

TEXAS HISTORICAL COMMISSION

Section 106 Review for Telecommunications Projects

September 2020

Overview

To streamline procedures for the review of proposed telecommunications licenses under Section 106 of the National Historic Preservation Act, the Federal Communications Commission (FCC) developed two Nationwide Programmatic Agreements, one for the [construction or modification of facilities](#) (executed in 2004), and one for the [collocation of wireless antennas](#) (executed in 2001 and amended in 2016). Also, a [Program Comment](#) covering FCC licenses for [Positive Train Control](#) (PTC) sites was adopted in 2014. Additional information is available on FCC's [Tower and Antenna Siting](#) homepage.

THC Project Submissions

The FCC developed standardized forms for the submission of new towers (Form 620) and collocations (Form 621) that, along with the required site information attachments, the applicant must submit to the State Historic Preservation Officer (SHPO, in Texas the Texas Historical Commission (THC)). To expedite your project, THC asks that applicants also include a short cover letter that provides the site name, the tower type and height, and the site's latitude and longitude. For small cell antenna installations, the cover letter should also indicate if this is a batched submission (see below) and if a reduced visual Area of Potential Effect (APE) is being requested with a justification for the proposed APE.

As of September 2015, THC does *not* participate in the FCC's E-106. To submit projects for SHPO review, THC recommends applicants submit projects through [eTRAC](#), the Electronic THC Review and Compliance System, but hardcopy submission will continue to be accepted. For more information, see our [Project Review](#) homepage. Please note, eTRAC is *only* for consultation with the THC. Applicants must continue to use the FCC's Tower Construction Notification System (TCNS) to consult with Tribal governments and must provide the required notice to local governments and the public.

Multiple small cell antennas (generally on towers 30 feet tall or less) that: 1) are within the same general area, 2) that utilize the same equipment, and 3) that will have a similar installation, may be submitted to THC for review as a single batch. In the cover letter or eTRAC project description, please indicate the number of proposed sites. Please also include a table with the site name and coordinates for each installation, and an overall map showing all sites of the batch. PTC antennas may also be batched in accordance with the PTC Program Comment. Please note, the FCC, Tribal governments, and local governments may require individual review of each proposed site.

General Tips

- Consulting parties may include, but are not limited to, the appropriate [County Historical Commission](#) and/or [Certified Local Government](#).
- THC maintains the [Historic Sites Atlas](#), which includes properties listed in the National Register, properties designated as Recorded Texas Historic Landmarks (RTHL), and recorded cemeteries. Properties designated as an RTHL, a State Antiquities Landmark (SAL), or a Historic Texas Cemetery (HTC) are generally considered to have been previously evaluated and found eligible for listing in the National Register. The Atlas does *not* include information on properties that are in the process of being nominated to the National Register or that have been determined eligible for listing in the National Register through previous Section 106 consultation.
- A single page résumé or curriculum vitae for appropriate consultants is sufficient.

Tips for Indirect Effects

- If available, please include recent aerial photographs showing the development of the site and a keyed map showing the location and direction from which site photographs were taken. To assess the potential visual effect on historic resources, a color rendering or photographs of a mock-up or balloon test are very helpful. If there are known historic properties within the visual APE, including these materials with the initial submission of the FCC 620 form can prevent the need for multiple rounds of consultation.
- For collocations on buildings more than 45 years old, include plans showing the location and method of installation.

If you have any questions about the THC's review process of above-ground resources for telecommunications projects, please contact Caitlin Brashear at caitlin.brashear@thc.texas.gov or 512-463-5851.

Tips for Direct Effects

- For new cellular tower construction and cellular tower collocation projects, please include a statement describing the expected vertical and horizontal below-ground impacts, and provide plans corroborating these impacts.
- For new cellular tower projects, consultants must conduct a background review of cultural and historical resources within a half-mile buffer.
- If archeological investigations beyond background reviews are needed, site visits must be conducted in person; Google Street View is not sufficient. If survey or monitoring is proposed on public lands, pre-notification and coordination with the THC is required under the Antiquities Code of Texas.
- Background reviews and fieldwork must be conducted by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards.
- Investigations and [reporting](#) must follow the [Council of Texas Archeology standards and guidelines](#), as well as the Nationwide PAs for [small cellular towers](#) (Form 620) and [collocations](#) (Form 621).

If you have any questions about the THC's review process of archeological resources for telecommunications projects, please contact our Archeology Division at 512-463-6096 or refer to the THC's [project reviewer assignments](#) for the appropriate regional reviewer.

