

# Phoenix Partnership

May 11, 2020

Ms. Melanie Bachman,  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Re: Docket No. 486 Application of Tarpon Towers II LLC,  
For a Certificate of Environmental Compatibility and Public  
Need for the Construction, Maintenance and Operation of a  
Telecommunications Facility at 796 Woodin St  
the Town of Hamden, Connecticut Development and  
Management Plan**

Dear Attorney Bachman:

The Connecticut Siting Council ("Council") granted a certificate for the above referenced docket to Tarpon Towers II, LLC ("Tarpon") on December 6, 2019 and approved the Development and Management (D&M) Plan on February 27, 2020. Tarpon hereby provided notice to start construction on or about March 22, 2020. During the early part of the construction, Tarpon personnel were notified by Doug Roberts of Aecom there was a drainage issue with the access road, and the water was pushing the road up to a point the new access road could not hold gravel. Doug provided a solution which was digging a trench along the access road and installing drainage for the road.

Please accept the attached plan as a revision to the previously approved D&M plan. All other items on the D&M plan will remain as originally approved.

Please feel free to contact me with any questions.

Best Regards,



Keith Coppins

Enclosures

cc: Service List  
Town of Hamden  
2750 Dixwell Ave  
Hamden, CT 06518

City of New Haven  
156 Church St  
New Haven, CT 06510

Cellco Partnership d/b/a Verizon Wireless  
Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street Hartford, CT 06103-3597

# ENVIRONMENTAL NOTES

## WETLAND PROTECTION PLAN

THE PROPOSED TARPON TOWERS II LLC ("TARPON TOWERS") FACILITY IS LOCATED IN CLOSE PROXIMITY TO WETLAND RESOURCES. AS A RESULT, THE FOLLOWING PROTECTIVE MEASURES SHALL BE FOLLOWED TO HELP AVOID INCIDENTAL IMPACT TO NEARBY WETLANDS DURING CONSTRUCTION ACTIVITIES.

IT IS OF THE UTMOST IMPORTANCE THAT TARPON TOWERS' CONTRACTOR COMPLIES WITH THE REQUIREMENT FOR THE INSTALLATION OF WETLAND PROTECTIVE MEASURES AND THE EDUCATION OF ITS EMPLOYEES AND SUBCONTRACTORS PERFORMING WORK ON THE PROJECT SITE. THIS PROTECTION PROGRAM SHALL BE IMPLEMENTED REGARDLESS OF TIME OF YEAR THE CONSTRUCTION ACTIVITIES OCCUR. ALL-POINTS TECHNOLOGY CORPORATION, P.C. ("APT") WILL SERVE AS THE ENVIRONMENTAL COMPLIANCE MONITOR FOR THIS PROJECT TO ENSURE THAT WETLAND PROTECTION MEASURES ARE IMPLEMENTED PROPERLY. THE CONTRACTOR SHALL CONTACT DEAN GUSTAFSON, SENIOR WETLAND SCIENTIST AT APT, AT LEAST 5 BUSINESS DAYS PRIOR TO THE PRE-CONSTRUCTION MEETING. MR. GUSTAFSON CAN BE REACHED BY PHONE AT (860) 552-2033 OR VIA EMAIL AT DGUSTAFSON@ALLPOINTSTECH.COM.

THE WETLAND PROTECTION PROGRAM CONSISTS OF SEVERAL COMPONENTS: EDUCATION OF ALL CONTRACTORS AND SUB-CONTRACTORS PRIOR TO INITIATION OF WORK ON THE SITE; USE OF APPROPRIATE EROSION CONTROL MEASURES TO CONTROL AND CONTAIN EROSION WHILE AVOIDING/MINIMIZING WILDLIFE ENTANGLEMENT; PERIODIC INSPECTION AND MAINTENANCE OF ISOLATION STRUCTURES AND EROSION CONTROL MEASURES; AND, REPORTING.

### 1. CONTRACTOR EDUCATION

- A. PRIOR TO WORK ON SITE, THE CONTRACTOR SHALL ATTEND AN EDUCATIONAL SESSION AT THE PRE-CONSTRUCTION MEETING WITH THE ENVIRONMENTAL COMPLIANCE MONITOR. THIS ORIENTATION AND EDUCATIONAL SESSION WILL CONSIST OF AN INTRODUCTORY MEETING WITH THE ENVIRONMENTAL COMPLIANCE MONITOR TO UNDERSTAND THE ENVIRONMENTALLY SENSITIVE NATURE OF THE DEVELOPMENT SITE AND THE NEED TO FOLLOW THESE WETLAND PROTECTION PLAN MEASURES.
- B. APT WILL POST CAUTION SIGNS THROUGHOUT THE SITE FOR THE DURATION OF THE CONSTRUCTION PROJECT PROVIDING NOTICE OF THE ENVIRONMENTALLY SENSITIVE NATURE OF THE WORK AREA AND PRECAUTIONS TO BE TAKEN TO AVOID IMPACT TO NEARBY WETLAND RESOURCES.
- C. THE CONTRACTOR WILL BE PROVIDED WITH CELL PHONE AND EMAIL CONTACTS FOR THE ENVIRONMENTAL COMPLIANCE MONITOR TO IMMEDIATELY REPORT ANY INCIDENTAL IMPACT OR RELEASES OF SEDIMENT INTO NEARBY WETLANDS.

### 2. EROSION AND SEDIMENTATION CONTROLS

- A. THE EXTENT OF THE EROSION AND SEDIMENTATION CONTROLS WILL BE AS SHOWN ON THE SITE PLANS. THE CONTRACTOR SHALL HAVE ADDITIONAL EROSION CONTROL MATERIALS STAGED ON SITE SHOULD FIELD CONDITIONS WARRANT EXTENDING/REINFORCING CONTROLS AS DIRECTED BY THE ENVIRONMENTAL COMPLIANCE MONITOR.
- B. PLASTIC NETTING USED IN A VARIETY OF EROSION CONTROL PRODUCTS (I.E., EROSION CONTROL BLANKETS, FIBER ROLLS [WATTLES], REINFORCED SILT FENCE) HAS BEEN FOUND TO ENTANGLE WILDLIFE, INCLUDING REPTILES, AMPHIBIANS, BIRDS AND SMALL MAMMALS. NO PERMANENT EROSION CONTROL PRODUCTS OR REINFORCED SILT FENCE WILL BE USED ON THE TARPON TOWERS PROJECT. TEMPORARY EROSION CONTROL PRODUCTS THAT WILL BE EXPOSED AT THE GROUND SURFACE REPRESENT A POTENTIAL FOR WILDLIFE ENTANGLEMENT WILL USE EITHER EROSION CONTROL BLANKETS AND FIBER ROLLS COMPOSED OF PROCESSED FIBERS MECHANICALLY BOUND TOGETHER TO FORM A CONTINUOUS MATRIX (NETLESS) OR NETTING WITH A MESH SIZE <math>< \frac{1}{4}</math>" SUCH AS THAT TYPICALLY USED IN COMPOST FILTER SOCKS TO AVOID/MINIMIZE WILDLIFE ENTANGLEMENT.
- C. INSTALLATION OF EROSION AND SEDIMENTATION CONTROLS SHALL BE PERFORMED BY THE CONTRACTOR PRIOR TO ANY EARTHWORK. THE ENVIRONMENTAL COMPLIANCE MONITOR WILL INSPECT THE WORK ZONE AREA FOLLOWING INSTALLATION TO ENSURE EROSION CONTROLS ARE PROPERLY INSTALLED.
- D. THE FENCING WILL CONSIST OF NON-REINFORCED CONVENTIONAL EROSION CONTROL WOVEN FABRIC, INSTALLED APPROXIMATELY SIX INCHES BELOW SURFACE GRADE AND STAKED AT SEVEN TO TEN-FOOT INTERVALS USING FOUR-FOOT OAK STAKES OR APPROVED EQUIVALENT.
- E. IN ADDITION TO REQUIRED DAILY INSPECTION BY THE CONTRACTOR, THE FENCING WILL BE INSPECTED BY THE CONTRACTOR FOR TEARS OR BREECHEES IN THE FABRIC FOLLOWING INSTALLATION AND FOLLOWING STORM EVENTS THAT PRODUCE A DISCHARGE. INSPECTIONS WILL BE CONDUCTED PERIODICALLY BY THE ENVIRONMENTAL COMPLIANCE MONITOR THROUGHOUT THE COURSE OF THE CONSTRUCTION PROJECT.
- F. ALL SILT FENCING AND OTHER EROSION CONTROL DEVICES SHALL BE REMOVED WITHIN 30 DAYS OF COMPLETION OF WORK AND PERMANENT STABILIZATION OF SITE SOILS SO THAT POSSIBLE REPTILE AND AMPHIBIAN MOVEMENT BETWEEN UPLANDS AND WETLANDS IS NOT RESTRICTED. IF FIBER ROLLS/WATTLES, STRAW BALES, OR OTHER NATURAL MATERIAL EROSION CONTROL PRODUCTS ARE USED, SUCH DEVICES WILL NOT BE LEFT IN PLACE TO BIODEGRADE AND SHALL BE PROMPTLY REMOVED AFTER SOILS ARE STABLE SO AS NOT TO CREATE A BARRIER TO MIGRATING WILDLIFE. SEED FROM SEEDING OF SOILS SHALL NOT BE SPREAD OVER FIBER ROLLS/WATTLES AS IT MAKES THEM HARDER TO REMOVE ONCE SOILS ARE STABILIZED BY VEGETATION.

### 3. PETROLEUM MATERIALS STORAGE AND SPILL PREVENTION

- A. CERTAIN PRECAUTIONS ARE NECESSARY TO STORE PETROLEUM MATERIALS, REFUEL AND CONTAIN AND PROPERLY CLEAN UP ANY INADVERTENT FUEL OR PETROLEUM (I.E., OIL, HYDRAULIC FLUID, ETC.) SPILL DUE TO THE PROJECT'S LOCATION IN PROXIMITY TO SENSITIVE WETLANDS.
- B. A SPILL CONTAINMENT KIT CONSISTING OF A SUFFICIENT SUPPLY OF ABSORBENT PADS AND ABSORBENT MATERIAL SHALL BE MAINTAINED BY THE CONTRACTOR AT THE CONSTRUCTION SITE THROUGHOUT THE DURATION OF THE PROJECT. IN ADDITION, A WASTE DRUM SHALL BE KEPT ON SITE BY THE CONTRACTOR TO CONTAIN ANY USED ABSORBENT PADS/MATERIAL FOR PROPER AND TIMELY DISPOSAL OFF SITE IN ACCORDANCE WITH APPLICABLE LOCAL, STATE AND FEDERAL LAWS.
- C. THE FOLLOWING PETROLEUM AND HAZARDOUS MATERIALS STORAGE AND REFUELING RESTRICTIONS AND SPILL RESPONSE PROCEDURES WILL BE ADHERED TO BY THE CONTRACTOR.

#### i. PETROLEUM AND HAZARDOUS MATERIALS STORAGE AND REFUELING

1. REFUELING OF VEHICLES OR MACHINERY SHALL OCCUR A MINIMUM OF 100 FEET FROM WETLANDS OR WATERCOURSES AND SHALL TAKE PLACE ON AN IMPERVIOUS PAD WITH SECONDARY CONTAINMENT DESIGNED TO CONTAIN FUELS.
2. ANY FUEL OR HAZARDOUS MATERIALS THAT MUST BE KEPT ON SITE SHALL BE STORED ON AN IMPERVIOUS SURFACE UTILIZING SECONDARY CONTAINMENT A MINIMUM OF 100 FEET FROM WETLANDS OR WATERCOURSES.

#### ii. INITIAL SPILL RESPONSE PROCEDURES

1. STOP OPERATIONS AND SHUT OFF EQUIPMENT.
2. REMOVE ANY SOURCES OF SPARK OR FLAME.
3. CONTAIN THE SOURCE OF THE SPILL.
4. DETERMINE THE APPROXIMATE VOLUME OF THE SPILL.
5. IDENTIFY THE LOCATION OF NATURAL FLOW PATHS TO PREVENT THE RELEASE OF THE SPILL TO SENSITIVE NEARBY WATERWAYS OR WETLANDS.
6. ENSURE THAT FELLOW WORKERS ARE NOTIFIED OF THE SPILL.

#### iii. SPILL CLEAN UP & CONTAINMENT

1. OBTAIN SPILL RESPONSE MATERIALS FROM THE ON-SITE SPILL RESPONSE KIT. PLACE ABSORBENT MATERIALS DIRECTLY ON THE RELEASE AREA.
2. LIMIT THE SPREAD OF THE SPILL BY PLACING ABSORBENT MATERIALS AROUND THE PERIMETER OF THE SPILL.
3. ISOLATE AND ELIMINATE THE SPILL SOURCE.
4. CONTACT APPROPRIATE LOCAL, STATE AND/OR FEDERAL AGENCIES, AS NECESSARY.
5. CONTACT A DISPOSAL COMPANY TO PROPERLY DISPOSE OF CONTAMINATED MATERIALS.

#### iv. REPORTING

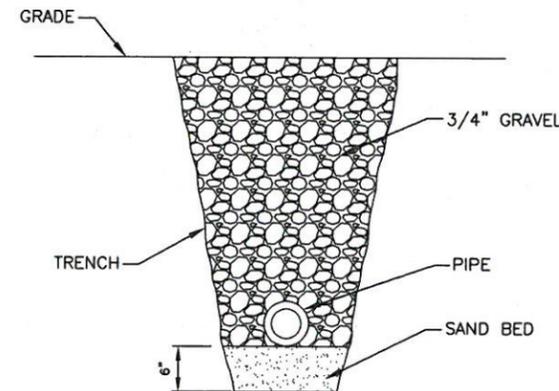
1. CONTRACTOR SHALL COMPLETE AN INCIDENT REPORT.
2. CONTRACTOR SHALL SUBMIT A COMPLETED INCIDENT REPORT TO APPROPRIATE LOCAL, STATE AND/OR FEDERAL AGENCIES, AS NECESSARY.

#### 4. HERBICIDE AND PESTICIDE RESTRICTIONS

- A. THE USE OF HERBICIDES AND PESTICIDES AT THE PROPOSED FACILITY SHOULD BE MINIMIZED AND WHEN USED SHOULD BE IN CONJUNCTION WITH INTEGRATED PEST MANAGEMENT ("IPM") TECHNIQUES WITH PARTICULAR ATTENTION TO MINIMIZE APPLICATIONS WITHIN 100 FEET OF WETLAND OR WATERCOURSE RESOURCES. NO APPLICATIONS OF HERBICIDES OR PESTICIDES ARE ALLOWED WITHIN ACTUAL WETLAND OR WATERCOURSE RESOURCES.

#### 5. REPORTING

- A. A COMPLIANCE MONITORING REPORT (BRIEF NARRATIVE AND APPLICABLE PHOTOS) DOCUMENTING EACH OF APT'S INSPECTIONS WILL BE SUBMITTED BY APT TO TARPON TOWERS AND ITS CONTRACTOR FOR COMPLIANCE VERIFICATION.
- B. FOLLOWING COMPLETION OF THE CONSTRUCTION PROJECT, APT WILL PROVIDE A COMPLIANCE MONITORING SUMMARY REPORT TO TARPON TOWERS AND ITS CONTRACTOR DOCUMENTING IMPLEMENTATION OF THE WETLAND PROTECTION PLAN AND APT'S MONITORING OBSERVATIONS. TARPON TOWERS SHALL PROVIDE A COPY OF THE COMPLIANCE MONITORING SUMMARY REPORT TO THE CONNECTICUT SITING COUNCIL FOR COMPLIANCE VERIFICATION.
- C. ANY INCIDENTS OF SEDIMENT RELEASE INTO WETLAND RESOURCE AREAS SHALL BE REPORTED BY TARPON TOWERS TO THE CONNECTICUT SITING COUNCIL WITHIN 24 HOURS OF THE INCIDENT.



**TRENCH DETAIL**  
SCALE: 1"=1'-0"

1  
EN-1

**TARPON TOWERS**  
TARPON TOWERS II, LLC  
1001 3rd AVENUE WEST, SUITE 420  
BRADENTON, FL 34205

A&E FIRM  
**AECOM**  
500 ENTERPRISE DRIVE  
SUITE 3B  
ROCKY HILL, CONNECTICUT  
1-(860)-529-8882



CHECKED BY: DJR

APPROVED BY: ME

SUBMITTALS			
REV.	DATE	DESCRIPTION	BY
1	05/06/20	ISSUED FOR REVIEW	CAT
0	03/03/20	ISSUED FOR REVIEW	KAM

SITE NAME:  
**HAMDEN II**

SITE ADDRESS:  
796 WOODIN STREET  
HAMDEN, CT 06514

SHEET TITLE  
**ENVIRONMENTAL NOTES**

SHEET NUMBER  
**EN-1**



CHECKED BY: DJR

APPROVED BY: ME

SUBMITTALS			
REV.	DATE	DESCRIPTION	BY
0	03/03/20	ISSUED FOR REVIEW	KAM

SITE NAME:  
**HAMDEN II**

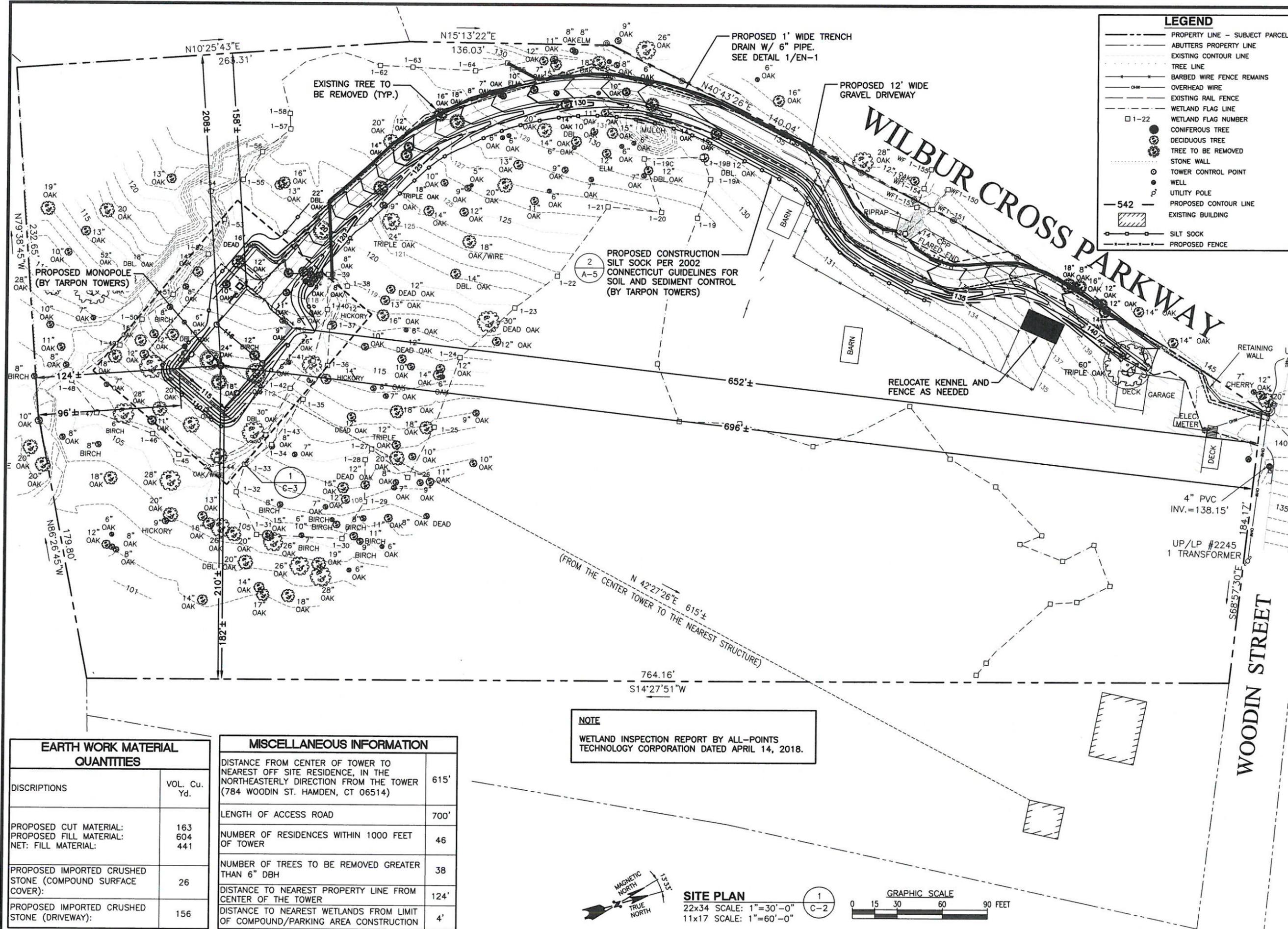
SITE ADDRESS:  
796 WOODIN STREET  
HAMDEN, CT 06514

SHEET TITLE  
**SITE PLAN**

SHEET NUMBER  
**C-2**

**LEGEND**

- PROPERTY LINE - SUBJECT PARCEL
- - - ABUTTERS PROPERTY LINE
- EXISTING CONTOUR LINE
- TREE LINE
- BARBED WIRE FENCE REMAINS
- OVERHEAD WIRE
- EXISTING RAIL FENCE
- WETLAND FLAG LINE
- 1-22 WETLAND FLAG NUMBER
- CONIFEROUS TREE
- DECIDUOUS TREE
- TREE TO BE REMOVED
- STONE WALL
- TOWER CONTROL POINT
- WELL
- UTILITY POLE
- PROPOSED CONTOUR LINE
- EXISTING BUILDING
- SILT SOCK
- PROPOSED FENCE



**EARTH WORK MATERIAL QUANTITIES**

DISCRIPTIONS	VOL. Cu. Yd.
PROPOSED CUT MATERIAL:	163
PROPOSED FILL MATERIAL:	604
NET: FILL MATERIAL:	441
PROPOSED IMPORTED CRUSHED STONE (COMPOUND SURFACE COVER):	26
PROPOSED IMPORTED CRUSHED STONE (DRIVEWAY):	156

**MISCELLANEOUS INFORMATION**

DISTANCE FROM CENTER OF TOWER TO NEAREST OFF SITE RESIDENCE, IN THE NORTHEASTERLY DIRECTION FROM THE TOWER (784 WOODIN ST. HAMDEN, CT 06514)	615'
LENGTH OF ACCESS ROAD	700'
NUMBER OF RESIDENCES WITHIN 1000 FEET OF TOWER	46
NUMBER OF TREES TO BE REMOVED GREATER THAN 6" DBH	38
DISTANCE TO NEAREST PROPERTY LINE FROM CENTER OF THE TOWER	124'
DISTANCE TO NEAREST WETLANDS FROM LIMIT OF COMPOUND/PARKING AREA CONSTRUCTION	4'

**NOTE**  
WETLAND INSPECTION REPORT BY ALL-POINTS TECHNOLOGY CORPORATION DATED APRIL 14, 2018.

