

Department of Planning and Zoning

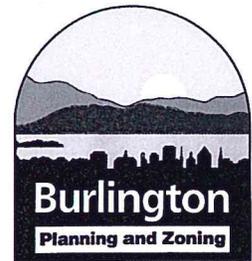
149 Church Street, City Hall
Burlington, VT 05401

www.burlingtonvt.gov/pz

Phone: (802) 865-7188

Fax: (802) 865-7195

David White, AICP, Director
Ken Lerner, Assistant Director
Sandrine Thibault, AICP, Comprehensive Planner
Jay Appleton, Senior GIS/IT Programmer/Analyst
Scott Gustin, AICP, CFM, Senior Planner
Mary O'Neil, AICP, Senior Planner
Elsie Tillotson, Department Secretary
Vacant, Zoning Clerk

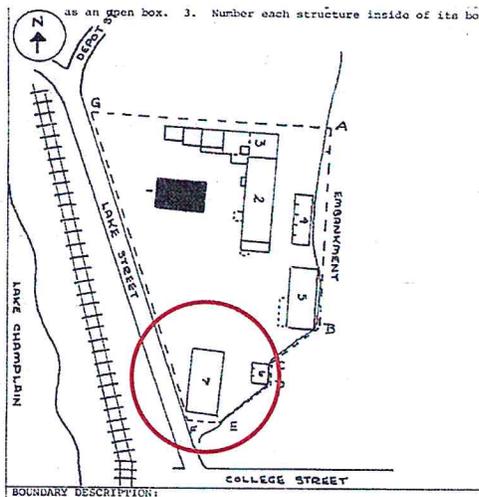


December 11, 2014

All Points Technology Corporation
3 Saddlebrook Drive
Killingworth, CT 06419
Attn: Nicole Castro

Dear Ms. Castro,

I am in receipt of your letter dated December 1, 2014 re: Verizon's proposed wireless telecommunications facility at 86 Lake Street in Burlington Vermont. Thank you for the opportunity to review the revised plans and photographic simulations.



The proposed subject property has been identified as part of an industrial complex of warehouses; all that remain of the Pioneer Mechanics' Shops along Burlington's waterfront. Building #7 (86 Lake Street) was constructed in 1860 to serve the Shepard and Morse Lumber Company. This building is listed on the Vermont State Register of Historic Resources.

Despite the revisions, we continue to find the proposed installation of mechanical equipment on the roof of 86 Lake Street to be in conflict with Section 5.4.8 of the Comprehensive Development Ordinance (CDO), the Municipal Development Plan (MDP), and 30 VSA §248a (c) (1); having an *undue adverse effect on aesthetics, historic sites, etc.* The equipment; placed symmetrically

and at corners of the rooftop, remains decidedly visible from both Lake Street and Battery Street; both highly traveled public roads with pedestrian walkways. The equipment, itself arranged in such a way as to suggest inclusion as original building components or recent facsimiles of building features that never existed. 86 Lake Street is a flat roofed box cornice industrial building that would under this proposal present an altered, misleading and incorrect historic character with the installation of four large corner mechanical boxes. It is again noted that the RRH sled is not



illustrated in the modeling studies, with would be similarly visible from Battery Street and the public walkway that overlooks the bay from Battery Street as well as other historic buildings within the complex. Despite assertions of the equipment's covertness, the proposed installation remains highly discernable and would be misrepresentative of the building's character.



While the proposed equipment would satisfy those goals of the CDO, MDP and Plan BTV relative to improvements to wireless communications in the City, this plan would alter the historic character of a Vermont State Register listed historic resource, and is therefore found to be unacceptable. When reviewed under *Criteria for Evaluating the Effect of Telecommunication Facilities on Historic Resources* as developed by the State of Vermont, we find the proposal as submitted to have

an Adverse Impact on the subject property due to the introduction of conjectural or implied features, the creation of a false sense of history, and the visual intrusion to the historic structure.

We continue to encourage Verizon to explore opportunities in telecommunication development that could identify equipment capable of mounting on other existing infrastructure (light poles, traffic lights, flagpoles), have more successful camouflage on existing mechanical infrastructure, have lower installation heights so as not to protrude above building cornice lines, avoids installation on historically sensitive buildings, or custom designed to minimize visual impact on its surroundings. Burlington's character and heritage depends upon the integrity of its historic resources and viewsheds, meriting such attention.

Cordially,

Mary O'Neil AICP
Senior Planner
Certified Local Government Coordinator