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## Memorandum

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**To:** Village of Nelsonville Zoning Board of Appeals  
**From:** Graham L. Trelstad, AICP / Ronald J. Gainer, PE  
**Date:** March 30, 2018  
**Re:** Homeland Towers Cellular Communications Tower/Rockledge Road  
**cc:**

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We have collaborated to review the latest Applicant submission consisting of the letter from Robert Gaudioso (dated March 26, 2018), the letter from New York State Office of Parks, Recreation and Historic Preservation (dated March 14, 2018), and the letter from Matthew Allen of Saratoga Associates (dated March 21, 2018) which included their latest visual resource assessment for the alternative tower designs currently under discussion. We have the following comments and suggested next steps.

The submitted material responds to our memorandum dated March 9, 2018 and provides supplementary visual impact assessment material for different design options. We believe that the submitted material is satisfactory and should provide your Board with sufficient material to properly choose between the various design options under consideration.

We do note that the letter from New York State Office of Parks, Recreation and Historic Preservation does conclude that only those options that are 110 feet in height or less would have no adverse effect on historic resources. While this letter was issued prior to the receipt of the supplementary visual assessments of the other design options, the conclusion seems fairly clear that, in their view, options exceeding 110 feet in height would have significant visual impacts. As the Board is aware, in accordance with a recommendation contained in our March 9, 2018 memorandum, on your behalf a copy of the latest visual assessment has just been provided to OPRHP and we await their determination as to whether any differing assessment may be offered on the basis of these latest visual materials.

Further, we note that, following other recommendations that were outlined in our recent memorandum, the Village has scheduled a new Public Hearing on these latest alternate designs for April 4, 2018, and has posted on their web site this latest visual resource assessment report received from the applicant. This should permit the public to have sufficient opportunity to offer comments on these latest tower concepts.

With respect to our memo's item 5 regarding consistency with the visual character protection provisions of the Scenic Areas of Statewide Significance (SASS), we note that the Applicant had addressed this concern in a letter from Saratoga Associates dated December 19, 2017. In that letter, the Applicant notes that the requirements of the State's Coastal Zone Management Program, within which reside the provisions of the Scenic Areas of Statewide Significance, are not triggered because this application does not trigger any

Federal or State review or permitting. We have consulted with representatives of the Federal Communication Commission (FCC) and with material on the FCC website to confirm this and we are now satisfied that no consistency review to the State's Coastal Zone Management Program is required. Nevertheless, the Applicant's letter of December 19, 2017 does address visibility of the proposed tower from points within the SASS.

We believe that the Zoning Board of Appeals now has sufficient material to complete its SEQRA review and issue a Determination of Significance.