

Vermont Division for Historic Preservation
Agency of Commerce and Community Development
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March 9, 2015

Ms. Nicole Castro
Project Manager/GIS Analyst
All-Points Technology Corporation, P.C.
3 Saddlebrook Drive
Killingworth, CT 06419

**Re: Proposed Wireless Telecommunications Facility Burlington Waterfront
86 Lake Street, Burlington, Vermont
FCC**

Dear Ms. Castro:

Thank you for the opportunity to comment on the above project (DHP #CH14-052) involving Verizon Wireless (the "Applicant".) The Vermont Division for Historic Preservation (the "Division") received All-Points Technology's ("APT") initial submittal packet on December 18, 2014, via email from Stacey Vairo, Architectural Historian at APT. The Division originated consultation on this project with Britta Fenniman-Tonn of EBI Consulting, Inc., with informal discussion during design development early in 2014 and more formally providing feedback with representatives from Verizon Wireless, through meetings held on July 11, 2014 and October 22, 2014. In addition, these interested parties met again on December 18, 2015 with the City of Burlington, represented by Senior Planner Mary O'Neil and others.

The Division has reviewed this proposed undertaking pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act. Project review consists of identifying the project's potential impacts to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archeological resources.

The project as proposed involves the installation of communications antennas on the rooftop of the building at 86 Lake Street by Verizon Wireless. The installation would include four (4) 3.5' by 4' by 7' high stealth enclosures on each corner of the building's roof to conceal two antennas per enclosure. The two enclosures (each enclosure containing two (2) antennas and two (2) RRH's, two (2) enclosures per sector, for a total of four (4) antennas/RRH's per sector) on the north end of the building will serve the Gamma sector, the two enclosures on the south end will serve the Beta sector, and Alpha sector will be served by four (4) antennas and four (4) RRH's to remain unconcealed, and located along the eastern side of the roof. In addition, the Applicant proposes to install vents in one bay on the northwest corner of the structure to provide ventilation for the proposed equipment room in the basement.



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The subject building is listed in the Vermont State Register of Historic Places as part of the Pioneer Mechanic's Shop Complex and has been recommended eligible for listing in the National Register by both consulting Architectural Historians [S. Vairo and B. Tonn.] The Division concurs, finding this property eligible for inclusion in the National Register.

The Division and the Applicant have engaged in extensive discussions regarding the project's effect on historic resources for both Direct and Indirect Effects. The consultation that has transpired included a number of requests from the Division for the Applicant to consider alternatives that would avoid the potential adverse effects. In this effort, it is our understanding that the Applicant has researched the options and inquired with numerous adjacent property owners but could not find a suitable alternate location within the project's focus area. The Division then requested the Applicant seek a design solution that would minimize the adverse effects on this National Register-eligible building.

Originally, the design called for the stealth enclosures to be designed to look like chimneys, which would create a false sense of history and look out of place on a building of this type and period of construction. To minimize this effect, the Applicant has agreed to have the stealth enclosures finished in a matte gray, similar to other service apparatus on the roof, and give the appearance of mechanical equipment and not faux building elements.

The Division also requested the Applicant move the stealth enclosures away from the corners of the building to reduce the visual effects. The Applicant informed the Division of the issues surrounding the relocation of the antenna. First and foremost, for every foot the antennas are moved away from the edge of the building, they will need to be increased approximately one foot in height in order to provide the same signal dispersion. Further, there are certain FCC safety guidelines that will not allow the antennas to be placed in a location where people can walk in front of them without additional safety markings and other visually distracting identifiers. The Division accepts that there are no feasible alternatives for relocating the antennas on this particular roof.

Finally, the Division and the Applicant have worked together to minimize the adverse effects of the venting needed for the equipment room in the basement. The original design included two separate vent systems, one for intake and one for exhaust that were to be drilled through the foundation. The updated design includes one vent that will penetrate the northern window in the foundation for access to the equipment room.

The City has expressed their lack of support for the project through the submittal of comments provided by Mary O'Neil. Due to the fact that the Division is reviewing this project under Section 106, we will not respond to the City's concerns of non-compliance with the Comprehensive Development Ordinance. However, we do not concur with the City's determination of effect because of the efforts to minimize the adverse effects stated above.



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Therefore, based on the materials submitted for review, our understanding of the Applicant's program goals, particular limitations of this project installation, it is our opinion and recommendation that the current proposed project will result in No Adverse Effect on historic resources.

If you have any questions or need clarification regarding any of the above, please do not hesitate to contact James Duggan, Historic Preservation Review Coordinator at james.duggan@state.vt.us or 802-477-2288. Mr. Duggan reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely,

VERMONT DIVISION FOR HISTORIC PRESERVATION

Laura V. Trieschmann
State Historic Preservation Officer



