

Department of Economic and Community Development



March 27, 2014

WEGEWED AR-1 2011 STING COUNT

Mr. Christopher B. Fisher, Esq. Cuddy & Feder 445 Hamilton Avenue, 14th Floor White Plains, New York 10601

Subject:

Proposed Telecommunications Tower

284 New Canaan Avenue (adjacent Merritt Parkway)

Norwalk, CT Docket No. 442

Dear Mr. Fisher:

The State Historic Preservation Office is in receipt of the proposal for the above-referenced project, submitted for review and comment pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations.

This office met with Michael Libertine, All-Points Technology (AT&T historic consultant) and Christopher B. Fisher, Esq., (Cuddy & Feder) on March 20, 2014 to discuss and clarify this office's 2011 determination of "conditional no adverse effect" for two 140' monopole towers with interior antennas proposed for the National Register for Historic Places Merritt Parkway. It was introduced to our office that AT&T could also consider a single 130' monopole with exterior antennas instead of two 140' monopole towers and still meet their requirements in providing service to that area of Connecticut. This office appreciates the flexibility by AT&T in providing multiple options. After consultation with the Merritt Parkway Conservancy, this office prefers the two 140' monopole towers option.

That said, it should be noted that this office considers the Merritt Parkway a single resource on the National Register for Historic Places and as such there is a cumulative effect that cell towers have on the property, even though the property encompasses multiple municipalities. Furthermore, in this particular case, two wider 140' monopole towers are indeed less destructive to the historic character of the Merritt Parkway than a single monopole with exterior antennas due to the low-profile platforms which are required for the external antennas. These platforms generate a visual mass that two monopoles with internal antennas do not.



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For clarity's sake, this office reaffirms that the undertaking (to built two 140' monopole towers with internal antennas at 248 New Canaan Avenue in Norwalk, CT) will have <u>no adverse effect</u> on the National Register for Historic Places Merritt Parkway, with the following <u>conditions</u>:

- 1. the towers and associated equipment will be designed, painted to match adjacent materials, and installed to be as non-visible as possible,
- 2. if not in use for six consecutive months, the towers and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Todd Levine, Environmental Reviewer, at (860) 256-2759 or todd.levine@ct.gov.

Sincerely,

Daniel T. Forrest

State Historic Preservation Officer

Cc: Ms. Melanie Bachman Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Michael Libertine All-Points Technology 3 Saddlebrook Drive Killingworth, CT 06419