

**FCC
NATIONAL ENVIRONMENTAL POLICY
ACT (NEPA) SCREENING REPORT**

**Ben Fold Five
BU#: 832281
70 Universal Drive
North Haven, Connecticut
New Haven County**

Prepared for:

Mr. Don Snyder
Manager of Regulatory Compliance
C/o CCATT LLC
2000 Corporate Drive
Canonsburg, PA 15317

Prepared by:



Martin Environmental Solutions Inc
3830 Crown Point Road Ste. F
Jacksonville, Florida 32257
www.MartinEnviro.com

June 18, 2025

FCC NEPA Screening Checklist

Site Type: <input checked="" type="checkbox"/> Raw land <input type="checkbox"/> Collocation <input type="checkbox"/> Replacement Tower <input type="checkbox"/> Other	Site Name: Ben Folds Five	BU Number: 832281		
	Site Address: 70 Universal Drive North Haven, Connecticut New Haven County	MartinEnviro #: 2025-CCU-0032	Latitude: 41° 20' 47.09"N	Longitude: 72° 52' 10.34"W
FCC NEPA Category	Federal, State, or Local Agency	POSITIVE	NEGATIVE	
(1) Wilderness Area	National Park Service, U.S. Forest Service, Bureau of Land Management, and U.S. Fish and Wildlife Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(2) Wildlife Preserve	U.S. Fish and Wildlife Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(3) Endangered Species	U.S. Fish and Wildlife Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(4) Historic Places	State Historic Preservation Office (SHPO)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(5) Indian Religious	American Indian Tribes via Tower Construction Notification System (TCNS)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(6) Floodplain	Federal Emergency Management Agency (FEMA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(7) Surface Features (e.g. Wetland Fill, Water Diversion, Deforestation)	U.S. Fish and Wildlife Service, Army Corps of Engineers (ACOE)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(8) High Intensity White Lights	Federal Aviation Administration (FAA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(9) Radio Frequency (RF) Radiation Exposure	Federal Communication Commission (FCC)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If screening investigation for any of the above categories results in a POSITIVE screening, an Environmental Assessment (EA) must be prepared and filed with the Federal Communications Commission (FCC). Construction may not start on any positively screened site requiring an EA prior to the receipt of a Finding of No Significant Impact (FONSI) from the FCC. A copy of this checklist with any applicable federal, state, or local determinations or permits, as well as copies of any EAs, evaluations, or corrective measures, should be included in the site file. The undersigned has reviewed and approved completion of the NEPA Checklist for the above-referenced site.

Prepared By:		 MartinEnviro Martin Environmental Solutions Inc
Print Name: Thomas Martin	Title: Principal Investigator	
Company: Martin Environmental Solutions Inc		
Date: June 18, 2025		

This checklist is only a summary of the findings and should be reviewed in conjunction with the NEPA Screening Report.

TABLE OF CONTENTS

Section	Page
1.0 EXECUTIVE SUMMARY	3
2.0 INTRODUCTION	4
2.1 Purpose	4
2.2 Special Terms and Conditions	4
2.3 Limiting Conditions and Methodology Used	5
2.4 User Reliance	6
3.0 SITE DESCRIPTION	7
3.1 Subject Site Location	7
3.2 Land Use	7
3.3 Proposed Action.....	7
4.0 SUBJECT SITE EVALUATION.....	8
4.1 Will the facility be located in an officially designated wilderness area?	8
4.1.1 National Wilderness Areas	8
4.1.2 Wild and Scenic Rivers and Trails	8
4.2 Will the facility be located in an officially designated wildlife preserve?	9
4.3 Threatened or Endangered Species.....	9
4.3.1 Will the facility affect listed threatened or endangered species or designated critical habitats?	9
4.3.2 Will the facility jeopardize the continued existence of any proposed threatened or endangered species or is the facility likely to result in the destruction or adverse modification of proposed critical habitats?	10
4.4 Will the facility affect districts, sites, buildings, structures or objects, significant in American history, architecture, archaeology, engineering or culture, that are listed or are eligible for listing in the National Register of Historic Places?	10
4.5 Will the facility affect Indian Religious sites?	11
4.6 Will the facility be located in a floodplain (per Executive Order 11988)?	11
4.7 Will the facility construction involve significant changes in surface features (e.g., wetland fill, deforestation, and surface water Diversion)?.....	11
4.8 Will the facility be equipped with high intensity white lights if it is to be located in a residential neighborhood as defined by the applicable zoning law?	12
4.9 Will the facility fall outside the categorical exclusions contained in Table 1 of 47 CFR 1.1307(b)(1) and potentially cause exposure of workers or the general public to levels of radio frequency radiation in excess of the emissions set forth in 47 CFR 1.1310?.....	12
5.0 CONCLUSIONS	13

TABLE OF CONTENTS, CONTINUED

LIST OF APPENDICES

- A. Site Location Map and Aerial Photograph
- B. Site Reconnaissance Photographs
- C. Site Plan
- D. Wilderness Area and Wild and Scenic River Maps
- E. Scenic Trails Map
- F. Wildlife Refuge Information
- G. Informal Biological Assessment
- H. Natural Resources Review
- I. SHPO Concurrence
- J. FCC Form 620
- K. Tribal Correspondence
- L. Floodplain Map
- M. Wetland Map
- N. Statement of Qualifications

1.0 EXECUTIVE SUMMARY

This report documents the findings of the Federal Communications Commission (FCC) National Environmental Policy Act (NEPA) Screening performed by Martin Environmental Solutions Inc (MartinEnviro) for the proposed telecommunications facility located at 70 Universal Drive, North Haven, New Haven County, Connecticut (*Subject Site*). The *Subject Site* is unimproved.

The purpose of the FCC NEPA Screening was to identify conditions as indicated in Title 47 of the Code of Federal Regulations, Part 1, Subpart I, rule Sections 1.1307 (47 CFR 1.1307) that would indicate the need to perform a NEPA Environmental Assessment (EA). Exceptions to or deletions from the scope of work are described in Section 2.0.

The assessment revealed no conditions that would require the performance of a NEPA EA at this time.

These conclusions are based on the review of available historical and regulatory records, wetland maps, floodplain maps, reconnaissance of the site and surrounding areas, and consultations with appropriate agencies. These conclusions are not subject to undocumented circumstances that were not readily discernible at the time of the site reconnaissance.

It should be noted that this section is only intended to represent a brief summary of the findings and does not represent a detailed account of all the information compiled in preparation of this report. The report should be reviewed in its entirety to understand the relevant conditions associated with the *Subject Site*.

2.0 INTRODUCTION

In March of 2025, CCATT LLC retained Martin Environmental Solutions Inc (MartinEnviro) to conduct an FCC NEPA Screening for the *Subject Site* in general accordance with 47 CFR 1.1307.

2.1 PURPOSE

The investigation is intended as a screen of the areas or situations that are considered environmentally sensitive as defined by 47 CFR 1.1307, which include:

- Wilderness Areas;
- Wildlife Preserves;
- Endangered/Threatened Species;
- Historic Places;
- Indian Religious Sites;
- Floodplains;
- Surface Features (wetland fill, deforestation, or water diversion)
- High Intensity Lights in Residential Neighborhoods; and
- Excessive Radio Frequency (RF) Emission.

If the findings of the FCC NEPA Screening determine that the Proposed Action will not affect any of the environmentally sensitive categories, further investigation and documentation are not required by the FCC. However, if the proposed action affects one or more of the environmentally sensitive categories, an EA is required.

2.2 SPECIAL TERMS AND CONDITIONS

The term *environmentally sensitive areas* is defined as those areas designated, mapped, and regulated by environmentally sensitive area regulations. These areas have existing site conditions that require development standards to minimize specific on-site and off-site adverse environmental impacts such as reduction of habitat areas or visual impact to historic sites.

The term *Area of Potential Effect (APE)* is defined in the regulations of the Advisory Council for Historic Preservation (ACHP) as the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. It is important that careful consideration be given to the height of the tower and its potential viewshed.

The term *100-year floodplain* is defined by Federal Emergency Management Agency (FEMA) as the flood elevation that has a 1-percent chance of being equaled or exceeded in any given year. Thus, the 100-year flood could occur more than once in a relatively short period of time. The 100-year flood, which is the standard used by most Federal and state agencies, is used by the National Flood Insurance Program (NFIP) as the standard for floodplain management and to determine the need for flood insurance.

The term *Subject Site* means the real property that is the subject of the NEPA Screening described in 47 CFR 1.1307.

According to the U.S. Army Corps of Engineers Wetlands Delineation Manual (Technical Report Y-87-1), *wetlands* are defined as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

2.3 LIMITING CONDITIONS AND METHODOLOGY USED

MartinEnviro performed this FCC NEPA Screening according to the scope provided in 47 CFR 1.1307. The findings and conclusions presented in this report are based on:

- Addresses and coordinates provided by the client for the Subject Site;
- A site reconnaissance of the Subject Site and surrounding area;
- A wilderness area and wildlife preserve review;
- An endangered, threatened, and proposed species review;
- A federally designated and proposed critical habitat assessment;
- A review of national and state significant cultural resources;
- Consultations with Indian Tribes;
- A review of a FEMA Flood Insurance Rate Map (FIRM);
- A review of a U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) Map;
- A review of FCC RF compliance and;
- Online resources, such as databases and maps, as determined by MartinEnviro to be appropriate.

Definitive determinations of the presence of wildlife, cultural resources, wetlands, and floodplains and the determination of the significance of any effects of the Proposed Action on those resources may require more detailed research, including but not limited to the performance of archaeological sampling, architectural surveys, biological surveys, wetland delineations, and floodplain determinations. MartinEnviro also made no determination of radio frequency radiation emissions and leaves this to the client.

No guarantee or warranty of the findings and conclusions is implied within the intent of this report or any subsequent reports, correspondence, or consultation, either expressed or implied. The user should recognize that the services performed for the investigation were conducted in accordance with the local standard of care in the geographic region at the time these services were rendered.

2.4 USER RELIANCE

This report was prepared for and may be relied upon by CCATT LLC, its respective subsidiaries, successors, assigns, advisors, affiliates, and lenders. Any rating agency, issuer, purchaser or underwriter of any security collateralized or otherwise backed by the property that is the subject of this report or any loans placed upon the property may further rely upon the report. We also consent to the inclusion of this report in any form, whether in paper or digital format, including any electronic media such as CD-ROM or the internet, in the Prospectus Supplement relating to any securitization transaction, and we consent to the reference to our firm under the caption "Experts" in such Prospectus Supplement.

3.0 SITE DESCRIPTION

3.1 SUBJECT SITE LOCATION

The *Subject Site* is identified as the proposed telecommunications facility located at 70 Universal Drive, North Haven, New Haven County, Connecticut. The North American Datum 1983 (NAD83) latitude and longitude for the *Subject Site* are 41° 20' 47.09"N and 72° 52' 10.34"W, respectively. A site location map and aerial photograph are provided in Appendix A.

3.2 LAND USE

A representative of MartinEnviro, conducted a visual inspection of the *Subject Site* and adjacent properties on March 26, 2025. MartinEnviro observed the *Subject Site* to be located within a manicured grass-covered area adjacent to a parking lot associated with a shopping mall.

The *Subject Site* is located on the larger Parent Parcel, which is developed with a multi-business shopping center. The site vicinity is commercial in nature and characterized primarily by commercial, industrial, and low-density residential development. Photographs documenting the relevant site features are included in Appendix B.

3.3 PROPOSED ACTION

Based on the information provided to MartinEnviro by CCATT LLC, the Proposed Action consists of the construction of telecommunication facility that will include an approximately 138-foot monopole tower (144 feet with appurtenances) and associated ground equipment within a 70-foot-by-70-foot fenced and gated lease area. Access to the site will be provided by an access and utility easement that extends south from a paved parking lot. A site plan is provided in Appendix C.

4.0 SUBJECT SITE EVALUATION

MartinEnviro conducted a site reconnaissance and the research described below to evaluate the Proposed Action regarding the following resources and conditions as defined in 47 CFR 1.1307.

4.1 WILL THE FACILITY BE LOCATED IN AN OFFICIALLY DESIGNATED WILDERNESS AREA?

4.1.1 National Wilderness Areas

The Wilderness Act of 1964 (16 U.S.C. §§1131-1136) created the National Wilderness Preservation System, which consists of 756 wilderness areas managed by the Bureau of Land Management (BLM), USFWS, U.S. Forest Service (USFS), and the National Park Service (NPS). During the site reconnaissance, MartinEnviro observed no postings or boundaries designating a wilderness area. MartinEnviro reviewed the information provided in the online resources through NPS, USFS, USFWS, BLM, and other appropriate sources to determine if the facility is located within a National Wilderness Area. Based on the site reconnaissance and a review of these resources, MartinEnviro determined that the *Subject Site* is not located within a National Wilderness Area. A map is provided in Appendix D.

4.1.2 Wild and Scenic Rivers and Trails

The Wild and Scenic Rivers Act of 1968 (16 U.S.C §§1271-1287) established a National Wild and Scenic Rivers System, which classifies designated rivers as wild, scenic, or recreational. The National Trails System Act of 1968 (16 U.S.C §§1241-1249) created the National Trails System, which is a network of scenic, historic, and recreational trails. MartinEnviro reviewed online resources through the NPS, USFS, USFWS, BLM, and other appropriate sources and determined that the *Subject Site* is not located within one mile of a National Wild and Scenic River or National Scenic Trail. The scenic river and scenic trail maps are provided in Appendices D and E, respectively.

4.2 WILL THE FACILITY BE LOCATED IN AN OFFICIALLY DESIGNATED WILDLIFE PRESERVE?

The National Wildlife Refuge System consists of public lands and waters managed by the USFWS to conserve fish, wildlife, and plants. During the site reconnaissance, MartinEnviro observed no postings or boundaries designating a wildlife preserve. MartinEnviro reviewed the information provided in the online resources available through the USFWS and other appropriate sources to determine if the facility is located in an officially designated wildlife preserve. Based on the site reconnaissance and a review of these resources, MartinEnviro has determined that the *Subject Site* is not located in an officially designated wildlife preserve. Information is provided in Appendix F.

4.3 THREATENED OR ENDANGERED SPECIES

4.3.1 *Will the facility affect listed threatened or endangered species or designated critical habitats?*

MartinEnviro conducted an Informal Biological Assessment (IBA) in order to determine what affect, if any, the Proposed Action may have on threatened and endangered species and designated critical habitats. MartinEnviro performed a review of the most current species list, database files, surveys, and maps maintained by state natural resource agencies and the USFWS in order to identify what, if any, listed or proposed species and designated or proposed critical habitats may be located on or near the *Subject Site*. MartinEnviro then conducted a site assessment to determine if the habitat necessary to support these species was present. MartinEnviro identified nearby water bodies and documented specific information on surface size, use(s), surrounding vegetation, and distance and direction from the *Subject Site*, as available. MartinEnviro concluded that the Proposed Action is not likely to adversely affect threatened or endangered species or critical habitats due to the lack of suitable habitat on or adjacent to the *Subject Site*. The IBA is included in Appendix G.

MartinEnviro utilized the USFWS's Information for Planning and Conservation online service (IPaC) to further investigate potential impacts to listed species and their habitat. The IPaC document further supported MartinEnviro's conclusion that the proposed undertaking will have no effect on listed species and their habitat. The IPaC and other supporting documentation is included in Appendix H.

4.3.2 Will the facility jeopardize the continued existence of any proposed threatened or endangered species or is the facility likely to result in the destruction or adverse modification of proposed critical habitats?

MartinEnviro conducted a site reconnaissance and performed research described in Section 4.3.1 above to determine if the Proposed Action might jeopardize the continued existence of any proposed threatened or endangered species. MartinEnviro reviewed pertinent data to determine if the Proposed Action is likely to result in the destruction or adverse modification of proposed critical habitats. MartinEnviro identified no evidence indicating that the Proposed Action might jeopardize the continued existence of any proposed threatened or endangered species nor is it likely to result in the destruction or adverse modification of proposed critical habitats.

4.4 WILL THE FACILITY AFFECT DISTRICTS, SITES, BUILDINGS, STRUCTURES OR OBJECTS, SIGNIFICANT IN AMERICAN HISTORY, ARCHITECTURE, ARCHAEOLOGY, ENGINEERING OR CULTURE, THAT ARE LISTED OR ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES?

MartinEnviro relied upon visual observations, on-line sources, including the National Register of Historic Places (NRHP), and comments from the public to identify historical and archaeological sites that might be adversely impacted by the Proposed Action. For this particular undertaking, the Area of Potential Effects (APE) for visual effects consists of a 0.5-mile radius surrounding the *Subject Site*. The APE for direct effects consists of the 70-foot-by-70-foot lease area in addition to the access and utility easements.

MartinEnviro submitted a New Tower "NT" Submission Packet (FCC Form 620) to the Connecticut State Historic Preservation Office (SHPO). In a letter dated May 19, 2025, SHPO responded indicating that no historic properties are affected within the area of potential effects of this undertaking. The Submission Packet and concurrence letter are provided in Appendices I and J, respectively.

4.5 WILL THE FACILITY AFFECT INDIAN RELIGIOUS SITES?

Under Section IV of the Nationwide Programmatic Agreement (NPA), Applicants must make reasonable and good faith efforts to identify, and ensure contact is made with Indian Tribes and Native Hawaiian Organizations (NHOs) that may attach religious and cultural significance to historic properties that may be affected by an undertaking. The Federal Communications Commission (FCC) has established the Tower Construction Notification System (TCNS) to assist applicants in meeting this requirement. MartinEnviro submitted a Notification (#293353) on March 20, 2025. The FCC notified the Tribes and/or State and Tribal Historic Preservation Officers (THPOs) on March 28, 2025, completing the initial contact process. Updated tribal procedures as of July 2, 2018 replace those procedures previously outlined in the 2005 Declaratory Ruling, and have established a 45-day tribal consultation procedure. Tribal Nations or NHO's who do not respond within 30 days after receiving appropriate site information (35 days for mailed copies) can be referred. Once referred, the Tribal Nations or NHO's are given 15 days to respond. When no response is received within 15 days of contact by the FCC, those tribal organizations are considered to have no interest in pre-construction review. A table summarizing the correspondence with the tribal organizations and relevant correspondence are provided in Appendix K.

4.6 WILL THE FACILITY BE LOCATED IN A FLOODPLAIN (PER EXECUTIVE ORDER 11988)?

MartinEnviro reviewed the FIRM, included in Appendix L, for the *Subject Site*. According to the FIRM, Map Number 09009C0451K, the *Subject Site* is located in Zone X. Zone X is defined as areas with less than a 1 percent chance of flooding each year. Thus, MartinEnviro concluded that the *Subject Site* is not located within a 100-year floodplain.

4.7 WILL THE FACILITY CONSTRUCTION INVOLVE SIGNIFICANT CHANGES IN SURFACE FEATURES (E.G., WETLAND FILL, DEFORESTATION, AND SURFACE WATER DIVERSION)?

MartinEnviro reviewed the NWI map provided by the USFWS for the *Subject Site* locale. During the site reconnaissance, MartinEnviro did not observe wetland indicators, such as hydrophytic vegetation or ponding. Based on the site reconnaissance and NWI map, MartinEnviro concluded that the *Subject Site* is not located within a wetland area. The wetland map is provided in Appendix M.

The Proposed Action does not call for significant removal of mature trees; therefore, it will not result in deforestation. Based on the site reconnaissance, surface water body diversion will not occur as a result of the Proposed Action. Based on the preceding assessments, MartinEnviro concluded that the Proposed Action will not result in significant changes in surface features.

4.8 WILL THE FACILITY BE EQUIPPED WITH HIGH INTENSITY WHITE LIGHTS IF IT IS TO BE LOCATED IN A RESIDENTIAL NEIGHBORHOOD AS DEFINED BY THE APPLICABLE ZONING LAW?

MartinEnviro assumes the tower will not be equipped with high intensity white lights. The client has provided no information indicating otherwise.

4.9 WILL THE FACILITY FALL OUTSIDE THE CATEGORICAL EXCLUSIONS CONTAINED IN TABLE 1 OF 47 CFR 1.1307(B)(1) AND POTENTIALLY CAUSE EXPOSURE OF WORKERS OR THE GENERAL PUBLIC TO LEVELS OF RADIO FREQUENCY RADIATION IN EXCESS OF THE EMISSIONS SET FORTH IN 47 CFR 1.1310?

An evaluation of the Proposed Action to ensure compliance with the applicable RF standards is beyond the scope of services for this study and is the responsibility of the client; therefore, MartinEnviro did not perform a determination regarding potential radio frequency (RF) radiation exposure.

5.0 CONCLUSIONS

MartinEnviro conducted this FCC NEPA Screening in general accordance with 47 CFR 1.1307 for the *Subject Site*, identified as Ben Folds Five, located at 70 Universal Drive, North Haven, New Haven County, Connecticut. Based on a site reconnaissance and performance of research tasks as described in Section 4.0 of this report, MartinEnviro identified no evidence that implementation of the Proposed Action described in Section 3.3 would require preparation of a NEPA EA.



Tom Martin
Principle Scientist / President

Date: June 18, 2025