

CONNECTICUT SITING COUNCIL

IN RE:

THE UNITED ILLUMINATING COMPANY (UI)	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND PUBLIC	:	DOCKET NO. 516
NEED FOR THE FAIRFIELD TO CONGRESS	:	
RAILROAD TRANSMISSION LINE 115-KV	:	
REBUILD PROJECT THAT CONSISTS OF THE	:	
RELOCATION AND REBUILD OF ITS EXISTING	:	
115-KILOVOLT (KV) ELECTRIC TRANSMISSION	:	
LINES FROM THE RAILROAD CATENARY	:	
STRUCTURES TO NEW STEEL MONOPOLE	:	
STRUCTURES AND RELATED MODIFICATIONS	:	
ALONG APPROXIMATELY 7.3 MILES OF THE	:	
CONNECTICUT DEPARTMENT OF	:	
TRANSPORTATION'S METRO-NORTH RAILROAD	:	
CORRIDOR BETWEEN STRUCTURE B648S	:	
LOCATED EAST OF SASCO CREEK IN FAIRFIELD	:	
AND UI'S CONGRESS STREET SUBSTATION IN	:	
BRIDGEPORT, AND THE REBUILD OF TWO	:	
EXISTING 115-KV TRANSMISSION LINES ALONG	:	
0.23 MILES OF EXISTING UI RIGHT-OF-WAY TO	:	
FACILITATE INTERCONNECTION OF THE	:	
REBUILT 115-KV ELECTRIC TRANSMISSION	:	
LINES AT UI'S EXISTING ASH CREEK, RESCO,	:	
PEQUONNOCK AND CONGRESS STREET	:	
SUBSTATIONS TRAVERSING THE	:	
MUNICIPALITIES OF BRIDGEPORT AND	:	
FAIRFIELD, CONNECTICUT	:	NOVEMBER 2, 2023

PRE-FILED TESTIMONY OF WES HAYNES

Q. Please state your name, position, and business address.

A. My name is Wes Haynes. I currently serve as the Executive Director of the Merritt Parkway Conservancy, Inc., a member-supported non-profit organization committed to the preservation and stewardship of one of the country's most scenic and historic automobile roads. I've worked in the field of historic preservation for over 40 years. I have extensive experience with assessing the impacts of transportation,

utility/energy, municipal and private projects on historic resources. A copy of my CV is attached hereto as Exhibit A.

Q. Please describe your educational background.

A. I received a BA in American History and Historical Geography from Clark University in Worcester, MA and my MS in Historic Preservation from the Columbia University Graduate School of Architecture & Planning in New York City.

Q. What is your professional background?

A. As noted, I currently serve as the Executive Director of the Merritt Parkway Conservancy, a non-profit, member-supported organization committed to the protection and stewardship of one of Connecticut's largest and most heavily used cultural resources. I previously held a senior staff position with the Connecticut Trust for Historic Preservation, the New York Landmarks Conservancy, the Preservation League of New York State, and the New Jersey Historic Trust. I have conducted primary research and prepared historic resource inventories, historic structure reports and National Register and National Historic Landmark nominations leading to the restorations and historic rehabilitations of Central Park, the New York State Capitol and several Adirondack Great Camps and directed a recently completed statewide historic resource inventory of 1,500 historic mills on behalf of the Connecticut Trust (now Preservation CT). I previously taught historic preservation at the Parsons School of Design in New York, Rensselaer Polytechnic Institute in Troy, and the Brooklyn High School for the Arts. I currently serve a volunteer preservation advisor to the Mary and Eliza Freeman Houses in Bridgeport, Stamford's First Presbyterian Church and the New Canaan Preservation Alliance.

I meet Department of the Interior Qualifications (36 CFR 61) for History and Architectural History.

Q. Have you authored any recent articles or held any recent presentations on the topic of local historic preservation?

A. Yes, a complete list of my publications and presentations can be found on my CV which is attached to this pre-filed testimony as Exhibit A. Some illustrative examples of my more recent publications and presentations include:

2023: *Mid Century Modern Houses of Worship In Fairfield County*
Presentation, Fairfield Museum and History Center, Fairfield, CT

2023: *Pequot Library and its Connecticut Peers*
Presentation, Pequot Library, Southport, CT

2020-23: *Fairfield County's Historic Public Libraries*
Presentation, various locations

2020-23: *Merritt Parkway Bridges*
Presentation, various locations

2019-23: *Merritt Parkway: Past and Future of an America Treasure*
Presentation, various locations

2018: *Mid-century American Gothic: Dalle de verre at the Fish Church, Stamford, CT*
Paper, Assoc. for Preservation Technology Jewels of Light Symposium, Washington, DC

Q. Have you received any awards for your work in historic preservation?

A. Yes, in 2022 I received the Lifetime Achievement Award for Preservation Leadership in the Adirondacks from Adirondack Architectural Heritage, a nonprofit historic preservation organization for New York's Adirondack region. Additionally, in 1996 and 2001, respectively, the New Jersey Historic Trust awarded me its Preservation

Excellence Award for my work associated with the historic preservation of the Tenafly Railroad Station and the Demarest-Lyle House.

Q. Have you previously testified before the Connecticut Siting Council?

A. No, this is my first time testifying before the Connecticut Siting Council (the "Council").

Q. What is your involvement with this project?

A. I was engaged by the Town of Fairfield (the "Town") to review the United Illuminating Company's ("UI") Application for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuilt Project that Extends from Fairfield to Bridgeport, Connecticut (the "Application"). I prepared a review of UI's Phase IA Cultural Resources Assessment dated September 2022 and its Supplemental Viewshed Report dated February 2023. A copy of my review is attached hereto as Exhibit B.

Q. What is the purpose of your testimony?

A. This testimony describes my findings and opinions with respect to UI's Application and, more specifically, its Phase IA Cultural Resource Assessment dated September 2022 and Supplemental Viewshed Report dated February 2023, both prepared by Heritage Consultants of Berlin, Connecticut.

Q. Please identify the resources you consulted prior to conducting your review of UI's Application.

A. In addition to reviewing UI's Application, its Phase IA Cultural Resources Assessment and Supplemental Viewshed Report, I consulted documentation on historic resources in Fairfield and Bridgeport including historic resource inventories,

nominations of individual properties and districts to the National Register of Historic Places, National Historic Landmark nominations, and the recent technical report on the Battle of Pequot Swamp.

Q. Generally speaking, what is the purpose of a Phase IA Cultural Resource Assessment?

A. The purpose of a Phase IA is to evaluate a project area's overall sensitivity for the presence of cultural and historic resources in order to guide subsequent field investigations and to identify project alternatives where necessary.

Q. Within your discipline, are there generally accepted practices and guidelines for preparing a Phase IA Cultural Resource Assessment? If so, please explain what is required.

A. Yes, there are generally accepted best practices and guidelines. The preparation of the Phase IA assessment requires a combination of thorough background research and preliminary fieldwork intended to identify historic and cultural resources and to define the boundaries of the project's potential impact area. At minimum, a consultant must conduct a thorough literature search, which often involves consulting sources at the State of Connecticut Historic Preservation Office ("SHPO"), local universities, libraries and informants, museums and historical societies. As noted, a Phase IA also generally requires an initial field inspection to assess the degree of previous disturbance and to evaluate the level of additional testing which may be required for a particular project.

A completed Phase IA should contain an inventory and history of cultural resources evident or likely to be discovered in the project area, as well as an evaluation

of the area's known and potential sensitivity for cultural resources which may be affected by possible construction impacts.

Q. In your professional opinion, was UI's Phase IA Cultural Resource Assessment prepared in compliance with the above-referenced practices and guidelines?

A. No, it was not.

Q. Please explain why.

A. The Phase IA submitted by UI is deficient in multiple respects. First, it is evident that UI's consultant, Heritage Consultants, did not engage in a meaningful review of available literature or historic resource inventories. On pages 22-23 of its Phase IA, Heritage Consultants identifies *only three resources* consulted for the purpose of identifying historic and cultural resources in the Town of Fairfield and within the Southport Historic District.

In my review, attached hereto as Exhibit B, I identify fourteen readily-available historical, architectural and archeological resources omitted from UI's Phase IA. These omitted resources contain extensive information based on archival research and fieldwork, which document the cultural resources within, and adjacent to, the Southport Historic District. The omission of these readily-available sources of information undermines the Phase IA's credibility as an objective assessment.

In addition, the Phase IA contains numerous omissions and mischaracterizations of historical and cultural resources. Neither the Phase IA nor the Viewshed Report, as presented, lead me to conclude that UI or its consultants conducted an acceptable level of review or investigation. As a result, the Phase IA's conclusions as to the 'minimal

impact' of its proposed transmission line project on Fairfield's cultural and historic resources are deficient and incomplete.

Q. Does UI's Phase IA Cultural Resource Assessment accurately document the cultural resources located within 0.5 miles of the project area?

A. No. As indicated in Exhibit B, Attachment 2, UI identified *only 20 historic* properties located in Southport. According to the Southport Historic District Commission, there are a total of *221 historic properties*, either listed on the National Register of Historic Places ("NRHP"), the State of Connecticut Register of Historic Places ("SRHP") or locally designated, within 0.5 miles of UI's proposed project corridor. All told, UI's Phase IA omits or ignores approximately ninety percent (90%) of the historic district resources in Southport.

Q. Does UI's Phase IA Cultural Resource Assessment accurately describe the historical significance of the Southport Historic District?

A. No. On page 11 of the Phase IA, Heritage Consultants defines the historical significance of the Southport Historic District as follows: "*the Southport Historic District is considered significant because it was the center of trade and commerce in the Town of Fairfield in the eighteenth and nineteenth centuries.*" The Phase IA's characterization of the District is misleading and minimizes its architectural significance and remarkable historical integrity.

The Southport Historic District was listed on the NRHP in 1971, prior to the National Park Service's adoption of formalized criteria for areas and levels of (local/state/national) significance. However, the District's areas and levels of significance can be gleaned from the text of its nomination narrative. The Southport

Historic District is defined as significant in the areas of history (i.e., commerce and shipping) and architecture. The District's narrative notes its distinct and "valuable concentration of Greek Revival and Victorian Structures." Descriptions were provided for approximately 150 contributing structures at the time of nomination. Additionally, the nomination acknowledged the national significance of the District by noting that "more shipping was owned in Southport in proportion to its size than in any port between Boston and New York" in the early nineteenth century. Today, the Southport Historic District retains exceptional architectural integrity.

UI's Phase IA omits any discussion of the District's architectural significance and exceptional integrity and attempts to minimize its historical significance by miscasting the District as nothing more than a local hub for trade and commerce.

Q. Have you reviewed UI's Supplemental Viewshed Report, dated February 2023?

A. Yes, I have.

Q. Does the Phase IA Cultural Resource Assessment and the Supplemental Viewshed Report, dated February 2023, accurately describe or depict, as the case may be, the impact of UI's transmission line project on Southport's cultural resources?

A. No, both the Phase IA and the Viewshed Report inaccurately report the number, character and location of the cultural and historic resources impacted by UI's proposed project. As noted in response to Question 14, the Phase IA severely undercounts the number of impacted historic resources in Southport (by approximately 90%).

Q. Have you seen the renderings of UI's proposed transmission line project created by David Scott Parker Architects, LLC?

A. Yes, I have seen the renderings.

Q. In your professional opinion, do the renderings created by David Scott Parker Architects, LLC accurately depict the adverse visual impact of UI's proposed project on historic resources within Southport and Fairfield?

A. Yes, in my professional opinion they do.

Q. Based on your review of the record, do you have an opinion concerning the proposed route and configuration of the transmission line as it relates to adverse impacts to historic resources in the Town?

A. Yes, I concur with the State Historic Preservation Office ("SHPO") that the proposed project will have adverse visual impacts on NRHP-listed, SRHP-listed and locally-listed resources in the project area. Additionally, UI's proposed permanent easements will have a direct adverse impact on multiple NRHP-listed and SRHP-listed resources, including, without limitation, the Pequot Library, the Trinity Rectory, Southport Congregational Church and 170 Pequot Avenue.

Q. Are there project alternatives that would sufficiently mitigate the adverse impacts to NRHP-listed, SRHP-listed and locally-listed structures within the Town? Please explain.

A. Yes, if feasible rebuilding the transmission line from on existing catenary structures would mitigate the indirect adverse visual impact to historic and cultural resources located within 0.5 miles of the project corridor in Southport, Fairfield and Bridgeport. Reutilization of existing catenary structures, rather than new monopoles, will

help to maintain the visual setting of historic properties in and adjacent to the project area, thus helping to protect their integrity. In addition, running the transmission lines below ground would avoid adverse visual impacts on historic resources and would be much preferred. Undergrounding the transmission lines within a public right of way (“ROW”) would avoid direct impacts (i.e. the taking of permanent easements, the installation of monopoles and their associated pads and the clear-cutting of vegetative buffers) to multiple NRHP-listed and SRHP-listed resources, including, by way of example, the Pequot Library, Trinity Church and its Rectory, Southport Congregational and 170 Pequot Avenue. Utilizing existing bonnets on catenary structures would also be a preferable option.

Q. Do you have additional concerns regarding UI’s Application?

A. Yes, the Phase IA does not adequately address the unique aggregation of *nationally-significant* cultural resources which will be impacted by, and are located within half a mile of, UI’s proposed project. Specifically, there are three National Historic Landmark (NHL) properties located in close proximity to the project area. NHL designation is the highest level of federal recognition of cultural importance for non-federal properties, reserved for resources of exceptional national significance that possess great integrity. UI’s project will visually impact: 1) the Birdcraft Sanctuary located at 314 Unquowa Road, Fairfield (designated 1992); 2) the Jonathan Sturges Cottage, 449 Mill Plain Road, Fairfield (designated 1994); and 3) the Barnum Institute of Science and History, 820 Main Street, Bridgeport (designated 2023).

Q. To conclude, do you believe UI's proposed transmission line project will adversely impact historic and cultural resources? In your professional opinion, how should the Siting Council proceed?

A. It is my professional opinion that UI's Phase IA Cultural Resource Assessment and Supplemental Viewshed Report have not been prepared to acceptable standards of completeness and accuracy. The Fairfield and Bridgeport area subject to investigation is one of exceptional sensitivity that has been misrepresented by this Phase IA assessment in the character, significance and extent of its above ground historic resources. These deficiencies render it a flawed tool for environmental review of the project's impacts. If approved as proposed, the project will physically and visually harm important historic places abutting the railroad corridor, and its new infrastructure, entirely out of proportion and character with its surrounding context, will permanently intrude upon the views of most properties and vistas within the historic areas. Introducing new, highly visible infrastructure at the scale proposed by UI's transmission line conflicts with threshold public federal and state historic preservation policy to avoid harm to historic resources where feasible alternatives are possible. A Phase IA assessment with complete and accurate data on the area's sensitivity, in my opinion, would have concluded with a recommendation to explore reasonable and feasible alternatives such as co-location of lines on existing infrastructure or burial of lines through historic districts.

This deficient Phase IA assessment should not be accepted at face value. Heritage Consultants should submit a new Phase IA Cultural Resource Assessment and Supplemental Viewshed Report including complete inventories of cultural resources

with accurate reporting of documented designation status, recognized levels of significance, accurate assessments of impacts, and recommendations for alternatives.

Q. Does this conclude your testimony?

A. Yes. However, I reserve the right to submit supplemental pre-filed testimony and exhibits, as needed, in response to any new information or late-filed exhibits produced or disclosed by UI, or Heritage Consultants, after November 2, 2023.

EXHIBIT A

WES HAYNES
HISTORIC PRESERVATION SPECIALIST
22 Brightside Drive, Stamford, CT 06902
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EMPLOYMENT

2018-present Executive Director, Merritt Parkway Conservancy, Stamford, CT
2017-18 Interim Co-Director, CT Trust for Historic Preservation, Hamden, CT
2014-18 Circuit Rider, CT Trust for Historic Preservation, Hamden, CT
2013-14 Executive Director, Historic Neighborhood Preservation, Stamford, CT
2008-12 Partner, 5516 Dauphine LLC, New Orleans, LA and New York, NY
2003 Instructor, Historic Building Technology, Brooklyn NY High School for the Arts
2000-02 Director, Garden State Trust Grants, New Jersey Historic Trust, Trenton, NJ
1998-2001 Adjunct Assistant Professor, Architectural Conservation, RPI, Troy, NY
1988-12 Principal, historic preservation consulting practice, Argyle NY & Stamford, CT
1987 Director, Preservation Services, Preservation League of NY State, Albany
1983-91 Consultant, NYS Commission on the Restoration of the Capitol, Albany
1983-87 Manager, Technical Preservation Services, New York Landmarks, NYC, NY
1980-83 Historic Preservation Specialist, The Ehrenkrantz Group, Architects, NYC, NY

EDUCATION

1983 MS Historic Preservation
Graduate School of Architecture & Planning, Columbia University, NYC
1975 BA *cum laude* American History/ Historical Geography
Clark University, Worcester, MA

QUALIFICATIONS

I meet Dept. of Interior Qualifications (36 CFR Part 61) for History Architectural History.

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EXPERIENCE

Publications / Papers / Presentations

- 2023 *Mid Century Modern Houses of Worship in Fairfield County.*
Presentation, Fairfield Museum and History Center, Fairfield, CT
- 2023 *Pequot Library and Its Connecticut Peers.*
Presentation, Pequot Library, Southport, CT
- 2020-23 *Fairfield County's Historic Public Libraries.*
Presentation, various public libraries in CT
- 2020-23 *Merritt Parkway Bridges.*
Presentation, various CT locations
- 2019-23 *Merritt Parkway: Past and Future of an American Treasure.*
Presentation, various CT locations
- 2018 *Mid-century American Gothic: Dalle de verre at the Fish Church, Stamford, CT*
Paper, Assoc. for Preservation Technology Jewels of Light Symposium, Washington, DC
- 2016 *World War I Stamford.*
Presentation, Ferguson Library, Stamford.
- 2000 "Origin and Diffusion of the Adirondack Camp, 1870-1930."
Paper, International Historical Geographers Association, Quebec City, PQ.
- 1995 *Architecture of an American Suburb: Rockland County.*
Exhibit and catalogue, Rockland Center for the Arts, West Nyack, NY.
- 1988 "Field Testing Weatherseals in Historic Windows."
Paper, National Park Service Windows Conference, Washington, DC.
- 1987 "Windows: Techniques for restoration and replacement."
Author, *Architectural Record*, June, 1987, pp. 150-165.
- 1982 *MacMillan Encyclopedia of Architects.*
Contributor, biographical entries, New York, NY: 1982.
- 1981 "Isaac G. Perry: Architect and Craftsman."
Author, *NYS Capitol Symposium Proceedings*, Albany, NY.
- 1975 "Pattern and Morphology of Blackstone Valley Mill Villages."
Paper, Eastern Historical Geographers' Association Conference, Sturbridge, MA.

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EXPERIENCE

Historic Resource Documentation, Registration & Planning

Historic Structure Reports (Principal Investigator and Author)

- 2006 Kruser-Finley House, Richmondtown, NY (for Staten Island Historical Society)
- 2002 Nassau County Courthouse, Mineola, NY (for Nassau County)
- 1995 Jackson Place Rowhouses, Washington, DC (for GSA)
- 1995 Health, Education and Welfare Building, Washington, DC (for GSA)
- 1996 U. S. Courthouse, New Haven CT (for GSA)
- 1993 The New York Studio School, New York, NY (for NY Studio School)
- 1992 William Barrow Mansion, Jersey City, NJ (for Barrow Mansion Development Corp.)
- 1991 Alonzo Roberson Mansion, Binghamton, NY (for Roberson Museum)
- 1982 New York State Capitol, Albany, NY (for NYS Capitol Commission)

National Historic Landmarks Nominations (Principal Investigator and Author)

- 2020 First Presbyterian Church, Stamford, CT (for First Presbyterian Church)
- 2020 Ulysses S. Grant Cottage, Wilton, NY (for Friends of Grant Cottage)
- 2012 Yaddo, Saratoga Springs, NY (for Corporation of Yaddo)
- 2005 Camp Uncas, Raquette Lake, NY (for private owners)
- 1994 Camp Sagamore, Raquette Lake, NY (for Sagamore Institute)
- 1992 NYS Inebriate Asylum, Binghamton, NY (for NYS SHPO)
- 1990 Camp Santanoni, Newcomb, NY (for Preservation League of NYS)
- 1990 Adirondack Camps NHL Thematic Context Statement (for NYS SHPO)
- 1982 Old Boston Post Road Historic District, Rye, NY (for Westchester County, NY)
- 1982 Playland Amusement Park, Rye, NY (for Westchester County, NY)

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EXPERIENCE

Historic Resource Documentation, Registration & Planning (cont.)

National Register of Historic Places Nominations (Principal Investigator and Author)

- 2001 The Trapps Cultural Resources, Gardiner, NY (for Mohonk Preserve)
- 1999 Adirondacks Fire Towers Multiple Resources (for Adirondack Architectural Heritage)
- 1980 Village of Ossining, NY Historic District (for Village of Ossining)
- 1979 Brandreth Factory Works, Ossining, NY (for Westchester County)
- 1979 Alexander Smith Carpet Works, Yonkers, NY (for Westchester County)

Historic Resource Inventories (Principal Investigator and Author)

- 2018 Making Places: CT's Historic Industrial Resources (for CT Trust for Hist. Preservation)
- 1992 US Military Academy, West Point, NY, Monuments Survey (for USMA)
- 1982 Central Park, NY, Multiple Resources (for Central Park Conservancy)
- 1979 Westchester NY Railroad Stations, Multiple Resources (for Westchester County)
- 1977 St. John's, NL, Heritage Area Historic Resources (for Newfoundland Historic Trust)

Select Restoration/Rehabilitation Planning (Historic Preservation Consultant)

- 2009 Conditions assessment, Village Hall, Seacliff, NY (for Village)
- 2007-09 Roof restoration, Friends Meeting House, Flushing, NY (for Flushing Friends)
- 2005-09 Stained glass restoration, P.E. Church of the Ascension, Greenwich Village, NY (for Church)
- 2008 Emergency salvage deconstruction, St. Saviour's Church, Maspeth, NY (for Maspeth Assoc.)
- 2007 Site drainage mitigation plan, Manitoga, Garrison, NY (for Russel Wright Design Center)
- 2007 Stabilization and adaptive use master plan, Chapel Hall, Franklin, NY (for Franklin Stage Co.)
- 1999 Adaptive reuse/ITC historic rehab certification, Demarest-Lyle House, Tenafly, NJ (for owner)
- 1997 U.S. Border Stations, Vermont: Historic Building Preservation Plans (for GSA)
- 1995 Exterior restoration, Tenafly NJ Railroad Station (for Borough of Tenafly)

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VOLUNTEER SERVICE

Current

- 2023 Merritt Parkway Conservancy, Stamford, CT, Board of Directors
- 2023 Fairfield County Preservation Network, Steering Committee Member
- 2020 New Canaan Preservation Alliance, Preservation Advisor
- 2012 Highland Green Foundation, Stamford CT, Board of Directors

Past

- 2023 Preservation League of NYS, Albany, NY Adirondack Architectural Tour coordinator
- 2018-20 Mary & Eliza Freeman Center, Bridgeport, CT Preservation Advisor
- 2013-14 Historic Neighborhood Preservation, Stamford, CT, Executive Director
- 2014-17 Sagamore Institute, Raquette Lake, NY, Board of Directors
- 1992-01 Battenkill Chorale, Cambridge, NY, Board of Directors
- 1992-2000 Washington County [NY] Covered Bridge Advisory Committee, Member
- 1980-86 Columbia University Preservation Alumni, New York, NY Board of Directors
- 1977-79 Connecticut Trust for Historic Preservation, (then) New Haven, CT, volunteer
- 1975-77 Newfoundland Historic Trust, St. John's, NL, volunteer

AWARDS

- 2022 Lifetime Achievement Award for Preservation Leadership in the Adirondacks
Adirondack Architectural Heritage, Keeseville, NY
- 2001 Preservation Excellence Award for Demarest-Lyle House Historic Rehabilitation
New Jersey Historic Trust, Trenton, NJ
- 1996 Preservation Excellence Award for Tenafly Railroad Station Exterior Historic Restoration
New Jersey Historic Trust, Trenton, NJ

EXHIBIT B

WES HAYNES
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November 2, 2023

Timothy M. Herbst, Esq.
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Re: Review of Docket # 516 "Appendix D: Phase IA Cultural Resources Assessment Survey of the Proposed Fairfield to Congress Railroad Transmission Line 115-Kv Rebuild Project"

Dear Attorney Herbst,

I have reviewed the above-referenced Docket # 516 Appendix D at your request on behalf of the Town of Fairfield. The scope of my review includes examination of the cultural resource assessment for conformance to methodological standards of research, thoroughness and accuracy of data, and conclusions. My review primarily focuses on the cultural resource assessment of the Southport Historic District, the largest and best documented cultural resource along the corridor of the proposed powerline and arguably the area of its greatest impact.

Phase IA Cultural Resource Assessments evaluate overall sensitivity of project areas for the presence of cultural resources in order to guide subsequent field investigation and initiate exploration of alternatives where necessary. Phase IA work conducted early in the planning activities for a project should generate information useful in developing and screening alternatives. Phase IA reports are based on a review of available documentation on cultural resources within an area potentially impacted by a project. Documentation review includes consulting sources at the State Historic Preservation Office (SHPO), universities, local libraries, museums, historical societies, and other repositories. They typically include an initial windshield level field inspection of the project area to assess previous disturbance and the level of testing which may be necessary within the proximity of the proposed project. The resulting assessment contains a history of cultural resources evident or likely to be discovered in the project area, and an evaluation of the area's known and potential sensitivity for cultural resources which might be affected by possible construction impacts. Where cultural resources are adversely impacted by proposed construction, Phase IA reports normally contain clear recommendations for subsequent Phase IB field survey.

The stated methodology of the UI Phase IA report's cultural resource assessment to 1) gather and present data regarding previously identified cultural resources within the vicinity of the Project corridor; 2) investigate the Project corridor in terms of its natural and historical characteristics; and 3) evaluate the need for completing additional cultural resource investigations are consistent with this approach, but the report as presented falls short of meeting those objectives. The numerous errors, omissions and mischaracterizations of cultural resources reported in the assessment show little evidence of an

acceptable level of review of the extensive documentation or investigation of cultural resources in the area impacted by the project, and its resulting conclusions are deficient and incomplete.

There is no pro forma methodology for viewshed assessment given the wide range of underlying variables of how natural and built environments interface with the introduction of new infrastructure of variable scales and forms. The stated objectives of the Phase IA report's supplemental viewshed analysis are 1) to gather and present data regarding previously identified above ground historic resources (e.g., districts, buildings, objects and areas) situated within a 0.5 mile of the Project and 2) to identify those above ground historic resources that may be impacted by the Project. While this analysis, presented in tables, evidences additional consultation of existing documentation beyond the Phase IA report, it is also flawed in its presentation of incomplete and incorrect data on cultural resources resulting in a flawed assessment of visual impacts on those resources.

Deficiencies of the UI Phase IA and viewshed reports

1. The literature search and documentation review in the UI Phase IA and viewshed reports provides inadequate basis to assess and report the extent, location and significance of cultural resources impacted by the proposed project.

Thorough review of existing historic resource inventories, State and National Register nominations, and local historic district commission files is a baseline task within a Phase IA scope of work. It is clear that this task was not accomplished in the UI Phase IA report based on the scant list of references cited on pages 22 and 23 and evidenced by the extraordinary and inexplicable undercount of cultural resources within and adjacent to the Southport Historic District impacted by the proposed powerline.

The report claims that its findings are "based on the examination of data maintained in the cultural resources files of the Connecticut State Historic Preservation Office (CT-SHPO)," but provides no evidence that these files were consulted. Based on the three applicable references cited-- an episodic timeline of Fairfield History prepared by the Fairfield Museum, a late 19th century county history, and a third secondary source inaccessible by a dead link, there is no evidence that a minimally acceptable rigorous research effort was made to identify or assess Southport's cultural resources.

CT-SHPO files of original surveys and reports in Hartford and digitized documents available on-line contain extensive information based on archival research and fieldwork conducted from 1965 to the present documenting cultural resources within and adjacent to the Southport Historic District and the community's long public efforts to preserve them. Omitted from the UI Phase IA and viewshed assessments are references to these readily available resources critical to understanding and evaluating the cultural resources within .5 miles of the project area including:

Omitted Historical and Architectural Surveys/Documentation

1965 "Fairfield, Connecticut, 1639-1964, On the Three Hundred Twenty-Fifth Anniversary of the Founding of Fairfield, inventory, 1965." [CT-SHPO files, shelved at CT Historic Preservation Council, Bk#68].

1966 Fairfield Historic District Commission, "Establishment of Historic Districts in Greenfield Hill and Southport," 1966. [LOCATION]

- 1966-78 "Historic American Buildings Survey: Southport CT" [Photographic documentation of 39 buildings, some with measured drawings]. [<https://www.loc.gov/photos/?q=southport+ct+habs>]
- 1971 Constance Luyster, Connecticut Historical Commission, "Southport Historic District National Register of Historic Places Inventory/Nomination Form," 1971.
[https://npgallery.nps.gov/NRHP/GetAsset/NRHP/71000898_text]
- 1985 "Historic Structures Report: Fairfield Railroad Station," 1985. [CT-SHPO files]
- 1988 Preservation Computer Services, Inc. "Historic and Architectural Survey of Fairfield, CT," typescript, July 1988 [UCONN ASC Digital Collections, <http://hdl.handle.net/11134/20002:fairfieldsurveys>] (Townwide survey of 630 buildings exclusive of the three designated historic districts; recommended expansion of Southport Historic District area by adding Spruce Street Historic District and railroad station buildings).
- 1989 Jan Cigliano and Ralph G. Schwarz. *Southport: The Architectural Legacy of a Connecticut Village*. The Southport Conservancy, Southport, CT, 1989.
- 1992 Jill S. Mesirow and Dr. Page Putnam Miller, "National Historic Landmark Nomination, Birdcraft Sanctuary [314 Unquowa Road, Fairfield, CT]" 1992.
https://npgallery.nps.gov/NRHP/GetAsset/NHLS/82004371_text
- 1993 Kate Ohno Means and Carolyn Pitts. National Historic Landmark Nomination: Jonathan Sturges House [449 Mill Plain Road, Fairfield, CT] 1993.
https://npgallery.nps.gov/NRHP/GetAsset/NHLS/84000247_text
- 2000 Historical Technologies. "The New Haven Railroad Catenary System," typescript, September, 2000. [UCONN ASC Digital Collections, <http://hdl.handle.net/11134/20002:860351875>] (Documentation of catenary lines, bridges and towers, Greenwich-New Haven corridor including 1912-14 existing 32' high bridges in Fairfield)
- 2006 "State Level Documentation: Westway Road Railroad Bridge (CDOT Bridge #08039R)," 2006. [CT-SHPO files]
- 2007 Fairfield Historic District Study Committee, "Proposal to expand the Southport Historic District to add the Spruce Street extension: Amended Final Report," typescript, 2007. [CT-SHPO files]
- 2009 Fitzgerald & Halliday, "Fairfield, Connecticut: 2009 Historic Resource Inventory," typescript, Spring, 2009 [UCONN ASC Digital Collections, <http://hdl.handle.net/11134/20002:fairfieldsurveys>] (Townwide inventory of 155 buildings not included in 1988 survey including 92 and 156 Pequot Avenue and 15 other individual buildings near but outside the Southport NR district).
- 2019 The Public Archaeology Lab, Inc. "National Historic Landmark: Barnum Institute of Science and History" [820 Main Street, Bridgeport, CT], 2019.
https://www.nps.gov/subjects/nationalhistoriclandmarks/upload/Barnum-Institute_NHL_NPSAB_2023-06_12_508.pdf

2019 R. Christopher Goodwin Associates. "The Architecture of Coastal Connecticut 1900-1970: Historic Context and Property Types." July, 2019.

2021 Fairfield Historic District Commission. *Historic Districts and Property Handbook*. Town of Fairfield, 2021.

Omitted Archaeological Surveys

1989 "Phase I Archaeological Reconnaissance Survey: Bridge No. 00321 (located between Mill Hill Road and Route 1)," 1989. [CT-SHPO files, CT Historic Preservation Council no. 413]

1996 "U.S. Route 1 Major Drainage Improvements (located north of Route 1 along Pease Ave. and extending south to Sasco Creek), CONNDOT 50-198, 1996. [CT-SHPO files, CT Historic Preservation Council no. 632] "

1997 "Archaeological Assessment of the Vicinity of the Harbor Road Bridges (East and West) (located over Mill River), State Project No. 50-196, Bridge No. 04950 and 04951," 1997. [CT-SHPO files, CT Historic Preservation Council no. 703].

2004 "Phase 1 Archaeological Reconnaissance Survey, Bookmark at Southport (located on Westway Road)," 2004. [CT-SHPO files, CT Historic Preservation Council no. 1452].

2010 "Archaeological Investigations for CT Siting Council Docket 272: Middletown-Norwalk 345 kV Transmission Line Project: Segments 3, 4a, 4b and 4c: East Devon Substation, Milford to Norwalk Substation," 2010. [CT-SHPO files, CT Historic Preservation Council no. 1853].

2019 Kevin McBride, David Naumec, Ashley Bissonnette, & Noah Fellman, contributors. "Technical Report Battle of Pequot (Munnacommock) Swamp, July 13-14, 1637: Site Identification and Documentation Project, Department of the Interior National Park Service American Battlefield Protection Program GA-2287-17-004 ARPA / NHPA Compliant Copy – Redacted For Public Use" 2019. [<https://www.fairfieldhistory.org/wp-content/uploads/2022/09/ABPP-FMHC-GA-2287-17-004-Technical-Report-ARPA-2019.pdf>]

2. The UI Phase IA Historical Background narrative is superficial, omitting important facts about the history and architectural importance of cultural resources impacted by the project. This results in a misleading assessment of the significance of the Southport Historic District's above-ground cultural resources.

The UI Phase IA report does not present a complete or accurate assessment of existing cultural resources to the minimal standards of a Phase IA cultural resource investigation.

Assessing potential adverse impacts to State and National Register-listed resources to a minimal standard in a Phase IA report is premised on an accurate understanding of the resource's area(s) of importance as recorded in the nomination form's statement of significance, with an understanding that over time a resource's significance may be subject to change.

When the Southport Historic District was included in the National Register in 1971, the National Park Service had yet to formalize the criteria in place today for thematic areas or levels (local/state/national)

of significance. Nonetheless, the areas and levels of significance are described in the nomination's narrative text, which clearly identifies the Southport Historic District to be significant in the areas of history (commerce and shipping) and architecture (as "a valuable concentration of Greek Revival and Victorian structures" substantiated by capsule descriptions of approximately one-fifth of the district's then more than 150 contributing nominated properties). The statement in the narrative that "more shipping was owned in Southport in proportion to its size than in any port between Boston and New York" in the early nineteenth century indicates that the Southport Historic District was then considered to be of national significance. Clear identification of National Register areas and level of significance are necessary to inform evaluations of the integrity of resources when evaluating impacts of future changes such as those proposed in this proposed project. Beyond the National Register nomination, the national significance of the Southport Historic District's architecture was additionally affirmed in by the National Park Service's Historic American Buildings Survey photographic documentation of 39 architecturally distinctive buildings within the district between 1966 and 1978.

Instead of quoting the National Register's statement of significance, the UI Phase IA states on page 11 that "the Southport Historic District is considered significant because it was the center of trade and commerce in the town of Fairfield in the eighteenth and nineteenth centuries." This misleading assessment, made without any substantiation or explanation, inaccurately diminishes the district's national significance and ignores the its architectural importance. In fact, the contributing buildings within the National Register historic district designated in 1971 and those subsequently added in two district expansions, retain exceptional integrity of their contributing features and settings compared to other National Register historic districts. This is due in large part to its consistent regulation as a local historic district. The fact that all contributing properties within the district, as well as new construction added to the district, have been subject to review and approval under preservation and design regulations, has reinforced the district's architectural integrity.

Given the adverse visual impact of the project as proposed, the absence of an accurate assessment of architectural integrity drawn from the historic district's significance is a serious flaw of this Phase IA cultural resource assessment and viewshed analysis.

3. The UI Phase IA report and viewshed analysis are inaccurate in reporting both the number, character and location of cultural resources impacted by the proposed project as well as the severity of impacts on those cultural resources.

It is not surprising that the area potentially impacted by the proposed project is exceptionally rich in above-ground cultural resources, for the development of the communities of Bridgeport and Fairfield was stimulated by the arrival of the railroad in 1849, and the proposed project corridor follows that of the railroad. Introducing this project with such highly visible elements as proposed into an area abundant in cultural resources will have extensive visual impacts on hundreds of visual impacts. Given the extensive documentation of above-ground cultural resources available in historic resource inventories, State and National Register nominations, and local historic district designation reports, a comprehensive visual assessment of potential impacts on all known above ground cultural resources would be expected. However, based on a review of the data on the Southport Historic District tabulated in UI Phase IA Table 1, "National and State Register and Local Historic District contributing and stand-alone properties along the Project corridor" and the viewshed analysis' Table 1, "Previously identified above-ground resources within 0.5 miles of the project corridor," the information is incomplete and inaccurate.

Both tables seriously undercount the number of above ground cultural resources in the Southport Historic District impacted by the proposed project, and the data presented within the tables include significant errors in describing resources and potential impacts.

Only five, or 2% of the 221 Southport Historic District properties are presented in the Phase IA Table, and each of these assessments errs in reporting potential impacts on the resources discussed:

1. the Southport Historic District (page 17) appears to be presented as a single resource containing “multiple addresses” subject to unenumerated visual impacts. Unlike other historic districts tabulated in the report, this entry does not provide readily available inventory details useful in assessing the impact of the project on the district’s individual cultural resources. The entry omits the fact that the power line will physically and visually bisect the historic district, and will be visible from multiple vistas toward the district from outside and from outward and internal vantages from within the 221 properties within the historic district’s jurisdiction. In addition, the report omits referencing the fact that local certificates of appropriateness for changes to all elevations take into account the appearance of all elevations regardless of public view blocked by vegetative screening. are issued on the basis of project review based on the appearance of changes to all elevations absent a presumption of vegetative screening. Under this standard, the visibility of transmission lines and poles would be considered extensive non-compliant visual intrusions.
2. Local Historic District and National Register listed properties at 560 Pequot Avenue (“Residence”) and 720 Pequot Avenue (Pequot Library) (page 17) within the local district, and State Register listed 170 Pequot Avenue (Northrup Cottage) (page 19) outside the local district, are misrepresented as properties not subject to visual impact. To the contrary, these properties will be subject to significant visual impact by permanent removal of existing vegetation screening the railroad and existing and proposed overhead powerlines and poles. In addition, all properties will be subject to permanent loss of use of significant portions of property. The taking of portions of these properties by easement will severely restrict the ability of the Pequot Library, a vibrant, heavily used cultural institution, to accommodate patron parking and expand facilities at 560 and 720 Pequot Avenue. The easement extending over the building at 170 Pequot Avenue threatens the physical integrity of the historic building and will severely restrict the owner’s future use of the property.
3. [Westbound] Southport Railroad Station (100 Center Street) (page 17) is misrepresented as a resource with no visual impact. To the contrary, it will be subject to significant visual impact by the close location of the powerline.
4. Phase IA Table 1 inexplicably omits reporting severe physical and visual impacts on other listed and inventoried cultural resources where portions of the existing properties will be made permanent parts of the project corridor by easement. Examples of these in Southport are a group of buildings on Pequot Avenue near to but outside the Historic District consisting of State Register-listed listed 170 Pequot Avenue and its neighbors included in the 1988 HRI considered “notable” at numbers 156 (dated 1875), 142 (dated 1900), 122 (dated 1859), and 92 (dated 1700).

5. Viewshed analysis Table 1 inexplicably omits reporting visual impacts on 199, or 90% of the 221 properties within the local historic and its largely coincidental National Register district as listed in Attachment 2 of this letter.

As a result of these omissions, the tables presenting the addresses of designated and impacted properties in the Southport Historic District fail to provide accurate and useful data to inform environmental project review by public agencies and the public in general. Taken at face-value,, the mischaracterizations and extensive undercount of cultural resources paint a misleading picture of the highly sensitive area subject to adverse impacts from the proposed project.

4. The cultural resource assessment does not disclose the unusual aggregation of cultural resources of national significance within 0.5 miles of the proposed project corridor.

One of the exceptional aspects of the area subject to investigation in the cultural resource assessment is its unusually large concentration of historic places of national significance. In addition to the Southport Historic District, the area contains three National Historic Landmark (NHL) properties: 314 Unquowa Road, Fairfield, Birdcraft Sanctuary designated 1992; 449 Mill Plain Road, Jonathan Sturges Cottage, designated 1994; and 820 Main Street, Bridgeport, Barnum Institute of Science and History, designated 2023. NHL designation is the highest level of federal recognition of cultural importance for non-federally owned properties, reserved for properties of exceptional national significance that possess great integrity. Although these resources are identified in the viewshed analysis, Birdcraft, located within 500' of the Project Corridor is incorrectly characterized as a state register resource instead of its unusual status as an NHL district. Birdcraft is additionally a wildlife sanctuary, contradicting the report's assessment that "The Project area does not cross over and is not located in the immediate vicinity of any national wildlife refuges or parks, state parks, forests, wildlife management areas or greenways..."

Conclusion

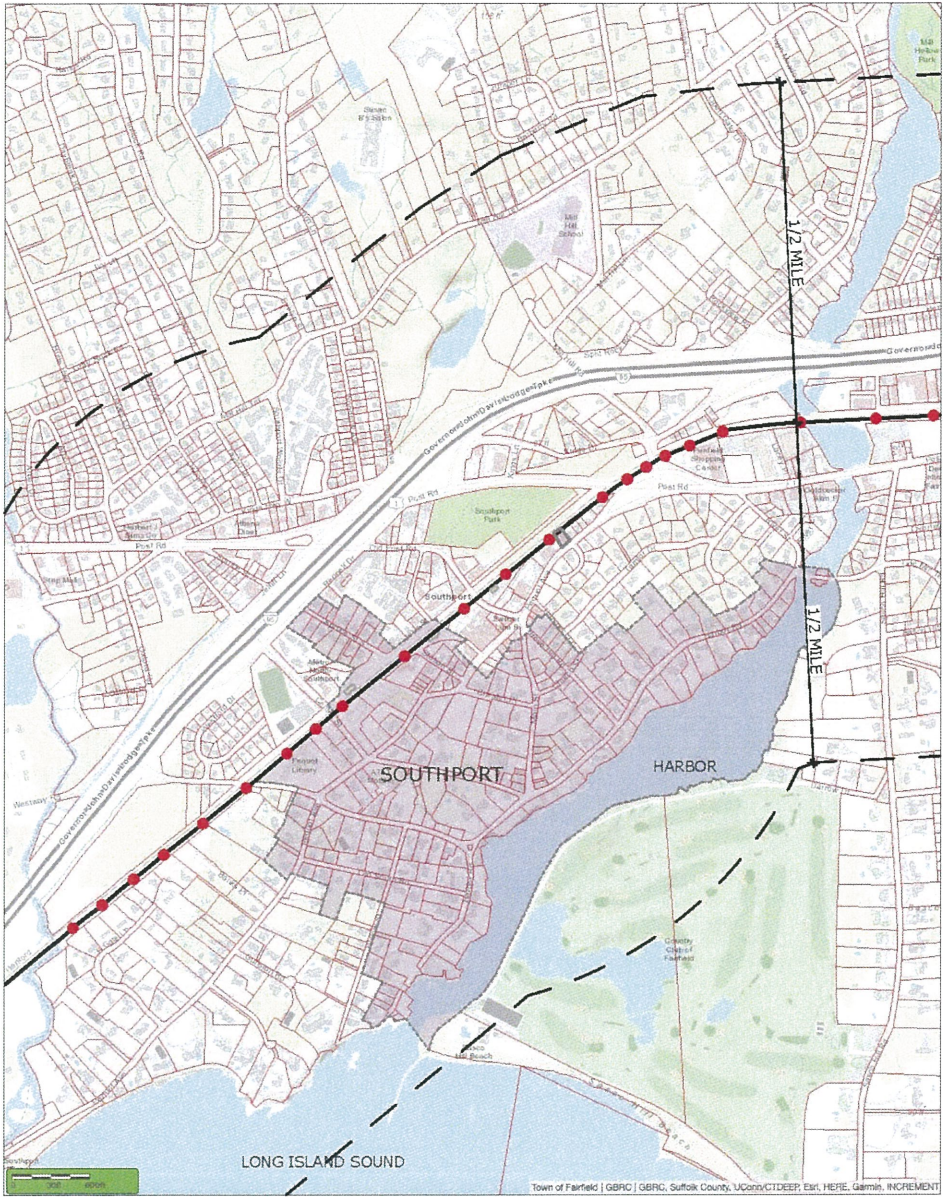
In summary, the data collection and findings concerning the existing above-ground cultural resources of the Southport Historic District in the UI Phase IA report and its supplemental viewshed assessment are incomplete and inaccurate. This omission of readily available sources of information critical to objective assessment leads to flawed and incomplete conclusions concerning the severity and extent of adverse physical and visual impacts to existing above ground cultural resources. As a result, the UI Phase IA report fails to provide substantive assessment of the physical and visual damage resulting from the proposed project, and does not present credible observations or recommendations for further Phase IB investigation and exploration of feasible alternatives necessary to minimize the project's adverse impacts.

Sincerely,



Wes Haynes
Historic Preservation Specialist

Attachment 1: Southport Historic District: Boundaries and .05 Mile radius from project corridor (David Scott Parker Architects)



Map indicating 1/2 Mile distance from proposed U.I. power lines regarding CT Siting Council - Docket #516 "Cultural Resources Report".

HISTORIC DISTRICT

Attachment 2: Inventory of Southport Historic District and select other Cultural Resources within 0.5 miles of proposed project corridor.

The following table presents the official inventory of the street addresses of all properties located within the local Southport Historic District compiled by the Fairfield Historic District Commission (Source: FHDC Handbook) with additions and corrections made resulting from field survey in October 2023 by David Scott Parker FAIA. The combined Southport Historic District inventory lists [221] street addresses of properties under the Commission’s jurisdiction, all of which are within .05 mile of the proposed project corridor and at risk from its visual impacts. The Phase IA cultural assessment and viewshed analysis reports a scant 20 of these properties, omitting any mention of 199 (90%) of these historic district resources.

Following the LHD inventory is a select list of other recognized cultural resources at risk of physical and visual impacts from the proposed project.

Note: Information absent from the FHDC inventory are supplemented with dates and notes presented in *italic* from the on-line Town tax assessment records compiled by VISION.

LHD Cultural Resource Address [Source: LHDC / 288 Center]	Dates and Notes [Source: (LHDC) / (Tax Record)]	Cited IA	Omitted IA
28 Center Street	(1828)		●
62 Center Street	C1830	●	
92 Center Street	1954		●
100 Center Street	1895/rebuilt 2008	●	
134 Center Street	1882		●
165 Center Street	1965		●
172 Center Street	1956		●
212 Center Street	1838		●
275 Center Street	1870		●
288 Center Street	Trinity parking lot		●
321 Center Street	C1950-60		●
33 Chester Place	1811		●
60 Chester Place	1961/ remodeled 1962		●
75 Chester Place	2015		●
95 Chester Place	2018		●
1 Church Street	1831		●
16 Church Street	1835		●
18 Church Street	1942		●
38 Church Street	(1884)		●
45 Church Street	(1942)		●
95 Harbor Road	1712?/remodeled 1946,58	●	
144 Harbor Road	2006		●
160 Harbor Road	1871/ remodeled 1961		●
163 Harbor Road	1958		●
187 Harbor Road	(1740 wi addition)		●
204 Harbor Road	1782		●
211 Harbor Road	C1899/rebuilt 2006		●
221 Harbor Road	(1884)		●
233 Harbor Road	C1782 moved Colonial		●
240 Harbor Road	1966		●
241 Harbor Road	C1925 (1896?) rebuilt 2008		●
260 Harbor Road	1954		●
273 Harbor Road	1939/ remodeled 1979		●
297 Harbor Road	1979/replaced 2001		●
298 Harbor Road	1834		●
319 Harbor Road	1922		●
320 Harbor Road	1927		●
322 Harbor Road	1999		●
324 Harbor Road	1978		●
330 Harbor Road	1997		●
331 Harbor Road	vacant land		●
350 Harbor Road	1931 wi c1874 shed		●
385 Harbor Road	1854/ remodeled 2014	●	
390 Harbor Road	1884/ remodeled 1939		●
406 Harbor Road	C1870		●
411 Harbor Road	1937		●
418 Harbor Road	1867-82 wi c1870 cottage	●	
450 Harbor Road	C1715 moved from E Haven 1958		●
457 Harbor Road	1957 modern		●

478 Harbor Road	1837		●
494 Harbor Road	1848 remodeled 1871, 1951	●	
523 Harbor Road	1927 remodeled 1952		●
534 Harbor Road	C1825	●	
564 Harbor Road	1823-89 remodeled 1926		●
575 Harbor Road	1966 modern		●
580 Harbor Road	2004 col rev		●
608 Harbor Road	1808		●
637 Harbor Road	<i>no tax record for address</i>		●
638 Harbor Road	1913		●
647 Harbor Road	<i>1834 Pequot Yacht Club</i>		●
648 Harbor Road	Wakeman Memorial Boys Club		●
656 (aka 668-70) Harbor Road	1787 remodeled 1834?, 1948		●
669 Harbor Road	1834 remodeled 1928,1954 Pequot Yacht Club		●
701 Harbor Road	Vacant lot		●
712 Harbor Road	C1835-40		●
750 Harbor Road	1843		●
780 Harbor Road	1830 reb c2000		●
789 Harbor Road	C1850/ remodeled c1910, c2010	●	
824 Harbor Road	1767-70		●
825 Harbor Road	C1830 remodeled 1952		●
850 Harbor Road	1949		●
883 Harbor Road	1953		●
892 Harbor Road	1809 remodeled 1920	●	
911 Harbor Road	C1910 rebuilt 2001		●
920 Harbor Road	2013		●
935 Harbor Road	1937 rebuilt 2013		●
968 Harbor Road	1928 (includes empty lot 977)		●
1000 Harbor Road	1884		●
1036 Harbor Road	1924		●
1060 Harbor Road	1971		●
1074 Harbor Road	1866		●
1085 Harbor Road	<i>(Town-owned open space)</i>		●
1088 Harbor Road	C1880 moved 1859		●
1100 Harbor Road	1904		●
1110 Harbor Road	1859 remodeled 1941 1960		●
15 (aka 33) Main St	1722 (remodeled 1920)		●
26 Main Street	C1840		●
40/42 Main Street	C1840 (1864) remodeled 1962		●
45 Main Street	<i>no tax record for address</i>	●	
52 Main Street	1792		●
69 Main Street	<i>1914 Vol. Fire Dept.</i>		●
81 (aka 85) Main Street	1834		●
95 Main Street	1828	●	
104 Main Street	C1825 remodeled c1840		●
115 Main Street	<i>1850, enlarged</i>		●
139 Main Street	1871-73		●
142 Main Street	C1811		●
176 Main Street	1861-86	●	
179 (aka 175) Main Street	1928		●

182 Main Street	1859		●
191 Main Street	1834		●
207 Main Street	1804		●
214 Main Street	1917-18		●
219 Main Street	1822 remodeled moved here 1946		●
226 Main Street	1863-65		●
227 Main Street	1833		●
234 (aka 236/8/42/44) Main Street	1894		●
249 Main Street	<i>Address not in tax records or field survey</i>		
251 Main Street	See 668-70 Harbor Road		●
252 Main Street	1894		●
24 Old South Road	1949		●
66 Old South Road	C1890? Rem 1938		●
75 Old South Road	1987 neo Victorian		●
101 Old South Road	1950		●
104 Old South Road	1826 2015		●
171 Old South Road	1924		●
174 Old South Road	1922		●
195 Old South Road	C1830 wi c1850 porch		●
216 Old South Road	1933		●
225 Old South Road	1874		●
241 Old South Road	<i>Address not in tax records or field survey</i>		
246 Old South Road	C1850		●
249 Old South Road	1871		●
170 Pequot Avenue		●	
416 Pequot Avenue	1877		●
425/35/41 Pequot Avenue	(1972)		●
428 Pequot Avenue	1840		●
448 Pequot Avenue	1834 remodeled 1949		●
470 Pequot Avenue	C1850		●
488 Pequot Avenue	1930		●
490 Pequot Avenue	1894		●
494 Pequot Avenue	C1892		●
500 Pequot Avenue	1890		●
504 Pequot Avenue	C1895		●
524 Pequot Avenue	1874-75 Southport Congregational Church		●
525 Pequot Avenue	(Southport Congregational Church parking lot)		●
550 Pequot Avenue	(Southport Congregational Church parking lot)		●
560 Pequot Avenue	1950	●	
561 Pequot Avenue	1956		●
581 Pequot Avenue	C1840		●
612 Pequot Avenue	1825-30, parsonage c1865		●
651 Pequot Avenue	1856-62 Trinity Church/1872 Trinity Chapel/ 1954 add		●
658 Pequot Avenue	1868-69		●
665 Pequot Avenue	(1895)		●
678 Pequot Avenue	1832		●
683 Pequot Avenue	1894		●
715 Pequot Avenue	1890		●
720 Pequot Avenue	1887-93 Pequot Library	●	
776 Pequot Avenue	1890 moved here		●

807 Pequot Avenue	1950		●
808 Pequot Avenue	1951		●
860 Pequot Avenue	C1880		●
29 Prospect Lane	1842		●
17 Rose Hill Road	1855		●
35 Rose Hill Road	1913		●
53 Rose Hill Road	1884		●
69 Rose Hill Road	1804? C1840		●
72 Rose Hill Road	1852 remodeled 1920		●
86 Rose Hill Road	1884 remodeled 1835		●
137 Rose Hill Road	1835		●
140 Rose Hill Road	C1970		●
155 Rose Hill Road	1848 remodeled 1919	●	
160 Rose Hill Road	1983		●
10 Spruce Street	1986		●
26 Spruce Street	1872		●
33 Spruce Street	1889		●
44 Spruce Street	1870		●
46 Spruce Street	1978		●
51 Spruce Street	1973		●
53 Spruce Street	1873		●
62 Spruce Street	1854		●
71 Spruce Street	1926-27		●
80 Spruce Street	1875		●
83 Spruce Street	1946		●
100 Spruce Street	2006		●
101 Spruce Street	1947		●
115 Spruce Street	1947 rebuilt 2013		●
28 Station Street	1874		●
46 Station Street	1859		●
49-51 Station Street	(1982)		●
62 Station Street	date not reported		●
65 Station Street	(1950)		●
75 Station Street	1890		●
96 Station Street	1884 RR station	●	
25 Westway Road	1856		●
30 Westway Road	(Vacant land)		●
45 Westway Road	1832	●	
50 Westway Road	(Vacant land)		●
67 Westway Road	1884		●
70 Westway Road	(Vacant land)		●
89 Westway Road	1840		●
90 Westway Road	(Address not in tax records)		
114 Westway Road	C1814/c1884/enlarged c2013	●	
144 Westway Road	C1900		●
155 Westway Road	1938		●
158 Westway Road	1794, moved 1894		●
187 Westway Road	1812, remodeled, 1925	●	
211 Westway Road	1977		●
231 Westway Road	(Vacant land owned by Pequot Library Assn)		●

271 Westway Road	1953		●
306 Westway Road	C1840 (on 720 Pequot Library property)		●
14 Willow Street	C1830		●
46 Willow Street	1901		●
72 Willow Street	1797, remodeled c1850		●
96 Willow Street	1797, remodeled c1830		●
130 Willow Street	1859		●
153 Willow Street	1989		●
181 Willow Street	1967		●
221 Willow Street	1968		●
Total LHDC/SR/NR Resources			
222		20	199
Other Cultural Resources			
92 Pequot Avenue	1700, "notable" in 1988 HRI		●
122 Pequot Avenue	1859, "notable" in 1988 HRI		●
142 Pequot Avenue	1900, "notable" in 1988 HRI		●
156 Pequot Avenue	1875, "notable" in 1988 HRI		●
170 Pequot Avenue	State Register listed, subject to taking by easement	●	
		21	203