



GEORGIA DEPARTMENT of COMMUNITY AFFAIRS

RESEARCH INFORMATION FOR SECTION 106 FCC-RELATED PROJECT APPLICANTS

Applicants for certain Federal Communications Commission (FCC) licenses related to communications tower, satellite access node (SAN), and positive train control (PTC) tower construction, collocations, and the deployment of small cell equipment are required to follow 47 CFR Part 1 and the applicable Nationwide Programmatic Agreement (NPA) for Review Under the National Historic Preservation Act – for detailed instructions see <https://www.fcc.gov/wireless/bureau-divisions/competition-infrastructure-policy-division/tower-and-antenna-siting>.

Submittal packages for Georgia Historic Preservation Division (HPD) review must be in a format determined by the FCC (i.e., FCC Form 620 or 621 with attachments). The following is not intended to interpret FCC regulations or forms, but to provide applicants with information on researching historic resources for these project types. 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.

HPD's ability to complete a timely Section 106 review and issue meaningful comments largely depends on the quality of the material submitted. Some applicants may find it advantageous to hire a historic preservation professional who meets the Secretary of the Interior's (SOI) *Professional Qualifications Standards* for history or architectural history (as required for archaeology).

Archaeological Assessment:

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 or directly overseen by a professional who meets the SOI *Professional Qualifications Standards* in archaeology (see 36 CFR Part 61). For information on whether an archaeological field survey is required for an FCC-related project, please see the federal regulations and FCC guidance.

For information on known archaeological resources in the project area, a Georgia Archaeological Site File (GASF) search must be conducted. The GASF is the current database of all identified archaeological sites in Georgia, along with manuscripts and research reports. Only an SOI-qualified archaeologist or GASF staff may undertake this research. Information regarding the policies and procedures for conducting research through GASF can be found here: <https://archaeology.uga.edu/access-and-policy-information>.

GASF Contact Information:

<https://archaeology.uga.edu/gasf>

(706) 542-8737

1125 Whitehall Road, Athens

All archaeological submissions should conform to the *Georgia Standards and Guidelines for Archaeological Surveys* found here:

[The Georgia Council of Professional Archaeologists | Advancing Archaeology in Georgia](#)



Since archaeological reports are sent to the GASF for permanent retention, please submit one electronic (PDF) copy of the draft report with the initial submittal, and following its acceptance by HPD, please provide a final report to HPD for submittal to GASF. Please ensure the electronic copy is an optical character enabled .pdf.

Identification of Buildings, Structures, and Districts:

Background research related to historic resources located within the FCC-determined applicable area of potential effect* (APE), in order to identify all previously identified National Register eligible and/or listed resources, can be adequately undertaken by utilizing online resources. While not required by the FCC, we strongly recommend that research be conducted by a historian or architectural historian who meets the SOI's *Professional Qualifications Standards*. At a minimum, online research should include the following digital resources and should be recorded in the attached **Research Checklist**. This checklist should be submitted with project materials for HPD review/comment.

- National Register Database
- GNAHRGIS - provides information on previously identified historic resources in the Georgia SHPO's inventory
 - *Guidance for SOI-qualified archaeologists who wish to use the archaeology side of GNAHRGIS is available at the above link*
- ER Files – individuals registered as an “ER Researcher” may use the ER external user system to research consensus determinations in previous project reviews by HPD; An ER Researcher is a an SOI-qualified professional registered in the ER external system – see the user guide on our website for details on registering as a user: <https://dca.georgia.gov/document/document/hpd-er-external-user-guide-122024/download>
- Georgia Tax Assessor Sites
- Historic Aerials
- Centennial Farm Program Award recipients
- HPD's website (for contexts) - <https://dca.georgia.gov/community-assistance/historic-preservation>
- GDOT cultural resources website (for contexts)
- <https://www.dot.ga.gov/GDOT/pages/CulturalResourcesProjects.aspx>

**Please note: the APE for projects reviewed under Section 106 of the National Historic Preservation Act is defined in 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.” In the applicable NPA, the FCC has indicated that the APE for visual effects for FCC-related projects is 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.*

Regarding alternative APEs, HPD recommends reaching out to our office to discuss alternatives in cases of small cell poles (under 50-feet), collocations (on rooftops in urban areas), or similar.

Researchers who need to research non-digitized files at HPD's offices, including older historic resources county and city surveys (not currently available in GNAHRGIS), identified sites, Centennial Farms (maps and photographs), topical files, and older environmental review files, should email ER@dca.ga.gov for details on scheduling an in-person research appointment.

Important notes regarding identification:

- Due to possible 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 documentation, including in GNAHRGIS.
- HPD recommends including all resources 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 digital and/or physical file location to please note all associated resources and/or file numbers.
- HPD requests that if a previously identified resource is no longer extant 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 multiple current quality photographs of the resources identified, whether considered eligible or not, including photographs of areas where a demolished resource once existed, and viewback photographs from all resources, eligible or not (in case of disagreement on eligibility), with indication of the location and height of the proposed tower. In some situations, HPD may request photographic simulations or recommend a balloon or crane test to assess visual effects more accurately.

Public Participation:

FCC regulations include provisions for public notice. HPD has made available a list of other groups who should be provided notice in Georgia as allowed through the NPA (see last page of guide). 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, Regional Services representatives, and others.

Submittals may be uploaded to the ER External System by registered ER Applicants or may be emailed to ER@dca.ga.gov.

For details on using the ER external system and registering as an ER Applicant or an ER Researcher (SOI-qualified professionals), please reference the NR-TIGERS user guide found on our website: <https://dca.georgia.gov/document/document/hpd-er-external-user-guide-122024/download>**

***Please note that one person may register as both an ER Applicant and an ER Researcher if an individual needs both rolls and is also SOI-qualified. ER Applicants (those users able to create and interact with projects in the ER system) need not be SOI-qualified.
See the External User Guide for more information.*

Research Checklist

For FCC-Related 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).

Name and Title _____

Company _____

Tower Address (or parcel number; include city and county) _____

Date Research completed online _____

Please check off that you have provided the minimum level of digital research in the submittal packet for the project site and APE, as applicable. Please write or attach your findings (maps, survey forms, etc.) from these records, as applicable:

Digital Research

___ Georgia Archaeological Site File (UGA, Athens - <https://archaeology.uga.edu/gasf>)

___ Historic Resources Survey Files (GNAHRGIS - <https://www.gnahrgis.org/PublicHome>)

___ National Register Files (<https://www.nps.gov/subjects/nationalregister/database-research.htm>)

___ Environmental Review Files (NR-TIGERS system, *ER Researchers only**)

___ Centennial Farms (<https://dca.georgia.gov/community-assistance/historic-preservation/centennial-farms-program>)

___ County Tax Assessors (<https://qpublic.net/ga/gaassessors/>)

___ Historic Aerials (<https://www.historicaerials.com/>)

Signature and Date _____

**requires registration in the NR-TIGERS system (see website for details)*

PUBLIC PARTICIPATION RECOMMENDATIONS FOR TOWER APPLICANTS

This list accurate as of January 2025

In accordance with Stipulation V.D of the NPA, here is a list of groups that should be provided notice for Undertakings within their jurisdiction(s):

Regional Commission Preservation Planner Contact Information

<https://dca.georgia.gov/document/resources/georgia-regional-commissions-contact-list/download>

Regional Commissions (RC) General Information

<https://dca.georgia.gov/community-assistance/coordinated-planning/regional-planning/regional-commissions>

Search for Georgia Historical Organizations

<https://www.georgiaarchives.org/ghrac/directory>

Georgia Certified Local Governments (CLG)

<https://dca.georgia.gov/community-assistance/historic-preservation/certified-local-governments>

Georgia Local Governments/Counties with Historic Preservation Commissions (HPC):

<https://dca.georgia.gov/document/resources/georgia-clg-list-updated-april-2024/download>

Local Preservation Groups in Georgia

<https://www.georgiitrust.org/resources/preservation-directory/>

Georgia Better Hometown and Main Street Managers

<http://www.georgiamainstreet.org/our-tiers/> (expand each tier for information)

Registered Local Government Authorities in Georgia

<https://dca.georgia.gov/community-assistance/government-authority-reporting/local-government-authorities>

Local Neighborhood or Community Organizations (where applicable)

It is HPD's 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.

Please Note: per Stipulation V.E of the NPA, an Applicant is required to consider the comments of the public. As such, HPD recommends including any historic properties, including eligibility and effect documentation, noted from the above entities either with the initial submittal or forward such resources as soon as they are received so that it is evident that the comments have been considered.