



May 13, 2022

Mr. David R. George  
Heritage Consultants  
PO Box 310249  
Newington, CT 06131

Subject: Request for Additional Information, Visual Impacts  
Milvon-West River Railroad Transmission Line 115-kV Rebuild Project  
Milford, Orange, West Haven, New Haven, Connecticut  
ENV-22-0382

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated September 2021. The proposed activities are under the jurisdiction of the Connecticut Siting Council and are subject to review by this office pursuant to the Connecticut Environmental Policy Act (CEPA). The proposed project includes the rebuilding of two single-circuit 115-kilovolt (kV) overhead lines along the Connecticut Department of Transportation (CT DOT) corridor between the Milvon and West River substations, including installation of new steel monopoles, reaching a maximum height of 160 feet, removal/modification of existing monopoles installed as part of previous upgrade projects, modification of existing 115-kV connections, and decommissioning of existing 115 kV facilities located on existing catenary structures, which may include the removal of electrical bonnets currently supporting the 115 kV transmission lines.

Five properties listed on the National Register of Historic Places are located within the project area:

- The Academy of Our Lady of Mercy – Luralton Hall (NR# 11000611)
- River Park Historic District (NR# 86002648)
- St. Peter's Episcopal Church (NR# 79002644)
- Taylor Memorial Library (NR# 79002642)
- U.S. Post Office – Milford Main (NR# 86002959)

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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All five resources will be visually impacted by the proposed undertaking, to varying degrees. Additionally, the corridor itself, the Metro-North Railroad (MNR)/Amtrack Railroad Alignment, formerly the New York, New Haven, & Hartford Railroad, is eligible for listing on the National Register, under Criteria A, in the area of transportation, as well as in the development of the Connecticut shoreline. The proposed alterations to the former New York, New Haven, & Hartford Railroad alignment will not adversely impact the integrity of the resource.

Following submittal of our letter dated December 22, 2021, our office met with representatives of the City of Milford, who expressed their concern with visual impacts the proposed action will have on historic resources. In an effort to ensure that alternatives have been sufficiently explored, this office requests additional information:

- Please provide a narrative as to whether reuse of the existing catenary structures has been considered, and if so, why their reuse did not meet the needs of the project. This response should also consider reuse of a limited number of catenary structures located within the viewshed of the enumerated resources;
- Please provide clarification as to the height of the structures proposed to be installed within the viewshed of the enumerated resources;
- During initial discussions of visual impacts, the installation of additional structures of lower height was considered, rather than the submitted design of fewer, taller structures. Please provide photosimulations that illustrate the lower structures within the viewshed of the enumerated resources.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's cultural resources. These comments are provided in accordance with the Connecticut Environmental Policy Act. For additional 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, flowing style.

Jonathan Kinney  
State Historic Preservation Officer

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