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March 4, 2021

**VIA EMAIL AND FEDEX OVERNIGHT DELIVERY**

Michael Klemens, Chairman  
Planning and Zoning Commission  
Town of Salisbury  
Town Hall  
P.O. Box 548  
27 Main Street  
Salisbury, CT 06068

**ORIGINAL**

**RECEIVED**

MAR 04 2021

LAND USE OFFICE  
Salisbury, CT

**Re: Special Permit #2021-0123 for a 12-Unit Multi-family Housing in PKSQ and APA – Salisbury Housing Committee – 11 Holley Street**

Dear Chairman Klemens:

With regard to the above-referenced matter, enclosed for filing with the Planning and Zoning Commission is a Verified Petition for Intervenor Status.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

CRAMER & ANDERSON, LLP

By   
Daniel E. Casagrande, Esq., Partner

DEC/smc  
Enclosure

cc: Ms. Susan Galluzzo  
Mr. William Muecke  
Ms. Celeste Shannon  
Ms. Judith Singelis  
Mr. Joseph Schaefer

**TOWN OF SALISBURY  
PLANNING AND ZONING COMMISSION**

**Re: Special Permit #2021-0123 for a  
12-Unit Multi-family Housing in PKSQ  
and APA – Salisbury Housing Committee  
11 Holley Street**

**March 4, 2021**

**VERIFIED PETITION FOR INTERVENOR STATUS**

**I. Introduction.**

Pursuant to C.G.S. § 22a-19, the Petitioners (as defined below) hereby submit this verified petition for party or intervenor status in the above proceeding. The ground for the petition is that the proposed multi-family housing project involves conduct that is reasonably likely to have the effect of unreasonably impairing or destroying the public trust in the natural resources of the state, specifically the unique historic character and integrity of the Lakeville Historic District and the Lakeville Local Historic District.

**II. Names and Addresses of Petitioners and Petitioners' Counsel.**

**Petitioners:**

Susan Galluzzo  
226 Millerton Road  
P.O. Box 1306  
Lakeville, CT 06039

William Muecke  
12 Elm Street  
Lakeville, CT 06039

Celeste Shannon  
29 Canterbury Lane  
P.O. Box 268  
Lakeville, CT 06039

Judith Singelis  
22 Millerton Road

Lakeville, CT 06039  
Joseph Schaefer  
20 Falls Mountain Road  
Falls Village, CT 06031

**Petitioners' Counsel:**

Daniel E. Casagrande, Esq.  
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30 Main Street, Suite 204  
Danbury, CT 06810  
Phone: (203) 744-1234  
Facsimile: (203) 730-2500  
Email: [dcasagrande@crameranderson.com](mailto:dcasagrande@crameranderson.com)

**III. Facts and Circumstances Giving Rise to the Petition.**

The applicant has defined the project as the "Holley Place Housing Project" (the "Project"), which involves the construction of a 12 unit modern apartment building on the site of Bicentennial Park (the "Property"). The Property is less than one-third acre in size, and is located in the Lakeville National Register Historic District (the "District"). The building will loom over its neighbors in the District.

Attached hereto and incorporated by reference herein is the March 3, 2021 "Report on the Proposed Holley Place Housing Project, Lakeville, Connecticut," prepared by Rachel D. Carley (the "Carley Report"). Ms. Carley is a highly respected historic preservation consultant with extensive experience in reviewing areas of historical importance in towns throughout Connecticut. She has completed numerous inventories and assessments of properties and areas of historical significance for Connecticut land use commissions, land trusts, and municipalities.

The Carley Report thoroughly examines and describes the rich historical heritage of the District and the unique architecture of the numerous Federal and Eighteenth-Century buildings in the area. (Carley Report, pp. 4-7) It finds that the Project is neither

“in keeping” with nor of a design that complements the existing character of its neighborhood. These findings include the following:

There is no eighteenth-century or Federal-period precedent for a large (90' x 63.6') multi-family building in the Salisbury/Lakeville villages.

• • •

Most of the Federal-era houses in the villages were designed by local housewrights who were referencing popular architectural handbooks as guides, and craftsmen often put their own twists on the designs they saw on their pages. Their unique, individual imprint is everywhere apparent in the town, and is part of what makes the area's architectural legacy so significant. This design sensibility, and the quality of workmanship inherent to it, remains entirely absent from the proposed Holley Place project.

**Materials:** Of particular concern is the lack of clear specification relating to materials. The notation on plans of “typical” in regard to window sash, cladding and trim leaves open important questions. Is the clapboard to be wood or some type of composite, or a synthetic material? Are windows to be wood with true divided lights (as opposed to vinyl dividers or fake paste-ins?) Is the trim to be wood? Synthetic materials would be incompatible with the building's historic context, so these and related details should be clearly specified. Face brick veneer, as proposed for the foundation, is also not compatible with the historical precedent, which conveys a true dimension that cannot be reproduced with veneers and synthetics.

**Scale:** The proposed building, which would appear to loom over its small neighbors, is particularly notable for its large scale, its heavy massing, and a roofline complicated by multiple dormers and the massive planes of a false hipped roof designed to conceal a solar panel installation. The result is a busy silhouette, out of keeping with the model provided by the simple, clean exterior profiles of Salisbury's eighteenth-century and Federal-era single-family houses. The building's rear overhang and four-door parking entry further emphasize its already prodigious bulk.

(Carley Report, pp. 5-6)

The Carley Report goes on to describe the neighborhood and community character as embodying “a tangible sense of history preserved by the town's older buildings and in the accessible scale of its village streetscapes.” (Id., p. 6) The proposed building, however, would be inimical to this character. As the Carley Report finds:

The introduction of a massive 3 1/2-story structure with huge expanses of asphalt-shingled roof plane into this village setting would significantly alter the neighborhood atmosphere by appearing as a large apartment house standing in a sea of pavement--all lit by industrial lamp posts and accessorized with concrete and steel. Such a building has the power to wield enormous change, not only visually, but also by generating vehicular traffic.

(Carley Report, p. 7)

The Carley Report notes that the Project would directly contradict the expressed intent of the donor of a 1967 gift to the town toward purchase of the parcel that the exterior design of any new buildings on the property must be "in keeping with the Federal or early Eighteenth Century image of our villages." (Id., pp. 1, 8) The report also points out that the Project fails to comply with § 405.6 of the Salisbury Zoning Regulations, requiring that new construction "shall be of such height, bulk and design that complements the existing character of the neighborhood and the community." (Id.) Beyond these considerations, the Carley Report finds, "it is important to note that the proposed Holley Place project will occupy a key site within the Lakeville Historic District, listed on the National Register of Historic Places in 1996." The area's historic district designations, the report emphasizes, "are put in place in order to protect and preserve the historic properties contained within." (Id.)

The Carley Report concludes:

That Lakeville has elected to designate both Local and National Register Districts in its villages signifies a serious, long-term obligation by the town to identify and preserve the village's historic resources and to educate local residents about their importance. The zoning regulation requiring multi-family buildings "shall be of height, bulk, and design that complements the existing character of the neighborhood and the community" closely dovetails with that commitment. Salisbury's historic neighborhoods and the buildings and parks they contain are a precious asset that have faced challenges and will continue to do so. Any opportunity to protect them for the public benefit within the reasonable bounds of local regulations should be responsibly considered.

(Carley Report, p. 8)

Simply put, one of the state's most respected experts on the importance of preserving historic districts and properties has demonstrated that the Project building and design will be completely out of character with this critical historical area of Salisbury.

**III. Legal Grounds for Party/Intervenor Status Under C.G.S. § 22a-19.**

Pursuant to C.G.S. § 22a-19, any person may intervene in any administrative proceeding based on facts alleged in a verified pleading that the proposed activity at issue “has, or is reasonably likely to have, the effect of unreasonably polluting, impairing, or destroying the public trust in the air, water, or natural resources of the state.” The verification by Petitioner Susan Galluzzo of the facts alleged and referred to herein is appended to this petition. This petition alleges facts and attaches expert testimony proving that the Project is reasonably likely to adversely affect the historic integrity and character of this area of Lakeville. The preservation of historic resources and character is within the scope of the natural resources which Section 22a-19 is designed to protect. See United Progress, Inc. v. Zoning Commission, 1994 WL 76803 (Conn. Super.).

The bar is quite low for filing an intervention petition, and thus § 22a-19 applications should not be lightly rejected. Finley v. Town of Orange, 289 Conn. 12 (2008) (an application need only allege a colorable claim to survive a motion to dismiss), citing Windels v. Environmental Protection Commission, 284 Conn. 268 (2007). An allegation of facts that the proposed activity at issue in the proceeding is likely to unreasonably impair the public trust in natural resources of the state is sufficient. See Cannata v. Dept. of Environmental Protection, 239 Conn. 124 (1996) (alleging harm to floodplain forest resources).

The Connecticut Appellate Court has noted that statutes “such as the EPA are remedial in nature and should be liberally construed to accomplish their purposes.” Avalon Bay Communities, Inc. v. Zoning Commission of the Town of Stratford, 87 Conn. App. 537 (2005); Keeney v. Fairfield Resources, Inc., 41 Conn. App. 120, 132-33 (1996). In Red Hill Coalition, Inc. v. Town Planning & Zoning Commission, 212 Conn. 727, 734 (1989) the Supreme Court held that “section 22a-19[a] makes intervention a matter of right once a verified pleading is filed complying with the statute, whether or not those allegations ultimately prove to be unfounded.” See Polymer Resources, Ltd. v. Keeney, 32 Conn. App. 340 (1993) (“[Section] 22a-19[a] compels a trial court to permit intervention in an administrative proceeding or judicial review of such a proceeding by a party seeking to raise environmental issues upon the filing of a verified complaint. The statute is therefore not discretionary.”) See also Connecticut Fund for the Environment, Inc. v. Stamford, 192 Conn. 247, 248 n.2 (1984).

The rights conveyed by CEPA are so important and fundamental to matters of public trust that the denial of a 22a-19 intervention itself is appealable. See CT Post Limited Partnership v. New Haven City Planning Commission, 2000 WL 1161131 Conn. Super. (Hodgson, J. 2000) (§ 22a-19 intervenors may file an original appeal for improper denial of intervenor status).

Intervention under § 22a-19 is appropriate in an affordable housing development application pursuant to C.G.S. § 8-30g. United Progress, supra. Moreover, the public health and safety that a commission must consider in a § 8-30g application “include[s] the preservation of the environment which, in turn, includes historic preservation.” Id.; see Smith v. Zoning Board of Appeals, 227 Conn. 71 (1993). In the United Progress case the

court upheld the Stonington commission's denial of a § 8-30g application for construction of a multi-family development in the Borough of Stonington based on evidence that the proposed height, density, and other characteristics of the building would adversely affect the diverse community character and preservation of the borough's unique historic area.

Because the facts and expert testimony set forth in this Petition demonstrate that the Project will or may cause unreasonable impact or harm to the historic character and integrity of Lakeville, the Commission must consider whether there are feasible and prudent alternatives to the Project. Under § 22a-19, "[t]he agency is not allowed to approve a proposal which does or is reasonably likely to unreasonably pollute, impair or destroy the public trust in the air, water or natural resources of the state, if considering all relevant surrounding circumstances and factors, there is a feasible and prudent alternative consistent with reasonable requirements of public health, safety, and welfare."

R. Fuller, Connecticut Land Use Law & Practice § 32:6, p. 206 (2007 ed.), citing § 22a-19(b) (emphasis added); see Quarry Knolls II Corp. v. Planning & Zoning Commission, 258 Conn. 674, 736-37 (2001).

Substantial evidence in this hearing record demonstrates the likelihood that the Project will unreasonably destroy or impair the character of this unique and precious historic area. Moreover, Petitioners will demonstrate that there is a feasible and prudent alternative to the Project. The questions of members the public and members of the Commission during the hearing on the prior withdrawn application as to the size of the building, the number of units, the design, and its location all trigger the Commission's responsibility to consider whether there is a feasible and prudent off-site alternative to the Project. For instance, Chair Klemens' October 8, 2020 comments speak directly to the



need to consider alternatives. As he points out, the plans fail to address 1) the building's disproportionate "mass [that is] out of scale with the surrounding streetscape/street wall," 2) the "discordant hodgepodge of various architectural elements and styles that bear no contextuality to one another nor reflect either the Federal or Victorian style," and 3) the "decidedly modern" appearance of the ground floor. The Chair also notes that the design "appears to be an effort to jam as much into the site as possible."

As the Carley Report shows, the new application fails to adequately address these concerns, let alone speak to the issue of feasible and prudent alternatives to the Project. Accordingly, the Commission must deny the application for the Project.

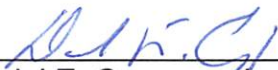
### **CONCLUSION**

The Project sits in the middle of or is adjacent to an area of Lakeville that has been designated by the federal government, the state and the town as a valuable historic resource. The Project is wholly out of character with the District, and the evidence will show that there are feasible and prudent alternatives to locating the Project on this critical historical site. The application therefore must be denied on this ground alone.

Lastly, Petitioners understand that the Commission intends to open the public hearing on March 8, 2021. Petitioners request that, after the applicant has made its presentation, the Commission continue the hearing to its next regular meeting in order to allow Petitioners to prepare and submit rebuttal evidence.


PETITIONERS,  
SUSAN GALLUZZO, WILLIAM  
MUECKE, CELESTE SHANNON,  
JUDITH SINGELIS, AND  
JOSEPH SCHAEFER

By:

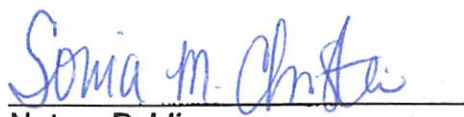
  
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**VERIFICATION**

The undersigned, Susan Galluzzo, duly sworn, hereby verifies that the above petition is true and accurate to the best of her knowledge and belief.

  
Susan Galluzzo

Subscribed and sworn to before me this 4th day of March, 2021.



Notary Public

My Commission Expires:

SONIA M. CHRISTIE  
NOTARY PUBLIC  
State of Connecticut  
My Commission Expires  
December 31, 2021

**Report on the Proposed Holley Place Housing Project  
Lakeville, Connecticut**

**Submitted to the Salisbury Planning and Zoning Commission  
March 4, 2021**

**Rachel D. Carley  
Historic Preservation Consultant**

To the Members of the Salisbury Planning and Zoning Commission:

This report is submitted on behalf of a group of local citizens in response to plans, dated February 4, 2021, by the firms QA+M Architecture and todesign, for the Holley Place Project, proposed for the site of Bicentennial Park, a property central to the Lakeville National Register Historic District. These comments address the appropriateness of the design under the requirements

1) as set forth in the zoning requirements applicable to multi-family housing under section 405.6 of the Salisbury zoning regulations, which states that new construction “shall be of height, bulk, and design that complements the existing character of the neighborhood and the community”;

2) as set forth in Provision No. 3 in the 1967 resolution under which the Town of Salisbury accepted a gift toward the purchase of the parcel now intended to be the site of Holley Place. That provision states that the exterior design of any new buildings on the property must be “in keeping with the Federal or early Eighteenth Century image of our villages.”

I have examined the proposal from the viewpoint that Section 405.6 and the directive of the 1967 gift are fully complementary and mutual in their intent. It is my professional assessment that the Holley Place project does not meet the standards of either, based on careful evaluation of its site plan, type, size, silhouette and massing (bulk), materials, stylistic features and detailing—all elements that together may be considered integral to its exterior design and placement in Bicentennial Park. These standards have been reviewed within the context of the Salisbury/Lakeville villages’ rich and readily accessible heritage of eighteenth-century and Federal-period architecture, as discussed on the following pages.

## **Siting**

The first focus of this report is the potential impact of the siting of the proposed project, a twelve-unit apartment building with a subterranean rear garage, to be located on the site of the former Holley Block, a Victorian-era building razed in 1967. This prominent site is contained within the Lakeville National Register Historic District. (See page 8.) From the earliest period of Lakeville/Salisbury’s history, activities and personalities associated with its National Register Historic District played a key role in the development of the area, which is why the properties within its boundaries—including the Holley Block site and today’s park—are considered to be so valuable to the community. Members of the Holley family, residents of the Holley-Williams House, located just to the north of Bicentennial Park, are well remembered as leading industrial, civic and business leaders who helped shaped the town’s history. Both the Lakeville Local and National Register Districts exist in order to honor and protect the neighborhood that embodies theirs and others’ stories.



The 1830s Federal-style Holley-Williams House, 15 Millerton Road, is fronted by distinctive wooden fences and a historic granite wall, above right, that is contemporaneous with the house. These elements contribute to the overall effect of the property's exterior design. This property is located directly to the north of Bicentennial Park.



The siting model provided by the Salisbury/Lakeville Federal-period and eighteenth-century architectural heritage is one of small-scale residential parcels. Most are landscaped with lawns, mature shade trees and

flower gardens and are accessed by unobtrusive side driveways, which are often left unpaved. Many of the properties are bordered by wooden fences, stone walls or low-growing hedges. Several include barns and other outbuildings that add historic value to their settings, while enhancing the rural atmosphere that is a defining quality of the Salisbury/Lakeville villages, and quite palpable within the immediate vicinity of Bicentennial Park.

A review of the site plan for the proposed Holley Place project highlights a number of serious concerns and omissions of relevant information.

- Demolition of Stone Walls and Concrete Replacement: Bicentennial Park was created by the town as a parking park in 1967–68 following the demolition of the then derelict

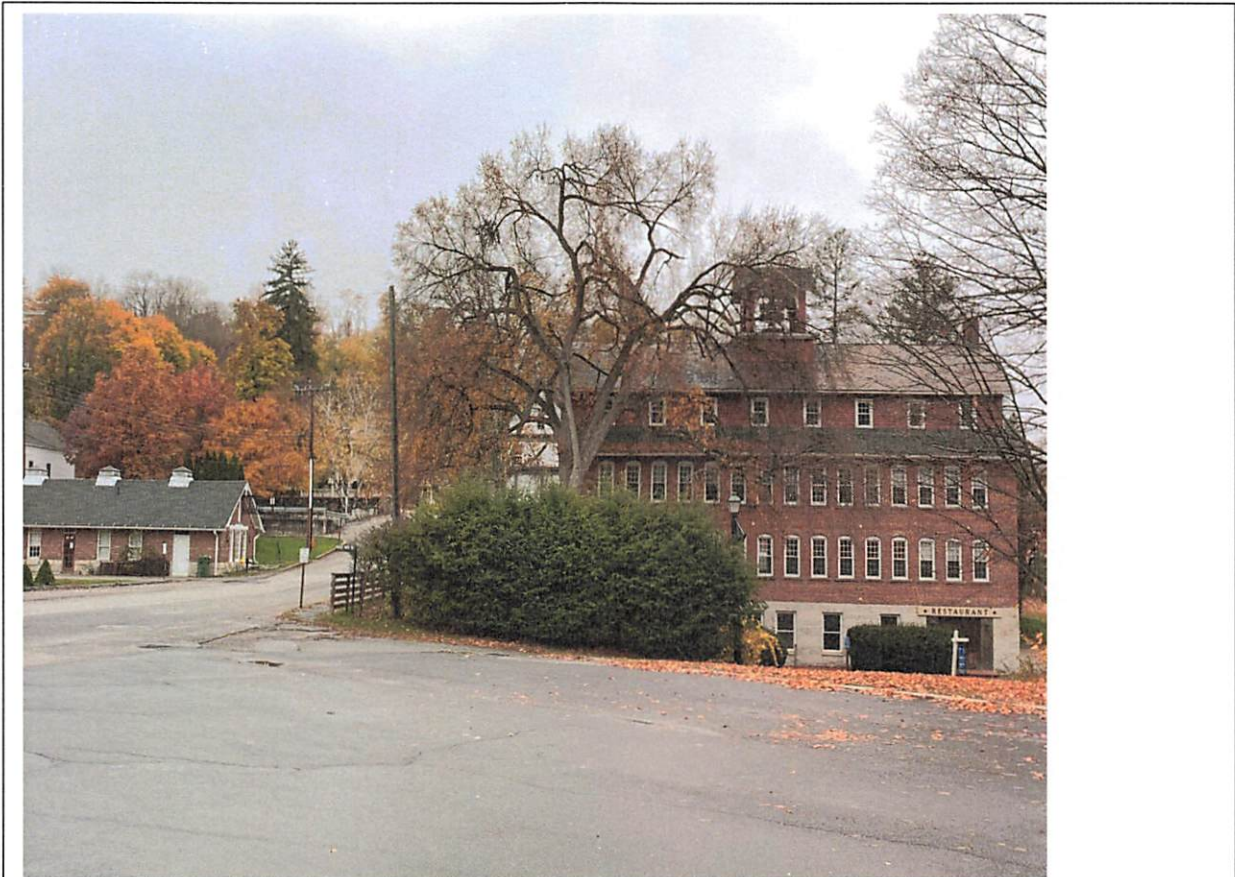


Bicentennial Park looking northwest. These historic walls incorporating the foundations of the Holley Block are to be removed.

Holley Block. The historic stone walls now bordering the park incorporate the foundations of this namesake building. Over the years, the town has put its financial resources into the careful maintenance of these walls, repaired by an expert mason using original stones. A time capsule of materials relating to Salisbury/Lakeville history was also placed within the stone border, which complements the appearance of other walls in the vicinity, including those fronting nearby Cannon Park. According to the proposal, these historic

features are to be demolished. That alone is a desecration. Moreover, while site plans (Layout Plan L-2.0) denote the insertion of a new concrete retaining wall with historic monuments reinstalled, to be erected at the northeast corner of the parcel, no design for this prominent feature has been submitted with the plans. In any case, concrete would not be compatible with an eighteenth-century or Federal design aesthetic. Inserting a few stones out of the hundreds placed here more than 130 years ago is demeaning to the cultural heritage they are meant to represent.

In addition, the single rendering of the site submitted (PR1.0) is misleading, as it shows the stone walls still in place, even though they are to be removed, as per the site plan. The proposed concrete corner retaining wall is not depicted in this rendering.



View looking north up Holley Street showing the Holley Manufacturing Co. on the right and the c. 1870 one-story brick Forge Building across the road. Both buildings are located within the Lakeville National Register and Local Historic Districts. The modern-day, multi-family Holley Block would occupy Bicentennial Park just to the north, a large intrusion into the otherwise highly cohesive historic neighborhood.

The rear side of the proposed site and the area of Pocketknife Square to the south of it are of equal importance. The proposal, however, has omitted to show renderings that would indicate the appearance of the site from this side of the property or convey the impact of inserting a large, twelve-unit apartment building into this bucolic view. This streetscape,

looking north up Holley Street, is one of the most important in Lakeville. Residents enjoy it year round as they stroll to the heavily frequented Town Grove for recreation, or to fish in Factory Pond, itself named for the heritage it reflects. This area is the soul of the community—a place of peace, history and serenity.

- Fencing and concrete: Layout Plan L-2.0 also indicates the placement of a perimeter border including a concrete retaining wall, concrete curb, and “ornamental” fence running on the west side of the parcel. No view in elevation of this side of the lot has been included with the project submission, but it would be critical for the public to see, as this addition of concrete and fencing would have an impact on the district, as well. Clearly, concrete has no place in the Federal/eighteenth-century context. While a segment of fence is shown in drawing L-5.2, it is unclear how these segments will go together absent a rendering or a view in elevation.

- Concrete Ramp and Stairs: These elements are proposed for the north, Millerton Road, facade of the building. Both are important features of the entry, but they have been omitted from the front elevation drawing of the building as presented (A3.01). Industrial stock-type pipe railings specified for the exterior stairs (also not indicated in rendering PR-1) are completely out of keeping with the appropriateness requirements, as would be the introduction of concrete stairs and ramps.

- Light poles and fixtures: Two twenty-foot-high light poles fabricated of steel and capped by industrial luminaires (specified as Viper Large Strike Optic LED type) are proposed for the south side of the parking area. Clearly, the size, material, type, scale, styling, and placement of these fixtures do not conform to the appropriateness requirements. Elevations and site renderings would be critical in conveying the full impact of introducing such elements into the historic streetscape. The same would be true for landscaping and the traffic signs planned for the site.



- Garage: The elevation (A3.0) has omitted any information re. the appearance or materials of the four oversized garage doors, which would have a significant impact on the appearance of the building.

## Typology

With the exception of the 1800 Salisbury Congregational Church, the majority of the local buildings that fall within the designated time frame of the 1967 gift of the Bicentennial Park property are gracious single-family residences. These properties represent one of two easily recognizable forms: a traditional, symmetrical five-bay design (set long side to the street), and a gable-front format typical of the Federal era.

These dwellings are relatively **small in scale**, generally two stories in height and **understated in aspect**. Built of wood or masonry, they have **simple peaked rooflines**



composed of a single gable, or two intersecting gabled sections, resulting in **straightforward, uncomplicated silhouettes**.

There is no eighteenth-century or Federal-period precedent for a large (90' x 63.6') multi-family building in the Salisbury/Lakeville villages.

### **Design, Material, Workmanship, and Scale**

Fine workmanship, craftsmanship, distinctive stylistic elements are fundamental elements of the historic model referenced in the 1967 gift and may be considered part of the design requirement cited by zoning regulations. Salisbury/Lakeville buildings of the Federal and eighteenth centuries are also notable for the high level of detail characteristic of their period, and a refined classically inspired architectural vocabulary including their dimensional moldings, pilasters and columns, and Palladian windows.

The gable fanlights that grace so many of the villages' Federal-style houses are of particular quality and distinction. It should be noted that the use of a fanlight does not in itself constitute Federal-era design, but these elements are highlighted because of the hand workmanship, often distinctive glazing and whimsical detailing that make them a hallmark of the town's architectural heritage.

Most of the Federal-era houses in the villages were designed by local housewrights who were referencing popular architectural handbooks as guides, and craftsmen often put their own twists on the designs they saw on their pages. Their unique,



A gable-front house in the Federal style, 8 Main Street, Salisbury Village, built of brick. A triangular gable pediment, trimmed with a modillion course, and simple roof profile enhance the building's dignified aspect. (Yet another distinctive gable fanlight.)



No. 158 Lime Rock Road, early 1800s, is a five-bay center-hall house with a Palladian window.



A gable-front Federal-period house on Main Street, Salisbury Village, with an unpaved drive and rear outbuilding. The house's attic fan is a distinctive Salisbury design, characteristic of its period. The Ionic pilasters with carved Ionic volutes on the façade are a characteristic classical touch.

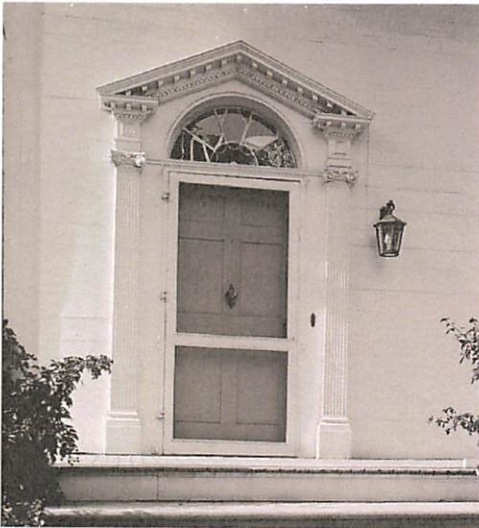
individual imprint is everywhere apparent in the town, and is part of what makes the area's architectural legacy so significant. This design sensibility, and the quality of

workmanship and attention to detail inherent to it, remains entirely absent from the proposed Holley Place project.

**Materials:** Of particular concern is the lack of clear specification relating to materials. The notation on plans of “typical” in regard to window sash, cladding and trim leaves open important questions. Is the clapboard to be wood or some type of composite, or a synthetic material? Are windows to be wood with true divided lights (as opposed to vinyl dividers or fake paste-ins?) Is the trim to be wood? Synthetic materials would be incompatible with the building’s historic context, so these and related details should be clearly specified. Face brick veneer, as proposed for the foundation, is also not compatible with the historical precedent, which conveys a true dimension that cannot be reproduced with veneers and synthetics.



The c. 1830 John Hubbard House nestles into a hill at no. 3 Millerton Road, Lakeville. Like all the residential properties in the immediate vicinity, it is surrounded by lawn, shrubbery and trees. There is no paved parking area.



The sophisticated classical doorway of the Holley-Williams house incorporates fluted pilasters in the Ionic order, a broken pediment trimmed with a richly carved, three-dimensional modillion course, and a fanlight with delicate swag dividers. Such craftsmanship, dimension, and detail are hallmarks of the Federal style and its widespread representation in the Salisbury/Lakeville area.

Sharon and Millerton Roads, Lakeville and Salisbury remain, to a large degree, sidewalk villages, surprisingly friendly to pedestrians.

**Scale:** The proposed building, which would appear to loom over its small neighbors, is particularly notable for its large scale, its heavy massing and a roofline complicated by multiple dormers and the massive planes of a false hipped roof designed to conceal a solar panel installation. The result is a busy silhouette, out of keeping with the model provided by the simple, clean exterior profiles of Salisbury and Lakeville’s eighteenth-century and Federal-era single-family houses. The building’s rear overhang and multi-door parking entry further emphasize its already prodigious bulk.

### **Neighborhood and Community Character**

What is the character of the neighborhood and the community? The answer lies in a tangible sense of history preserved by the town’s older buildings and in the accessible scale of its village streetscapes. Despite the volume of traffic passing through town on

In the immediate vicinity to the proposed project, a small cluster of 1- and 1½-story wood-framed buildings erected in the 1800s lines the street. On the north side of Millerton Road are the Holley-Williams House, the Farnham Tavern (no. 7 Millerton Road), and the Federal-style John Hubbard House (no. 3 Millerton Road)—all located within the Lakeville National Register and Local Historic Districts. These buildings are all residential properties, surrounded by green space. The introduction of a massive 3½-story structure with huge expanses of asphalt-shingled roof plane into this village setting would significantly alter the neighborhood atmosphere by appearing as a large apartment house standing in a sea of pavement—all lit by industrial lamp posts and accessorized with concrete and steel. Such a building has the power to wield enormous change, not only visually, but also by generating vehicular traffic.



The Millerton Road blockfront, Lakeville, looking west from Holley Street, south side of Millerton, consists of small-scale, wood-framed buildings entered from the sidewalk. The scale and unassuming charm of these buildings make a critical contribution to the neighborhood's atmosphere.



The c. 1759/79 Farnham Tavern, no. 7 Millerton Road, Lakeville. Shaded by an enormous evergreen, the house blends into its setting with the help of traditional foundation plantings and a wooded backdrop.

### Concluding Thoughts:



28 Sharon Road, Lakeville: A vernacular Federal-period house with a wood-shingle exterior. The building has a typical composition of two intersecting gabled sections.

Beyond the immediate consideration of the donor's 1967 gift and the town's zoning restrictions, it is important to note that the proposed Holley Place project will occupy a key site within the Lakeville Historic District, listed on the National Register of Historic Places in 1996. Bicentennial Park is also immediately adjacent to the village's second historic district, the Lakeville Local Historic District.

Mention of both districts is relevant, because these designations are put in place in order to protect and preserve the historic properties contained within. National Register designation, overseen by the U.S. Department of Interior, is an honorific intended to recognize

resources worthy of preservation throughout the nation. Listing on the National Register is not easy: Eligibility requirements are strict, and inclusion requires rigorous study and review at the state and national level before a district is accepted.

That Lakeville has elected to designate both Local and National Register Districts in its village signifies a serious, long-term obligation by the town to identify and preserve the village's historic resources and to educate local residents about their importance. The zoning regulation requiring multi-family buildings "shall be of height, bulk, and design that complements the existing character of the neighborhood and the community" closely dovetails with that commitment. Salisbury's historic neighborhoods and the buildings and parks they contain are a precious asset that have faced challenges and will continue to do so. Any opportunity to protect them for the public benefit within the reasonable bounds of local regulations should be responsibly considered.

Respectfully submitted,

A handwritten signature in black ink that reads "Rachel D. Carley". The signature is written in a cursive style with a large, prominent initial "R".

Rachel D. Carley  
Historic Preservation Consultant  
Litchfield, Connecticut