



Oklahoma Historical Society
State Historic Preservation Office

Founded May 27, 1893

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December 4, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street S.W.
Washington, D.C. 20554

RE: Draft Program Comment Addressing Collocation on Twilight Towers, WT Docket No. 17-79

Ms. Dortch:

The Oklahoma State Historic Preservation Office (OK/SHPO) staff has reviewed the draft Program Comment addressing Collocation on Twilight Towers, and has concerns regarding the proposal.

I. Background

- a. *"Accordingly, a large number of towers constructed during the period between the effective dates of the two NPAs - that is, those for which construction began after March 16, 2001 and before March 7, 2005 - do not have documentation demonstrating compliance with the Section 106 review process (An issue exacerbated by the limitations of the State Historic Preservation Officers' record-keeping as well as subsequent changes in tower ownership.)"* If the property has not gone through the Section 106 process, the SHPO would never have received notification. This is the responsibility of the federal agency, not the SHPO.

II. Need for Program Comment to Address Twilight Towers

- a. *(3) the limited likelihood that Section 106 review could identify adverse effects from these towers that are not yet known after 12 years or more.* As referenced above, if a tower has not gone through the Section 106 process, the SHPO would have no knowledge of adverse effects. Does the federal agency have documentation that this is the case? Is so, why has it not been provided to the SHPOs?

III. Exclusion for Twilight Towers

- a. How are you addressing cumulative effect for collocation of multiple towers? There is an increased probability of adverse effects with additional towers.
- b. Have there been studies on the twilight towers to assess their effects on the environment and historic properties? Does it account for the passage of time as some of these may now be located on historic properties?
- c. There is a potential for ground disturbance for equipment sheds for the collocations and effect to the resource(s).
- d. Are the twilight towers still in use? Will antiquated antennas be removed and replaced with new?
- e. How will obsolete equipment sheds be handled?

Ms. Dortch
December 4, 2017
Page 2

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As outlined, the OK/SHPO disagrees with excluding twilight towers from Section 106 review. If the purpose is to collocate on twilight towers, amend the Collocate NPA to remove the 'constructed commenced on or before...' clause so that twilight towers can be utilized, then allow twilight towers to be reviewed on a case-by-case basis as they are identified.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Lynda Ozan', written in a cursive style.

Lynda Ozan
Deputy State Historic
Preservation Officer

LO:pm