

Connecticut Commission on Culture & Tourism

Historic Preservation
& Museum Division

April 11, 2007

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860 566 3005
(f) 860 566 5078

Ms. Julie D. Kohler
Cohen and Wolf
1115 Broad Street
PO Box 1821
Bridgeport, CT 06601-1821

Subject: Distributed Antenna System (as revised)
Merritt Parkway
National Register of Historic Places
FHWA National Scenic Byway
Connecticut

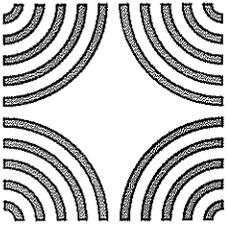
Dear Ms. Kohler:

The State Historic Preservation Office is in receipt of your correspondence concerning the conceptual plan for the above-referenced undertaking, which involves a property listed on the National Register of Historic Places and as a National Scenic Byway.

The mandate of the State Historic Preservation Office is protection of the public trust in Connecticut's cultural resources. Please be aware that a Certificate of Public Convenience and Necessity does not exempt public utilities from the provisions of the Connecticut Environmental Policy Act, Section 106 of the National Historic Preservation Act, or FCC regulations.

Based on the information to date, this office has concluded that the Distributed Antenna System will impact the scenic and historic resources of the state. Your letter indicates that you agree with the finding of "no adverse effect," but strongly disagree with our recommendation to provide an opportunity for mitigation specific to preservation of both the character and integrity of the Merritt Parkway.

Please refer to the enclosed copy of our recent letter to the Connecticut Siting Council, which may address some of your questions and concerns.



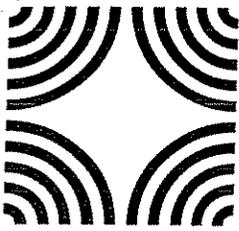
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The Commission on Culture & Tourism looks forward to working with you, CSC, and ConnDOT to balance the interests of historic preservation and telecommunications. Please contact Susan Chandler, Historical Architect, should you have additional questions concerning these comments.

Sincerely,

Karen Senich
Acting Executive Director and
Deputy State Historic Preservation Officer

c: Mr. Edgar Hurle/ConnDOT-OEP
Mr. Jeffrey Smith/OPM
Mr. Stephen DelSordo/FCC
Mr. S. Derek Phelps/CSC



Connecticut Commission on Culture & Tourism

April 9, 2007

Historic Preservation
& Museum Division

Mr. S. Derek Phelps
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

59 South Prospect Street
Hartford, Connecticut
06106

Subject: Merritt Parkway Distributed Antenna System
Greenwich to Westport, CT
CSC Petition No. 782 (ClearLinx)

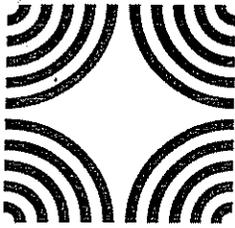
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Dear Mr. Phelps:

The State Historic Preservation Office appreciates the opportunity provided by the Connecticut Siting Council to mutually discuss and better understand both the technical specifics of the above-noted undertaking and our respective agency's regulatory roles, responsibilities and perspectives.

The State Historic Preservation Office notes that the Merritt Parkway possesses singular importance for its engineering and landscape design and is listed on the National Register of Historic Places. In addition, the U.S. Department of Transportation has designated the Merritt Parkway as a National Scenic Byway. Of particular note, the Connecticut Department of Transportation has worked in partnership with this office over the last decade to ensure the sensitive rehabilitation, restoration and preservation of the historic ambiance of this important transportation corridor. This coordination has fostered the development and implementation of the *Merritt Parkway Conservation and Restoration Plan: Bridge Restoration Guide; Merritt Parkway Guidelines for General Maintenance and Transportation Improvements, and Scenic/Aesthetic Initiatives*; and, *A Landscape Plan for the Merritt Parkway*. Finally, the Connecticut Department of Transportation has established the Merritt Parkway Advisory Committee, which includes our professional participation, in order to further ensure the appropriate treatment of this historic transportation corridor.

The State Historic Preservation Office likewise appreciates that 21st century transportation requirements, including telecommunication facilities, are essential and warranted to ensure the health and safety of



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Connecticut residents. This office strongly encourages and advocates for new technological approaches which facilitate current transportation and telecommunication needs and minimize physical and/or visual effect upon Connecticut's cultural heritage.

In this regard, the State Historic Preservation Office supports the innovative technological and design concept proposed by ClearLinx Network Corporation. Nonetheless, in our professional opinion, the proposed pole-mounted antenna nodes and cable-suspended receivers will constitute a visual effect upon the overall historic character of the Merritt Parkway. However, this office believes that the ClearLinx Distributed Antenna System will have no adverse effect on this historic transportation resource. We note that Cohen & Wolf, on behalf on ExteNet Systems (ClearLinx Network Corporation), concurred with our evaluation in correspondence dated February 15, 2007.

The State Historic Preservation Office strongly recommends consideration of the following mitigative measures that would counterbalance the introduction of a subtle, but nonetheless incremental technological change with the conservation of the Merritt Parkway's unique historic and scenic character:

- ClearLinx, in coordination with the Connecticut Department of Transportation, will establish a fund to be administered by the Merritt Parkway Conservancy for the sole purpose of restoring and maintaining the historic landscape and visual design qualities of the Merritt Parkway in a manner consistent with ConnDOT's *A Landscape Plan for the Merritt Parkway*. The amount to be contributed to the fund by ClearLinx will be \$50,000 annually for every year the currently proposed Distributed Antenna System is in use.



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- If an antenna or other equipment related to the Distributed Antenna System is not in use for six consecutive months, the equipment shall be removed by ClearLinx. This removal shall occur within 90 days of the end of such six-month period.

The State Historic Preservation Office's comments are provided pursuant to Connecticut's regulatory and statutory requirements. As warranted, this office may undertake an independent project-related analysis in coordination with the Federal Communications Commission in accordance with the National Historic Preservation Act.

The State Historic Preservation Office appreciates the opportunity to have reviewed and commented upon the proposed telecommunications facilities. This office looks forward to the expeditious furtherance of the proposed ClearLinx Distributed Antenna System as well as the professional management of Connecticut's transportation heritage.

Finally, this office concurs that additional inter-agency coordination and data sharing would better integrate historic preservation concerns vis-à-vis the Connecticut Siting Council's telecommunication-related review and decision-making process.

Please contact Susan Chandler, Historical Architect, should you have additional questions concerning these comments.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer

cc: Mr. Edgar Hurle/ConnDOT-OEP
Mr. Jeffrey Smith/OPM
Mr. Stephen DelSordo/FCC