



**Parks, Recreation
and Historic Preservation**

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

November 22, 2017

Ms. Laura Mancuso
CBRE
Director, Cultural Resources
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 / 0007902925

Dear Ms. Mancuso:

As you know, this undertaking has raised several questions concerning perceived unassessed potential impacts to historic resources within the project's area of potential effect (APE). To date our office has received several calls from local officials concerned about our Section 106 review.

Although we had previously concurred with your finding of No Adverse Effects for this undertaking, these questions required me to re-evaluate the project file. In my review, I noted that the APE contains 13 individually listed resources as well as a portion of one historic district. This is a significantly high concentration of National Register listed properties within a one-half mile radius of a communication tower project site. We have also noted that at least one property, the Cold Spring Rural Cemetery had not been previously identified in our survey data during the review process. We have formally identified the cemetery as eligible for inclusion in the National Register of Historic Places. We also note that you had already considered this resources in your visual analysis.

At this point in time our office is not prepared to seek to reopen the review process with the FCC. However, we would ask that any alternatives analysis that was done for this site location be provided to us for further review. We are particularly interested in any documentation of other sites that had been considered as well as alternative lower heights that may have been evaluated for the proposed tower.

If you should have any questions regarding our request, please do not hesitate to contact me at (518) 268-2166 or john.bonafide@parks.ny.gov.

Sincerely,

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

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