June 9, 2017

Ms. Brona Simon, State Preservation Officer, Executive Director, State Archeologist
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125-3314

RE: Proposed MBTA Monopole Tower installation
2 Burnham Road, Project #31931 and 49 Haverhill Street, Project #31931, Andover, MA 01810

On May 31, 2017, the Andover Preservation Commission reviewed and took public comment at an open meeting on the installation of monopole towers by the MBTA in three locations in Andover and determined that in two of those locations, 2 Burnham Road and 49 Haverhill Street, installation of such towers meets the “adverse effect” criteria outlined in Section 106, 800.5 (2)(a):
(iv) Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;
(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features;

Both proposed monopole towers will be located near or within view of properties located in two National Historic Register Districts, the Andover Village Industrial National Historic Register District (2 Burnham Road) and the Shawsheen Village National Historic Register District, (49 Haverhill Street) or are within view of properties listed independently on the National Register of
Historic Places or the Andover Historic Building Survey. The proposed towers will stand 74' high and located on berms that add an additional 20' and therefore have the impact of a 94' tower. In addition, 5' by 5' concrete equipment pads will be located near the towers. We have no information concerning the equipment to be installed or whether noise will be a factor. The towers are also in proximity of the Lawrence Municipal Airport so lights may be required. Further, it should be noted, that both these historic areas are densely populated which magnifies the impact of these towers on residents.

Andover is fortunate to have seven designated National Historic Register Districts. Five districts are in close proximity to the Main Street/North Main Street corridor. We view these areas along North Main Street, as important extensions of our historic downtown.

Both the Andover Village Industrial Historic District and Shawsheen Village Historic District have similar components that relate to the historic industrial development of Andover, are unique in their development pattern and therefore culturally and architecturally invaluable both locally and nationally.

Residences listed on the Andover Historic Building Survey are found in the surrounding areas where the proposed monopole towers are proposed. Many other homes in the area may qualify as historic structures but have not been inventoried. They will also be affected by the visual intrusion of the monopole towers.

Andover Village Industrial National Register District was traditionally known as “The Village”. This complex of industrial structures and associated buildings lies at the heart of Andover, and played central role in the Town’s existence. Factories and residences cluster around two waterfalls on the Shawsheen River. The District reflects the concentration of population around such power sites after the advent of the region’s industrial era. The growing population here led to the establishment of Andover as a separate entity from the original agricultural settlement now known as North Andover. Broadly speaking, the District represents a significant site of early industrial activity in the Merrimack Valley.

The early 18th century mills included an iron works, a Revolutionary War power mill, and a paper mill. No visible trace exists today. Textile operations began here in the early 19th century. Cotton spinning and woolen manufacturing and the
country's first flax mill soon followed. Marland Mills, circa 1820, with its distinctive saw toothed roof, circa 1925, still stands as Atria-Marland Place, a senior living facility at 15 Stevens Street. The Village also includes the housing that related to all these various enterprises—*all of it irreplaceable historic fabric*

Also found in the immediate area are two Individual listings on the National Register of Historic Places.

- 6-8 Harding Street – Sarah Harding Double House, circa 1840, built in the Greek Revival style. Sarah Harding was an Abolitionist associated with the Free Christian Church.
- 166 North Main Street – the Nathan Frye House, built in 1852 as a grand Italianate style residence. Nathan Frye was associated with the Marland Manufacturing Company for decades, eventually serving as its President

The Shawsheen Village National Register Historic District, envisioned and financed by American Woolen Mill magnate, William Madison Wood, (construction began in 1918 and continued until 1924), has remained largely intact to this day. The Village was planned as a self-sustaining mill community for middle and upper management employees. Every detail of village life that William Wood believed would affect his plan's aesthetic was addressed. Noted architects were hired to design 200 houses in both brick and white Shawsheen along with the mill and other supporting community buildings, including the Administration Building, Post Office, drug store and spa, an elementary, school, dormitory for single female office workers, a company restaurant, creamery, a large Merchant's building, railroad station, (the mill workers, housed in nearby Lawrence, commuted by rail). Only the highest quality materials were used. The majority of buildings had slate roofs. Most still do. The Village also had underground utilities—unusual for the era. Two centrally located garages were provided as individual garages were not permitted and neither was off street parking. A centrally located laundry was also built.

Shawsheen Village is recognized as a National Historic Register District because it is so unique as a planned mill community—*the only one of its kind in the country*—with a diverse collection of homes and other buildings that all have an aesthetic relationship to each other. Such an extensive and expensive undertaking would be unimaginable today. Village residents recognize that value, and cherish it.
These proposed monopole towers are a visual intrusion—monolithic elements that are visually and likely audibly incompatible with the surrounding historic districts, would dramatically change the character of both National Historic Register Districts and harm the aesthetic of the Andover community as a whole.

The monopole cell towers clearly qualify as having an "adverse affect" according to section 800.5 of Section 106 of the National Historic Preservation Act. 74' cell towers have no place in either historic district setting in Andover. We urge the Massachusetts Historical Commission to confirm our assessment and stipulate that the towers must be removed from these historic districts to locations that will not be negatively affected by their presence or eliminate them entirely from the proposed plan.

Sincerely,

Karen Herman
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c.
Ramaker and Associates
Andover Board of Selectmen
Andrew Flanagan, Town Manager
Representative Niki Tsongas
Senator Barbara L’Italian- Andover
Representative Jim Lynons – Andover
Andover Preservation Commission
Linda Santoro, Massachusetts Historical Commission