



Pennsylvania State Historic Preservation Office  
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

# PA State Historic Preservation Office (PA SHPO)

## Guidelines for Projects with Potential Visual Effects

**UPDATED July 2023**

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## Guidelines for Projects with Potential Visual Effects in Pennsylvania

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**NOTE:** This document was updated in July 2023 to clarify the initial Area of Potential Effects (APE), specifically with regards to existing transmission lines, and required level of documentation for reconnaissance level surveys.

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### Introduction

The Pennsylvania State Historic Preservation Office (PA SHPO) has developed guidance for the identification and assessment of effects of proposed transmission towers, cell towers, wind turbines, highways, solar arrays, and other new construction on historic buildings, structures, and landscapes.

Under Section 106 and the Pennsylvania History Code, it is the role of our office to provide comments on the effects a project may have on historic properties. Some effects, such as demolition of a historic property or disturbance of an archaeological site, can be easily evaluated and determined to be adverse. However, assessing the impact of visual changes is often more subjective and may require more in-depth evaluation and discussion.

The purpose of this document is to outline the process necessary for the identification of those above ground resources where the introduction of new visual elements would diminish integrity, thereby significance and a property's eligibility for listing in the National Register of Historic Places (National Register). Guidelines for the assessment of adverse visual effects are also included.

Avoidance of adverse visual effects on historic properties is the recommended course of action for projects. If adverse effects cannot be avoided, then it is necessary to work to minimize adverse visual effects through changes to the project's location, scale, or design. If the adverse visual effects cannot be avoided or minimized, then it may be necessary to mitigate to compensate for the loss of integrity.

### Integrity and Significance

Integrity is critical to the ability of a property to convey its historic significance. Therefore, for projects with the potential for visual effects, properties in the APE should be considered in light of the criteria for significance and aspects of integrity for which they are significant. ***Evaluation of whether the introduction of a new feature will adversely affect a property's significance and aspects of integrity is critical in determining if a resource is recommended for further survey.***

Questions to be asked include:

- Is setting a character-defining feature of the resource?
- Will the project introduce new features into the setting?
- Will the project remove existing features from the setting?
- Would the introduction of new features or the removal of old features in the setting of this property affect its integrity? If so, which aspects?
- Would changes to the identified aspects of integrity affect the ability of the property to convey its significance?

In assessing the potential for visual effects for historic properties, the criteria for significance and the aspects of integrity provide a qualitative method for determining visual effects on historic properties.

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For example, integrity of setting is critical to a farm's (farm complex and associated lands) ability to convey its agricultural significance. The introduction of a tower or a field of solar panels in the view shed of the farmstead or the removal of associated landscape features, such as farmland, tree lines, woodlots, or field patterns, could alter integrity of setting and feeling. Therefore, a property of this type would likely require more documentation as there is the potential for an effect. However, if the setting of a property is not critical to understanding its significance (i.e., resources significant for architecture alone), then the introduction of a new visual feature or removal of surrounding features may not diminish the integrity of the property and therefore additional documentation to assess eligibility would not be warranted as there is no potential for an effect.

Typical examples of projects and resources that could be affected by associated changes in setting include:

- A historic farm whose associated farmland would be impacted by the construction of a solar array on the farmland and/or within the viewshed of the farm complex.
- Historic agricultural districts, scenic trails, and/or cultural landscapes that would be affected by the location of a transmission line or solar array in the associated landscape.
- A twentieth-century estate designed to take advantage of prominent view sheds of a ridge line on which a wind turbine is proposed.
- Historic farms with associated woodlots, hedgerows, stone walls, and/or field patterns that would be affected by clear cutting in order to provide a transmission line right of way.

## Initiation of Consultation with the PA SHPO

Consultation on the project begins with an Environmental Review (ER) submission to the PA SHPO using PA-SHARE, the PA SHPO's online system for consultation.

More information on how to submit a project in PA-SHARE is found on the [Environmental Review website](#).

If PA SHPO staff determine that the project has the potential to affect above ground historic properties, then it will be necessary to refine the APE and document potential historic properties as outlined below. If PA SHPO staff determine that the project has no potential to affect above ground historic properties, then the appropriate response will be sent via PA-SHARE and consultation will be complete.

## Delineation of APE

The delineation of the initial APE should consider the viewshed or those areas from which the project may be visible. For example, a tower, solar array, or transmission line may not be located on a property, but it could introduce new features into the landscape. This could potentially affect an adjacent historic property's relationship to its setting, which may include surrounding features as well as view sheds.

The initial APE will be provided as part of the ER initial submission in PA-SHARE.

## Initial APE



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When delineating the initial APE, consider the extent of the potential visual effects these types of **new construction** would have on above ground resources, consulting the guidance provided below.

### *Transmission Lines*

For a proposed new transmission line, the initial APE will consist of all resources that are within 0.5 miles on either side of the proposed right-of-way (ROW).

If the proposed project includes modifications within an existing ROW (i.e., that transmission lines already exist), the initial APE should be limited to the existing ROW. (The SHPO reviewer may request expansion of the APE if the modifications will be more visible than existing infrastructure.)

### *Cell Towers*

Two Nationwide Programmatic Agreements define the APE for visual effects for the construction of new cell towers and collocation of antennas on non-tower structures:

- Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission:  
[https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-04-222A3.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-04-222A3.pdf).
- Nationwide Programmatic Agreement for the Collocation of Wireless Antennas:  
<https://wireless.fcc.gov/releases/da010691a.pdf>.

For new cell tower construction:

- If the proposed new tower is 200 feet or less, the APE is 0.5 miles from the tower site.
- If the proposed new tower is more than 200 feet but less than 400 feet, the APE is 0.75 miles from the tower site.
- If the proposed new tower is more than 400 feet, the APE is 1.5 miles from the tower site.

For collocations on existing buildings or structures, the APE is 250 feet from the collocation location.

An alternative APE for densely built urban areas where towers may not be fully visible within the standard APE can be proposed as part of the Environmental Review initial submission and determined upon further discussion between the FCC applicant and PA SHPO.

### *Wind Turbines*

The initial APE for wind turbine towers will be 5 miles in all directions from the turbine site.



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### *Solar Arrays*

For the purposes of this guidance, solar arrays are large-scale solar installations of ground-mounted panels installed across large areas as well as the associated infrastructure including transmission facilities, conduit, equipment pads, and substations.<sup>1</sup>

The initial APE for solar arrays will include the land area(s) where the solar array and associated infrastructure is physically located and will extend within .25 mile in all directions from the outer edge of installation(s).

### Reconnaissance Level Survey

In response to the initial ER submission, if PA SHPO determines the project has the potential to affect above ground historic properties, then PA SHPO staff will respond with a More Information Request, asking for a reconnaissance level survey which will consist of submission of 1) a refined APE and 2) a reconnaissance level survey (memo, table, photographs, and mapping) outlining those 45-year-old resources located in the refined APE and recommendations for further survey. If only a few resources will be affected, PA SHPO above ground staff may forgo a reconnaissance level survey and may request individual resource information.

The refined APE and reconnaissance level survey should be developed by cultural resources staff that meet the Secretary of the Interior's Professional Qualifications for Architectural History or History. The cultural resources staff person will need to be included as a contact on the ER project in PA-SHARE.

### Refined APE

The initial APE can be refined through an examination of topography, changes in elevation and vegetative cover, and/or GIS based modeling, to include only the anticipated extent to which a project may be visible. The refined APE should be checked during the field survey. As vegetative cover can change, the memo should include meta-data on the date of the vegetative cover information used for the GIS analysis.

In addition to the refined APE boundary, a memo outlining cursory background research and methodology; a table of identified properties and recommendations for further survey; and supporting mapping and photographs should be provided as part of the reconnaissance level survey.

### Memo

The memo should provide the methodology for refining the APE boundary and outline the background research and field survey methods. The refined APE should be described and justified through mapping and photographs.

It is necessary to conduct sufficient background research to determine the nature and extent of previously identified historic resources within the boundary. At a minimum, background research should consist of:

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<sup>1</sup> Solar arrays are different from rooftop solar systems and commercial solar power systems that provide power to individual homes or businesses.

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- an examination of Pennsylvania’s online resource database, PA-SHARE for previously identified resources;
- if the APE includes agricultural properties, an examination of the [Pennsylvania Agricultural Context](#) and its updates to determine what types of properties can be anticipated within the APE; and
- a comparison of historic and current aerial mapping to document changes to the landscape and the potential for a historic agricultural district. If agricultural properties, such as farms and historic agricultural districts are identified in the refined APE, they should be included in the recommendations for future survey.

A statement explaining when field work was conducted and any limitations in property access should be included.

### Table of Properties in Refined APE and Survey Recommendations

A table of 45-year-old properties in the APE should summarize the results of background research and field work and outline recommendations for future work. The table should include resource number, name of property, address, date of construction, previous survey documentation (including determinations of eligibility), recommendations for future survey work, and at least one photograph of the identified resources.

Recommendations for future survey efforts should be based on the potential of the project to affect the significance or integrity of identified property types. If the resource is a farm, the recommendations section should note the function and age of the buildings that remain. The age of buildings can be determined from an examination of historic aerials. This will help the submitter to indicate if the farm retains the basic registration requirements to qualify for eligibility as a farm or farmstead within the relevant agricultural region, as illustrated in the [Agricultural Property Assessment Worksheets](#). If historic agricultural districts are identified in the refined APE, they should be included in the recommendations for future survey.

### Mapping and Illustrations

Mapping and illustrations should support the refined APE and recommendations for further survey. They should be of high quality and in color, of readable scale, and should include sources and dates. At a minimum, the following should be included to convey the project’s potential to affect historic properties:

- Aerial mapping of the refined APE, showing the location of the proposed above ground features including but not limited to proposed towers or solar arrays;
- Aerial mapping with all 45-year-old resources within the refined APE labeled, showing the tax parcel boundaries and relationship of the resources to the project. Resources on the mapping should be labeled to correspond to the associated table;
- Additional photographs of previously identified resources;



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- Photographs of the APE showing viewsheds to and from National Register listed and eligible resources and those areas where changes in the landscape will occur (tree cutting, access roads, etc.); and
- Illustrations of the type, size, and scale of proposed above ground features.

Additional illustrations outlining changes to the landscape, such as historic and current aerial mapping comparisons, may also be included. The reconnaissance level survey memo and supporting materials should be submitted in PA-SHARE as a single pdf attachment. The refined APE can also be provided as a shapefile.

## Evaluation of Historic Properties

The PA SHPO above ground reviewer will examine the reconnaissance-level information provided in PA-SHARE. For those properties whose potential significance and integrity could be affected by the planned project, evaluation-level documentation will be requested via a PA-SHARE More Information Request to assess National Register eligibility. For large scale surveys (10 or more resources), above ground review staff may request a Survey Proposal to allow for use of the PA SHPO's Surveyor application.

Required information for evaluation-level documentation includes site plan with buildings and features and photo locations labeled; historic and current aerial comparison; narrative that includes physical description, property history, and National Register eligibility evaluation; and additional photographs of the resource with captions. This information can be compiled into a single pdf document and attached to the resource in PA-SHARE in response to the More Information Request that will be generated from PA-SHARE.

The [Pennsylvania Agricultural Context](#) and its updates should be consulted in the assessment of eligibility of agricultural properties. Additional attachments for evaluation-level documentation for a farm include the appropriate agricultural assessment worksheet and agricultural census data presented in chart form as detailed here:

<https://www.phmc.pa.gov/Preservation/About/Documents/Ag%20Properties%20Required%20Attachments.pdf>.

The documentation should also include a discussion of those landscape features or viewsheds that are critical to the ability of a property to convey its historic significance.

## Assessment of Effect

For those resources identified as eligible for listing in the National Register, either previously or as part of the evaluation-level information submitted for the project, the effect of the project should be assessed. The assessment of effect documentation should be provided in PA-SHARE in response to a SHPO More Information Request for an effect assessment. If it is determined in consultation with PA SHPO that the proposed project will significantly and negatively impact a historic property, the agency should first propose measures for avoiding or minimizing the effect. Avoidance of adverse effects on historic properties is the recommended course of action for projects.





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In assessing the potential effects of a project on historic properties, the criteria for significance and the aspects of integrity are factors that require evaluation. Assessments of effect should present the following information:

- Detailed project description.
- Property's historic significance. It is necessary to understand the property's historic significance and integrity in order to evaluate the project's effects on the property's eligibility for listing in the National Register. The focus of the analysis should be consideration of setting.
- Brief physical description of the property with a focus on natural topography, setting, and man-made or natural features that enhance a historic property's significance and integrity. This should also include a discussion of the nature and quality of the view to and from the historic property. For example, specific viewsheds that enable the property to convey its significance should be noted.
- Assessment of physical effects. This assessment should focus on how the project will affect those physical features that convey the significance and integrity of the historic property.
- Assessment of visual effects. The historic property's relationship to its setting, which may include surrounding features and open space, should be taken into account. This includes the view from the historic property as well as the view toward a historic property.

Findings of effect should be justified through relevant illustrations, all of high quality and in color, with mapping at a scale that is readable and source data identified:

- For each identified historic property, aerial photographs showing the boundaries of the property, location of primary and secondary resources, and landscape features should be provided. The aerial photograph should also show the location and direction of ground photographs, a depiction of line of site and distance from the resource to the project. The date of the aerial photograph should be noted.
- Photographs should include views from the entire property, including secondary resources and historic landscape features, not just the primary resource. Panoramic photographs or photograph montages are especially useful to visual analysis.
- Plans of proposed and existing (if applicable) designs, including illustrations of the type, size, and scale of proposed above ground features.

### Minimization Measures

If visual effects to historic properties cannot be avoided, then it is necessary to consult with the PA SHPO and other consulting parties, as applicable, to minimize adverse effects through changes to the project's location,

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scale, or design. Recommended measures for minimizing visual effects are addressed below, including specific recommendations for cell towers, wind farms, power lines, and solar arrays.<sup>2</sup>

### General

- Site facilities outside of sensitive viewsheds or as far as possible from sensitive viewing locations as possible.
- Site facilities in previously developed landscapes.
- Use landforms, vegetation, or architectural screening.
- Color treat structures to reduce contrast with existing landscape.
- Preserve existing vegetation.
- Re-vegetate using native plants.

### Cell Towers

- Use of camouflage and/or disguise strategies in highly sensitive viewsheds.
- Collocation of towers on existing structures or buildings when the effect to historic properties will be lessened.

### Wind Turbines

- Consider topography when siting wind turbines.
- Cluster or group to break up overly long lines of turbines.

### Transmission Lines

- Improvements to tower design to minimize visual effects.
- Removal of redundant poles.
- Burying lines underground.

### Solar Arrays

- Screening solar collectors to avoid off-site glare through the use of vegetative buffers and other less visually obtrusive means.

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<sup>2</sup> The measures for minimizing visual effects outlined in this document are taken from the Visual Mitigation Measures Checklist included in the National Park Service's, [Guide to Evaluating Visual Impacts for Renewable Energy Projects](#). National Resource Report NPS/ARD/NRR-2014/836.

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- Avoiding complete removal of vegetation around solar collectors.
- Locate and operate solar collectors to avoid off-site glare.
- Use color-treated solar collectors and support structures.

### Adverse Visual Effects

In general, a project can be considered to have an adverse visual effect to a historic property if it diminishes the integrity of the resource to the point that it can no longer convey its historic significance. Examples of potential adverse effects include:

- Introduction of a visual element that is incompatible, out of scale, detracts, or is out of character with the setting of a property or district.
- Elimination of open space or a scenic view that is critical to the ability of a property to convey its historic significance.
- Elimination of a sufficient number of small-scale features (fence rows, tree lines, field patterns, etc.) that a property can no longer convey its historic use and significance.
- Blocking or intruding on a scenic view or blocking the view from one historic property to another.

If adverse effects cannot be avoided or minimized, then it may be necessary to mitigate to compensate for the loss of integrity, also in consultation with the PA SHPO and other consulting parties.

Projects subject to Section 106 of the National Historic Preservation Act review require execution of a Memorandum of Agreement by the Federal agency, PA SHPO, the project applicant, and any consulting parties in order to address the adverse effect of the project.

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### Appendix A: Preferred Memo Template

#### Introduction

Memos for projects with the potential for visual effects should be brief, concise, and specific. While the length of the memo will be dictated by the nature of the project, size of the Area of Potential Effect (APE), and resources within the APE, every effort should be made to keep the memo as straightforward as possible while still providing adequate information for PA SHPO to complete a review.

PA SHPO has developed the following template for potential visual effects memos that captures the required information in the preferred format. The suggested length of each section is a guideline. Examples of a historic resources table and graphics to illustrate the memo are also provided.

#### Suggested Table of Contents

The following sections should be included in the potential visual effects memo and in this order. Please note specific instructions have been included for each section.

##### Cover Page

- Include the following:
  - Memo title
  - Project name
  - Project municipality and county
  - PA-SHARE Project Number
  - Memo authors
  - Applicant/client
  - Date

##### Table of Contents & List of Figures and Tables

- Both lists should fit on one page.

##### Introduction

- The introduction should be no more than half a page.
- Include:
  - name of project
  - name of applicant
  - specific undertaking triggering review
  - applicable legislation

##### Project Description

- The project description should be no longer than 1 page.
- Use maps and refer to supplemental materials about the Above Ground features being proposed rather than an extensive narrative.
- Include:

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- brief discussion of project being proposed, specifically what it is and why it is being proposed
- potential for visual effects
- size of project area
- project limits of disturbance.

### Summary of Findings & Recommendations

- Summary should be no longer than 1 page
- Include:
  - Brief characterization of project area
  - Size of APE
  - Number of properties in APE 45 years old or older
  - Characterization of landscape and types of 45-year-old resources in APE
  - Recommendations for future work.

### Project Location/Area of Potential Effect

- Location and APE discussion should be no longer than 1-2 pages of text.
- Use maps and photographs rather than an extensive narrative to describe project location, initial APE and refined APE.
- Include:
  - how the APE was developed.
  - subsection for Initial APE
    - Note size and distance from project area
    - Number of previously-identified historic properties within initial APE.
  - subsection for Refined APE
    - Note changes to initial APE after GIS-based modeling
    - Number of previously-identified historic properties within refined APE.
  - graphics
    - refer to and follow guidelines outlined in the [Mapping and Illustrations](#) and [Assessment of Effect](#) sections of the Guidelines for Projects with Potential Visual Effects when creating graphics.

### Methodology

- Methodology should be no longer than 1 page.
- Include:
  - Purpose of research and survey
  - Brief overview of steps in research and survey process
  - General types of sources consulted
  - Type of survey conducted
  - Criteria for inclusion in survey

### History & Context

- History and context section should be no longer than 2-3 pages of text, depending on size of the APE, the area's developmental history, and the nature of the properties within the APE.
- Include:

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- General details pertinent to the history of the area included within the APE.
- Identification of themes and events that influenced regional development patterns, land use, economics, industries, populations, political subdivisions, and/or other factors in the settlement and evolution of the area included within the APE.
- Subsection for Agricultural Context
  - For projects in rural or semi-rural communities and/or where agricultural properties are within the APE.
  - Identify the applicable agricultural context from the “Agricultural Resources of Pennsylvania 1700-1960” and “ca. 1960-1980: An Era of Specialization and Expanded Amish Presence” MPDFs.
  - The MPDF, guidance, and worksheets for using the MPDF are available at <https://www.phmc.pa.gov/Preservation/Pennsylvania-Agricultural-History-Project/Pages/Historic-Agricultural-Resources-of-Pennsylvania-MPDF.aspx> .
- Subsection for each other applicable historic context
  - Information about completed historic contexts for Pennsylvania are available at <https://www.phmc.pa.gov/Preservation/National-Register/Pages/Contexts-Overview.aspx>.
- Graphics
  - refer to and follow guidelines outlined in the [Mapping and Illustrations](#) and [Assessment of Effect](#) sections of the Guidelines for Projects with Potential Visual Effects when creating graphics.
  - include Historic aerial mapping annotated with key information like APE to show changes over time.

### Properties in APE & Recommendations

- Recommendations section should be no longer than 4-5 pages, depending on size of the APE and the number and nature of the properties within the APE.
- Refer to and follow guidelines outlined in the [Table of Properties](#) and [Assessment of Effect](#) sections of the Guidelines for Projects with Potential Visual Effects when completing table.
- Use a table to organize recommendations; see [Appendix B](#) for an example.
- Table should be landscape orientation within memo.
- Table should include the following columns:
  - Resource Number/Map Key #
  - Resource name and address
  - Municipality and County
  - Resource description
  - Impacts/Preliminary Assessment of Effects
  - Recommended Status/Further Documentation/Justification
  - Photo(s)
- Each tax parcel should be in a separate row.
- When completing the table:
  - Resource number: This should be the PA-SHARE resource number (#####RE#####) for previously identified resources in the APE or “Newly identified” for resources 45 years old and older identified in the APE as part of project.



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- Resource name and address: If property does not have a name, use owner's last name and use mailing address.
- Resource description: Brief statement that identifies all above ground buildings, structures, and objects by name, date of construction, and use. Note landscape characteristics and features.
- Impacts: Note if impact exists. If impact is noted, identify what is affected, and how it would be affected.
- Recommendation: Note if potentially eligible or not eligible and why. If potentially eligible, note what type of further documentation is appropriate. Note previous determinations by PA SHPO as shown in PA-SHARE.
- For resources with multiple buildings, like farms, more than one photograph should be included so all buildings, structures, objects, landscape, and landscape feature are documented.

### References

- References section should be no longer than 2 pages.
- Include specific contexts consulted to develop history and context statement.

### Appendices

- Use appendices to include specific information about the project's proposed above ground features, such as utility poles, cell phone towers, wind turbines, transmission lines, and solar arrays.
- Include:
  - product cut sheets or specifications
  - detail map showing exact location and dimensions for each above ground feature proposed and number of above ground features proposed
    - refer to and follow guidelines outlined in the [Mapping and Illustrations](#) and [Assessment of Effect](#) sections of the Guidelines for Projects with Potential Visual Effects when creating graphics.
  - photographs of above ground feature in situ on a similar landscape
  - photographs of viewshed looking toward installation



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### Appendix B: Preferred Recommendations Table Example and Template



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**Example: Properties in APE & Recommendations Table**

Resource # Map Key #	Name Address	Municipality County	Description	Impacts Preliminary Assessment of Effects	Recommended Status Further Documentation Justification	Photo
Newly- Identified  Building 1	Abram Farm,  820 York Road, Wyano PA	South Huntingdon Township, Westmoreland County	Contains an 1870 house, 1900 ground barn with 1920 milking house, two 1920 silos, a 1940 drive through corn crib and 1960 machine shed, and two or more relic landscape features including a 10-acre orchard	Pipeline ROW goes through the historic orchard, and the ROW will be within 50 feet of barn and drive through corn crib. Potential for effects due to loss of significant landscape feature and ROW location	Potentially Eligible  Full HRSF  The property meets the agricultural context/property registration requirements for the periods 1900-1960	 
2000RE12345	Potter Farm, 863 Farm Lane Road, Wyano PA	South Huntingdon Township, Westmoreland County  MP 46.2	Contains a c.1800 house and summer kitchen, and 1925 chicken house. The 1900 bank barn burned down in 2005 and was replaced with a pole barn in 2006.	None. No impact to resource due to HDD bore	Not Eligible  No Further documentation  The property does not contain barn that is at least 50 years of age, therefore it does not meet the property registration requirements for its agricultural region	