

- The rule proposes that the pole should be the same style but may be substantially larger. This needs to be clarified if it just means taller or if it could be bigger around? Also if the scale does not match the existing poles in the district it could distract from the feeling integrity of the historic district.
- The language in the first amendment to Nationwide Programmatic Agreement for the Collocation of Wireless Antennas (PA) excludes most of these types of projects from review and should be sufficient to streamline the process of installations. Stipulation VII.C of the PA excludes mounts on and replacement of “traffic control, light pole, lamp post, or other structure who’s primary purpose is to provide public lighting, where the structure is located inside or within 250’ boundary of a historic district” unless the structure is contributing to the district. The vast numbers of utility poles in the US are not within historic districts and requiring that that for poles within 250’ of a district be reviewed to ensure they do not contribute to the historic district does not add a large amount of work or significantly impede the implementation of cellular/wireless infrastructure across the nation; therefore, the existing guidelines should be sufficient.
- In regards to statements in III.A.10.i.c How will these utility poles be evaluated to ensure they are not a historic property if the SHPO is not asked to evaluate contributing status? Additionally who will insure that new poles match the design of poles in historic districts?
- Most utility poles are not evaluated to know if they contribute to a historic district or not. In addition, consultants have not been making an effort to discover the construction/installation date of poles to determine if they fall within historic districts period of significance or not which is leading to a larger volume of requests for additional information for these types of projects and is making the review process take longer. This could be easily resolved if the consultant simply contacted the governmental entity that owns the pole and asks when they were constructed/installed.
- If this new rule is implemented it cannot be known how many utility poles, which may contribute to historic districts, will be removed do to not being previously evaluated for contributing status to historic districts; therefore, it is recommended that a nationwide context that discusses the history of utility poles and light poles, includes a chorology of types and technology, and a context should be developed to offset the adverse effects that will result from this rule.