggested the APE for visual effects as follows: within ½ mile radius for towers 200 feet or less in height, ¾ mile radius for towers more than 200 but no more than 400 feet tall, and 1 ½ miles radius for towers taller than 400 feet. Other factors such as topography and vegetation may also determine an alternative APE for visual effects.***

- ◆ **Historic Resources County and City Survey files** have information on field surveys and individual properties organized by county, with some keyed to USGS topographic maps, as well as to specialized maps for certain areas. There is also a state-owned buildings survey organized by state agency. Many areas have more than one survey that cover the same county, city, or area. It is important to check all surveys that cover the APE – old and new. Additionally, all resources marked on a survey map, even without a survey number or form should be included in the background research.

***\*\*Please note: many areas of the state have no surveys, out-of-date surveys, or incomplete/incorrect data or locations. HPD recommends also reviewing those resources that fall just outside of the APE as they may actually be within the APE. Additionally, the absence of information does not mean that no historic resources are present.***

- ◆ **National Register of Historic Places files** are organized by county and official property name. Special file areas exist for Ossabaw and Sapelo Islands, as well as for thematic nominations such as county courthouses. Finding aids include notebooks with countywide listings and maps. We do not recommend web-based National Register searches, as the boundaries are not digitized on these sites. In order to determine district boundaries, you must review the files at HPD. Districts could include hundreds or even thousands of acres of land.
- ◆ **Identified Sites files** include material submitted for information purposes, as well as pending National Register nominations. Names may vary if the project was never finalized, and some files do not contain maps. It is up to the researcher to determine the location of the subject property by searching the documents contained in the file. If files are checked out to staff, please request the information.
- ◆ **Centennial Farms files** are our states historic farms. Some are also listed or eligible for listing in the National Register. Most files will contain maps to easily help a researcher locate the farm.

- ◆ **Topical files** include important topics related to Georgia history. This includes transportation, industry, and many other topics. These files will primarily need to be accessed when there are known resources within the APE, such as railroads.
- ◆ **Environmental Review (ER) files** contain consensus determinations of eligibility (DOEs) and are not located with the above files. ER files contain information on properties previously considered eligible for inclusion in the National Register of Historic Places for the purpose of previous or ongoing Section 106 projects. Files are organized by county and date initially received, and may require a time-consuming manual search. ER files are normally archived after five years of no activity.
- ◆ **GNAHRGIS** is Georgia's Natural, Archaeological, and Historic Resources GIS. It is a web-based registry designed to catalog resource information for public accessibility. [The database](#) gives the researcher the opportunity to locate a site, draw an APE, and determine the cataloged resources within that APE.

\*\*Please note that the locations of resources and the APE distance drawn are not completely accurate in GNAHRGIS. HPD recommends also reviewing those resources that fall just outside of the drawn APE as they may actually be within the APE.

### Important notes regarding identification:

- ◆ Due to inconsistencies in resource locations, HPD recommends checking the tax assessor's site, historic topographic maps, and Google Earth to compensate for errors that may have occurred in existing surveys.
- ◆ HPD recommends including all resource identified, whether eligible or not and affected or not, in FCC forms since the forms note eligibility and effect determinations.
- ◆ HPD requests that if a resource is found in more than one of the above file locations to please note all file numbers associated with the resource.
- ◆ HPD requests that if a resource is demolished to please include evidence of such in the submittal.

### Assessment of Effects to Identified Resources:

Please refer to FCC regulations regarding procedures and consultant qualifications. HPD recommends submitting photographs of the resources identified, whether considered eligible or not, including photographs of areas where a demolished resource once existed. Additionally, HPD recommends submitting photographs showing the view from a resource towards the tower site, including those considered ineligible, with arrows or a simulation noting the location and height of the proposed tower. **In some situations HPD may recommend a balloon or crane test to more accurately assess effects.**

### Public Participation:

FCC regulations include provisions for public notice. In addition, HPD has made available a list of other groups who should be provided notice as allowed through the NPA (please see below). We currently request FCC applicants to utilize the list included herein, which includes web-based contact information for Regional Commission historic preservation planners, Georgia historical organizations, Certified Local Governments (CLGs), historic preservation commissions, preservation non-profit organizations, Georgia Better Hometown and Main Street managers, registered local government authorities, and others.

HPD does not participate in the online E-106 program.  
Submittals should be mailed to:

Dr. David Crass, Division Director, Historic Preservation Division  
Attention: Environmental Review  
Jewett Center for Historic Preservation  
2610 GA Hwy 155, SW  
Stockbridge, GA 30281  
***HPD Research File Checklist***

For Tower Project Consultants:

*Please fill out and check off the following form, which will allow HPD to better evaluate and review your tower project (Form 620 or 621). **Attach this to your project submission packet or cover letter.***

Name and Title:

Company:

Tower Address (include city and county):

Date Research was compiled at HPD:

Please check off that you have researched the project site and APE in the following locations and please note what resources were identified. (HPD recommends attaching your findings from these records, as applicable):

GA Archaeological Site File (UGA, Athens)

Historic Resources Survey Files (HPD)

National Register Files (HPD)

Identified Site Files (HPD)

Centennial Farms Files (HPD)

Topical Files (HPD)

Environmental Review Files (HPD)

NAHRGIS (Online)

**Signature and Date:**

## Public Participation Recommendations for Tower Applicants:

- ◆ **Regional Commission (RC) Preservation Planners:** [Community Planning – Georgia SHPO](#) (see maps and lists of RC Preservation Planners)
- ◆ **Georgia Historical Organizations:** [Directory of Historical and Cultural Organizations](#) (search by county and/or city) and [Georgia Historical Society Affiliate Chapter List](#)
- ◆ **Certified Local Governments (CLG) and Historic Preservation Commissions (HPC):** [Georgia CLGs – Georgia SHPO](#)
- ◆ **Preservation Non-Profit Partners:** [Community Assistance - Georgia SHPO](#)
- ◆ **Georgia Better Hometown and Main Street Managers:** [Main Street Communities](#)
- ◆ **Registered Local Government Authorities:** [Directory](#) (search by city or county)
- ◆ **Local Neighborhood or Community Organizations** (where applicable): It is HPDs experience that local neighborhood groups can often provide the best information pertaining to historic resources in their communities. These organizations are also often involved in the local zoning process and so it is advantageous to notify and seek their comments on potential effects to historic properties as early in project planning as possible. In most instances, such groups can be found via a simple online search.