

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 513
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY OFF :
MASON HILL ROAD, LITCHFIELD, :
CONNECTICUT :
APRIL 27, 2023

SUBMISSION OF EVIDENCE AND INFORMATION
FOR A PROPOSED ALTERNATE TOWER LOCATION

I. Factual Background

On February 28, 2023, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) filed an application (the “Application”) for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council (“Council”) to construct a wireless telecommunications facility on an 8.17-acre parcel off Mason Hill Road in Northfield, Town of Litchfield, Connecticut (the “Property”). The Property is owned by the Joyce Williams. Cellco refers to this cell site as its “Litchfield SE Facility”. As described in the Application, the Litchfield SE Facility would be located in the southeasterly portion of the Property.

A 250-foot wide Eversource electric transmission line easement (the “Eversource Easement”), bisects the Property. Eversource maintains three sets of electric transmission lines and transmission towers in the central and western portion of the Eversource Easement.

In the Application, the Litchfield SE Facility is proposed to be located partially within the eastern-most portion of the Eversource Easement. At the time of the filing of the Application,

Cellco was under the impression that Eversource might agree to allow for the use of the easterly, unused portion of the Eversource Easement for the Litchfield SE Facility. On April 11, 2023, Cellco learned that its proposed use of a portion of the Eversource Easement would not be permitted.

II. Alternative Facility Locations Evaluated

On or about April 12, 2023, Cellco instructed its project team to relocate the proposed Litchfield SE Facility to an area outside of the Eversource Easement. Project engineers first evaluated a possible location on the west side of the Eversource Easement, immediately south of the existing site access drive off Mason Hill Road. This alternative was rejected by Cellco for three principle reasons: (1) this alternative site would require the installation of a taller tower (approximately 150 feet in height) due to a much lower ground elevation in the area; (2) a 150-foot tower at this location would be more visible, particularly from the adjoining properties to the west; and (3) a facility at this location would be difficult to construct due to steep grades along the western edge of the Eversource Easement.

The better alternative and the one presented for the Council's consideration, is located along the east side of the Eversource Easement. *See* Partial Site/Facilities Overlay Plan and Partial Site/Alternative Facility Plan included in Attachment 1. As shown on Plan Sheet ALT – 1.0, the proposed alternate Litchfield SE Facility (the “Alternate Facility”) compound has been shifted to the northeast so that it is completely outside the Eversource Easement. To maintain an appropriate setback from Wetland 1, to the east, the Alternate Facility compound will maintain an irregular shape and be reduced in area from 2,500 square feet to approximately 2,355 square feet. To avoid having to construct the site access driveway within the Eversource Easement the

Alternate Facility access drive has also been relocated and will extend directly from Mason Hill Road to the northeast of the Alternate Facility compound. See Attachment 1 Sheet ALT – 1.1.

III. Evaluation of Environmental Effects for the Alternate Facility Location

A. Tower Height

As depicted on the plans included in Attachment 1, the Alternate Facility tower would be located approximately 55 feet to the northeast of the original tower location proposed in the Application. The finished compound ground elevation and the proposed 110-foot tower height for the Alternate Facility will remain unchanged. The horizontal shift in the tower location, 55 feet to the northeast, will not affect Cellco's ability to meet its wireless service objectives in the Northfield area.

B. Alternate Facility Construction

According to project engineers, existing grades in the area around the Alternate Facility location do not present any insurmountable challenges that might impact the project development. To establish a level compound area and reduce the overall limits of disturbance associated with the Alternate Facility, Cellco will construct a retaining wall, approximately four feet in height, along the east, south and west sides of the Alternate Facility compound. The Alternate Facility compound will maintain adequate space for Cellco's equipment, backup generator and propane fuel tank and equipment for up to three (3) additional wireless carriers.

Construction of the Alternate Facility and new access driveway will require the removal of nine (9) mature trees (6" diameter or greater at breast height). The original compound location would have required the removal of seven (7) mature trees. Additional site grading will be required to construct the new site access driveway. (See Attachment 1).

C. Visibility

In an effort to assess the visual impact of the Alternate Facility tower, All Points Technology Corporation completed a preliminary viewshed analysis and mapping for the Alternate Facility tower location. According to this analysis, the area of year-round visibility of the Alternate Facility tower would include approximately 16 acres, slightly less than the 21 acres of year-round visibility predicted for the original tower location. Seasonal visibility of the Alternate Facility tower would include approximately 67 acres, 13 acres more than the original tower location. Overall, the surrounding areas where year-round and seasonal visibility may occur do not change significantly from the original tower location. See Attachment 2.

D. Wetland Impacts

Cellco took great care in selecting the Alternate Facility location to minimize, to the extent possible, impacts on Wetland 1. Like the original tower site, the proposed Alternate Facility will have no direct impacts to Wetland 1. The Alternate Facility fenced compound would maintain a setback of approximately 33 feet from Wetland 1. Minor grading, tree clearing, and installation of soil erosion control measures would result in temporary work occurring within approximately 25 feet of Wetland 1. The Applicant remains committed to the Best Management Practices described in the November 16, 2022 Wetland Impacts Analysis (Application - Attachment 11) and is proposing to install additional measures designed to enhance the remaining vegetation that would buffer Wetland 1 from the proposed Alternate Facility compound. A Wetland Impact Analysis Addendum describing these additional wetland protection measures is included in Attachment 3. The area proposed for wetland buffer vegetative enhancement is depicted on Plan Sheet ALT – 1.1.

E. Modified Interrogatory Responses

Cellco offers the following modifications to its interrogatory responses submitted on April 10, 2023 as they relate to the Alternate Facility compound location described in this filing.

Question No. 12:

Referring to Application p. 14, what is the distance and direction to the nearest residence not owned by the lessor?

Response:

The nearest residence to the Alternate Facility tower site is approximately 350 feet to the north at 282 Mason Hill Road, approximately 34 feet closer than the original tower location. This parcel is owned by Donald and Dianne Voluckas.

Question No. 13:

Referring to Application p. 8 and Attachment 14, would Cellco require an agreement from Eversource to cross or utilize the Eversource right-of-way for access to the site? If yes, has an agreement been reached? Is the right-of-way gated?

Response:

As revised, since the Alternate Facility compound does not require the use of the Eversource right of way no such agreement is required. Cellco may need Eversource's permission to construct a portion of the gravel vehicle parking area within the Eversource ROW. Cellco would seek permission for this encroachment from Eversource if the Application is approved.

Question No. 29:

What is the distance between the proposed tower and the nearest edge of the Eversource right-of-way? Are there any restrictions/NESC clearance requirements on how close the tower can be to the to the right-of-way and/or transmission lines?

Response:

The proposed Alternate Facility tower is located approximately 141 feet from the nearest transmission line and approximately 37 feet from the eastern edge of the Eversource Easement.

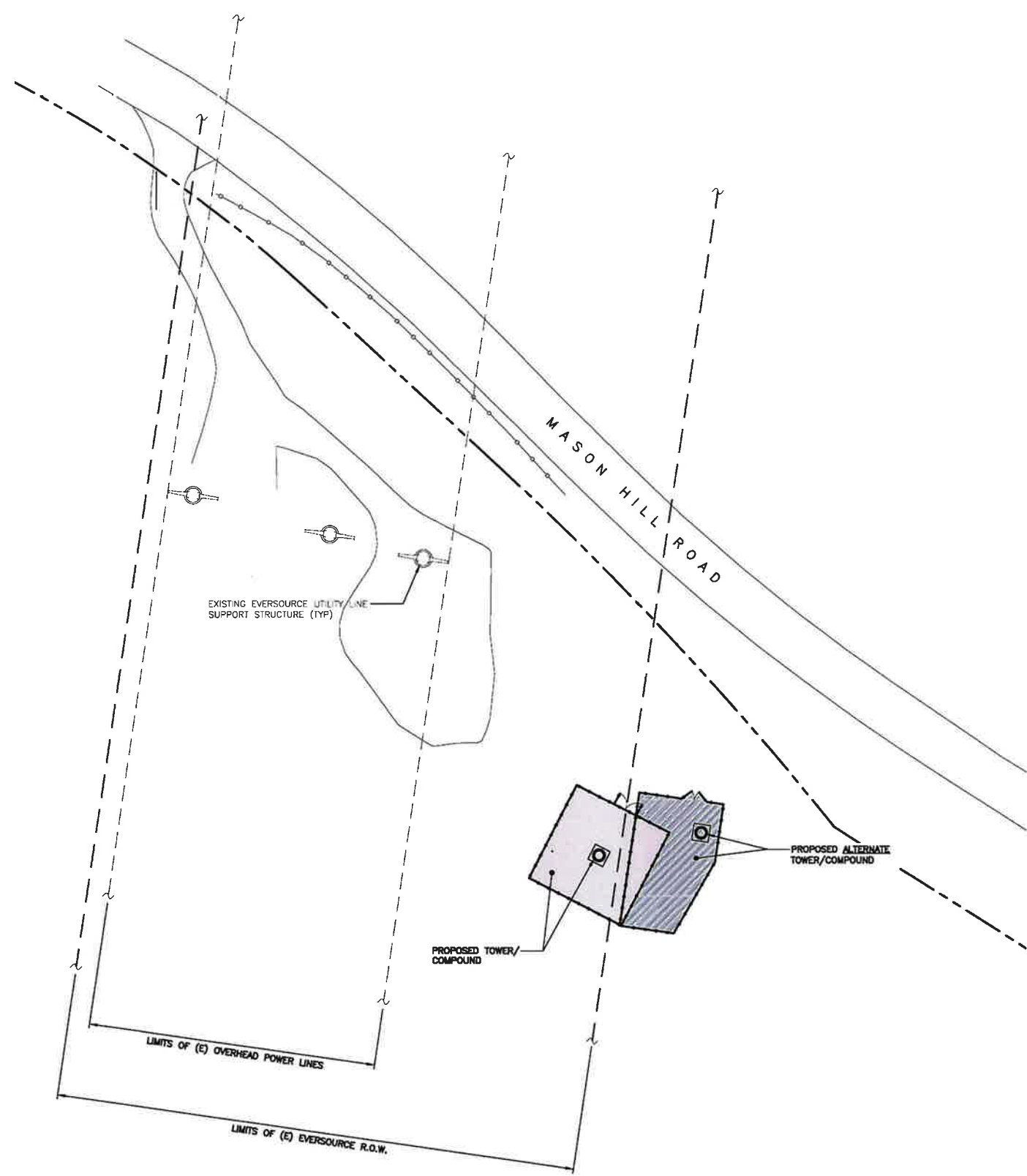
Question No. 33:

Referencing Application Attachment 9, Visual Resource Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed facility.

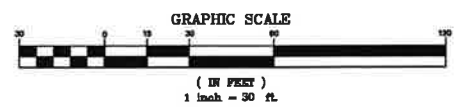
Response:

Visibility of the proposed Alternate Facility tower would be comparable to the original tower location. It is predicted that a total of 31 residential properties, within 0.5 mile of the Alternate Facility tower site, will have seasonal views and 10 residential properties will have year-round and seasonal views. There are no residential properties estimated to have only year-round visibility.

ATTACHMENT 1



1 PARTIAL SITE/ PROPOSED FACILITIES OVERLAY PLAN
 ALT-1.0 SCALE: 1" = 30'



Celco Partnership d/b/a Verizon Wireless LITCHFIELD SE CT MASON HILL ROAD NORTHFIELD, CT 06776		(203) 488-0580 (203) 488-6587 Fax 65-2 North Benford Road Branford, CT 06405 www.CentekEng.com	
PROFESSIONAL DESIGNER SEAL	DATE: 04/13/23 SCALE: AS NOTED JOB NO. 21098.07	REVISIONS:	ALTERNATE PROPOSED TOWER FACILITY DESCRIPTION
0	04/28/23	DATE	REVISION BY CHFD BY DESCRIPTION
1	04/13/23	DATE	REVISION BY CHFD BY DESCRIPTION
ALT-1.0 Sheet No. 1 of 2		PARTIAL SITE/ FACILITIES OVERLAY PLAN	

TREE REMOVAL SUMMARY

NOTE: A TOTAL OF (9) TREES OF 6" IN DIAMETER OR GREATER AT BREAST HEIGHT ARE PROPOSED TO BE REMOVED AS FOLLOWS:

PROPOSED SITE COMPOUND:	PROPOSED ACCESS DRIVE:
(2) 15" HICKORY	(1) 12" MAPLE
(2) 12" MAPLE	(1) 12" OAK
	(1) 12" HICKORY
	(2) 15" HICKORY

NOTES:

- PROPOSED UTILITY ROUTING SHOWN HEREIN IS SCHEMATIC. FINAL ROUTING TO BE COORDINATED WITH UTILITY PROVIDERS AND PROPERTY OWNER DURING THE D&M PHASE OF THE PROJECT.
- DELINEATED WETLAND BOUNDARY, 100 FT UPLAND REVIEW AREA, WETLAND AREA 1 AND WETLAND AREA 2 SHOWN HEREIN ARE REFERENCED FROM WETLAND INSPECTION REPORT PREPARED FOR VERIZON WIRELESS BY ALL POINTS TECHNOLOGY CORP., P.C. (APT) DATED SEPTEMBER 8, 2022. APT PROJECT NO: CT14113440.

SITE/SURVEY PLAN SYMBOLS LEGEND

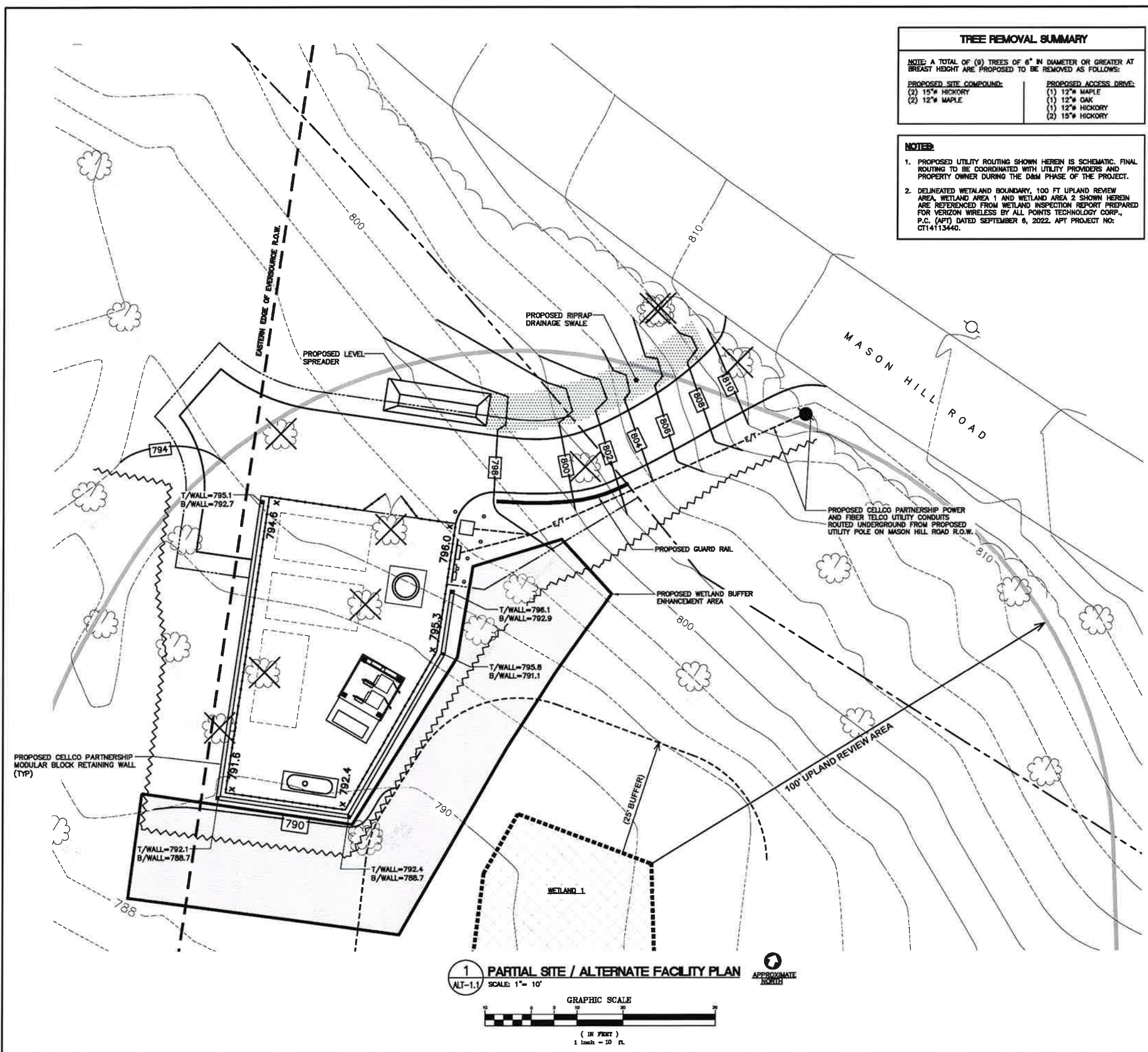
---	PROPERTY LINE
—○—○—	TIMBER GUARD RAIL (EXISTING)
---	ACCESS DRIVE (EXISTING)
○	UTILITY POLE (EXISTING)
●	UTILITY POLE (PROPOSED)
~~~~~	TREELINE (EXISTING)
---	OVERHEAD WIRES (EXISTING)
⊗	TREE >6" (EXISTING)
⊗	TREE >6" TO BE REMOVED
---	2' CONTOUR LINE
---790---	10' CONTOUR LINE
---	GRAVEL ACCESS DRIVE (PROPOSED)
794	GRADING LINE/ELEVATION
x 794	SPOT ELEVATION (PROPOSED)
---E/T---	U/G ELECT. AND TELCO UTILITY CONDUITS (PROPOSED)
---	ACCESS EASEMENT (PROPOSED)
~~~~~	SILTATION FENCE/COMPOST FILTER SOCK EROSION CONTROL

Planting Schedule: Wetland Buffer Enhancement Area

QTY	BOTANICAL NAME	COMMON NAME	SIZE	SPACING
15	AMELANCHIER CANADENSIS	SERVICEBERRY	3-4'	5-7 FEET
15	CORNUS RACEMOSA	GRAY DOGWOOD	3-4'	5-7 FEET
15	LIABRIA BRIZOWA	SPICEBUSH	3-4'	5-7 FEET
15	IBURNUM DENTATUM	ARROWWOOD	3-4'	5-7 FEET
15	IBURNUM LENTAGO	NANNYBERRY	3-4'	5-7 FEET

NOTES:

- THE WETLAND BUFFER ENHANCEMENT AREA WILL CONSIST OF PLANTING WITH SELECT NATIVE SHRUBS TO IMPROVE FUNCTION AND VALUE OF BUFFER ZONE WITH FOCUS ON PROVIDING A DENSE BUFFER OF NATIVE VEGETATION BETWEEN THE PROPOSED FACILITY AND NEARBY WETLAND WITH A FOCUS ON IMPROVING WILDLIFE HABITAT AND WATER QUALITY FUNCTIONS.
- SOIL EXPOSED AS A RESULT OF GRADING ACTIVITIES AND NATIVE SPECIES PLANTING ACTIVITIES WILL BE UNDER SOWN WITH NATIVE SEED MIXES. IN AREAS WHERE THE EXISTING OVERSTORY TREES WILL BE RETAINED, THE NEW ENGLAND SEMI-SHADE GRASS AND FORBES MIX (NEW ENGLAND WETLANDS PLANTS INC., OR APPROVED EQUIVALENT) WILL BE APPLIED. THIS SEED MIX IS APPROPRIATE FOR SUNNY LOCATIONS BY PROVIDING A PERMANENT COVER OF GRASSES AND POLLINATOR SPECIES TO PROVIDE BOTH GOOD EROSION CONTROL AND WILDLIFE HABITAT VALUE.
- SHRUB SPACING IS PROVIDED FOR GENERAL PURPOSES. ACTUAL LOCATION OF PLANTS TO BE ADJUSTED IN THE FIELD BASED ON AVAILABLE SPACE BETWEEN EXISTING TREES AND REMOVED INVASIVE SHRUBS. THE SUPERVISING WETLAND SCIENTIST WILL ASSIST IN SELECTING PLANTING LOCATIONS AND SPACING TO SIMULATE NATURAL GROWTH PATTERNS.



1 PARTIAL SITE / ALTERNATE FACILITY PLAN
 ALT-1.1
 SCALE: 1" = 10'
 GRAPHIC SCALE
 (IN FEET)
 1 inch = 10 ft

PROFESSIONAL ENGINEER SEAL

verizon

CENITEK
 Corporation of Connecticut
 (203) 488-0380
 (203) 488-8597 Fax
 65-2 North Branford Road
 Branford, CT 06405
 www.CenitekEng.com

Cellco Partnership d/b/a Verizon Wireless
LITCHFIELD SE CT
 MASON HILL ROAD
 NORTHFIELD, CT 06778

DATE: 04/13/23
 SCALE: AS NOTED
 JOB NO. 21058.07

PARTIAL SITE/
 ALTERNATE
 FACILITY PLAN

ALT-11
 Sheet No. 2 of 2

ATTACHMENT 2



VIEWSHED MAPPING

Date: April 21, 2023

To: Verizon Wireless
20 Alexander Drive
Wallingford, CT 06492

From: Brian Gaudet, Project Manager

Re: Connecticut Siting Council Docket 513
Proposed Telecommunications Facility – Alternate Location
Mason Hill Road
Northfield (Litchfield), Connecticut

Verizon Wireless (“Verizon”) has identified an alternate proposed location for development of a wireless telecommunications facility on Mason Hill Road in the village of Northfield in the Town of Litchfield, Connecticut (the “Host Property”). The ± 8.17 -acre Host Property is located on the border of Litchfield and Thomaston south of Mason Hill Road. Land use in the immediate vicinity consists of a mix of residential development and forested areas.

The proposed alternate location is approximately 55 feet to the northeast of the original location¹ at a similar ground elevation. No substantive modifications to the Facility are required to accommodate the alternate location. As originally introduced, the Facility would include a 110-foot-tall steel monopole and be located within an irregularly shaped $\pm 2,355$ sq. ft. compound located in the eastern portion of the Host Property (the “Site”).

At the request of Verizon, All-Points Technology Corporation, P.C. (“APT”) has prepared initial viewshed mapping to provide a preliminary evaluation of the visibility associated with the proposed alternate location. APT prepared this viewshed mapping using the predictive computer model that was developed specifically for this project using ESRI’s ArcMap Geographic Information System (“GIS”)² software and available GIS data. The predictive model provides an initial estimate of potential visibility throughout the two-mile Study Area introduced in APT’s *Visual Assessment and Photo-Simulations* report. The predictive model was modified to include the proposed alternate Facility location, its ground elevation and proposed height. The same methodologies used to evaluate the original location were subsequently employed to assess the alternate location.

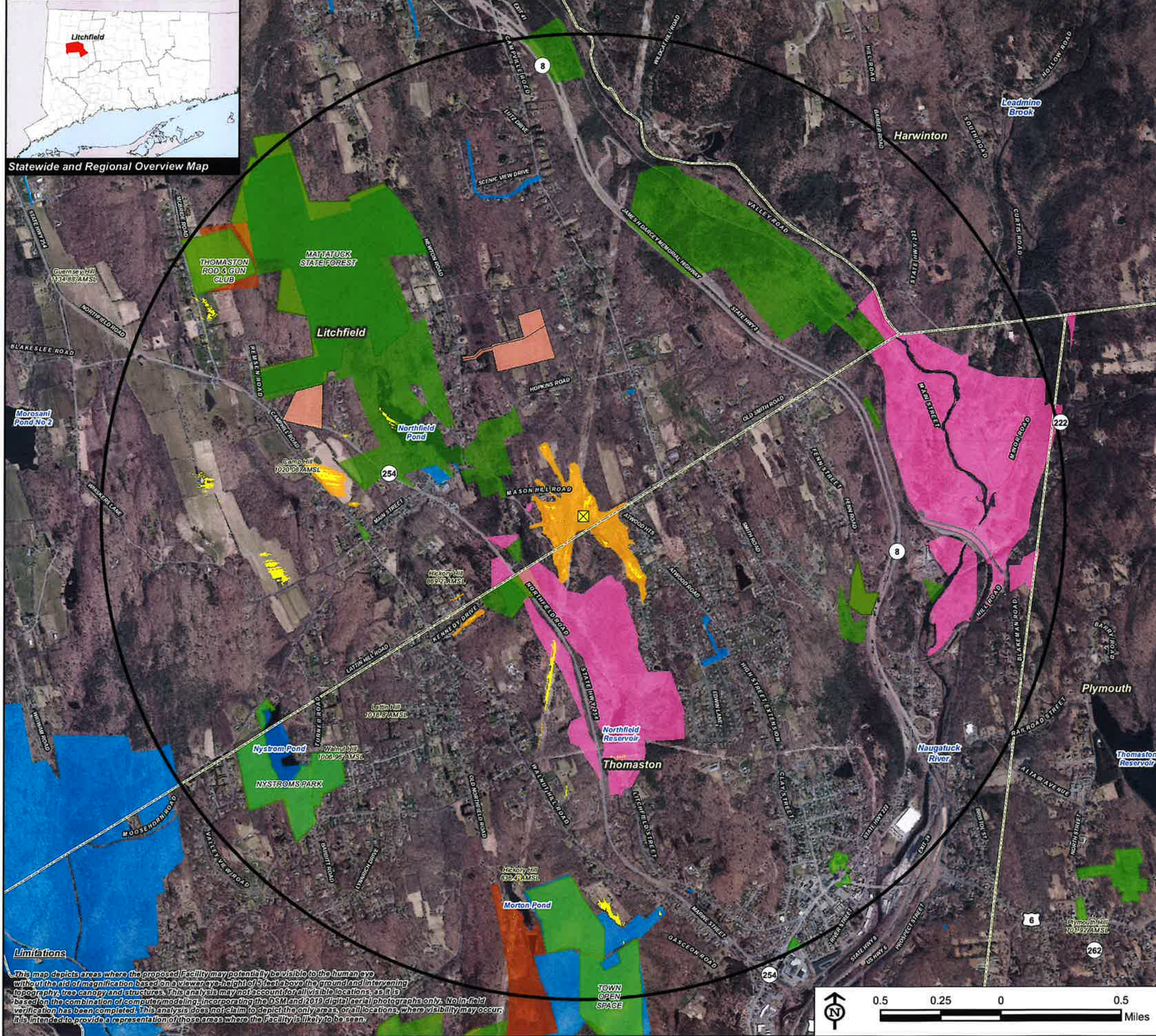
¹ The original location was evaluated and documented in APT’s report titled, *Visual Assessment and Photo-Simulations*, submitted as Attachment 9 of the Application associated with Connecticut Siting Council Docket No. 513.

² ArcMap is a Geographic Information System desktop application developed by the Environmental Systems Research Institute for creating maps, performing spatial analysis, and managing geographic data.

The preliminary viewshed mapping results associated with the proposed alternate location indicate year-round visibility could include approximately 17 acres. Predicted seasonal visibility, when leaves are off the deciduous trees, could include an additional 67 acres; this represents a slight increase (± 13 additional acres) from the original location (± 54 acres). Collectively, year-round and seasonal visibility is predicted to occur over a very small portion of the 8,042-acre Study Area (less than one percent). Note that the results of the computer model have not been field verified. Our experience is that the computer model's sensitivity typically results in the initial mapping being over-predictive of the Facility's total viewshed.

When compared to the original location, predicted year-round visibility associated with the proposed alternate location reduces visibility by ± 5 acres. The primary areas of year-round visibility, similar to the original location, would likely occur along the utility ROW, primarily south of the Site, and over open agricultural fields at distances between ± 1.0 mile and ± 1.6 miles to the west. Seasonal visibility is predicted to occur in generally the same areas as the original location, with a slight increase in seasonal views in the immediate vicinity to the northwest and southwest of the proposed alternate location. The minor shift in location for development of the Facility is not likely to materially alter the visibility as compared to the original location.

ATTACHMENTS



Preliminary Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
 Alternate Location
 Litchfield SE CT
 Mason Hill Road
 Northfield, Connecticut

Proposed facility height is 110 feet AGL.
 Forest canopy height is derived from LiDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Information provided on this map has not been field verified
 Base Map Source: 2019 Aerial Photograph (CTECO)
 Map Date: April 2023

Legend

- Proposed Site
- Study Area (2-Mile Radius)
- Predicted Year-Round Visibility (17 Acres)
- Areas of Potential Seasonal Visibility (67 Acres)
- Municipal Boundary
- Trail
- Scenic Highway
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park
- Protected Open Space Property**
- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

Physical Geography / Background Data
 A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.
 Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas
 Connecticut Department of Energy and Environmental Protection (DEEP); DEEP Property (May 2007); Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)

Connecticut Forest & Parks Association, Connecticut Walk Books East & West

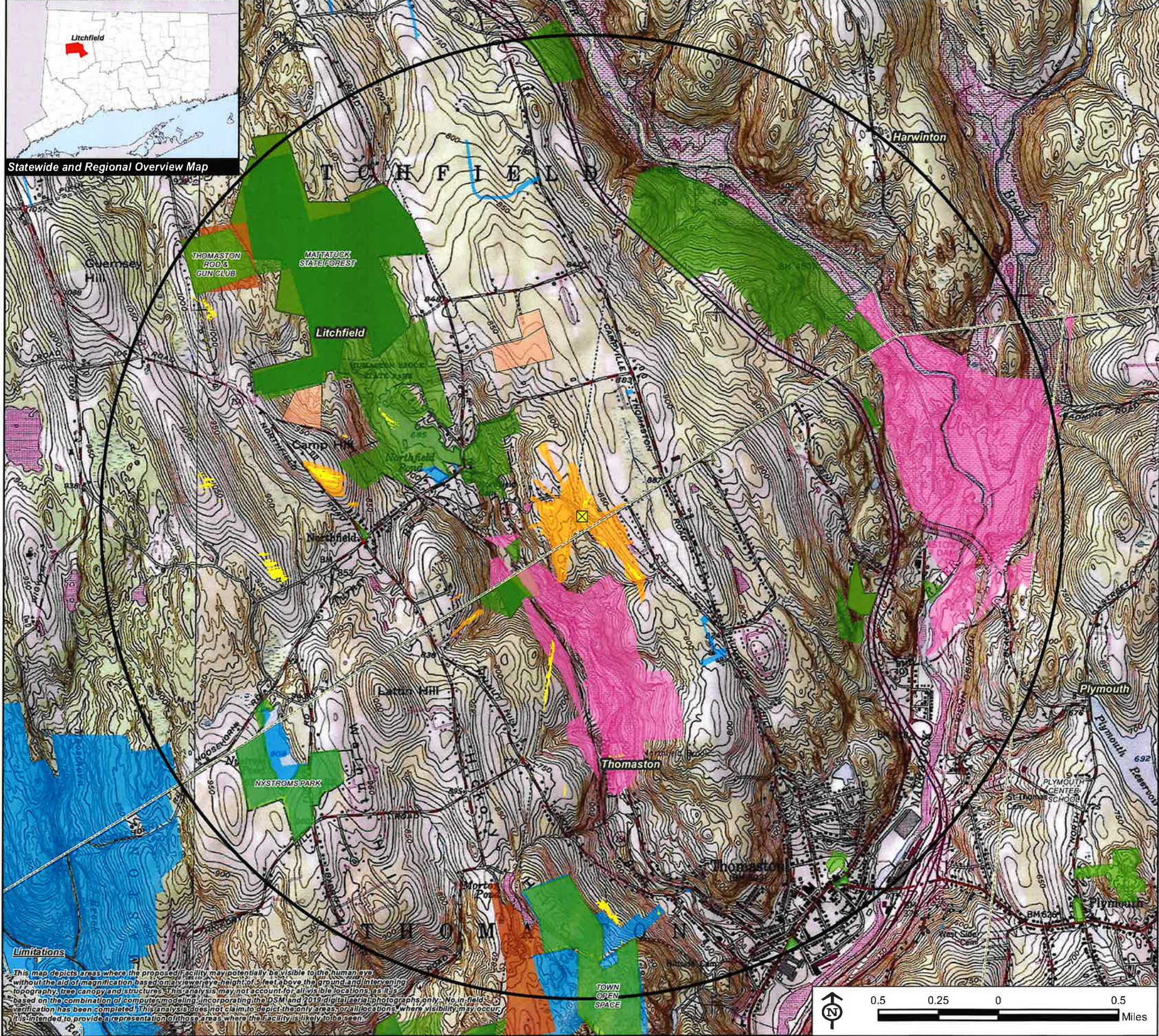
Other
 CTDOT Scenic Strips (based on Department of Transportation data)

Notes

**Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.

Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating the DSM and 2019 digital aerial photographs only. No in-field verification has been completed. This analysis does not claim to depict the only areas, or all locations, where visibility may occur. It is intended to provide a representation of those areas where the Facility is likely to be seen.





Preliminary Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
 Alternate Location
 Litchfield SE CT
 Mason Hill Road
 Northfield, Connecticut

Proposed facility height is 110 feet AGL.
 Forest canopy height is derived from LiDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Information provided on this map has not been field verified
 Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Litchfield, CT (1984) and Thomaston, CT (1976)
 Map Date: April 2023

Legend

- Proposed Site
- Study Area (2-Mile Radius)
- Predicted Year-Round Visibility (17 Acres)
- Areas of Potential Seasonal Visibility (67 Acres)
- Municipal Boundary
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A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

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Dedicated Open Space & Recreation Areas

Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007); Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)
 Connecticut Forest & Parks Association, Connecticut Walk Books East & West

Other

CTDOT Scenic Strips (based on Department of Transportation data)

Notes

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ATTACHMENT 3



WETLAND IMPACT ANALYSIS ADDENDUM

April 26, 2023

Verizon Wireless
20 Alexander Drive
Wallingford, Connecticut 06492

Re: Proposed Verizon Wireless Litchfield SE CT Telecommunications Facility
Mason Hill Road, Northfield, Connecticut
Connecticut Siting Council Docket No. 513
APT Project No. CT14113400

On behalf of Verizon Wireless ("Verizon"), All-Points Technology Corporation, P.C. ("APT") performed an evaluation of wetland impacts associated with the proposed referenced telecommunication facility ("Facility") on a forested parcel adjacent to an Eversource electrical transmission right-of-way off Mason Hill Road in Northfield (Litchfield), Connecticut ("Subject Property"). The Subject Property, which is located just north of the Litchfield-Thomason municipal boundary, is an undeveloped mainly forested parcel with a maintained Eversource electrical transmission right-of-way ("ROW") bisecting the parcel.

This wetland impact analysis addendum supplements the previously issued wetland impact analysis document dated November 16, 2022. APT understands that an alternate Facility location is proposed slightly east of the original location due to restrictions from placement of any structures within the adjacent Eversource ROW. As a result of this design constraint, the alternate Facility is now slightly closer to Wetland 1. This addendum is based on a review of Partial Site/Alternate Facility Plan, Sheet No. ALT-1.1, prepared by Centek Engineering dated 04/13/23 (latest revision date 04/26/23).

Wetland Impact Evaluation

The proposed alternate Facility avoids any direct wetland impacts to wetlands. The eastern side of the proposed alternate Facility's fenced compound would be ± 33 feet (original Facility location would be ± 54 feet) west of the nearest wetland boundary at Wetland 1; minor grading, tree clearing, and installation of erosion controls would likely result in temporary work being ± 25 feet (original Facility would be ± 47 feet) from the nearest wetland. A new proposed access drive dedicated to the alternate Facility from Mason Hill Road would be ± 70 feet from Wetland 1. A 25-foot wide non-disturb zone that consists of upland forest habitat would remain between the alternate Facility location and Wetland 1.

Protective practices noted in the original wetland impact analysis will continue to be employed with the alternate Facility location during construction to avoid potential short-term impacts and provide safeguards to avoid unintentional impacts to nearby wetlands. These best management practices

include the installation and maintenance of erosion controls in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*. In addition to erosion control measures, the previously proposed wetland protection plan will be implemented during construction of the alternate Facility location. By implementing these protective techniques throughout the duration of construction, potential adverse impacts to nearby wetland resources will be mitigated.

However, considering the closer encroachment to Wetland 1 with the alternate Facility location, additional measures are recommended to enhance the remaining vegetation that buffer the alternate Facility from Wetland 1. A wetland buffer enhancement plan is proposed along the east and south sides of the alternate Facility location that would include plantings of native shrubs. These plantings would enhance the understory thereby providing improvements to functions of the buffer and nearby wetland with a focus on water quality and wildlife habitat enhancements. Details of the wetland buffer enhancement plan are provided on the Partial Site/Alternate Facility Plan.

With implementation of erosion controls and wetland protection measures during construction and enhancements to the wetland buffer, the proposed alternate Facility would not result in a likely adverse impact to wetland resources.

If you have any questions regarding the above-referenced information, please feel free to contact me by telephone at (860) 552-2033 or via email at dgustafson@allpointstech.com.

Sincerely,

All-Points Technology Corporation, P.C.



Dean Gustafson
Senior Wetland Scientist

cc: Kenneth C. Baldwin, Robinson & Cole, LLP