

Save \$3,700 on Your Next Form 620 or Form 621: Advice on Cultural Resource Management Services for Cell Tower NEPA Compliance

By

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Introduction

I've seen worst-case scenarios many times before. For example, you've just hired a cultural resource management (CRM) consultant to do a Form 620 only to find out your proposed build location is within a historic district with cell tower restrictions. Or, the awesome deal you got on your Form 620 turned into a change-order nightmare. Or, you didn't think you needed any cultural resources for your co-location, but the state historic preservation office (SHPO) is saying you have to do archaeological monitoring because you need to dig to install a new conduit from the tower to a nearby transformer.

In my decade working as a cultural resource management archaeologist, I have seen a number of ways cell tower site acquisition and construction companies could have saved money on the cultural resources consultation that is required for cell tower builds and site acquisitions under the National Environmental Policy Act (NEPA). Some of this savings comes from doing a little of the legwork yourself. Other savings comes from making sure your CRM consultant does a thorough job, knows what they're doing, and is working to serve your interests.

The title of this book came out of a conversation I had with a fellow CRM archaeologist. He told me about a certain large company looking to acquire some tower sites in northern California. My friend did the CRM work for three proposed build sites, quickly learning that they were in and adjacent to a well-known archaeological district that was already listed in the National Register of Historic Places (NRHP). My friend's company charged \$3,700 for the cultural resources report that was used to fill out the Form 620 for these locations that had an extremely low chance of being developed.

The archaeological district showed up on a simple Google search, but my friend's company got nearly \$4,000 from the project.

A couple years later, when my friend started working for another CRM company, he lucked into a conversation with someone that worked for the acquisition company. In this conversation, my friend mentioned that they could easily use the Internet to look for historic properties, archaeology sites, or districts before they request CRM services for future build sites (see Tip #2). The acquisition company employee was unaware that many historic buildings and archaeological districts can be easily identified online.





Cultural resource management is nearly a billion dollar industry in the United States. NEPA compliance is an integral part of this industry. Many long-time CRM professionals like myself have completed dozens of compliance projects for Form 620 and other parts of the NEPA process. We enjoy making money, but we also enjoy saving our clients money because it helps build mutually beneficial business partnerships that extend into the future.

Please, take a few minutes to read this short eBook. It was the brainchild of numerous conversations with CRM professionals across the country who would like to make things easier for their clients and help you save money.

Many thanks,

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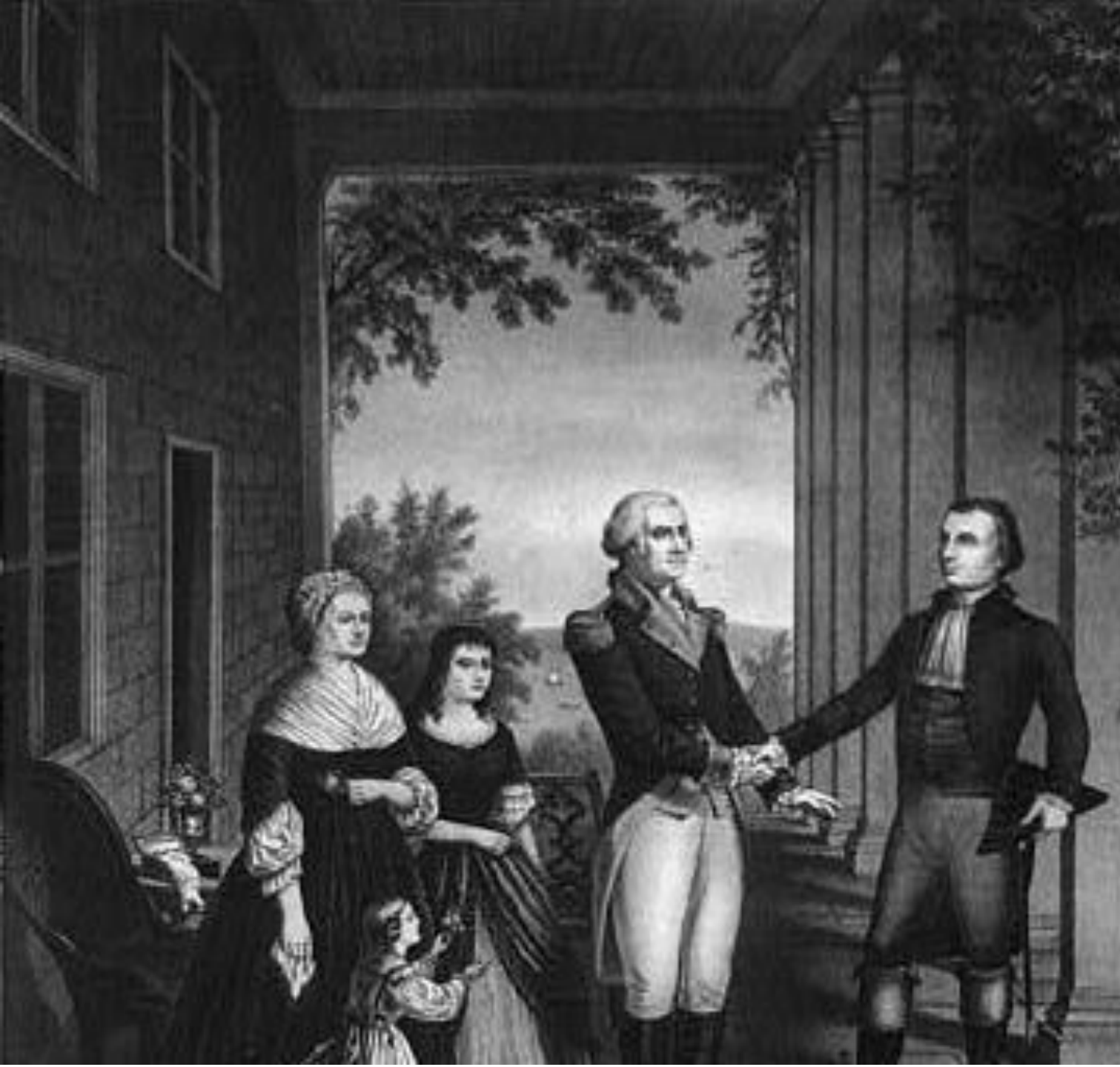
Historic Preservation in the United States





I'm not sure exactly who is reading this eBook, so I just wanted to say a couple things about the history of historic preservation in the United States and how that relates to cell tower construction and site acquisition. Cultural resource management is the result of sustained efforts from groups of citizen activists to protect places and spaces that are important for our unique heritage as Americans.

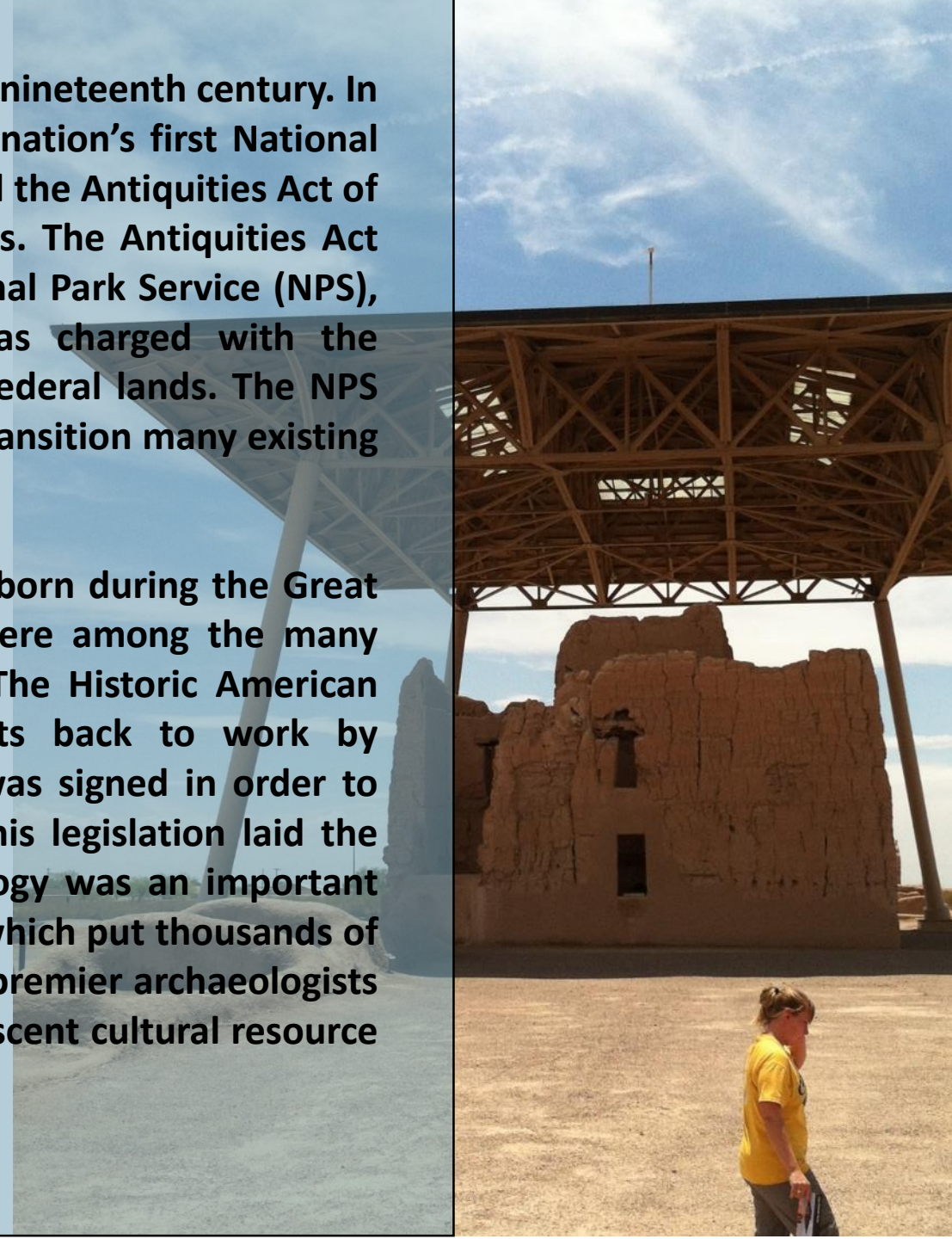
Historic preservation has its roots in nineteenth century pioneer and historical societies. By the mid-1800s, communities across the country realized that many of their original pioneers were aged or had already passed on. In an attempt to preserve these pioneers' legacies, local publishers across the country recorded the memories of their forebears in large volumes. In some places, the locations of important events were commemorated with plaques and monuments. War veterans also sought to protect battlefields and historic forts from destruction. Historic preservation has always been grassroots and focused on places that mattered to local communities.

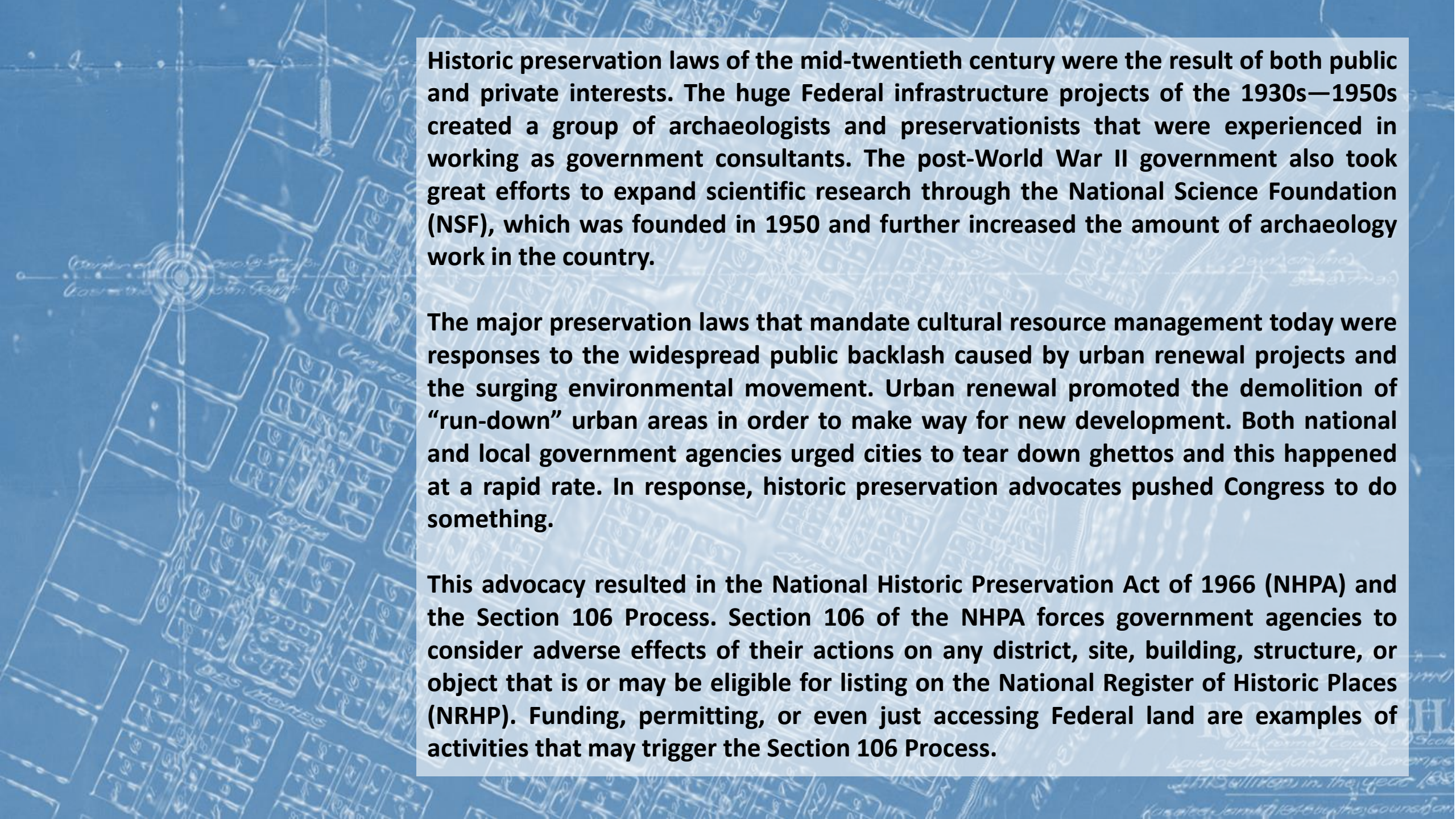


Most of these early preservation activities were the result of small groups of concerned citizens that joined together to accomplish a specific goal and dissolved as soon as that goal had been accomplished. The Mount Vernon Ladies' Association of the Union is generally considered the first permanent historic preservation group organized in the United States. The Mount Vernon Association was created in 1853 to purchase and restore the then deteriorating home of George and Martha Washington. The association served as an early model for historic preservation and a number of local preservation groups were subsequently created for the purpose of saving the places that mattered to local communities.

Government involvement in preservation did not begin until the late nineteenth century. In 1889, Congress designated the Casa Grande ruin in Arizona as the nation's first National Monument and set aside \$2,000 for its preservation. Congress passed the Antiquities Act of 1906 to protect archaeological sites on federally administered lands. The Antiquities Act sparked the identification of sites across the country and the National Park Service (NPS), established in 1916 within the Department of the Interior, was charged with the administration of historic monuments and archaeological sites on federal lands. The NPS immediately began a program to acquire Civil War battlefields and transition many existing historic places to government administration.

Federally mandated historic preservation as we know it today was born during the Great Depression. Archaeology and building documentation programs were among the many activities designed to put Americans back to work at that time. The Historic American Buildings Survey (HABS) was created in 1933 to put architects back to work by documenting historical structures. In 1934, the Historic Sites Act was signed in order to preserve historic buildings and sites based on their uniqueness. This legislation laid the groundwork for later national historic preservation laws. Archaeology was an important activity of the Works Progress Administration (WPA) (1935—1943), which put thousands of Americans to work excavating sites across the country. Many of the premier archaeologists of that time learned skills that they would later use to create the nascent cultural resource management industry during the 1950s.





Historic preservation laws of the mid-twentieth century were the result of both public and private interests. The huge Federal infrastructure projects of the 1930s—1950s created a group of archaeologists and preservationists that were experienced in working as government consultants. The post-World War II government also took great efforts to expand scientific research through the National Science Foundation (NSF), which was founded in 1950 and further increased the amount of archaeology work in the country.

The major preservation laws that mandate cultural resource management today were responses to the widespread public backlash caused by urban renewal projects and the surging environmental movement. Urban renewal promoted the demolition of “run-down” urban areas in order to make way for new development. Both national and local government agencies urged cities to tear down ghettos and this happened at a rapid rate. In response, historic preservation advocates pushed Congress to do something.

This advocacy resulted in the National Historic Preservation Act of 1966 (NHPA) and the Section 106 Process. Section 106 of the NHPA forces government agencies to consider adverse effects of their actions on any district, site, building, structure, or object that is or may be eligible for listing on the National Register of Historic Places (NRHP). Funding, permitting, or even just accessing Federal land are examples of activities that may trigger the Section 106 Process.



Americans were also increasingly frustrated by escalating pollution and environmental degradation and, by the 1960s, environmentalists were actively lobbying Congress to protect the environment. The National Environmental Policy Act of 1969 (NEPA) declares it is the United States Government's policy to protect the environment by evaluating the effects of federally enabled activities on the environment. Under NEPA, the environment includes natural and cultural resources. Agencies are ordered to use a multi-disciplinary approach as part of decision-making on actions that may have an impact. An Environmental Assessment (EA) is a summary of the multi-disciplinary analysis that is conducted for minor federally enabled actions that might impact the environment. An Environmental Impact Statement (EIS) is prepared for any major federally enabled action. Cultural resource management professionals typically evaluate actions for impacts to cultural resources in an EA or EIS.

While the NHPA and NEPA set the bar for CRM work on a national scale, a complex network of parallel historic and environmental preservation laws have been created in most states and communities across the United States. Sometimes these local regulations are the same as the national laws. Sometimes they aren't. Sometimes these local laws are stringent and will impact a cell tower build, which is why it's important to also consider local requirements when siting a tower (see Tips #1, #8, and #9).

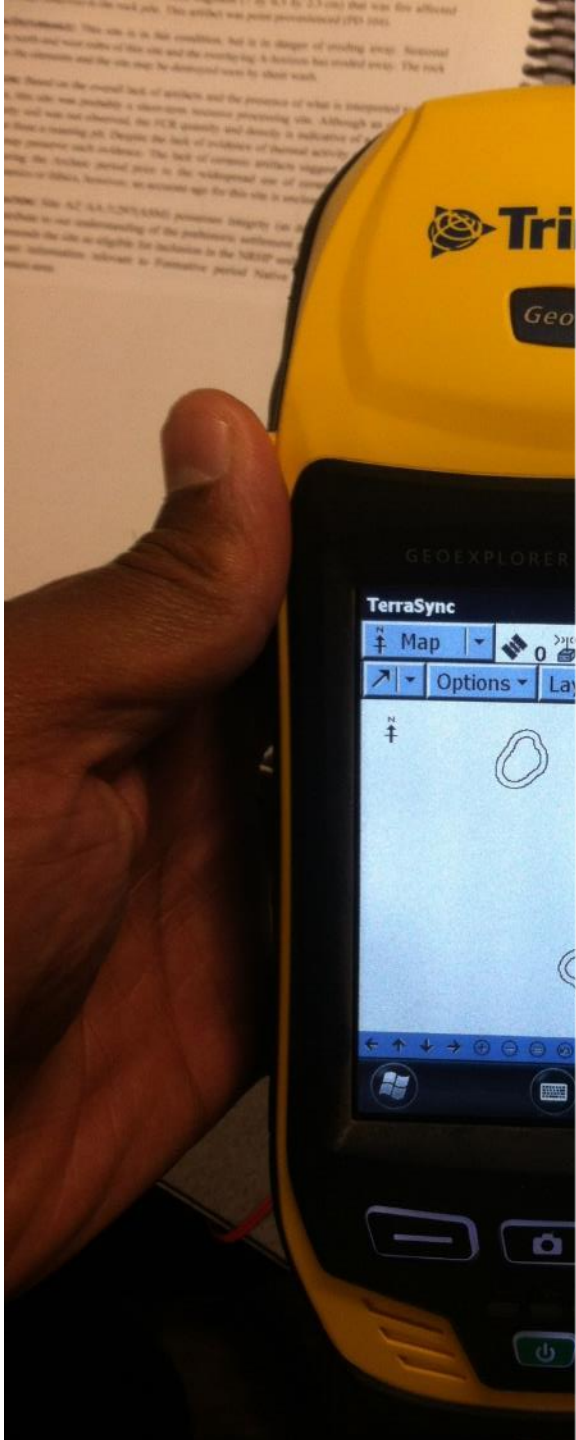
You may be thinking, *“That’s interesting, but why does this matter for me? I just want to build a cell tower.”* Environmental compliance is required for cell towers because of regulations established by the Federal Communications Commission (FCC). Cell towers are licensed by the FCC, which is a government agency that is mandated to comply with the NEPA and NHPA. Since 2004, the FCC has maintained a nationwide programmatic agreement stating that undertakings approved by the FCC must provide a Section 106 review in order to address effects to cultural resources. This means new cell towers must consider impacts to the natural and cultural environment for their FCC licensing. Form 620 is the official report summarizing the effects a new communications tower on cultural resources. Form 621 is the report that describes how co-location on or modifications to an existing tower will effect cultural resources.

Historic preservation laws exist because people care about the places where they live. Preservation is part of a public campaign that is more than 150 years old. It is based on the idea that our history and heritage is worth saving. Businesses and government agencies that comply with historic preservation laws are simply listening to the needs and wants of their customers and constituents.



**What
Exactly
Does a
CRM
Specialist
do with
your
Money?**





It's been my experience that many of the client's I've worked with did not fully understand how cultural resource management works. Oftentimes, clients seem to think cultural resource management professionals are just another hurdle or "problem" — a money vacuum that also causes delays. In fact, CRMers are frequently the opposite.

The people that work in cultural resource management typically have college degrees in architecture, anthropology (the field that most archaeologists are educated in), history, or historic preservation. There is also a growing number of CRMers with MBAs and JDs. Cultural resources professionals are skilled in the application of local, state, and national historic preservation laws on a case-by-case basis.

On the national level, the professional standards for CRMers have been defined by the Secretary of the Interior of the United States of America. The minimum standards for an archaeologist includes a graduate degree and at least one year professional supervisory experience. At a minimum, an architectural historian needs a graduate degree, two years full-time experience, and a contribution to American architectural history (usually a published article or book). You can see these standards at http://www.nps.gov/history/local-law/arch_stnds_9.htm.



It is important to remember these are the minimum professional standards, but additional standards apply to cultural resource management principal investigators (PIs). In most states, a PI is required to approve all CRM reports prior to their submittal to the state or local agency that administers historic properties (usually a State Historic Preservation Office [SHPO] or Tribal Historic Preservation Office [THPO]).

NEPA compliance projects typically require the submittal of a formal cultural resources report that fulfills the criteria established by that state. For a Form 620 or 621, this report can only be generated and submitted by a qualified cultural resource management PI, although the stringency of PI qualifications varies widely across the country. This is another reason to pay attention to the local regulations (see Tip #4).



Basically, we CRMers are trained and experienced in identifying historic properties (as defined under various laws) and recommending ways our clients can avoid, minimize, or mitigate damage to these properties. Cultural resources consultation is usually mandated by laws that were created because, at some point, a local community decided they wanted to preserve the places and things they considered important to their heritage.

Cultural resource management is part of a larger universe of environmental and heritage conservation legislation that has been part of our society in the United States for over 50 years.

Typical CRM services for a communications tower site include a:

- **Summary of the legal context that mandates cultural resources services**
- **Description of the proposed project**
- **Historical context that describes the history and prehistory of the vicinity of the proposed tower**
- **Summary of any previous cultural resource investigations and known historic properties or archaeological sites nearby**
- **Visit to the proposed build location in order to see if there are any previously unidentified cultural resources at that location**
- **Determination of the presence or absence of adverse effects to newly identified or nearby historic properties, if any; and**
- **Recommendations on how these adverse effects can be ameliorated.**

For a Form 620 or 621, these results are used to fill out the official form. Most of the time, the client fills out the form, but it can also be filled out by a qualified CRMer. The report is also summarized and added to the NEPA Phase I report that is required for all FCC-licensed communications towers.





Cultural resource management services are a form of professional advice that helps our clients avoid damaging valuable resources. Cultural resources are non-renewable—once they're destroyed, they're gone forever. As with any form of professional advice, our clients can either follow our recommendations or disregard them.

The most successful clients have no problem adhering to preservation laws. These clients benefit by having more accurate cost estimates, more sober project schedules, fewer problems with local officials, and lower odds of a law suit from angry government agencies, Native American tribes, or citizen action groups who feel like they have been wronged.

There is also a great public relations benefit that comes along with being seen as a champion of cultural resource management. Historic preservation legislation provides an opportunity for businesses to show that they care about local communities, even while they are simply doing what is required by law.

The 9 Money-Saving Tips





Better, faster, cheaper. We always want all three, but few companies specialize in all of them.

Most site acquisition and tower construction companies are interested in working with consultants that have all three of the above characteristics. All companies value getting the compliance they need for the best possible price in a timely fashion. The following tips are designed to help you get a better price for CRM consulting, but they will also help you prevent the most common mistakes in the business-to-business relationship between tower developers and cultural resource management companies.

Application of CRM regulations is a true craft— the result of years of experience. But, there are a number of things you can do without the help of a consultant to save time and money.

Tip #1— Do you even need to hire a consultant?

New tower sites will most likely require an EA, but you should see if the proposed location has already been cleared for cultural resources by the local government. Some areas, like atop modern shopping malls or in commercial zones, may not need an EA. Most co-locations do not need an EA unless you are planning on digging in an undisturbed area or are significantly altering the height or other dimensions of the existing tower.

Also, during the 1990s and 2000s, many companies did EAs for a large number of sites that were never developed. Now, with our increasing bandwidth needs, your company may be returning to some of these locations that were less than optimal in the past. Ask around and see if the site you're considering has already been cleared for cultural resources.

Tip #2— Look for historic properties yourself

While you need a CRM professional to officially evaluate a location for cultural resources, it doesn't hurt to scan the Internet for historic buildings, districts, and archaeological sites that may be affected by your tower site. Most cities and counties have some sort of historic preservation group and many municipalities have online maps that are available to the public that show the location of historical buildings and structures and archaeological sensitivity areas. It never hurts to check out these resources and re-think your prime build locations before you hire a CRM consultant.

Tip #3— Look for things that might be historic properties

Most local historic preservation laws mirror the national standards outlined in Section 106 of the NHPA when it comes to determining what is and isn't a historic property. The Criteria for Evaluation under Section 106 of the NHPA basically defines historic properties as:

- Districts, sites, buildings, structures, and objects
- that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and
- Are associated with significant historical events (Criterion A)
- Are associated with important people (Criterion B)
- Are examples of distinctive architecture or construction (Criterion C), or
- Have the potential to yield important historical or prehistoric information (Criterion D); and,
- Are more than 50 years old

(That was just a Cliff's Notes version of the criteria. You can see the whole NHPA at <http://www.cr.nps.gov/local-law/nhpa1966.htm>. Or, check out the Criteria for Evaluation at <http://www.achp.gov/nrcriteria.html>)

Tip #3— Look for things that might be historic properties (cont.)

There are a few exemptions (such as, a historical building that has been moved or a church), but that's pretty much what CRM professionals are looking for when they do a cultural resources survey. Some of these historic properties, like previously unidentified archaeological sites, can't be inferred from websites. But, there are several websites you can use to roughly gauge the potential for a CRM professional to find a historic property near your build site.

For instance, you can *check the county assessor's website* or [Trulia.com](https://www.trulia.com) to see the age of the buildings near your tower site. If the adjacent buildings are more than 50 years old and are well-maintained, there's a higher chance your tower will impact a potentially National Register-eligible property. If there are old buildings near your tower site, you can look at the area using Google Earth or Trulia to see if they've been drastically modified. If you see older buildings that have been modified (additions, garages added, houses subdivided into apartments, ect.) there's a chance these buildings have been changed so much that they no longer fulfill the "integrity" requirement in the Criteria for Evaluation. In the end, eligibility can only be evaluated by a qualified CRM professional, but at least you will have an idea of what to expect.

Tip #4— Check the local regulations first

This may be the most important tip. Many site acquisition specialists work for multinational or multi-state companies and may not be aware of the specific preservation regulations in the municipalities in which we are working. Sometimes, it's worth it to peruse the local regulations regarding environmental and preservation compliance for communication towers to see what the historic property recording requirements are for a given acquisition site. For instance, how do archaeological sites need to be recorded and reported to the SHPO? How long does it take for the SHPO to review the cultural resources report for your Form 620? Does the city or county handle Form 620s or does it go up to the state level?

While most preservation laws are similar to Section 106, some municipalities have more stringent laws. Other places have blanket clearance for towers in certain zones. If you don't have the time to skim through the regulations, take a few minutes to call up a local cultural resources company and ask if there's any oddities you should know about.

Tip #5— Know your final design or site location before hiring a consultant

It seems like this should be a given, but, oftentimes, site acquisition or tower construction companies are not sure of the final dimensions or exact locations of their proposed towers at the time when they hire a cultural resources consultant.

You can save a lot of money if you're sure of the pad dimensions, locations and depths of any necessary excavations, or what the final mast height will be. It is counterproductive and expensive to resurvey a location because the project location was off by a few meters. These extra costs are passed on to our customers and clients.

If you're unsure, plan for a cultural resources evaluation for an area larger than you will probably need. Being sure of your final design location and dimensions can help you reduce costs and stay competitive. It will also speed up the cultural resources evaluation for your Form 620/621.

Tip #6— Bundle and ask for a discount

You can save quite a bit if you have the ability to bundle your projects. This allows the cultural resources consultant to more efficiently plan their field effort and knock out more build sites in one swoop.

Ask your consultant for a discount if they survey a group of tower sites in close geographic proximity.

Tip #7— A deceptively low price usually means one thing — change order

The price of CRM consulting services vary widely across the country and between CRM companies. While you can't always be sure of exact prices, try to talk to more than one company in the vicinity of your proposed project if you need cultural resource management services (For instance, talk to a couple companies in the same city or county). *Be wary of an extremely low price.*

Many companies have rock-bottom initial rates that explode in the event a building or archaeological site is identified. State and local laws usually require CRMers to record any and all of the historic properties and/or archaeological sites we encounter within our project areas. *This is usually not something we cannot avoid if we find something.* Of course, recording an archaeological site or historic structure takes time and money— things that will have to be priced in the contract or scope of work. But, the CRM consultant should be upfront about these additional costs. If you've done a little background research, you'll probably be aware of approximately how many old buildings will be adjacent to the tower site (see Tip #3). This will give you an idea of how many properties the consultant may have to record.

It is difficult to accurately predict how much a given cultural resources assessment will cost, especially when excavation in a previously undisturbed area is involved. *You can never be 100% sure what is beneath the ground.* Archaeology sites have been discovered in some of the most unassuming places. Nevertheless, always be wary of any company that has extremely low rates or you might be swimming through an ocean of endless change orders.

Tip #8— Is your consultant thorough?

This tip is closely related to the previous one. Nearly all cultural resources consultants are very ethical and pride themselves in thoroughly evaluating every project area for potential historic properties. However, there are also less thorough companies that do not identify historic properties or archaeological resources and write inadequate reports that are frequently rejected by state historic preservation offices.

The thoroughness of a CRM consultant is always difficult to gauge, but you should ask for a copy of one of their previous NEPA Class I cultural resources or Form 620/621 reports and compare it to some of the ones your company has previously purchased. Be wary of a company that has very short, flimsy letter reports when the local standard is a more substantial document. Also, watch for companies that write extremely long, wordy reports when the local standard is a short, letter report. Again, the length and density of reports varies based on local regulations and custom, but you should pay attention to where your consultant ranks among its peers.

Tip #9— Are they qualified to work on your project?

This has already been said, but it is very important because reports produced by unqualified CRMers happens all the time. Is your preferred vendor or CRM consultant is qualified to work in the area of your build location? The standards for cultural resource management professionals and PIs vary across the country. For instance, the standards for a cultural resources PI in Arizona are extremely stringent for work on public lands; however, the Secretary of Interior's standards are baseline for work on private property.

Usually, company websites describe the qualifications of their employees and curriculum vitae (CVs) can be obtained upon request for anyone that might provide services for your Form 620/621. While the Secretary of the Interior's Standard is the baseline for CRM consultants for Form 620 and 621 projects, the standards at the local level vary widely. Make sure you are certain your consultant is qualified to record and make recommendations for historic buildings and structures or archaeological sites in the municipality where your tower site is located.

The goal of every cultural resource management company should be to protect valuable cultural resources and save you money by getting the job done right



The 9 Tips are straightforward, but, in my experience, are things that all companies can do to save some money on their Form 620 or 621 and eliminate mistakes. In some instances, these tips can actually prevent the need for a cultural resources consultant for build sites that are likely to impact historic properties, which is how you really save money.

Tip#1– Do you need a cultural resources consultant?

Tip#2– Look for historic properties yourself

Tip#3– Look for things that might be historic properties

Tip#4– Check the local regulations

Tip#5– Know your final design before hiring a consultant

Tip#6– Bundle and ask for a discount

Tip#7– A deceptively low price is usually too good to be true

Tip#8– Is your consultant thorough?

Tip#9– Are they qualified to work on your project?

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About William A. White, III

William A. White is the *Research Publications Director* at **Succinct Research**, a company dedicated to disseminating information about cultural resource management archaeology and historic preservation to practitioners and students of those fields. The ultimate goal is to help heritage conservation professionals better serve their communities. He is also an experienced cultural resource management professional.

For over a decade, Bill has worked on archaeological fieldwork projects in some of the most remote locations in the United States including the temperate rainforests of Washington State, at high altitudes near Great Basin National Park, and in the Mojave and Sonoran Deserts of the American Southwest. As a cultural resource management archaeologist, Bill has played an integral role in helping others develop their professional skills and use their experiences to find gainful employment. He has helped numerous students and co-workers on their career paths.

An innovative, thorough archival researcher, field scientist, and author, Bill has participated in over 100 historical, archaeological, and anthropological research projects across the United States. He has written or co-authored over 50 research reports and given presentations to diverse audiences across the United States, in Canada, and the United Kingdom. A lifelong student of human cultures and practices, Bill graduated from Boise State University with a B.A. in Anthropology and a Native American Studies minor and earned his M.A. in Anthropology from the University of Idaho. He is currently a PhD student at the University of Arizona.

Learn more about what Bill and [Succinct Research](#) can do for you, your business, or organization.

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