



Department of Economic and  
Community Development

State Historic Preservation Office

October 27, 2023

Mr. Brian Gaudet  
All Points Technology Corporation  
567 Vauxhall Street Extension, Suite 311  
Waterford, CT 06385

Subject: Proposed Wireless Telecommunications Facility  
124 Ague Spring Road  
Haddam, CT  
Homeland Towers, LLC  
ENV-24-0239

Dear Mr. Gaudet:

The State Historic Preservation Office (SHPO) has reviewed the submittal for a proposed telecommunications facility at the above address. 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 150 foot tall monopole within an approximate 2,800 square foot fenced equipment compound, located in the northwestern portion of the Subject Property. The compound is to contain an equipment pad and shelter, generator on concrete pad, and additional lease spaces. Access is to be through a new gravel access road, originating from Ague Spring Road.

No previously identified archaeological sites are located within 0.5 miles of the project area. Two properties listed on the State Register of Historic Places, the Haddam Neck Congregational Church (1873), located at 408 Quarry Hill Road, and the Higganum Schoolhouse (c. 1825), located adjacent to the Church, are located within 0.5 miles of the project area; they have not been evaluated for eligibility for listing on the National Register of Historic Places. However, intervening topography and tree cover will prevent the installation from being seen from the property the majority of the time, and will not adversely impact the resources.

Soils within the project area are characterized as well drained; a pedestrian survey revealed that while the western portion of the proposed compound and access road have been previously disturbed, the remainder retains the potential to contain intact archaeological deposits. We therefore recommend that a Phase IB professional cultural resources assessment and reconnaissance survey that includes subsurface testing techniques be completed in areas

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identified as having moderate to high archaeological sensitivity and will be impacted by the proposed facility prior to construction. All work should be in compliance with our *Environmental Review Primer for Connecticut's Archaeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey.

Though this office acknowledges that the *Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process* recommends an Area of Potential Effect-Visual Effects (APE-VE) to be limited to a 0.5 mile radius from the proposed telecommunications facility, the proposed facility will be visible from areas within the National Register of Historic Places-listed Haddam Center Historic District (NR# 89000012) and the State Register of Historic Places-listed Higganum Landing Historic District (listed March 25, 1987). The visual impact to both districts will constitute an adverse effect to historic resources, namely impacting the setting of each district. This office also acknowledges that the Project Proponent evaluated multiple sites for the telecommunications facility, which were not selected due to inadequate coverage/disinterest of property owners.

Therefore, finding no prudent and feasible alternative to the proposed site, this office requests that the Project Proponent continue consultation to resolve the adverse effect, including any potential impacts to archaeological resources revealed by the requested Phase IB Survey.

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 with a large, sweeping flourish at the end.

Jonathan Kinney  
State Historic Preservation Officer

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