



**Laura L. Mancuso**  
Director, Cultural Resources

CBRE, Inc.  
Telecom Advisory Services

70 West Red Oak Lane  
White Plains, New York 10604

914-597-6991 Tel  
914-522-7433 Fax  
914-439-0527 Cell

Laura.Mancuso@cbre.com  
www.cbre.com

**VIA EMAIL AND HARD COPY**

February 15, 2018

Mr. John Bonafide  
Director, Technical Preservation Services  
New York State Division for Historic Preservation  
Pebbles Island State Park  
P.O. Box 189  
Waterford, New York 12188-0189

Re: Proposed Telecommunications Facility  
"NY170 – Nelsonville"  
15 Rockledge Road  
Nelsonville, New York  
CBRE Project No.: TS60816121  
FCC File No.: 0007902925

Dear Mr. Bonafide:

CBRE is writing on behalf of Homeland Towers, LLC regarding the proposed telecommunications facility at the above referenced address. As the Project is a federal undertaking regulated by the Federal Communications Commission (FCC), the project was reviewed under Section 106 of the National Historic Preservation Act for its impacts to historic architectural and archaeological resources.

CBRE submitted the FCC Form 620 to your office via E106 on August 24, 2017. On October 2, 2017, NY SHPO concurred with our findings that the proposed telecommunications facility, including a 110-foot monopole designed to resemble a tree for Verizon Wireless and AT&T, would have No Adverse Effect on historic properties in the APE for Visual Effects and that no historic properties were identified within the APE for Direct Effects.

In a letter dated November 22, 2017, you stated that SHPO has determined that the Cold Spring Rural Cemetery is officially eligible for listing in the National Register of Historic Places. Although not related to the concurrence, you also requested any alternatives analyses completed for the site as a courtesy. Please see attached the requested alternative site analyses. For context and background, also attached are various other reports and materials submitted by the applicants to the Village, as well as the reports from Village's radio frequency engineer, Ron Graiff, and a report prepared by

February 15, 2018  
Page 2

AKRF, the Village's own professional planning firm, dated January 2, 2018. A complete list of the documents submitted herewith is attached.

The Village of Nelsonville retained AKRF to review the Visual Impact Assessment prepared by Saratoga Associates as well as other documentation related to this project which is outlined in their letter. On page 4 of the report, AKRF states:

*"In my professional opinion, the project would have a visual impact on the Cold Spring Rural Cemetery and Cold Spring Rural Cemetery Gatehouse, as defined by DEP-00-2, but agree that it would not have a significant aesthetic impact on either resource."*

Should you have any questions or require any additional information, please do not hesitate to contact me. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura L. Mancuso".

Laura L. Mancuso  
Director, Cultural Resources

cc: Jill Springer, Acting FPO, FCC  
Hon. William O'Neill, Mayor, Nelsonville

## HT Nelsonville Chronology

- Exhibit 1: Transcript from Metro PCS New York, LLC v. The City of Mount Vernon and the City of Mount Vernon Planning Board before Judge Stephen C. Robinson, and article discussing contents of transcript, dated July 29, 2010
- Exhibit 2: Area Analysis by Vincent Xavier of Homeland Towers to Chairman William Rice and the Zoning Board of Appeals of the Village of Nelsonville, dated June 28, 2017.
- Exhibit 3: Independent Radio Frequency Report by Adam Feehan of PierCon Solutions, dated August 30, 2017.
- Exhibit 4: Letter from Tim Hornbeck of Sabre Industries to William Rice and the ZBA regarding monopine design, dated September 25, 2017.
- Exhibit 5: Supplement to Area Analysis by Vincent Xavier to William Rice and the ZBA, dated September 29, 2017.
- Exhibit 6: Letter from Ronald E. Graiff to William Rice and the ZBA regarding the Independent Radio Frequency Report, dated October 2, 2017
- Exhibit 7: Letter from Daniel M. Laub of Cuddy & Feder LLP to Ronald E. Graiff, dated October 11, 2017, including:  
A. Radio Frequency Justification Report with AT&T FCC licenses; and  
B. Updated AT&T FCC licenses.
- Exhibit 8: Letter from Robert D. Gaudioso of Snyder & Snyder, LLP to William Rice and the ZBA, dated October 18, 2017, including CBRE letter with SHPO concurrence.
- Exhibit 9: Letter from Ronald E. Graiff to William Rice and the ZBA regarding the Radio Frequency Justification Report, dated October 23, 2017.

- Exhibit 10: Letter from Robert D. Gaudioso to William Rice and the ZBA, dated October November 1, 2017, including:
- A. Supplemental Area Analysis;
  - B. CBRE letter;
  - C. Radio Frequency Engineering Report; and
  - D. Photographs of nearby existing facilities.
- Exhibit 11: Letter from Daniel M. Laub to Ronald E. Graiff, dated November 13, 2017, including:
- A. Map of existing AT&T sites; and
  - B. Inventory of existing AT&T sites.
- Exhibit 12: Additional Requested Alternate Location Coverage Plots by Adam Feehan, dated November 14, 2017.
- Exhibit 13: Visual Resource Assessment by Matthew W. Allen of Saratoga Associates to William Rice and the ZBA, dated November 15, 2017.
- Exhibit 14: Potential impact analysis by Paul A. Alfieri III of Lane Appraisals, Inc. to William Rice and the ZBA, dated November 16, 2017.
- Exhibit 15: Commitment Agreement from Manuel J. Vicente of Homeland Towers to William Rice and the ZBA, dated November 17, 2017.
- Exhibit 16: Third Supplement to Area Analysis by Vincent Xavier to William Rice and the ZBA, dated November 20, 2017.
- Exhibit 17: Email from Mayor William O'Neill of the Village of Nelsonville to Robert D. Gaudioso withdrawing offer to lease 2 Secor Street to Homeland Towers, dated November 21, 2017.

- Exhibit 18: Letter from Laura L. Mancuso of CBRE regarding historical, architectural, and archaeological review to William Rice and the ZBA, dated November 21, 2017.
- Exhibit 19: Letter from Ronald E. Graiff to William Rice and the ZBA regarding the Statement in Opposition, dated December 9, 2017.
- Exhibit 20: Letter from Robert D. Gaudioso to William Rice and the ZBA including CBRE letter, dated December 18, 2017.
- Exhibit 21: Supplemental Report Regarding the Philipstown Cell Solutions Group Report by Adam Feehan, dated December 18, 2017.
- Exhibit 22: Visual Resource Assessment by Matthew W. Allen of Saratoga Associates to William Rice and the ZBA, dated December 19, 2017.
- Exhibit 23: Fourth Supplement to Area Analysis to William Rice and the ZBA from Vincent Xavier, dated December 27, 2017.
- Exhibit 24: Letter from Lucia Chiochio of Cuddy & Feder LLP to William Rice and the ZBA dated December 28, 2017, including coverage maps
- Exhibit 25: Letter from Graham L. Trelstad of AKRF to William Rice and the ZBA regarding document review, dated January 2, 2018.
- Exhibit 26: Letter from Robert D. Gaudioso to William Rice and the ZBA dated January 3, 2018, including supplemental radio frequency engineering report.
- Exhibit 27: Letter from Ronald E. Graiff to William Rice and the ZBA regarding review of various documents, dated January 8, 2018.
- Exhibit 28: Letter from Adam Feehan to William Rice and the ZBA regarding the Comi letter, dated January 10, 2018.

- Exhibit 29: Letter regarding application from Adam Feehan of PierCon Solutions to William Rice and the ZBA, dated February 5, 2018.
- Exhibit 30: Fifth Supplement to Area Analysis by Vincent Xavier of Homeland Towers to William Rice and the ZBA, dated February 7, 2018.
- Exhibit 31: Visual Resource Assessment by Matthew W. Allen of Saratoga Associates to William Rice and the ZBA, dated February 7, 2018.
- Exhibit 32: Follow-up filing from Daniel M. Laub of Cuddy and Feder LLP to William Rice and the ZBA, dated February 9, 2018, including:
- A. Press release;
  - B. RF letter;
  - C. FirstNet license;
  - D. Top Ten Frequently Asked Questions (Regarding FirstNet); and
  - E. Drive test mapping.