

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	DOCKET NO. 503
ARX WIRELESS INFRASTRUCTURE, LLC	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY	:	
LOCATED AT 43 OSGOOD AVENUE,	:	July 12, 2021
NEW BRITAIN, CONNECTICUT	:	

**PRE-FILED TESTIMONY OF MICHAEL LIBERTINE, LEP AND BRIAN GAUDET**

**Q1: Mr. Libertine, please state your name and position.**

A1: My name is Michael Libertine, LEP, and I am Director of Siting and Permitting with All-Points Technology Corporation (“APT”), which has offices at 567 Vauxhall Street Extension, Suite 311 in Waterford, Connecticut. APT was engaged by ARX Wireless Infrastructure, LLC (“ARX”) to provide due diligence services in connection with the proposed telecommunications facility at 43 Osgood Avenue in New Britain, Connecticut (the “Property” or “Site”), including: a wetland inspection, visual assessment, migratory bird analysis and NEPA compliance.

**Q2: Mr. Libertine, please state your qualifications.**

A2: I have a Bachelor of Science degree from the University of Connecticut with a concentration in Natural Resources Management and Bachelor of Arts degree from Stonehill College in Business. My background includes over 38 years of

professional experience, including 30 years of environmental engineering consulting. I have been Project Manager for more than 2,500 environmental site assessments and field investigations for property transfers in Connecticut, Rhode Island, New Hampshire, Massachusetts, New Jersey, New York, Florida and Canada. In addition, I have assisted in the permitting of more than 500 wireless telecommunication facilities in New England during the past 23 years. My responsibilities have included: coordination and oversight of site screenings and environmental assessments to fulfill NEPA requirements, environmental site assessments, wetland delineations and assessments, vegetative/biological surveys, noise analyses, visual impacts analyses and regulatory permitting support.

**Q3: Mr. Gaudet, please state your name and position.**

A3: My name is Brian Gaudet and I am Project Manager with APT.

**Q4: Mr. Gaudet, please state your qualifications.**

A4: My background includes over 15 years of professional experience in the wireless telecommunications field, including program, construction, and permitting management. I have provided siting, land planning, and permitting services on behalf of various telecommunications and wireless service providers and tower developers through the Northeast and Mid-Atlantic states. I have testified on behalf of clients regarding environmental and aesthetic considerations in front of local municipalities and the Connecticut Siting Council. My responsibilities have

included: due diligence and land use evaluations, preliminary site screenings, preparation of environmental compliance documentation, environmental assessments to fulfill NEPA requirements, and the coordination of wetlands and vernal pool assessments; vegetative and biological surveys; noise analyses; visibility analyses; graphics support; regulatory, zoning and building permits; and environmental monitoring during and post-construction.

**Q5: Please describe APT's involvement in this matter.**

A5: One of APT's project responsibilities was the preparation of a Visual Assessment report for the proposed Site (found in the Application at Exhibit H). The purpose of this Visual Assessment report was to evaluate the potential visibility of the proposed telecommunications facility ("Facility") from the areas surrounding the Site.

APT was also responsible for securing compliance of the Facility in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 ("NEPA") (found in the Application at Exhibit I). We also completed, among other things, an Avian Resources Evaluation (found in the Application at Exhibit K) and a Wetlands Inspection (found in the Application at Exhibit L).

**Q6: Please describe the process for conducting the Visual Assessment report.**

A6: At the request of ARX, APT conducted the Visual Assessment and Photo Simulations (found at Exhibit H of the Application) to evaluate the potential visibility of the Facility from within a 2-mile radius (the "Study Area"). APT used a combination of a predictive computer model, in-field analysis, and a review of various data sources to evaluate the visibility associated with the Facility on both a quantitative and qualitative basis. The predictive model provides a measurable assessment of visibility throughout the entire area, including private properties and other areas inaccessible for direct observations.

The in-field analyses consisted of a balloon test completed on March 8, 2021 and field reconnaissance of the area to: record existing conditions, verify results of the predictive model, inventory seasonal and year-round view locations, and provide photographic documentation from publicly accessible areas. The balloon test consisted of raising a brightly-colored, approximately four-foot diameter, helium-filled balloon tethered to a string at a height of  $\pm 104$  feet AGL at the location of the proposed Facility. APT conducted a Study Area reconnaissance by driving along local and State roads and traveling along other publicly accessible locations to document and inventory where the red balloon could be seen above and through the tree canopy and other visual obstructions. Visual observations from the reconnaissance were also used to evaluate results of the preliminary visibility mapping and to identify any discrepancies in the initial modeling.

**Q7: Please describe the results of your Visual Assessment process.**

A7: As presented in the viewshed maps attached to the Visibility Analysis, the visibility of the Facility would be limited primarily to the areas immediately surrounding the Site within  $\pm 0.5$  miles. Adjacent neighborhoods (within  $\pm 0.25$  miles of the Site) will experience both year-round and seasonable views. Intermittent seasonal views may extend to select locations between 0.4 miles and 0.6 miles away to the south, southeast, and east of the Site. Additional year-round views are anticipated at farther distances (between  $\pm 0.86$  miles to  $\pm 1.58$  miles from the Site) to the northeast, south, and northwest. The predicted seasonable visibility of the proposed Facility is estimated to include about 87 acres. The predicted year-round visibility is estimated to include an additional  $\pm 47$  acres. Collectively, these areas represent about 1.66% of the 8,042-acre study area.

**Q8: Please describe the visibility of the Facility to the nearest schools and commercial day care centers.**

A8: No schools or commercial daycare centers are located within 250 feet of the Facility. E.C. Goodwin Technical High School is located about 0.73 miles west of the Site at 735 Slater Road in New Britain. A small area of year-round visibility is predicted from the northwestern portion of the high school's grounds. The nearest commercial childcare center is Learn 'n Play Childcare, which is located about 0.82 miles to the southeast of the Site at 357 Allen Street in New Britain. No visibility is predicted from or in the vicinity of the childcare center.

**Q9: Please describe the results of APT's NEPA Compliance Review.**

A9: APT prepared a NEPA Compliance Review which is attached to the Application as Exhibit I. As detailed in the NEPA Report, we reached the following conclusions:

- The State Historic Preservation Office ("SHPO") determined that the Facility would have no adverse effects to sites listed on or eligible for listing on the National Register of Historic Places, with the following conditions: 1) The antennae, wires, mounts, and associated equipment will be designed, painted to match adjacent materials, and installed to be as non-visible as possible; and 2) if not in use for six consecutive months, the antennae, mounts, and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six months. (See letter from SHPO dated November 24, 2020 contained in NEPA Report attached to the Application as Exhibit I). ARX is prepared to fully comply with these conditions.
- The proposed Facility will have no adverse effects on any districts, sites, buildings, structures or objects significant in American history, architecture, archaeology, engineering or culture that are listed, or are eligible for listing, in the National Register of Historic Places.
- SHPO reviewed the Phase I archaeological survey and concluded that "[n]o previously identified archaeological sites are located within 1.0 miles of the project area," and "the project area possesses a low potential to contain intact archaeological deposits." SHPO concurred with the findings of the Phase I

archaeological survey and concluded that “additional archaeological investigations are not warranted . . . .”

- APT consulted with the United States Fish and Wildlife Service (“USFW”) and reviewed the CT DEEP Wildlife Division Natural Diversity Data Base (“NDDB”) to determine if rare, threatened, or endangered species or designated critical habitat may be present in the project area. The proposed Facility will not be located in an area designated as a wilderness area or a wildlife preserve. The Facility would not affect federally listed threatened or endangered species or designated critical habitats.
- There are no known areas of state-listed species depicted on the DEEP NDDB maps within 0.25 miles of the Site. Therefore, consultation with DEEP is not required.
- The proposed Facility would not impact migratory bird species since the height would be below 200 feet, would not include guy wires, and would not require lighting. The Site is not proximate to an Important Bird Area and the Facility design complies with the USFWS Guidelines for minimizing potential impacts to bird species. A study done by APT concluded that the proposed development would not impact migratory bird species (APT’s Avian Resources Evaluation dated April 15, 2021 is attached to the Application as Exhibit K).
- There are no National Parks, National Forests, National Parkways or Scenic Rivers, State Forests, State Designated Scenic Rivers, or State Gamelands located in the vicinity of the Site.

- According to the site survey, field investigations, Natural Resources Conservation Service (NRCS) Soil Survey, and USFWS National Wetland Inventory, the Facility will not result in significant changes in surface features such as wetland fill, water diversion, or deforestation. Specifically, the proposed development will not result in either temporary or permanent direct impacts to any wetland resource area, as there are no wetlands or watercourses located within or near the Property. If this Application is approved, ARX will design, install, and maintain sedimentation and soil erosion controls during construction activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.
- The Facility would not be located within a floodplain.
- The Site is not within an area designated by Conn. Gen. Stat. § 22a-94 as being a coastal resource and therefore the proposed Facility will not result in adverse impacts to coastal resources as defined within the Coastal Management Act.
- The proposed Facility will not affect Indian religious sites. The Site is not located on an American Indian federal reservation trust land. Following tribal consultation via FCC's Tower Construction Notification System, it was determined that the proposed undertaking is unlikely to affect Indian religious sites.
- APT consulted with eight Native American Indian tribes – the Bad River Band of Lake Superior Tribe of Chippewa Indians, the Lac Vieux Desert Band of Lake Superior Chippewa Indians, the Mohegan Indian Tribe, the Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin, Narragansett Indian Tribe,



Mashantucket Pequot Tribe, the Lac du Flambeau Band of Lake Superior Chippewa Indians, and the Sac and Fox Nation – because they might have interests impacted by the construction, operation, and maintenance of the Facility. APT received no reply from the Bad River Band of Lake Superior Tribe of Chippewa Indians, the Lac Vieux Desert Band of Lake Superior Chippewa Indians, the Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin, Narragansett Indian Tribe, Mashantucket Pequot Tribe, the Lac du Flambeau Band of Lake Superior Chippewa Indians, and the Sac and Fox Nation. The Mohegan Indian Tribe replied and indicated that they did not believe that they have any interests that would be impacted by the Facility. They further indicated that they concurred with the conclusion in the Preliminary Archaeological Assessment that no further archaeological investigation was warranted. A copy of the Tribal Consult is contained in the NEPA Report attached to the Application as Exhibit I.

- The Facility would not be located within a 100-year floodplain, and the Site is located outside of a 100-year flood hazard, as identified on the Flood Insurance Map for the Site.
- No wetlands or watercourses are located within or immediately adjacent to the Site. The nearest wetland is ±0.6 miles to the east. As a result of the significant distance from the proposed Facility to the nearest wetland resource, the proposed development would not adversely impact wetland or watercourse resources.

- The Facility will not be equipped with high intensity white lights. No lighting is required for the tower.

**Q10: Based on APT's NEPA Compliance Review, did you draw any other conclusions?**

A10: Based on our NEPA Compliance Review, the Facility is categorically excluded from any requirement for further environmental review by the FCC in accordance with NEPA, and no permit is required by the FCC prior to construction of the proposed Facility. See 47 C.F.R. §§ 1.1306(b) and 1.1307(a).

**Q11: In a document entitled Affidavit of Steven P. Schiller dated July 8, 2021 submitted by the City, in paragraph 12 of the document, it states that the building currently on the Site "has been included in the City of New Britain's 1996 Grand List Historic Properties Survey..." Have you evaluated the potential historic qualifications of this building, and do you have any response?**

A11: Yes. First and foremost, the status or eligibility of the building for inclusion on the National Register of Historic Places requires formal nomination and acceptance at both the state and federal level. The process is typically initiated through the State Historic Preservation Office ("SHPO"). Proposed nominations are reviewed by the SHPO and the state's National Register Review Board. Complete nominations, with certifying recommendations, are submitted by the state to the National Park Service in Washington, D.C. for final review and listing by the

Keeper of the National Register of Historic Places. In its determination letter dated November 24, 2020, SHPO concluded that: **“The Subject Property itself, known as the Israel Putnam Elementary School, does not appear eligible for listing on the National Register.”** (Emphasis added.)

As noted above, the proposed Facility will have no adverse effects on any districts, sites, buildings, structures or objects significant in American history, architecture, archaeology, engineering or culture that are listed, or are eligible for listing, in the National Register of Historic Places. More specifically SHPO determined that the Facility would have no adverse effects to sites listed on or eligible for listing on the National Register of Historic Places, with the following conditions (with which ARX is fully prepared to comply): 1) The antennae, wires, mounts, and associated equipment will be designed, painted to match adjacent materials, and installed to be as non-visible as possible; and 2) if not in use for six consecutive months, the antennae, mounts, and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six months. (See letter from SHPO dated November 24, 2020 contained in NEPA Report attached hereto as Exhibit A).

Moreover, we examined whether in fact the building on the Site was listed in any local designation of historic places, and we have concluded that it is not. The City’s Historic Preservation Commission maintains a “Listing of Historic Properties by District” at the following web address:

<https://www.newbritainct.gov/civicax/filebank/blobdload.aspx?BlobID=25451>. A true and accurate copy of this listing, dated as of 2/18/16, is attached hereto as Exhibit B, and demonstrates that the Site is not included in any of the listed categories, which include the National Register of Historic Properties, the Monument Historic District Properties, the Walnut Hill Historic District Properties, the West End Historic District Properties, and the Downtown Historic District Properties.

**Q12: In light of the fact that the building on the Site is not included on any list of historic properties, can you explain the relevance of its inclusion on the “1996 Grand List Historic Properties Survey?”**

A12: Yes. The 1996 Grand List Historic Properties Survey is not a City of New Britain listing. Rather, it is a “window survey” conducted by SHPO identifying properties that may potentially have historical significance. However, the ultimate determination as to whether a building or property is in fact one of historical significance is made by SHPO in its determination letter, which supersedes any prior surveys. As detailed above, in this case, in its determination letter SHPO concluded that: “The Subject Property itself, known as the Israel Putnam Elementary School, does not appear eligible for listing on the National Register.”

Q13: Does this conclude your testimony?

A13: Yes.

The above testimony is are true and complete to the best of my knowledge

July 12, 2021 Michael Libertine  
Date Michael Libertine

Subscribed and sworn before me this 12<sup>th</sup> day of July, 2021

Hollis M. Kidding  
Notary Public  
Commission expires: 9/30/23

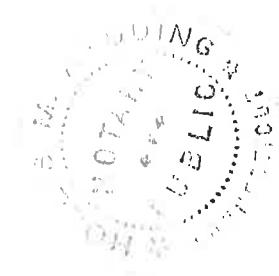


The above testimony is are true and complete to the best of my knowledge

July 12, 2021 Brian Gaudet  
Date Brian Gaudet

Subscribed and sworn before me this 12<sup>th</sup> day of July, 2021.

Hollis M. Kidding  
Notary Public  
Commission expires: 9/30/23



# **EXHIBIT A**



Department of Economic and  
Community Development

State Historic Preservation Office

November 24, 2020

Ms. Stacey Vairo  
c/o All Points Technology Corp.  
567 Vauxhall Street Extension, Suite 311  
Waterford, CT 06385

Subject: Phase IA Cultural Resource Reconnaissance Survey  
Proposed Wireless Telecommunications Facility  
43 Osgood Avenue  
New Britain, CT  
ARX Wireless  
ENV-21-0273

Dear Ms. Vairo:

The State Historic Preservation Office (SHPO) has reviewed the cultural resource reconnaissance survey prepared by Heritage Consultants, LLC (Heritage), dated September 22, 2020, as part of the larger submittal for a proposed telecommunications facility. The proposed activities are subject to review by this office pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations. SHPO understands that the proposed undertaking includes the installation of a 104 foot tall monopole within a 50 foot by 50 foot chain-link equipment compound, located in the northcentral portion of the Subject Property. Future telecommunications arrays are proposed to be installed on the monopole at intervals of 76 feet above ground level (AGL), 88 feet AGL, and 100 feet AGL, respectively. Access is to be through a new approximately 12 foot wide access road, originating from Beach Street.

No previously identified archaeological sites are located within 1 mile of the project area. One resource listed in the National Register of Historic Places (NR), the Washington School (NR# 84001053) is located within 1 mile of the project area. However, distance and intervening modern development will prevent the installation from being visible from this resource. Two resources located within the Area of Potential Effect – Visual Effects (APE-VE), Beth Alom Cemetery at 48 Allen Street and Holy Cross Church (1936) at 31 Biruta Street, are potentially eligible for listing on the National Register of Historic Places. However, the proposed installation will not impact either property so as to make it ineligible for listing. The Subject Property itself, known as the Israel Putnam Elementary School, does not appear eligible for listing on the National Register.

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | [ct.gov/historic-preservation](http://ct.gov/historic-preservation)

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The preliminary archaeological assessment consisted of a pedestrian survey of areas that would be subject to ground disturbing impacts as part of the proposed undertaking. No cultural material from either historic or prehistoric periods were observed, and it was determined that the area had been substantially disturbed in the past. Soil profiles within the project are characterized as Urban Land, likely impacted during historic period development. A review of historic maps and aerials indicate the property was improved with the Israel Putnam Elementary school by 1934, with a large addition being constructed by 1951. Therefore, the project area possesses a low potential to contain intact archaeological deposits.

Based on the information provided to our office, SHPO concurs with the findings of the cultural resources survey that additional archaeological investigations are not warranted, and the proposed undertaking will have no adverse effects to sites listed on or eligible for listing on the National Register of Historic Places, with the following conditions:

1. The antennae, wires, mounts, and associated equipment will be designed, painted to match adjacent materials, and installed to be as non-visible as possible, and
2. if not in use for six consecutive months, the antennae, mounts, 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 Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or [marena.wisniewski@ct.gov](mailto:marena.wisniewski@ct.gov).

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style.

Jonathan Kinney  
Deputy State Historic Preservation Officer

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | [ct.gov/historic-preservation](http://ct.gov/historic-preservation)

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# **EXHIBIT B**

**City of New Britain**

# Historic Preservation Commission

## LISTING OF HISTORIC PROPERTIES BY DISTRICT

- ✚ Individual Listed - National Register
- ✚ Monument Historic District
- ✚ Walnut Hill Historic District
- ✚ West End Historic District
- ✚ Downtown Historic District

City of New Britain  
Dept. of Economic Development  
27 West Main Street  
New Britain, CT 06051  
Phone: 860.826.3430  
Fax: 860.612.5033  
Email: [sschiller@newbrtaintct.gov](mailto:sschiller@newbrtaintct.gov)

**REVISED: 2/18/16**

## Individual Listed National Register Historic Properties

Address	Street
241	ARCH STREET
140	BASSETT STREET
41	BEAVER STREET
530	EAST STREET
77	FRANKLIN SQUARE
27	GROVE HILL
60	HARTFORD ROAD
370	HIGH STREET
37	LENOX PLACE
69	MAIN STREET
90	MAIN STREET
608	MAIN STREET
349	ROCKY HILL AVENUE
1615	STANLEY STREET
1928	STANLEY STREET
1939	STANLEY STREET
2134	STANLEY STREET
2162	STANLEY STREET
265	WEST MAIN STREET
76	WINTER STREET

## Monument Historic District Properties

Address	Street
230	MAIN STREET
27	WEST MAIN STREET (City Hall)
51	WEST MAIN STREET
67	WEST MAIN STREET
114	WEST MAIN STREET

## Walnut Hill Historic District Properties

Address	Street
295	ARCH STREET
10	CAMP STREET
14	CAMP STREET
24	CAMP STREET
32	CAMP STREET
36	CAMP STREET
40	CAMP STREET
42	CAMP STREET
46	CAMP STREET
48	CAMP STREET
50	CAMP STREET
54	CAMP STREET
84	CAMP STREET
88	CAMP STREET
94	CAMP STREET
98	CAMP STREET
104	CAMP STREET
110	CAMP STREET
118	CAMP STREET
120	CAMP STREET
126	CAMP STREET
137	CAMP STREET
12-14	CEDAR STREET
17	CEDAR STREET
18	CEDAR STREET
23	CEDAR STREET
26	CEDAR STREET
30	CEDAR STREET
32	CEDAR STREET
57	COURT STREET
8	EMMONS PLACE
11	EMMONS PLACE
15	EMMONS PLACE
19	EMMONS PLACE
25	EMMONS PLACE

## Walnut Hill Historic District Properties (Cont'd)

Address	Street
27	EMMONS PLACE
31	EMMONS PLACE
35	EMMONS PLACE
41	EMMONS PLACE
10	GRAND STREET
25	GRAND STREET
35	GRAND STREET
40	GRAND STREET
18	HART STREET
21	HART STREET
26	HART STREET
27	HART STREET
47	HART STREET
8	HIGH STREET
31	HIGH STREET
1	HILLSIDE PLACE
15	HILLSIDE PLACE
27	HILLSIDE PLACE
1	PROSPECT STREET
14	PROSPECT STREET
15	PROSPECT STREET
16	PROSPECT STREET
28-30	PROSPECT STREET
34	PROSPECT STREET
42	PROSPECT STREET
50	PROSPECT STREET
51	PROSPECT STREET
56	PROSPECT STREET
57	PROSPECT STREET
60	PROSPECT STREET
64-66	PROSPECT STREET
67	PROSPECT STREET
68	PROSPECT STREET
73	PROSPECT STREET
74	PROSPECT STREET
76	PROSPECT STREET

## Walnut Hill Historic District Properties (Cont'd)

Address	Street
79	PROSPECT STREET
83	PROSPECT STREET
84	PROSPECT STREET
87	PROSPECT STREET
88	PROSPECT STREET
92	PROSPECT STREET
99	PROSPECT STREET
6	ROGERS PLACE
9	ROGERS PLACE
10	SCHOOL STREET
22	SCHOOL STREET
19	SOUTH HIGH STREET
25	SOUTH HIGH STREET
29	SOUTH HIGH STREET
33	SOUTH HIGH STREET
37	SOUTH HIGH STREET
40	SOUTH HIGH STREET
44	SOUTH HIGH STREET
45	SOUTH HIGH STREET
46	SOUTH HIGH STREET
50	SOUTH HIGH STREET
53	SOUTH HIGH STREET
54	SOUTH HIGH STREET
65	SOUTH HIGH STREET
50	WALNUT STREET
63	WALNUT STREET
69	WALNUT STREET
70	WALNUT STREET
114	WEST MAIN STREET
119	WEST MAIN STREET
130	WEST MAIN STREET
136	WEST MAIN STREET
144	WEST MAIN STREET
150	WEST MAIN STREET
151	WEST MAIN STREET
165	WEST MAIN STREET
175	WEST MAIN STREET

## West End Historic District Properties

Address	Street
26	ADAMS STREET
1	COOLIDGE STREET
11	COOLIDGE STREET
4	FOREST STREET
7	FOREST STREET
10	FOREST STREET
13	FOREST STREET
16	FOREST STREET
19	FOREST STREET
24	FOREST STREET
25	FOREST STREET
28	FOREST STREET
31	FOREST STREET
32	FOREST STREET
38	FOREST STREET
49	FOREST STREET
53	FOREST STREET
57	FOREST STREET
61	FOREST STREET
65	FOREST STREET
66	FOREST STREET
74	FOREST STREET
77	FOREST STREET
83	FOREST STREET
87	FOREST STREET
93	FOREST STREET
96	FOREST STREET
99	FOREST STREET
123	FOREST STREET
246	HART STREET
256	HART STREET
260	HART STREET
268	HART STREET
282	HART STREET
286	HART STREET

## West End Historic District Properties (Cont'd)

Address	Street
296	HART STREET
302	HART STREET
312	HART STREET
324	HART STREET
330	HART STREET
339	HART STREET
343	HART STREET
388	HART STREET
404	HART STREET
405	HART STREET
10	LEXINGTON STREET
18	LEXINGTON STREET
24	LEXINGTON STREET
41	LEXINGTON STREET
49	LEXINGTON STREET
55	LEXINGTON STREET
56	LEXINGTON STREET
61	LEXINGTON STREET
69	LEXINGTON STREET
77	LEXINGTON STREET
81	LEXINGTON STREET
85	LEXINGTON STREET
91	LEXINGTON STREET
111	LEXINGTON STREET
53	LIBERTY STREET
138	LINCOLN STREET
139	LINCOLN STREET
141	LINCOLN STREET
144	LINCOLN STREET
149	LINCOLN STREET
154	LINCOLN STREET
160	LINCOLN STREET
161	LINCOLN STREET
166	LINCOLN STREET
171	LINCOLN STREET
172	LINCOLN STREET
173	LINCOLN STREET



## West End Historic District Properties (Cont'd)

Address	Street
175	LINCOLN STREET
178	LINCOLN STREET
185	LINCOLN STREET
192	LINCOLN STREET
203	LINCOLN STREET
204	LINCOLN STREET
220	LINCOLN STREET
243	LINCOLN STREET
251	LINCOLN STREET
256	LINCOLN STREET
259	LINCOLN STREET
266	LINCOLN STREET
271	LINCOLN STREET
274	LINCOLN STREET
277	LINCOLN STREET
285	LINCOLN STREET
290	LINCOLN STREET
291	LINCOLN STREET
292	LINCOLN STREET
300	LINCOLN STREET
310	LINCOLN STREET
318	LINCOLN STREET
19	MURRAY STREET
22	MURRAY STREET
25	MURRAY STREET
28	MURRAY STREET
56	MURRAY STREET
57	MURRAY STREET
6	PARK PLACE
14	PARK PLACE
23	PARK PLACE
28	PARK PLACE
29	PARK PLACE
32	PARK PLACE
42	PARK PLACE
45	PARK PLACE
48	PARK PLACE

### West End Historic District Properties (Cont'd)

Address	Street
8	SUNNYLEDGE STREET
9	SUNNYLEDGE STREET
22	SUNNYLEDGE STREET
31	SUNNYLEDGE STREET
32	SUNNYLEDGE STREET
9	VINE STREET
14	VINE STREET
18	VINE STREET
25	VINE STREET
28	VINE STREET
30	VINE STREET
31	VINE STREET
41	VINE STREET
47	VINE STREET
48	VINE STREET
50	VINE STREET
52	VINE STREET
57	VINE STREET
59	VINE STREET
60	VINE STREET
63	VINE STREET
66	VINE STREET
70	VINE STREET
71	VINE STREET
74	VINE STREET
82	VINE STREET
83	VINE STREET
92	VINE STREET
93	VINE STREET
99	VINE STREET
102	VINE STREET
105	VINE STREET
109	VINE STREET
115	VINE STREET
123	VINE STREET
149	VINE STREET

## West End Historic District Properties (Cont'd)

Address	Street
169	VINE STREET
175	VINE STREET
179	VINE STREET
191	VINE STREET
201	VINE STREET
209	VINE STREET
219	VINE STREET
225	VINE STREET
241	VINE STREET
8	WEST END AVENUE
7	WOODBINE STREET
17	WOODBINE STREET
27	WOODBINE STREET

## Downtown Historic District Properties

Address	Street
5	ARCH STREET
41	ARCH STREET
59	ARCH STREET
67	ARCH STREET
73	ARCH STREET
85	ARCH STREET
96	ARCH STREET
100	ARCH STREET
105	ARCH STREET
139	ARCH STREET
140	ARCH STREET
145	ARCH STREET
150	ARCH STREET
161	ARCH STREET
168	ARCH STREET
176	ARCH STREET
184	ARCH STREET
191	ARCH STREET
210	ARCH STREET
222	ARCH STREET
225	ARCH STREET
228	ARCH STREET
232	ARCH STREET
250	ARCH STREET
266	ARCH STREET
282	ARCH STREET
295	ARCH STREET
296	ARCH STREET
310	ARCH STREET
336	ARCH STREET
340	ARCH STREET
345	ARCH STREET
368	ARCH STREET
374	ARCH STREET
380	ARCH STREET
406	ARCH STREET
414	ARCH STREET

## Downtown Historic District Properties (Cont'd)

Address	Street
50	BASSETT STREET
27	COLUMBUS BOULEVARD
53	COLUMBUS BOULEVARD
61	COLUMBUS BOULEVARD
25	COURT STREET
33	COURT STREET
35	COURT STREET
40	COURT STREET
41	COURT STREET
50	COURT STREET
51	COURT STREET
3	FRANKLIN SQUARE
7	FRANKLIN SQUARE
19	FRANKLIN SQUARE
45	FRANKLIN SQUARE
77	FRANKLIN SQUARE
78	FRANKLIN SQUARE
98	FRANKLIN SQUARE
99	FRANKLIN SQUARE
105	FRANKLIN SQUARE
110	FRANKLIN SQUARE
111	FRANKLIN SQUARE
12	GLEN STREET
23	GLEN STREET
27	GLEN STREET
35	GLEN STREET
61	GLEN STREET
94	GLEN STREET
95	GLEN STREET
97	GLEN STREET
98	GLEN STREET
103	GLEN STREET
115	GLEN STREET

## Downtown Historic District Properties (Cont'd)

Address	Street
116	GLEN STREET
119	GLEN STREET
123	GLEN STREET
129	GLEN STREET
132	GLEN STREET
133	GLEN STREET
139	GLEN STREET
145	GLEN STREET
149	GLEN STREET
10	GRAND STREET
8	HIGH STREET
31	HIGH STREET
43	HIGH STREET
2	MAIN STREET
27	MAIN STREET
38	MAIN STREET
47	MAIN STREET
52	MAIN STREET
69	MAIN STREET
90	MAIN STREET
116	MAIN STREET
132	MAIN STREET
160	MAIN STREET
162	MAIN STREET
178	MAIN STREET
200	MAIN STREET
222	MAIN STREET
230	MAIN STREET
232	MAIN STREET
242	MAIN STREET
250	MAIN STREET
283	MAIN STREET
291	MAIN STREET
300	MAIN STREET
302	MAIN STREET
15	WALNUT STREET

## Downtown Historic District Properties (Cont'd)

Address	Street
21	WALNUT STREET
34	WALNUT STREET
40	WALNUT STREET
43	WALNUT STREET
49	WALNUT STREET
10	WASHINGTON STREET
24	WASHINGTON STREET
30	WASHINGTON STREET
3	WEBSTER STREET
7	WEBSTER STREET
11	WEBSTER STREET
17	WEBSTER STREET
19	WEBSTER STREET
27	WEST MAIN STREET
51	WEST MAIN STREET
54	WEST MAIN STREET
66	WEST MAIN STREET
67	WEST MAIN STREET
70	WEST MAIN STREET
75	WEST MAIN STREET
87	WEST MAIN STREET
94	WEST MAIN STREET
102	WEST MAIN STREET
111	WEST MAIN STREET
114	WEST MAIN STREET
119	WEST MAIN STREET
9	WEST PEARL STREET
13	WEST PEARL STREET
14	WEST PEARL STREET
18	WEST PEARL STREET
19	WEST PEARL STREET
22	WEST PEARL STREET
23	WEST PEARL STREET

## Downtown Historic District Properties (Cont'd)

Address	Street
26	WEST PEARL STREET
29	WEST PEARL STREET
32	WEST PEARL STREET
22	WHITING STREET
56	WHITING STREET
57	WHITING STREET
67	WHITING STREET
70	WHITING STREET
75	WHITING STREET
83	WHITING STREET