



Department of Economic and  
Community Development

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January 2, 2015

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Ms. Melanie A. Bachman  
Staff Attorney/Acting Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051  
860-827-2951

RECEIVED  
JAN 07 2015  
CONNECTICUT  
SITING COUNCIL

Subject: Proposed 150' Telecommunications Facility  
186 Black Rock Turnpike  
Redding, CT  
Message Center Management

ORIGINAL

Dear Ms. Bachman

The State Historic Preservation Office reviewed the above referenced undertaking in July 2014 and determined that the initial proposed height of 150' would result in an adverse effect to historic resources. We suggested a reduced height of 120' to avoid an adverse effect. Our determination letter (enclosed) was sent to the lead consultant, All-Points Technology Corporation's sub-contracted historian, FuturePast Preservation on July 14, 2014. Furthermore, as a courtesy to All-Points Technology Corporation, this office sent them an email with a draft of the letter on July 18, 2014. All-Points Technology Corporation was fully aware of our position. Although our letter was read into record during one of the Siting Council hearings, because the signed copy of the determination (enclosed) was not shared with the Siting Council, our determination was not considered.

This office is therefore requesting that the Siting Council formally re-open the hearing on 186 Black Rock Turnpike in Redding, CT and request that any work on the undertaking be suspended until a hearing can be held.

Sincerely,

Daniel T. Forrest  
State Historic Preservation Officer



December 8, 2014

Department of Economic and Community Development  
State Historic Preservation Office  
One Constitution Plaza  
Hartford, CT 06103

Attn: Mary B. Dunne  
Deputy State Historic Preservation Officer

Re: Approved Telecommunications Facility  
186 Black Rock Turnpike  
Redding, CT

Dear Ms. Dunne,

On October 30, 2014 the Connecticut Siting Council granted Message Center Management (MCM) a Certificate of Environmental Compatibility and Public Need for constructing a new, 150-foot tall telecommunications monopole tower at the referenced property. The property is currently developed with the Redding Ridge Fire Department complex and includes an 80-foot tall, steel lattice tower used for emergency communications. This will be replaced with the 150-foot tall monopole.

While consulting with the Redding Town Historian in March 2014, and in response to its request for evaluation of potential effects to historic properties eligible for listing on the National Register of Historic Places, All-Points Technology (APT) notified your office of this pending proposal. The field efforts to assess potential impacts involved a balloon test and photo-documentation, as well as the creation of photo-simulations depicting the future build scenario. The balloon test was conducted on March 18, 2014 and the documentation/simulations provided to the Town Historian shortly thereafter. The photographs and simulations documented that none of the properties specifically identified in the Town Historian's request would be affected by the proposal.

APT through its architectural consultant formally initiated consultations with your office on April 7, 2014 in accordance with Section 106 of the National Historic Preservation Act and the FCC Programmatic Agreement. In near-view images, the above referenced photos demonstrate that the existing tower, albeit of lower height, is substantially wider and, in our opinion, more of a visual impact than the proposed replacement tower, which will be a narrower monopole. As

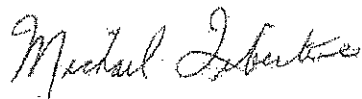
such, we identified our opinion that the project would have no adverse effect on historic resources or districts in this area of Redding, the nearest of which is substantially east of the project area. Having received no other contrary information from any consulting party within thirty days as provided for in the FCC's Programmatic Agreement, on May 19, 2014 MCM formally filed an application with the Siting Council for the project.

On May 30, 2014 we received an email from your office that requested a site reconnaissance to assist in your review of potential effects of the project on historic resources. We met in the field on June 24, 2014. In our follow up communications, notwithstanding the FCC Programmatic Agreement, we were advised in July that your office would be confirming that the proposed undertaking would have no adverse effect on contributing resources eligible for listing in a potential National Register of Historic Places district subject to some possible "conditions". A formal confirmation was never received from your office.

During the Siting Council's hearings on July 29 and September 9, 2014 MCM, AT&T and Cellco Partnership (d/b/a Verizon Wireless) collectively demonstrated a need for a facility of 150' to provide reliable service. Sprint Nextel Corporation had previously demonstrated its need at 120' as part of Siting Council Docket 334. As you know, one of the primary responsibilities of the Siting Council under state statute is to minimize the proliferation of towers through careful siting and providing opportunities for sharing, or collocation, of facilities. That goal is achieved here with the approved tower which will be capable of accommodating both the fire department's antennas as well as AT&T, Verizon and other wireless carriers such as Sprint Nextel (which has a demonstrated need in the area) and T-Mobile which are also active in the Connecticut market.

At this point in time, MCM has all discretionary approvals in place to construct the 150-foot tower and compound facility. In this regard, we have advised MCM that all federal consultations are complete and no further review is required for purposes of FCC's NEPA regulations. Recognizing your agency's interest in this project, I wanted to ensure you were apprised of same.

Sincerely,  
All-Points Technology Corporation, P.C.



Michael Libertine  
Director of Siting & Permitting

**ALL-POINTS TECHNOLOGY CORPORATION, P.C.**

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Department of Economic and  
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July 14, 2014

Mr. Lucas Karmazinas  
FuturePast Preservation  
940 West Boulevard  
Hartford, CT 06105

Subject: Proposed Telecommunications Facility  
186 Black Rock Turnpike  
Redding, CT  
Message Center Management

Dear Mr. Karmazinas:

The State Historic Preservation Office is in receipt of the proposal for the above-referenced project, submitted for review and comment pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations.

After a reconnaissance visit on 6/24/2014, this office has determined that the undertaking as proposed would result in an adverse effect to potential National Register of Historic Places sites. However, a reduction in the height of the 150' monopole tower to 120' would reduce the visual impact beneath the threshold of an indirect adverse effect.

Therefore, in the opinion of this office, the proposed undertaking will have no adverse effect on contributing resources eligible for listing in a potential National Register of Historic Places district, with the following conditions:

1. The 150' monopole be reduced in height to 120',
2. the 120' monopole and associated equipment within a roughly 47' by 50' fenced compound will be designed and installed to be as non-visible as possible,
3. if not in use for six consecutive months, the monopole and associated equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period.

State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | P: 860.256.2800 | [Cultureandtourism.org](http://Cultureandtourism.org)

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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 Todd Levine, Environmental Reviewer, at (860) 256-2759 or [todd.levine@ct.gov](mailto:todd.levine@ct.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mary B. Dunne".

Mary B. Dunne

Deputy State Historic Preservation Officer

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State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | P: 860.256.2800 | [Cultureandtourism.org](http://Cultureandtourism.org)

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## Levine, Todd

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**From:** Levine, Todd  
**Sent:** Friday, July 18, 2014 4:00 PM  
**To:** 'Mike Libertine'  
**Subject:** Redding  
**Attachments:** Redding Black Rock Turnpike 186 FCC NRE - CNAE.doc

Hi Mike,

I got your message. Attached is a copy of the letter on Redding. I'm in Monday at 8am and look forward to chatting with you.

Sincerely,

~T~

Todd Levine  
Historian  
Environmental Reviewer  
Freedom Trail & WSR Coordinator  
State Historic Preservation Office  
Department of Economic & Community Development  
1 Constitution Plaza, 2nd floor  
Hartford, CT 06103

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[www.cultureandtourism.org](http://www.cultureandtourism.org)

[www.ct.gov/ecd](http://www.ct.gov/ecd)

[www.CTvisit.com](http://www.CTvisit.com)

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