



**Brad Little**Governor of Idaho

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HISTORY, IDAHO, GOV

15 September 2020

Becky John Haney
AT&T Area Manager
AT&T Mobility
Construction & Engineering
161 Inverness Dr. West, 2<sup>nd</sup> Floor
Englewood, Colorado 80112

Via Email

RE: IDL04521 / Redfish Lake / CBRE Project No.: TS00122830 / SHPO Rev. No. 2020-606

Dear Ms. John Haney:

Thank you for continuing consultation with our office on the above referenced project. We understand that AT&T Mobility, LLC proposes to construct a new 199-foot (ft) self-support communications tower (monopole) within a proposed 50-ft x 75-ft lease area. Access to the proposed lease area will extend southwest along an existing access drive from Decker Flats/Sheep Drive Road. An additional 12-ft wide access easement will connect the existing access drive to the lease area and a proposed 8-ft wide utility easement will be routed along the existing access drive. The project will be located at 10598 Decker Flats Sheep Drive Road, Stanley, Custer County, Idaho.

On the 22 May 2020, our office received an "Archaeological and Historic Survey Report," for the undertaking referenced above. Upon review of this report our office contacted the consultant, CBRE, Inc. on the 12 June 2020 with several questions. On the 23 June 2020, we received additional information from the consultant.

Due to the height of the proposed tower, in a letter dated 9 July 2020 our office asked in accordance with Section VI (C)(5) of the 2004 Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (Nationwide PA) that the Area of Potential Effects (APE) be enlarged to incorporate the National Register of Historic Places (NRHP)-eligible Redfish Lodge Complex (37-14944). Our office was concerned that two aspects of integrity, setting and feeling were going to be adversely affected by the proposed undertaking and asked for photo simulations of the tower from the historic property.

On the 31 July 2020, our office received the photo simulations of the monopole from the Redfish Lodge Complex. Pursuant to 36 CFR Part 800.5 our office applied the criteria of effect to the proposed undertaking. Based on the previous information received, our office did not concur with determination of no adverse effect and determined that the proposed undertaking would have an **adverse effect to historic properties**. In an attempt to avoid the adverse effect, our office recommended that the applicant use a monopine in place of a monopole, since height reduction was not an option.

In a letter received 15 September 2020, AT&T in consultation with the Idaho Department of Lands determined that the monopole is the best solution for the location since the monopine would be visible in other areas outside the location where historic properties are located. As previously stated above, our office has determined that the construction of the monopole will adversely affect the feeling and setting of the Redfish Lodge Complex, two aspects of integrity that qualify the property for inclusion in the National Register.

Please notify the Advisory Council on Historic Preservation of the finding of adverse effect pursuant to 36 CFR 800.6(a)(1). We look forward to working with you, as well as other consulting parties (e.g. Sawtooth National Forest, Sawtooth Interpretive & Historical Association, and others) to mitigate this adverse effect. To learn more about the mitigation process please visit: <a href="https://history.idaho.gov/section-106/mitigation-process/">https://history.idaho.gov/section-106/mitigation-process/</a>. If you have any questions, please contact me via phone or email at 208.488.7463 or ashley.brown@ishs.idaho.gov.

Sincerely,

Ashley Brown, M.A.
Historical Review Officer
Idaho State Historic Preservation Office

CC: Ryan Montoya, Idaho Department of Lands Doug Baughman, Sawtooth National Forest Lin Gray, Sawtooth Interpretive & Historical Association