



HOWARD COUNTY HISTORIC PRESERVATION COMMISSION  
*ELlicOTT CITY HISTORIC DISTRICT ■ LAWYERS HILL HISTORIC DISTRICT*  
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Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, DC 20554

June 27, 2016

RE: *Amended Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*  
WT Docket No. 15-180, DA 16-519.

The Howard County, Maryland, Historic Preservation Commission, a unit of Howard County Government, respectfully submits the comments below on the Federal Communications Commission's (FCC) proposed *Amended Nationwide Programmatic Agreement for the Collocation of Wireless Antennas* (Amended Collocation Agreement) – WT Docket No. 15-180, DA 16-519.

The HPC has concerns about the proposed amendments and how they will impact the integrity of the two Historic Districts in Howard County. Most importantly, the proposed amendments should be revised to make clear that local commissions or other bodies with jurisdiction over historic districts or buildings retain full authority to make determinations about alterations to historic buildings. The Section 106 process is separate and independent of local historic review procedures, but local review procedures must remain intact. This is necessary to protect the historical and architectural integrity of historic districts and buildings, partly because there are several elements of the proposed amendments that pose significant adverse effects to aesthetic character of historic districts and buildings and it is not clear on who makes necessary determinations envisions by the proposed amendments.

In Howard County, property owners must apply for a Certificate of Approval in order to make alterations to certain historic buildings, or to any structure within the Ellicott City or Lawyer's Hill Historic Districts. Adopted Design Guidelines inform consideration of applications for Certificates of Approval. The proposed amendments should make clear that they do not circumvent this process. This is particularly important because parts of the Amended Collocation Agreement are ambiguous about who makes necessary determinations. For example, Stipulation VII.A(1)(c) requires that antennas must be installed using "stealth techniques that match or complement the structure," but it is not clear who makes such a determination. By leaving intact existing local historic district review processes, the stakeholders with the most relevant information and experience will make the necessary determination.

This is critical because the proposed Amended Collocation Agreement allows for a structure of three cubic feet to be collocated on a historic building. Proliferation of such structures may constitute adverse effects on historic properties pursuant to the National Historic Preservation Act. Moreover, the proposed amendments (Stipulation VII.B(2)) allow the installation of up to 21 cubic feet of antennas and associated equipment in what, in most historic districts, is already a heavily cluttered right of way. The result is further deterioration of historic viewsheds and obstruction of the public way.

In Ellicott City, current utility lines and poles are close to the buildings and additional visual disturbance of the views of historic structures constitutes an adverse effect on historic properties. This is moving in the wrong direction as most communities want utility lines removed and placed underground or behind the most historic areas of town, not further burdened with several cubic feet of communications equipment.

Associated equipment installations are not a viable option in much of the Ellicott City Historic District based on the lack of space available on Main Street, where the sidewalks are already exceptionally narrow and crowded. In any event, associated equipment should be screened or subject to stealth techniques that match or complement surrounding properties.

Additionally, Stipulation VII.C provides that antenna may be located on traffic control structures without § 106 review. The proposed amendments set up a process for determining whether the structures are contributing element to a historic district, but they provide for no involvement of the local stewards of such districts. SHPOs may not have the information necessary to make a determination of whether a structure is contributing or not. These determinations should be made by the local bodies responsible for such decisions.

All antennae and power cabinets installed on historic buildings or within historic districts should be subject to approval by the responsible local authorities. The proposed amendments should only apply to § 106 reviews and local authorities must retain the right to control exterior alterations to their historic districts; otherwise the integrity of such districts will be degraded.

The Howard County Historic Preservation Commission urges the FCC to amend the proposed Amended Collocation Agreement to ensure that local authorities responsible for ensuring the historical and architectural integrity of historic buildings and districts retain their authority to approve visible exterior alterations. Otherwise these vital economic, historic, and cultural resources will suffer adverse effects from the proliferation of antennas and associated equipment.

Sincerely,



Beth Burgess  
Historic Preservation Commission, Executive Secretary  
Resource Conservation Division, Chief  
Department of Planning and Zoning  
Howard County Government