



Vanasse Hangen Brustlin, Inc.

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Memorandum

To: Mr. Scott Chasse
All-Points Technology Corp., P.C.
3 Saddlebrook Drive
Killingworth, CT 06419

Date: September 29, 2009

Project No.: 40505.11

From: Dean Gustafson
Senior Wetland Scientist

Re: Coastal Consistency Analysis
T-Mobile Site No. CTNL813C
166 Pawcatuck Avenue
Stonington, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) provides the following assessment to demonstrate that the proposed T-Mobile project meets the requirements of the Connecticut Coastal Management Act (CGS Section 22a-90 through 22a-112) and is adequately protective of the interests of these regulations and the State's coastal resources.

The property is improved with a residence and garage with land use consisting of a small farming operation including maintained hayfields and cultivated fields. Based on a review of plans prepared by All-Points Technology Corporation, P.C. (latest revised date 09/15/09) VHB understands that T-Mobile proposes to construct a wireless communications facility ("Facility") in the northeast corner of the subject property north of the garage building and just south of Amtrak rail lines in an existing cleared area that is currently in hayfield.

The proposed Facility location is outside the coastal boundary although within the coastal area (the entire town of Stonington is considered in the coastal area); refer to the enclosed Coastal Boundary Map. No coastal resources are located on the subject property. No federal or state-regulated tidal wetlands or watercourses were identified (or delineated) on the subject property. The Facility would be located outside the 100-year and 500-year floodplain as shown on the Town of Stonington, Connecticut FEMA Flood Insurance Rate Map, Panel Number 0901060017 F, revised September 16, 1995. According to the 1979 Connecticut Coastal Resources Map, developed shorefront coastal resources associated with the Pawcatuck River are the nearest coastal resource to the subject property, approximately 3,000 feet east of the proposed Facility location.

Due to the absence of coastal resources on and proximate to the Facility location, no coastal resources will be adversely affected by the proposed development and the T-Mobile project is consistent with the State's coastal policies and goals as detailed below.

Coastal Consistency Review

The proposed T-Mobile project will not result in adverse impacts to coastal resources as defined in the Connecticut Coastal Management Act (CCMA). The CCMA identifies eight potential adverse impacts to coastal resources. This section provides a definition of each potential adverse impact for each resource area and why the proposed project will not adversely affect each resource.

- 1) *Degrading **water quality** of coastal waters by introducing significant amounts of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity.*

The proposed project will not affect water quality within the Pawcatuck River or associated developed shorefront coastal resources, located 3,000± feet to the east. Since the proposed wireless telecommunications compound creates minimal impervious surface and is underlain by a gravel surface, no significant stormwater runoff will be generated by the proposed project.

- 2) *Degrading **existing circulation patterns of coastal waters** by impacting tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours.*

The proposed project is located on property that is currently developed and outside of tidally influenced coastal water areas and as such will not impact current drainage or circulation patterns.

- 3) *Degrading **natural erosion patterns** by significantly altering littoral transport of sediments in terms of deposition or source reduction.*

The proposed project would not affect littoral transport of sediments since the Facility location is not on a shoreline.

- 4) *Degrading **natural or existing drainage patterns** by significantly altering groundwater flow and recharge and volume of runoff.*

Existing drainage patterns, groundwater flow and recharge and stormwater runoff will not be significantly altered by the proposed Facility due to its limited size, limited impervious surfaces and the existing developed nature of the subject property.

- 5) *Increasing the hazard of **coastal flooding** by significantly altering shoreline configurations or bathymetry, particularly within high velocity flood zones.*

The proposed project will not significantly alter shoreline configurations or bathymetry. The proposed project is located outside of the 100-year flood hazard zone.

- 6) *Degrading **visual quality** by significantly altering the natural features of vistas and viewpoints.*

The proposed 120 foot monopole will not significantly alter vistas or viewpoints and does not result in significant visibility from coastal resource areas. Refer to VHB's Visual Resource Evaluation Report, dated September 2009, provided under separate cover.

- 7) *Degrading or destroying **essential wildlife, finfish or shellfish habitat** by significantly altering the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significantly altering the natural components of the habitat.*

No essential wildlife, finfish or shellfish habitat exist on the subject property. The proposed Facility location is within a managed hayfield and is immediately adjacent to Amtrak rail lines.

- 8) *Degrading **tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments** by significantly altering their natural characteristics or function.*

The proposed project will not alter the natural characteristics of any coastal resource area as none exist on the subject property.



Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Ashaway (1984), Mystic (1984), Old Mystic (1983), and Watch Hill (1984)

Legend

- Proposed Facility
- Coastal Boundary



Vanasse Hangen Brustlin, Inc.
Coastal Boundary Map
Proposed T-Mobile Wireless
Telecommunications Facility
CTNL813C
166 Pawcatuck Avenue
Stonington, Connecticut

