

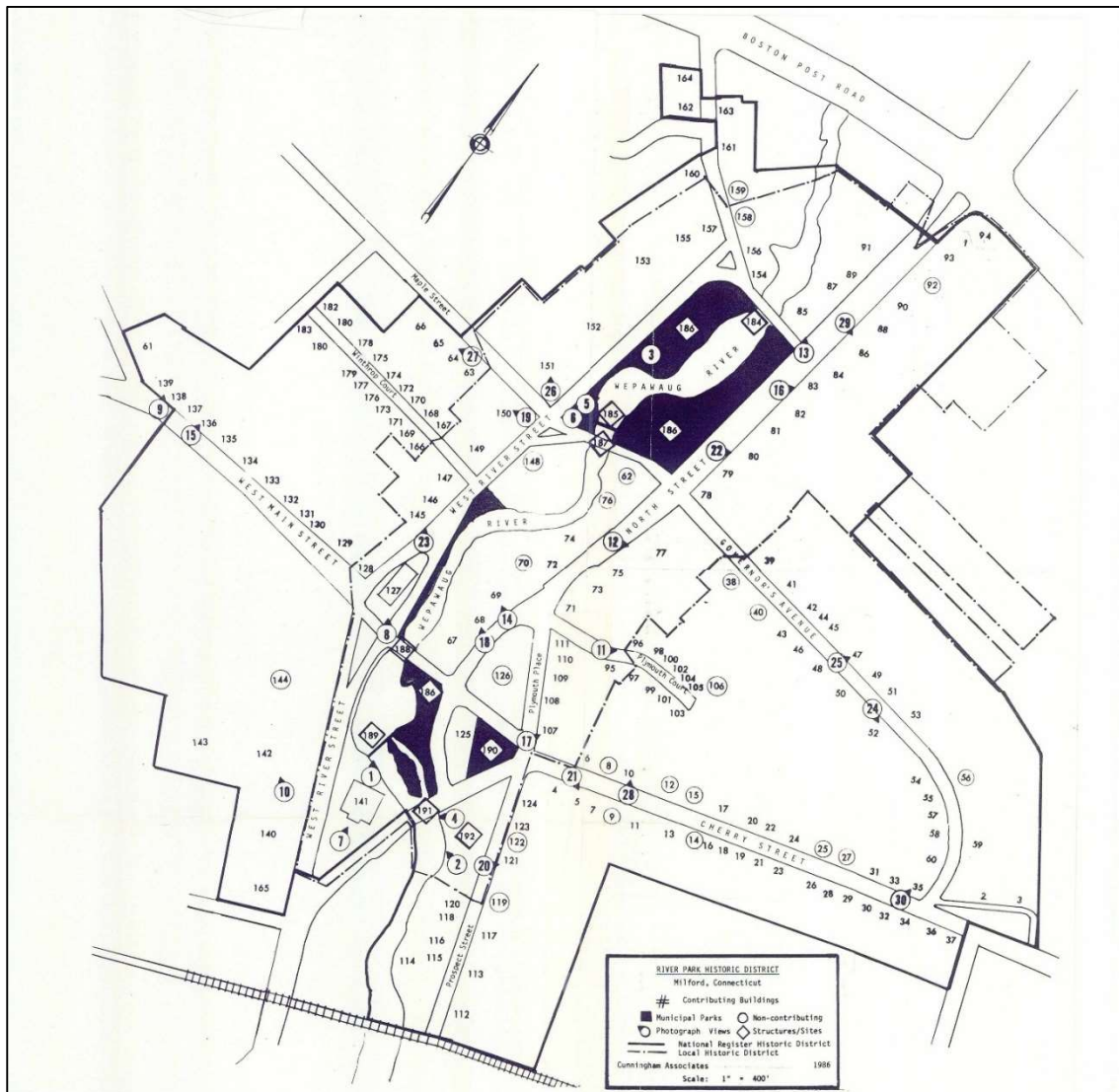
**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
	:	DOCKET NO. 508
THE UNITED ILLUMINATING COMPANY	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE MILVON TO	:	
WEST RIVER RAILROAD	:	
TRANSMISSION LINE 115-KV REBUILD	:	
PROJECT THAT TRAVERSES	:	
PORTIONS OF MILFORD, ORANGE,	:	May 17, 2022
WEST HAVEN, AND NEW HAVEN,	:	
CONNECTICUT	:	

PRE-FILED TESTIMONY OF MARGUERITE CARNELL

- 1 **Q. Please state your name, position, and business address.**
- 2 A. My name is Marguerite Carnell. I am a Senior Historian/Architectural Historian with
3 Archaeological and Historical Services, Inc. (AHS), at 569 Middle Turnpike, Storrs,
4 Connecticut, 06268. I've worked in the historic preservation field for over 25 years,
5 focusing on cultural resource management since joining AHS in 2014. I have
6 extensive experience with assessing the impacts of transportation, utility/energy,
7 municipal, and private projects on historic resources. I have been a member of the
8 Connecticut Historic Preservation Council since 2018, and I served on the
9 Simsbury Historic District Commission for seven years. My CV is provided in
10 Attachment A.
- 11 **Q. On whose behalf are you testifying in this case?**
- 12 A. I am testifying on behalf of the City of Milford, Connecticut (the "City").
- 13 **Q. Have you reviewed the documents submitted by UI in support of its current**
14 **application, as well as responses to interrogatories and other record**
15 **documents in Docket 508?**
- 16 A. Yes.
- 17 **Q. Based on your review of the record, do you have an opinion concerning the**
18 **proposed route and configuration of the transmission line as it relates to**
19 **adverse impacts to historic resources in the City?**
- 20 A. Yes, I concur with Heritage Consultants that the proposed project will have adverse
21 visual impacts on NRHP-listed resources in the project area, including:

- 1 • U.S. Post Office – Milford Main (1931, individually NRHP-listed and also
- 2 included in the River Park Historic District) at 6 West River Street;
- 3 • St. Peter’s Episcopal Church (1850-1851, individually NRHP-listed) at 61, 71,
- 4 and 81 Broad Street;
- 5 • Taylor Memorial Library (1895-1895, individually NRHP-listed) at 5 Broad
- 6 Street;
- 7 • Academy of Our Lady of Mercy - Lauralton Hall (individually NRHP-listed,
- 8 period of significance 1864-1960) at 200 High Street; and
- 9 • The River Park Historic District (NRHP-listed historic district with a period of
- 10 significance from 1650-1936; see map below).

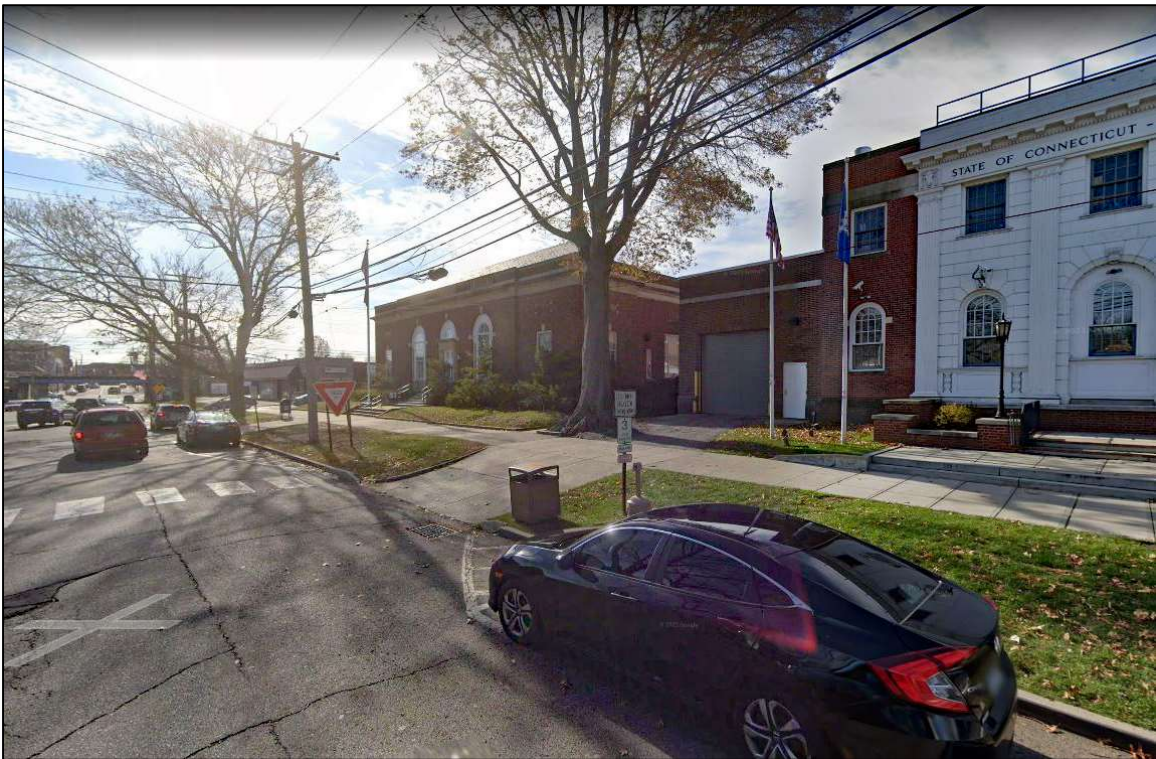


11 *River Park Historic District Map (National Register Nomination, 1986). Inventory No. 140 is*
 12 *the Courthouse, No. 141 is City Hall, and No. 165 is the Post Office.*

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1 As Heritage Consultants noted in the Phase 1A report dated 9/2021, the adverse
2 visual impacts to the U.S. Post Office – Milford Main, St. Peter’s Episcopal Church,
3 and Taylor Memorial Library would be the greatest, as structural elements of the
4 Project will be visible year-round at these three properties. The adverse visual
5 effect on the Academy of Our Lady of Mercy - Lauralton Hall would be somewhat
6 less noticeable, with Project structures mostly visible from the athletic fields on the
7 eastern side of the property.

8 The greatest adverse visual impact to the River Park Historic District would be at
9 the south end of the district, affecting several houses along Prospect Street, as
10 well as the State of CT Superior Court and City Hall area on West River Street.
11 These are among the most prominent buildings in the district and they are located
12 immediately north of the U.S. Post Office – Milford Main (see photo below). The
13 adverse impact would be year-round.



14 *View toward project area along West River Street at the Courthouse (at right), just north of the Post*
15 *Office (center), camera facing southwest (Google Street view photo).*

16 **Q. How does UI’s current proposal result in adverse impacts to historic**
17 **resources listed on the National Register for Historic Properties (NRHP)**
18 **within the City? Please explain.**

19 **A.** The project currently proposes adding about 50 steel monopoles, as well as
20 numerous transmission lines and other modifications to existing 115kV equipment,
21 along the CTDOT railroad corridor in Milford. In the downtown area (between

1 Beardsley Avenue and Gulf Street), new monopoles and transmission lines are
2 proposed up to a maximum height of 140 feet—which is roughly equal to 13 stories
3 in height and far exceeds the height of the historic resources identified, as well as
4 the height of any other building or structure in this area. The quantity and height of
5 the monopoles and transmission lines is out of scale with the historic resources in
6 the project area and incompatible with their character, representing adverse visual
7 impacts that contribute to cumulative degradation of their settings.

8 **Q. In addition to the adverse impacts to historic structures listed on the**
9 **National Register for Historic Properties, are there any structures in the City**
10 **that are eligible for listing on the National Register and that will be impacted**
11 **by UI’s current proposal? Please explain.**

12 A. Yes, the former New York, New Haven, & Hartford Railroad (the current Metro-
13 North Railroad (MNR)/Amtrack Railroad Alignment), is eligible for listing on the
14 National Register, under Criteria A, in the area of transportation, as well as in the
15 development of the Connecticut shoreline. The entire rail line between the New
16 York-Connecticut state line and New Haven has long been regarded as an
17 important historic resource (see photo below). The line was recorded by the
18 Historic American Engineering Record as HAER No. CT-11 in 1977. CTSHPO
19 Jonathan Kinney confirmed its NRHP-eligibility in his letter to Heritage Consultants
20 dated 12/22/2021.



21 *View of NRHP-eligible rail line with historic stone retaining walls along Railroad Avenue west of*
22 *River Street, camera facing southeast (Google Street view photo).*

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1 **Q. In addition to the adverse impacts to historic structures listed on the**
2 **National Register for Historic Properties, will any structures listed on the**
3 **State Register for Historic Properties be impacted by UI's current proposal?**
4 **Please explain.**

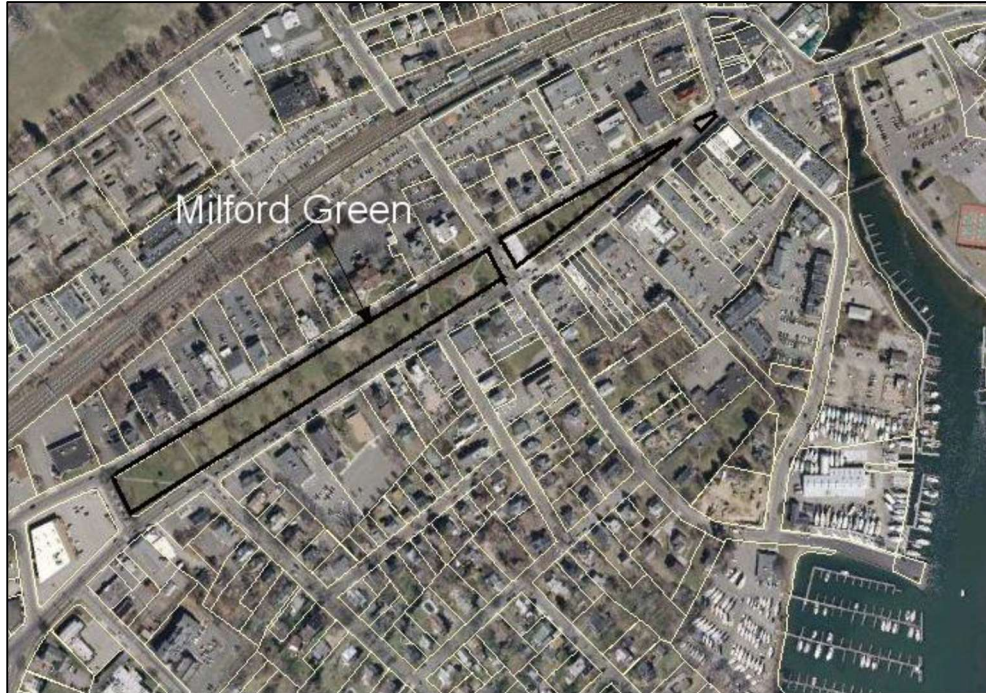
5 A. Yes. South of the rail line, the Milford Railroad Station (now the Milford Arts
6 Council), individually listed on the SRHP, is a small building in the project area.
7 While there is an existing monopole nearby that overshadows the building, the new
8 monopole, carrying even more transmission lines, would have an even greater
9 adverse impact (see photo below).



10 *View of proposed new monopoles and transmission lines from Railroad Avenue South, camera*
11 *facing east toward the SRHP-listed former Milford Railroad Station, now the Milford Center for the*
12 *Arts (Heritage Consultants photo)*

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1 In addition, the Milford Green was listed in the SRHP in 2018. Views of the
2 monopoles behind properties lining the Green—large modern structures
3 incongruous with this historic resource—will have an adverse impact on its setting
4 (see photos below).



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23 *Aerial photograph with boundaries of the SRHP-listed Milford Green shown in black,*
24 *camera facing north (Milford Green SRHP nomination, 2018).*



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43 *View of proposed new monopole and lines from Broad Street, bordering the north side*
44 *of the SRHP-listed Milford Green, facing north (Heritage Consultants photo).*

1 **Q. Does the Charles Island mitigation measure proposed in UI’s application**
2 **address these adverse impacts? Please explain.**

3 A. No. The Charles Island mitigation measure, including survey, mapping, historical
4 research, and interpretive signage is a worthy endeavor, but Charles Island is
5 about two miles away and has no relationship to the historic resources in the
6 project area. As a historian working in cultural resource management, I would
7 recommend mitigation measures that are more closely aligned with this particular
8 project, ideally related to resources that will be adversely impacted.

9 **Q. Does the Town support an alternative mitigation measure to address the**
10 **adverse impacts to historic resources in the City?**

11 A. Yes. The City strongly supports rebuilding the transmission line from Beardsley
12 Avenue to Gulf Street on existing catenary structures, at a height of approximately
13 80 to 85 feet, as a measure to mitigate the adverse visual impacts of the
14 monopoles. Using the existing catenary structures, rather than new monopoles,
15 will help to maintain the visual setting of historic properties in and adjacent to the
16 project area, thus helping to protect their integrity.

17 **Q. How does rebuilding the portion of the transmission line that runs from**
18 **Beardsley Avenue to Gulf Street on existing catenary structures mitigate**
19 **adverse impacts to historic resources in the City?**

20 A. Running transmission lines on the existing catenary structures avoids adding taller,
21 visually intrusive new monopole structures with higher transmission lines to the
22 setting of the City’s historic resources, thereby maintaining their current integrity of
23 setting.

24 **Q. Other than this alternative configuration using the existing catenary**
25 **structures, is there any other mitigation measure that would sufficiently**
26 **mitigate the adverse impacts to NRHP-listed structures within the City?**
27 **Please explain.**

28 A. If feasible, running the transmission lines below ground would avoid adverse visual
29 impacts on historic resources and would be much preferred. Utilizing existing
30 bonnets on catenary structures would also be a preferable option. If these options
31 are not possible, rebuilding the catenary bonnets, with additional mitigation
32 measures related to historic resources in the project area, could be acceptable.
33 Additional mitigation measures could include: building conditions assessment(s)
34 or preservation plans for resources that will experience adverse visual impacts as
35 a result of this project—e.g., the Taylor Memorial Library building or the Milford
36 Railroad Station (now the Milford Arts Council); updating the River Park Historic
37 District NRHP-nomination (it dates to 1986); and/or installing interpretive signage
38 related to Milford’s history on the Milford Green.

ATTACHMENT A

Marguerite Carnell, M.Phil.
Senior Historian/Architectural Historian
Archaeological and Historical Services, Inc.

Professional Licenses/Registrations: NPS (36 CFR 61)-qualified Architectural Historian; Connecticut and Massachusetts SHPO-approved consultant since 2013, and New Hampshire and Rhode Island SHPO-approved since 2015. She has completed Metro-North's and Amtrak's safety courses.

Experience and Qualifications:

A native of coastal Connecticut, Ms. Carnell brings expertise in history, architectural history, and historic preservation to AHS. Following her passion for design and architecture, she graduated summa cum laude from the University of Connecticut with a B.S. in Design and Resource Management, where she was inducted into Phi Kappa Phi. She went on to receive her M.Phil. in American Civilization from the George Washington University, with interdisciplinary studies in architectural history, material culture, religious history, and women's history. She has also completed coursework in architectural conservation at Columbia University. Professional affiliations include the National Trust for Historic Preservation, Association for Preservation Technology, Preservation Connecticut, and the Hartford Preservation Alliance. She served on the Simsbury (CT) Historic District Commission from 2013 to 2020, including as chair, and received a community service award from the town in 2017. She was appointed to the Connecticut Historic Preservation Council in 2018 and to the Council's Executive Committee in 2019.

Ms. Carnell's professional experience and qualifications include:

- Over 20 years of experience in historic resource assessment, documentation, restoration, and rehabilitation. Services include historical research, identification of character-defining features, analysis of construction sequence, and development of preservation strategies. Projects involve dozens of properties on the National Register of Historic Places and National Historic Landmarks, including documentation and preservation of historic buildings including housing, mills and industrial complexes, theaters, houses of worship, civic and commercial buildings; cultural landscapes such as parks, boulevards, and cemeteries; bridges, railroads, and other types of transportation infrastructure; and water supply systems.
- Knowledge of state and federal regulations, practices, and procedures for historic properties in Connecticut. Excellent working relationship with the Connecticut State Historic Preservation Office (CTSHPO), Preservation Connecticut, and the Massachusetts Historical Commission (MHC). Extensive experience with transportation-related projects for CTDOT and MassDOT.
- Significant experience with cultural landscapes including environmental compliance review and advising on the Route 7/15 Interchange project in Norwalk, CT, which included assessment of project effects on the NRHP-listed Merritt Parkway and other historic resources in the project area (2017-present).
- Preparation of Massachusetts Historical Commission documentation: Form A for areas in Bridgewater, Chicopee, Oxford, West Boylston, and Newton; Form B for buildings in Ashby, Bernardston, Milton, Northampton, Oxford, and Williamsburg; Form E for cemeteries in Chelmsford and Peabody, and Form F for structures in Bridgewater and West Boylston. Most were prepared for MassDOT (2016-present).

- Identification and evaluation of impacts on the replacement of the 1896 National Register-eligible Norwalk River Railroad swing bridge, including resource-dense historic districts, bridges, and character-defining elements such as retaining walls. Prepared sections of EA/EIE and coordinated public outreach and stakeholder contact (2015-present).
- Significant experience with projects involving historic rail-line feature identification and assessment, such as the New Haven-Hartford-Springfield rail project, the Norwalk River Railroad (WALK) Bridge replacement, the Moosup Valley State Park Trail in Plainfield and Sterling CT, and state-level documentation of Housatonic Rail Line bridges in New Milford, Kent, and Canaan, CT (2015-present).
- Extensive experience with documentation and evaluation of bridges, particularly through updating and expanding the Connecticut Statewide Historic Bridge Survey. In Task 2, documented and re-evaluated dozens of previously inventoried pre-1941 bridges and updated the 1991 inventory forms. In Task 3, completed desktop research and evaluation of hundreds of pre-1941 bridges that had not been previously inventoried, and prepared Task 3 memorandum report (2018-2020).
- Environmental review of Resilient Bridgeport project's effects on Seaside Park and other cultural resources in the South End of Bridgeport, CT. Designed by Frederick Law Olmsted and Calvert Vaux, Seaside Park is slated for modifications related to storm-surge protection, along with surrounding streets (2017-2019).
- Other landscape-related projects include documentation and NRHP-eligibility evaluation of Commonwealth Avenue in Newton, MA (2021); review of proposed renovations to Harkness Memorial State Park in Waterford, CT (2019); and documentation of cemeteries in Chelmsford and Peabody, MA (2018).
- Evaluation of NRHP-eligibility of a historic cemetery and surrounding buildings and features (bridges and retaining walls) in Norfolk, CT, including extensive research in related African American and abolitionist history (2017).
- Lead architectural historian for historic building and district assessment and impact evaluation on the 2017 Cape Cod Canal transportation improvement feasibility study (2017).
- Preparation of the National Register of Historic Places nomination for the South Willington Historic District in Willington, CT (2017).
- Town-wide inventory of architectural and historic resources for Stow, MA. Updates and expansion of a 1980s historic resource inventory, including archival research and writing property histories (2016).
- Environmental review for CT Green Bank/CEFIA, a program for residential solar panels and other energy upgrades. Prepared and reviewed reports for over 1,000 properties (2014-2021).
- Preparation of the National Register of Historic Places nomination for the American Thread Mill in Willimantic, CT (2014).
- Significant expertise in federal and state historic tax credit programs. Projects include dozens of rehabilitations of historic houses, apartment buildings, hotels, and industrial and commercial buildings, from early 19th-century vernacular through mid-20th-century Modern buildings (2011-present).

- Successful grant applications for a variety of historic preservation projects, including Connecticut SHPO's Historic Restoration Fund (HRF) grants and CTHP's Historic Preservation Technical Assistance Grants (HPTAG) (2011-2014).
- Architectural conservation experience includes hand-on finish analysis and preparation of conservation reports and treatment plans for architects, conservators, owners, and contractors. Projects include many National Register-listed properties, such as the Waterbury, CT, City Hall, Gasson Hall at Boston College, South Church on Nantucket, the Waterville, ME, Opera House and City Hall, and National Historic Landmark finish conservation projects includes the Eisenhower Executive Office Building and United States Capitol in Washington, DC (2009-2011).
- Project manager for three successive on-call historic preservation contracts for the Connecticut State Capitol. Projects involved an inventory of historic building archives, comprehensive building assessment, ADA accessibility, lighting upgrades, and design for a major exterior masonry cleaning and restoration project (2006-2014).
- Preparation of the National Register of Historic Places nomination for Hampton National Historic Site in Towson, MD (1997).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed
to the following service list on May 17, 2022:

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