



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
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JAN LESHNER
County Administrator

September 20, 2023

Sent via email:
Christine.Heacock@fcc.gov

Christine Heacock, MA, RPA
Deputy Federal Preservation Officer
Competition and Infrastructure Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: Tower A844-100 TUC CAMPBELL Cellular Tower Collocation at 2565 East Camino
Juan Paisano, Tucson, AZ**

Dear Ms. Heacock:

The Pima County Board of Supervisors, County Administration, and staff have received several citizen inquiries and complaints regarding the recent collocation and array expansion on an existing cell tower located on private property in unincorporated Pima County north of Tucson, Arizona. These complaints focus on the visual impacts of this cellular tower collocation to historic properties listed in the National Register of Historic Places and the historic landscape in the greater Catalina foothills area.

Although the cell tower was initially reviewed and approved by Pima County in 2001 when first constructed and by SHPO with a finding of "no historic properties affected," the tower has been modified twice with no further consultation with SHPO or with Pima County. The recent tower modifications have been reviewed by Pima County for adherence to zoning and permitting requirements and is in compliance with these. However, the most recent modifications show a much larger array, which may be considered "a substantial increase in the size of the tower" pursuant to the National Programmatic Agreement for the Collocation of Wireless Antennas (as amended). The wider array certainly results in a more substantial intrusion on the viewshed of the historic properties in the vicinity and the Catalina foothills historic landscape.

There is growing awareness and interest in preserving the historic character of the area that was initially developed as a residential community beginning in the 1920's and designed in a romantic Spanish Colonial Revival style by renowned architect Josias Joesler. Not only

Ms. Christine Heacock, MA, RPA
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were these large traditional southwestern residences constructed with a wealth of hand-crafted details including hand crafted decorative motifs such as hand-applied plaster, hand-hewn beams, colorful tile from Mexico, colored concrete floors, and decorative iron/tin work, but the very large parcels, careful siting of structures, retention of the natural landscape, and specific planting of large pines and other trees next to these structures to visually landmark these residences may all be considered defining historic characteristics in this area.

We are also in receipt of a September 7, 2023, letter (attached) to Ms. Ellen SaintOnge and yourself from Kathryn Leonard, Arizona State Historic Preservation Officer who notes that:

"It is our opinion that the combined multiple collocations and the most recent prominent antenna collocations has created an adverse effect to the viewshed of historic properties, many of which have design elements and viewshed siting as character-defining features.

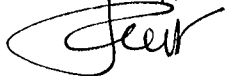
SHPO concludes:

At this time, the State Historic Preservation Office is filing a complaint with the FCC to dispute the exemption of this collocation from Section 106 review.

As a Certified Local Government, Pima County supports this filing and likewise requests an investigation to determine if the stipulations of the NPA were properly adhered to, and recommend that the applicant work with SHPO, the adjacent property owners, the Catalina Foothills Association, and Pima County to take steps to resolve the adverse effect that has been created by this collocation.

Thank you for your attention to this matter and we look forward to working with the FCC, SHPO, and the applicant in resolving the visual adverse effect from this collocation that is affecting County residents.

Sincerely,



Jan Lesher
County Administrator

Attachment

c: The Honorable Rex Scott, Pima County Board of Supervisors
Carmine DeBonis, Jr., Deputy County Administrator
Kathryn Leonard, Arizona State Historic Preservation Officer
Linda Mayro, Director, Sustainability, Conservation, Historic Preservation