<u>USFWS</u>



21 B Street Burlington, MA 01803 Tel: (781) 273-2500

Fax: (781) 273-3311

October 30, 2007

Verizon Wireless c/o Ms. Rachel Mayo Robinson & Cole, LLP 280 Trumbull Street Hartford, CT 06103

Subject:

Section 7 USFW

Kent, CT

38 Maple Street, Kent, Litchfield County, Connecticut

EBI Project #61070291

Dear Ms. Mayo:

In a letter dated March 12, 2007, EBI Consulting (EBI) forwarded project information and a request for comments relative to the impacts of the proposed project on threatened or endangered species to the United States Fish and Wildlife Service (USFWS). The USFWS returned EBI's letter marked "Received March 19, 2007," with no additional comments.

According to a statement issued by the USFWS in a March 9, 2007 letter, "...towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review." The area proposed to be occupied by Verizon Wireless consists of a developed property improved with the Kent Department of Public Works and town transfer station.

According to information provided by the USFWS in their March 9, 2007 letter, two federally-listed threatened species have been identified within Litchfield County, Connecticut: the Bog turtle and Small whorled pogonia. Further research on these two species regarding their natural habitats identified the following information:

Bog turtle: The preferred habitat for bog turtles includes open wet meadows, shallow water marshes, spring seeps, flood plain wetlands, bogs, and fens. Bog turtles live in wetlands that offer a mosaic of wet and dry areas, thus providing a variety of micro-climatic conditions that aid in thermoregulation and egg incubation. Deep, soft, mucky soils allow bog turtles to avoid predators and to escape climatic extremes such as hot and cold temperatures. Groundwater springs, seeps, and subsurface flows provide areas where the turtles can overwinter without the threat of freezing to death. The wetland plants most often found in these areas include cattails, rushes, jewelweed, skunk cabbage, sedges (particularly tussock sedge), sphagnum, and various native grasses. Common trees and shrubs include red maple, alder, willows, and poison sumac.

Small whorled pogonia: In the Northeast, the Small whorled pogonia typically occurs in acidic sandy loam having a fragipan (impervious layer), associated with the pH and moisture regime which the plant may require. Slope of the terrain where the orchids are found was typically 8 to 15%, or at the base of steep slope (Sperduto and Congalton 1996). Moisture regime is also affected by slope. The vegetative cover is usually mixed deciduous/coniferous, mid-successional forest with gaps in the canopy.

Additionally, according to Mr. Anthony Tur, an Endangered Species Specialist with the USFWS, habitat suitable for the Small whorled pogonia must consist of an area with a seasonable high water table with moisture in close proximity to surface during spring time. The Small whorled pogonia will not be found in areas of excessively drained soils. Additionally, the species thrives in habitats that allow for sunlight, such as logging trails, dirt roads, and areas with fallen trees. There must be a sparse understory and shrubal area, and mature over story. Also, the species will not be detected in close proximity to heavily developed areas.

Based on EBI's review of the natural habitats of the two Federally-listed threatened species identified in Litchfield County and information provided by the USFWS, it does not appear that habitat at the Subject Property is suitable to support these species. Therefore, with consideration given to the fact that no suspected habitats for listed threatened or endangered species were identified at the Subject Property, *Verizon Wireless'* proposed project is not likely to affect Federally-listed threatened or endangered species.

Thank you for the opportunity to prepare this *Letter*, and assist you with this project. Please do not hesitate to contact us should you have any questions or if we may be of further assistance.

Respectfully Submitted,

Mr. David Akerblom Author/Project Scientist

Attachments USFW Correspondence



21 B Street Burlington, MA 01803 Tel: (781) 273-2500 Fax: (781) 273.3311

March 12, 2007

Mr. Michael Amaral U.S. Fish & Wildlife Service 70 Commercial St. #300 Concord, NH 03301-5031

Subject:

Request for Section 7 Review

Kent, CT

38 Maple Street, Kent, CT 06757

Latitude & Longitude: N 41° 43′ 20″ and W 73° 28′ 30″.

EBI Project #61070291

Dear Mr. Amaral:

EBI CONSULTING (EBI) is preparing an environmental review on behalf of *Verizon Wireless* for the project noted above (herein, the Subject Property) as part of its permit process and regulatory review by the Federal Communications Commission (FCC). The review is focused on compliance with the Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307.

The Subject Property is located in Kent, Connecticut at 38 Maple Street. Kent is located in Litchfield County in northwest Connecticut. The property consists of an approximately 10.19-acre lot improved with four building structures. A 10-bay garage with a two-bay open-air extension on its western side (the main garage), is located approximately 100 feet southwest of the entrance to the property. A second, five-bay garage (the secondary garage) is located near the southeastern corner of the lot. Two open-air shelter structures are located to the west of the main garage and are used to store sand. These structures are part of the town Department of Public Works operations. The lot also includes the town transfer station. Two large dumpsters associated with the transfer station are located on the west-central portion of the property. A filling station for town trucks, consisting of a combined diesel/gasoline AST, is located to the east of the main garage near the entrance to the property. The area between the buildings consists of packed dirt and asphalt, with scattered dirt piles. Deciduous trees line the edge of the property. Areas of tall grasses and scattered hydric vegetation occur on the western portion of the Subject Property and along the eastern boundary. The main garage building was constructed in 1976. The other structures were constructed in the early-1990s.

Verizon Wireless proposes to construct a 150-foot monopole or stealth tree style telecommunications tower within a 50-foot by 80-foot fenced compound on the central portion of the Subject Property (herein, the Project Site) and adjacent to the secondary garage. Three sectors of four panel antennas each will be mounted to the proposed monopole at a centerline height of 150-feet above the existing ground surface. A 12-foot by 30-foot prefabricated equipment shelter with an internal generator will be placed at the base of the tower within the fenced compound. A telecommunications cabinet and an electric meter center will be placed at the southeast corner of the proposed compound. A pad-mounted transformer will be placed at the northeast corner of the proposed compound. Telecommunications and electric cables will be routed from existing connection points on the property. The site will be accessed via a proposed 12-foot wide access drive over the existing paved driveway area.

Enclosed please find copies of a street map as well as a section of the 1971 Kent, Connecticut USGS topographic map that have the location of the proposed telecommunications installation highlighted. Additionally, photographs of the areas proposed to be occupied by *Verizon Wireless* and vicinity properties are attached to this letter.

We would appreciate your assistance on determining if the proposed project will have an impact on any listed and/or proposed threatened or endangered species or designated and/or proposed critical habitats. On behalf of *Verizon Wireless*, I would appreciate your comments on this proposed telecommunications installation in a letter directed to the attention of Trevelyn Potter at 21 B Street, Burlington, MA 01803.

Sincerely,

Ms. Trevelyn Potter Environmental Scientist Phone: 617-715-1832

Email: tpotter@ebiconsulting.com

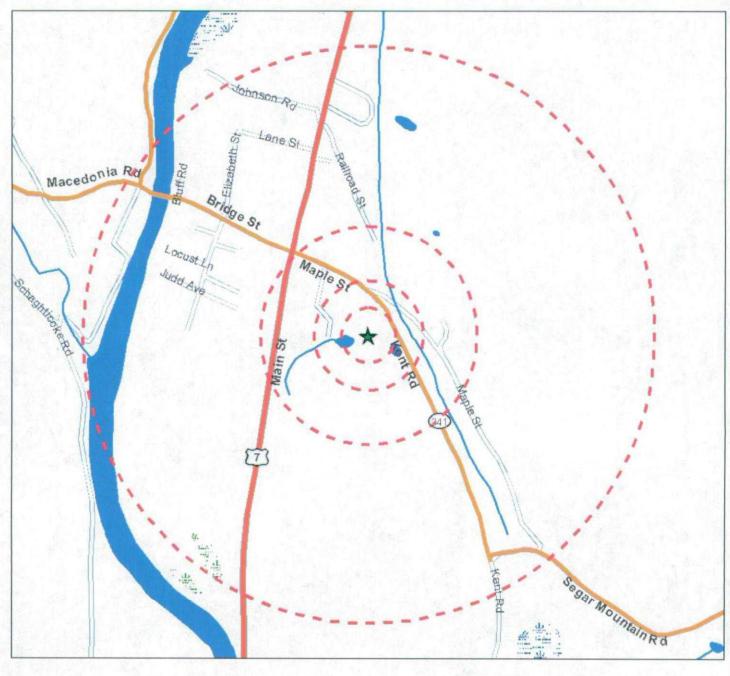
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Appendix A - Figures, Drawings, and Maps

Appendix B - Photographs

APPENDIX A
FIGURES, DRAWINGS, AND MAPS





Legend

★ Project Site Site Buffer at 250', 500', 1000' and 1/2 mile

Source: Selected data from ESRI, EBI and NWI

/Kent, CT 38 Maple Street

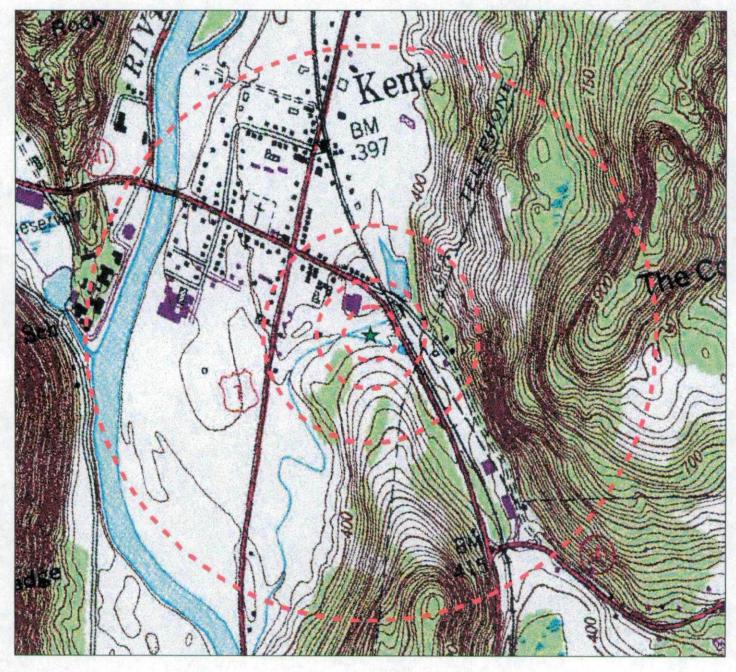
Figure 1 - Site Location Map

Kent, CT 06757

PN: 61070291







★ Project Site Site Buffer at 250', 500', 1000' and 1/2 mile

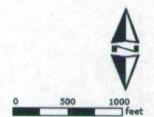
Source: Selected data from ESRI, EBI and USGS

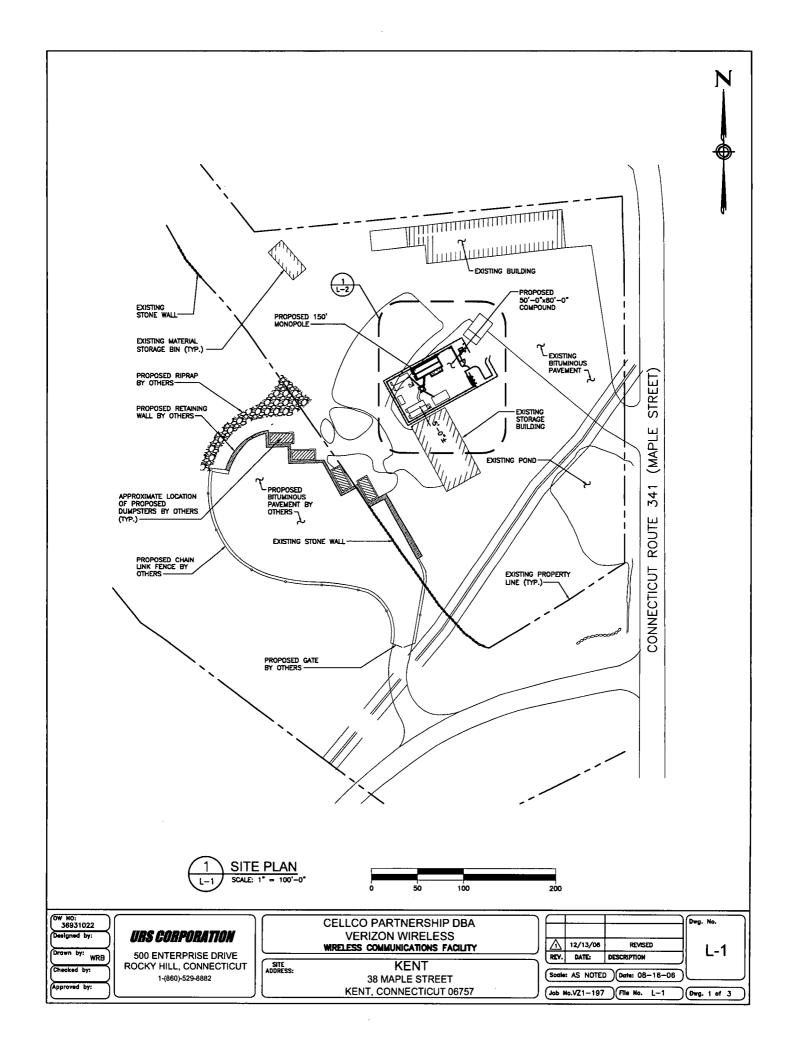
USGS 24k Quad: Kent, CT 1972
Figure 2 - USGS Quad Location Map

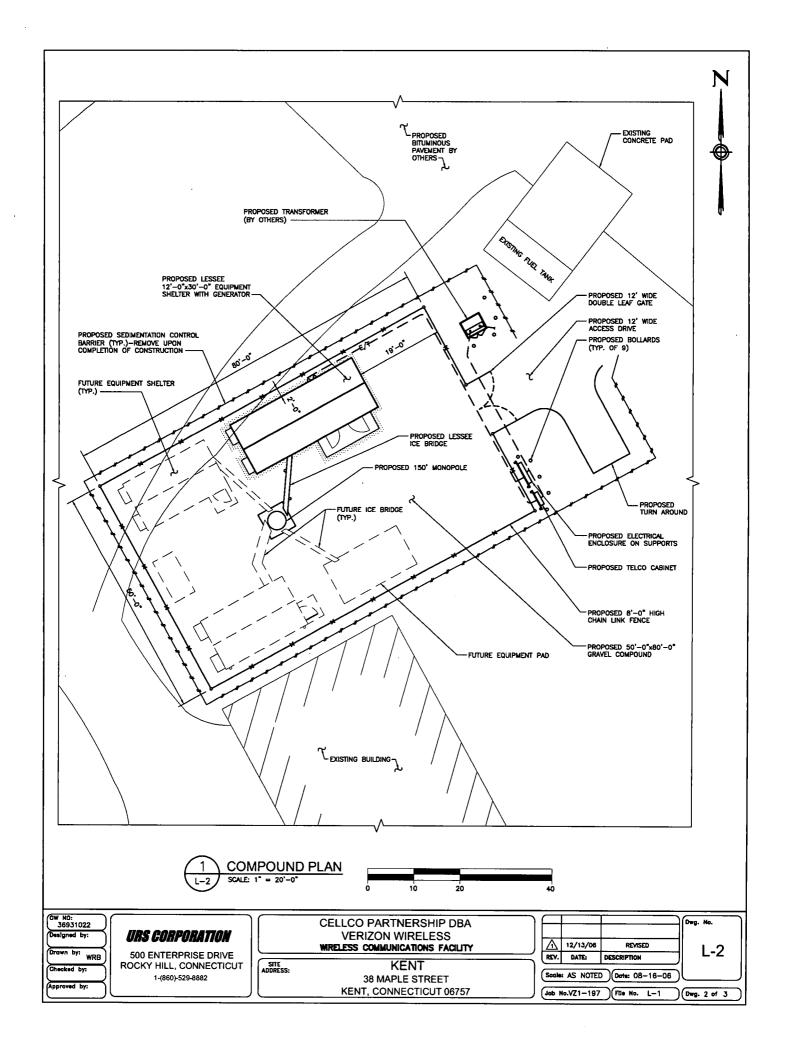
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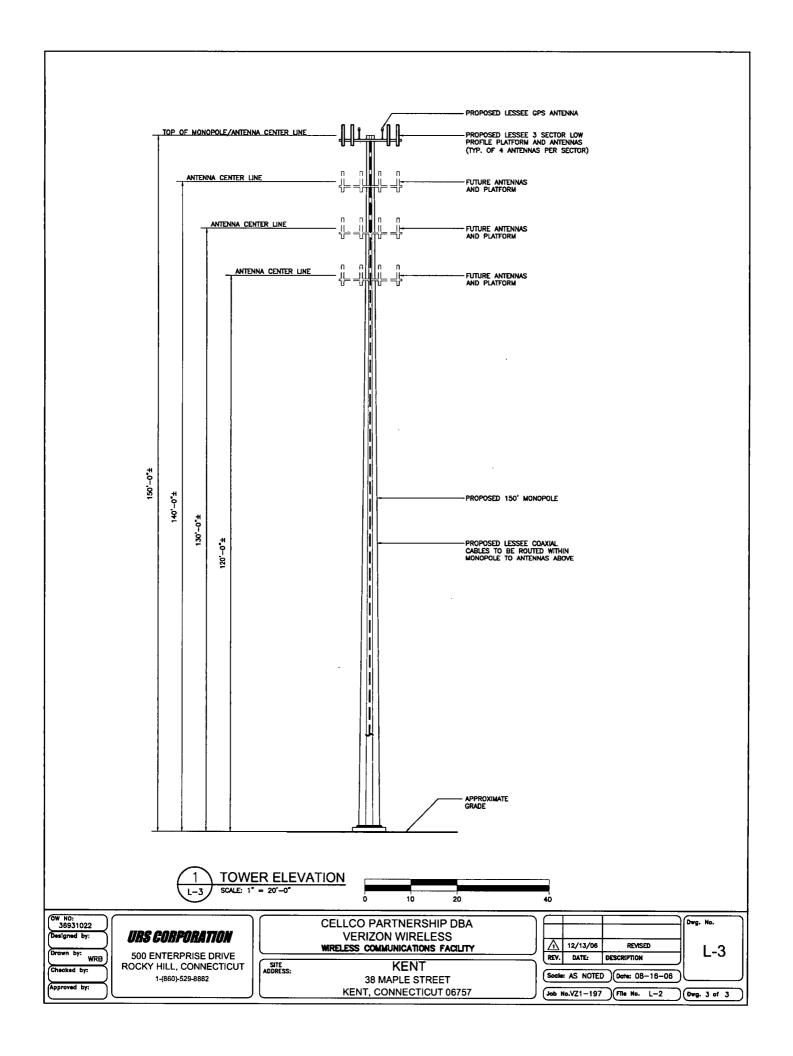
/Kent, CT 38 Maple Street Kent, CT 06757

PN: 61070291









APPENDIX B
PHOTOGRAPHS



Town Garage
 property viewed from
 Maple Street.



Proposed tower site, with the main garage in the background, facing north.



3. Facing east from the proposed tower site towards the secondary garage.



4. Facing south from the proposed tower site.



5. Facing west from the proposed tower site.



View of the proposed tower site from the northwest.



21 B Street Burlington, MA 01803 Tel: (781) 273-2500 Fax: (781) 273.3311

March 12, 2007

Mr. Michael Amaral U.S. Fish & Wildlife Service 70 Commercial St. #300 Concord, NH 03301-5031



"E'Y ENGLAND FIELD OFFICE

ONCORD, NH

Subject:

Request for Section 7 Review

Kent, CT

38 Maple Street, Kent, CT 06757

Latitude & Longitude: N 41° 43' 20" and W 73° 28' 30".

EBI Project #61070291

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Enclosed please find copies of a street map as well as a section of the 1971 Kent, Connecticut USGS topographic map that have the location of the proposed telecommunications installation highlighted. Additionally, photographs of the areas proposed to be occupied by Verizon Wireless and vicinity properties are attached to this letter.



United States Department of the Interior



FISH AND WILDLIFE SERVICE New England Field Office 70 Commercial Street, Suite 300 Concord, New Hampshire 03301-5087

March 9, 2007

Dear Sir or Madam:

We are in receipt of your enclosed letter requesting our endangered species review with regard to your proposed telecommunications project.

We recently distributed a letter (also enclosed) to numerous companies, including yours, which we hope will streamline the consultation process.

Please review our letter. We're confident that it will adequately respond to your request. If you have any questions, please contact me at 603-223-2541.

Sincerely yours,

Anthony P. Tur

Endangered Species Specialist

New England Field Office

Enclosures



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

March 6, 2007

To Whom It May Concern:

The U.S. Fish and Wildlife Service's (Service) New England Field Office has determined that individual project review for certain types of activities associated with communication towers is **not required**. These comments are submitted in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Due to the rapid expansion of the telecommunication industry, we are receiving a growing number of requests for review of existing and new telecommunication facilities in relation to the presence of federally-listed or proposed, threatened or endangered species, critical habitat, wilderness areas and/or wildlife preserves. We have evaluated our review process for proposed communications towers and believe that individual correspondence with this office is not required for the following types of actions relative to existing facilities:

- 1. the re-licensing of existing telecommunication facilities;
- 2. audits of existing facilities associated with acquisition;
- 3. routine maintenance of existing tower sites, such as painting, antenna or panel replacement, upgrading of existing equipment, etc.;
- 4. co-location of new antenna facilities on/in existing structures;
- 5. repair or replacement of existing towers and/or equipment, provided such activities do not significantly increase the existing tower mass and height, or require the addition of guy wires.

In order to curtail the need to contact this office in the future for individual environmental review for existing communication towers or antenna facilities, please note that we are not aware of any federally-listed, threatened or endangered species that are being adversely affected by any existing communication tower or antenna facility in the following states: Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts. Furthermore, we are not aware of any existing telecommunication towers in federally-designated critical habitats, wilderness areas or wildlife preserves. Therefore, no further consultation with this office relative to the impact of the above referenced activities on federally-listed species is required.

Future Coordination with this Office Relative to New Telecommunication Facilities

We have determined that proposed projects are not likely to adversely affect any federally-listed or proposed species when the following steps are taken to evaluate new telecommunication facilities:

- 1. If the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building, no further coordination with this office is necessary. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.
- 2. If the above criteria cannot be met, your review of the attached lists of threatened and endangered species locations within Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts may confirm that no federally-listed endangered or threatened species are known to occur in the town or county where the project is proposed.
- 3. If a listed species is present in the town or county where the project is proposed, further review of our enclosed lists of threatened and endangered species may allow you to conclude that suitable habitat for the species will not be affected. Based on past experiences, we anticipate that there will be few, if any, projects that are likely to impact piping plovers, roseate terms, bog turtles, Jesup's milkvetch or other such species that are found on coastal beaches, riverine habitats or in wetlands because communication towers typically are not located in these habitats.

For projects that meet the above criteria, there is no need to contact this office for further project review. A copy of this letter should be retained in your file as the Service's determination that no listed species are present, or that listed species in the general area will not be affected. Due to the high workload associated with responding to many individual requests for threatened and endangered species information, we will no longer be providing response letters for activities that meet the above criteria. This correspondence and the enclosed species lists remain valid until January 1, 2008.

Thank you for your cooperation, and please contact me at 603-223-2541 for further assistance.

Sincerely yours,

Anthony P. Tur

Endangered Species Specialist New England Field Office

Enclosures

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN CONNECTICUT

Common Name	Species	Status	County/General Distribution
Sturgeon, shortnose ¹	Acipenser brevirostrum	Е	Atlantic coastal waters and Connecticut River
Bat, Indiana	Myotis sodalis	Е	New Haven/hibernaculum
Eagle, bald	Haliaeetus leucocephalus	Т	Nesting: Hartford, Litchfield Wintering: entire state, major rivers
Plover, piping	Charadrius melodus	T	Nesting: Fairfield, Middlesex, New Haven, New London (coastal beaches) Migratory: Atlantic Coast
Tern, Roseate	Sterna dougallii dougallii	Е	Nesting: New Haven (coastal island) Migratory: Atlantic Coast
Turtle, bog	Clemmys muhlenbergii	Т	Fairfield, Litchfield
Wedge mussel, dwarf	Alasmidonta heterodon	Е	Hartford ·
Beetle, Puritan tiger	Cicindela puritana	Т	Hartford, Middlesex (Connecticut River floodplain)
Beetle, Northeastern beach	Cicindela dorsalis dorsalis	Т	Coastal beaches/Extirpated
Small whorled pogonia	Isotria medeoloides	T	Litchfield, New Haven
Sandplain gerardia	Agalimis acuta	È	Hartford
Chaffseed	Scwalbea Americana	Е	New London/Historic

¹ Principal responsibility for this species is vested with the National Marine Fisheries Service.

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN MASSACHUSETTS

Common Name	Species	Status	County/General Distribution
Sturgeon, shortnose ¹	Acipenser brevirostrum	Е	Atlantic coastal waters and Connecticut and Merrimack Rivers
Cougar, Eastern	Felis concolor cougar	E	Entire state/historic
Bat, Indiana	Myotis sodalis	Е	Berkshire/historic
Eagle, bald	Haliaeetus leucocephalus	Т	Barnstable, Berkshire, Essex, Franklin, Hampden, Hampshire, Plymouth, Worcester
Plover, piping	Charadrius melodus	Т	Nesting: Barnstable, Essex, Plymouth, Dukes, Nantucket, Bristol (coastal beaches) Migratory: Atlantic Coast
Tern, Roseate	Sterna dougallii dougallii	E	Nesting: Barnstable, Plymouth (coastal islands) Migratory: Atlantic Coast
Turtle, bog	Clemmys muhlenbergii	Т	Berkshire
Wedge mussel, dwarf	Alasmidonta heterodon	E	Hampshire, Franklin
Beetle, Puritan tiger	Cicindela puritana	Т	Hampshire (Connecticut River floodplain)
Beetle, Northeastern beach	Cicindela dorsalis dorsalis		Barnstable, Duke (coastal beaches)
Beetle, American burying	Nicrophorus americanus	E	Bristol, Nantucket (Penikese & Nantucket Isl.) reintroduced populations
Small whorled pogonia	Isotria medeoloides	Т	Hampshire, Essex, Hampden, Worcester, Middlesex
Sandplain gerardia	Agalinus acuta	Е	Barnstable, Duke
Northeastern bulrush	Scirpus ancistrochaetus	E	Franklin

¹ Principal responsibility for this species is vested with the National Marine Fisheries Service.

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN NEW HAMPSHIRE

Common Name	Species	Status	County/General Distribution
Sturgeon, shortnose ¹	Acipenser brevirostrum	Е	Atlantic coastal waters
Eagle, bald	Haliaeetus leucocephalus	Т	Nesting: Coos, Merrimack, Cheshire, Sullivan Migratory/ wintering: entire state
Plover, piping	Charadrius melodus	Т	Nesting: Rockingham (coastal beaches)
Tern, Roseate	Sterna dougallii dougallii	E	Nesting: Isles of Shoals Migratory: Atlantic Coast
Canada lynx	Lynx canadensis	T.	Coos
Cougar, Eastern	Felis concolor cougar	E	Entire state/historic
Wolf, gray	Canis lupus	Е	Historic
Wedge mussel, dwarf	Alasmidonta heterodon	E	Cheshire (S. Branch Ashuelot, Ashuelot River) Sullivan (Connecticut River main stem), Grafton (Connecticut River main stem), Coos (Connecticut River main stem, Johns River)
Beetle, Puritan tiger	Cicindela puritana	Т	Extirpated (Connecticut River floodplain)
Butterfly, karner blue	Lycaeides melissa samuelis	T	Merrimack
Jesup's milk-vetch	Astragalus robbinsii var. jesupi	E	Sullivan (Plainfield, Charlestown)
Small whorled pogonia	Isotria medeoloides	Т	Belknap, Strafford, Grafton, Merrimack, Rockingham, Carroll, Hillsborough
Northeastern bulrush	Scirpus ancistrochaetus	E	Sullivan

¹ Principal responsibility for this species is vested with the National Marine Fisheries Service.

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN RHODE ISLAND

Common Name	Species	Status	County/General Distribution
Sturgeon, shortnose ¹	Acipenser brevirostrum	E	Atlantic coastal waters
Eagle, bald	Haliaeetus leucocephalus	Т	Nesting: Providence Migratory: entire state
Plover, piping	Charadrius melodus	Т	Nesting: Newport, Washington (coastal beaches) Migratory: Atlantic Coast
Tern, Roseate	Sterna dougallii dougallii	E	Migratory: Atlantic Coast
Beetle, Northeastern beach	Cicindela dorsalis dorsalis	Т	Coastal beaches/Extirpated
Beetle, American burying	Nicrophorus americanus	Е	Washington (Block Island)
Small whorled pogonia	Isotria medeoloides	Т	Providence, Kent
Sandplain gerardia	Agalinus acuta	Е	Washington

¹ Principal responsibility for this species is vested with the National Marine Fisheries Service.

$\frac{\text{FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES}}{\text{IN VERMONT}}$

Common Name	Species	Status	County/General Distribution
Eagle, bald	Haliaeetus leucocephalus	Т	Nesting: Addison, Windsor, Windham Migratory/ wintering: entire state
Canada lynx	Lynx canadensis	Т	Extirpated
Cougar, Eastern	Felis concolor cougar	Е	Historic
Wolf, gray	Canis lupus	T	Historic
Bat, Indiana	Myotis sodalis	Е	Addison, Chittendon, Rutland, Bennington
Wedge mussel, dwarf	Alasmidonta heterodon .	Е	Windsor and Windham (Connecticut River main stem)
Beetle, Puritan tiger	Cicindela puritana	Т	Extirpated (Connecticut River floodplain)
Jesup's milk-vetch	Astragalus robbinsii var. jesupi	E	Windsor (Hartland)
Small whorled pogonia	Isotria medeoloides	Т	Chittendon/historic
Northeastern bulrush	Scirpus ancistrochaetus	E	Windsor, Windham

CONNECTICUT DEP NATURAL DIVERSITY DATA BASE

Transportation Land Development Environmental

Services



imagination innovation energy Creating results for our clients and benefits for our communities

November 1, 2007

Ref: 41240.18

Vanasse Hangen Brustlin, Inc.

Ms. Jenny Dickson Wildlife Biologist Connecticut Department of Environmental Protection Wildlife Division Sessions Woods Wildlife Management Area P.O. Box 1550 Burlington, CT 06013-1550

Re:

Parula Americana – NDDB #15426 Proposed Verizon Wireless Facility 38 Maple Street Kent, Connecticut

Dear Ms. Dickson:

Vanasse Hangen Brustlin, Inc. (VHB) understands that the CTDEP Natural Diversity Database (NDDB) indicates that the state species of special concern *Parula americana* (Northern Parula) occurs in the vicinity of the proposed Verizon Wireless project. The proposed Site is depicted on the enclosed USGS topographic map that includes the NDDB information. Copies of correspondences from the NDDB (June 7, 2007) and your office (July 18, 2007) are also enclosed for reference.

Northern Parula constructs nests using *Usnea* lichens (old man's beard) growing on cedars or a variety of other kinds of trees and placed from 3 to 20 feet off the ground.¹ In Connecticut, the Northern Parula relies entirely on this lichen for the construction of its nest and has not made an adjustment to use other kinds of nest materials. The decrease in the Northern Parula as a Connecticut breeder is associated with the loss of *Usnea* lichens.² Northern Parulas prefer woodlands near water (i.e., ponds, lakes, swamps, etc.), including both deciduous and coniferous forest, as long at the lichen is present.³

VHB originally inspected the subject property on January 13, 2007 as part of a wetland delineation investigation. The property is improved with the Town of Kent's transfer station and highway department garage. The structures and infrastructure associated with this usage dominates the

CTDEP Wildlife Division Correspondence, NDDB #15426. Jenny Dickson. July 18, 2007.

¹ The Atlas of Breeding Birds of Connecticut. Louis R. Bevier, Editor. State Geological and Natural History Survey of Connecticut Bulletin 113. Pg. 302.

² The Atlas of Breeding Birds of Connecticut. Louis R. Bevier, Editor. State Geological and Natural History Survey of Connecticut Bulletin 113. Pgs. 303.

Ms. Jenny Dickson Project No.: 41240.18 November 1, 2007 Page 2

subject property. The existing facility generally bisects two maintained and more natural vegetated areas located general along the south and north ends of the Site. A small man-made pond (known locally as Kent's Kids Fishing Hole) is located in the southeast corner of the Site along Maple Street. The pond overflows through a culvert drop structure into a narrow drainage ditch feature with some narrow bordering vegetated wetland and upland areas. The banks of this man-made channel are characterized by moderately steep fill slopes and adjoining developed/disturbed areas. This drainage ditch then enters a culvert under the existing facility and outlets just southwest of a long garage into a relatively narrow forested wetland system. Based on a review of plans prepared by URS Corporation (latest revised date 10-31-07), VHB understands that Verizon Wireless proposes to construct a wireless communications facility in the central portion of the subject property immediately adjacent to an existing storage building. A copy of the site plans is enclosed. The drainage ditch is located approximately 12 feet northeast of the proposed Verizon Wireless facility. Although work is proposed in proximity to nearby wetland resource area, no direct impact to wetlands is proposed for the Verizon Wireless development and no mature vegetation will be removed. The property's developed and vegetated areas are depicted on a color aerial photograph enclosed as Parula Americana Habitat Analysis figure.

A subsequent Site inspection was performed on October 4, 2007 to determine if suitable habitat exists on the subject property for Northern Parula. In particular, forest habitat in and surrounding the Site was closely observed to determine if *Usnea* lichens are present. VHB utilized *Lichens of North America* (Brodo, Sharnoff & Sharnoff. Yale University Press. 2001) for the identification and classification of *Usnea* lichens. Photographs of the Site are enclosed.

Dominant vegetation was noted within the wetland corridor west of the pond, generally identified by wetland flags WF 1-09 to 1-29. American elm (*Ulmus americana*) all of which was in poor health or dead, with some white ash (*Fraxinus americana*) dominate the overstory. A few silver maples (*Acer saccharinum*) and American basswoods (*Tilia americana*) were noted on the western tip of this wetland (near wetland flags WF 1-20 to 1-23) and adjacent to the gravel drive that accesses the transfer station. A row of small Eastern hemlocks (*Tsuga canadensis*) exists on the northern edge of the wetland along the gravel access area (near WF 1-15 to 1-20), probably planted as a landscape feature. Jewelweed (*Impatiens capensis*) and Japanese knotweed (*Polygonum cuspidatum*) were dominant in the understory within the wetland. A planted row of large white spruce trees (*Tsuga canadensis*) exists behind the garage along the north property boundary. The overstory within this small flagged wetland area (WF 1-50 to 1-54) along the north boundary is dominated by Eastern cottonwood (*Populus deltoides*). Each over-story tree within the two wetland areas and adjoining uplands, including the row of white spruce trees was inspected for the presence of the *Usnea* lichen. No *Usnea* lichen was observed on the subject property or in proximity to the proposed Verizon Wireless development.

Due to the lack of *Usnea* lichen on the subject property and the general lack of established woodlands on the developed subject property, it is unlikely that Northern Parula occurs on the property. Therefore, the proposed Verizon Wireless project will not adversely impact this species of special concern.



Ms. Jenny Dickson Project No.: 41240.18 November 1, 2007 Page 3

We respectfully request your written concurrence with our findings to support our application with the Connecticut Siting Council. At your earliest convenience, please forward correspondence to my attention.

Thank you in advance for your prompt consideration of this request.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.

Dean Gustafson

Senior Environmental Scientist

Enclosures

cc: Dawn M. McKay, CTDEP NDDB

Sandy Carter, Verizon Wireless

Kenneth C. Baldwin, Robinson & Cole LLP



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Natural Resources
Division of Wildlife
79 Elm Street, 6th Floor
Hartford, CT 06106
Natural Diversity Data Base

June 7, 2007

Ms. Trevelyn Potter EBI Consulting 21 B Street Burlington, MA 01803

> re: New Verizon Wireless Telecommunication Facility at 38 Maple Street in Kent, Connecticut

Dear Ms. Potter:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed new Verizon Wireless telecommunication facility at 38 Maple Street in Kent, Connecticut. According to our information, there are records for State Special Concern *Parula americana* (northern parula) from this area of Kent. I have sent your letter to Jenny Dickson (DEP-Wildlife; 860-675-8130) for further review. Ms. Dickson will write to you directly with her comments regarding this bird.

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Please contact me if you have further questions at 424-3592. Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Dawn M. McKay

Biologist/Environmental Analyst 3

Cc: Jenny Dickson, NDDB #15426



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

WILDLIFE DIVISION



SESSIONS WOODS WILDLIFE MANAGEMENT AREA P.O. BOX 1550 • BURLINGTON, CT 06013 - 1550 TELEPHONE (860) 675-8130 • FAX (860) 675-8141

July 18, 2007

Ms. Trevelyn Potter EBI Consulting 21 B Street Burlington, MA 01803

Re: Telecommunications facility at 38 Maple Street in Kent, Connecticut

Dear Ms. Potter:

Materials pertaining to the above project were forwarded to me on 6/21/07 by the DEP Natural Diversity Database (NDDB). The NDDB indicated that the state species of special concern northern parula (*Parula americana*) occurs in the vicinity of the project.

Northern parulas are strongly tied to *Usnea* lichens for nesting material. This gray-green lichen is often called "old man's beard" and the decline in nesting parulas is linked to the loss of this lichen. In Connecticut, this bird has not made the switch to alternative nesting materials. While it will utilize hemlock or spruce for nesting, it can be found in deciduous or coniferous stands as long as the lichen is present. The nesting season for this bird is May through August. Generally, northern parulas prefer woodlands near water (ponds, lakes, swamps, etc.).

Some potential impacts to this and other avian species through tower kills during migration can be reduced through the tower design process. It does appear from the material I received that the height and style of the proposed tower are consistent with current recommendations for minimizing bird strikes. Two other issues relating to bird strikes involve tower lighting and geographic location. In general, towers located along ridgelines have a greater potential for bird strikes. While the current location is not on a ridgeline, it occurs between two ridgelines and is adjacent to the Housatonic River, a major migration corridor. This makes lighting and design details more significant in reducing the potential overall impact.

The Wildlife Division has not made an on-site inspection of the project area. Consultation with this office should not be substituted for site-specific surveys that may be required for environmental assessments. This is a preliminary site review and is not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the DEP for the proposed site. Please be advised that should state permits be required or should state involvement occur in some other fashion, specific restrictions or conditions relating to the species discussed above may apply. In this situation, additional evaluation of the proposal by the DEP Wildlife Division should be requested and species-specific surveys may be required.

Please feel free to contact me if you have additional questions regarding northern parulas.

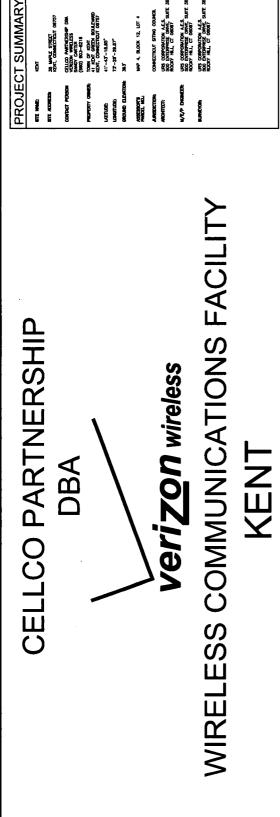
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Jenny Dickson Wildlife Biologist

JD/ls cc: D. McKay - 15426

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38 MAPLE STREET KENT, CONNECTICUT 06757

URS CORPORATION A.E.S. 500 ENTERPRISE URME, SLITTE 38 ROCKY HELL, CT 08087

COMPETITION STING COUNCE 4WP 4, BLOCK 12, LOT 4

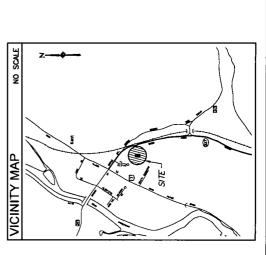
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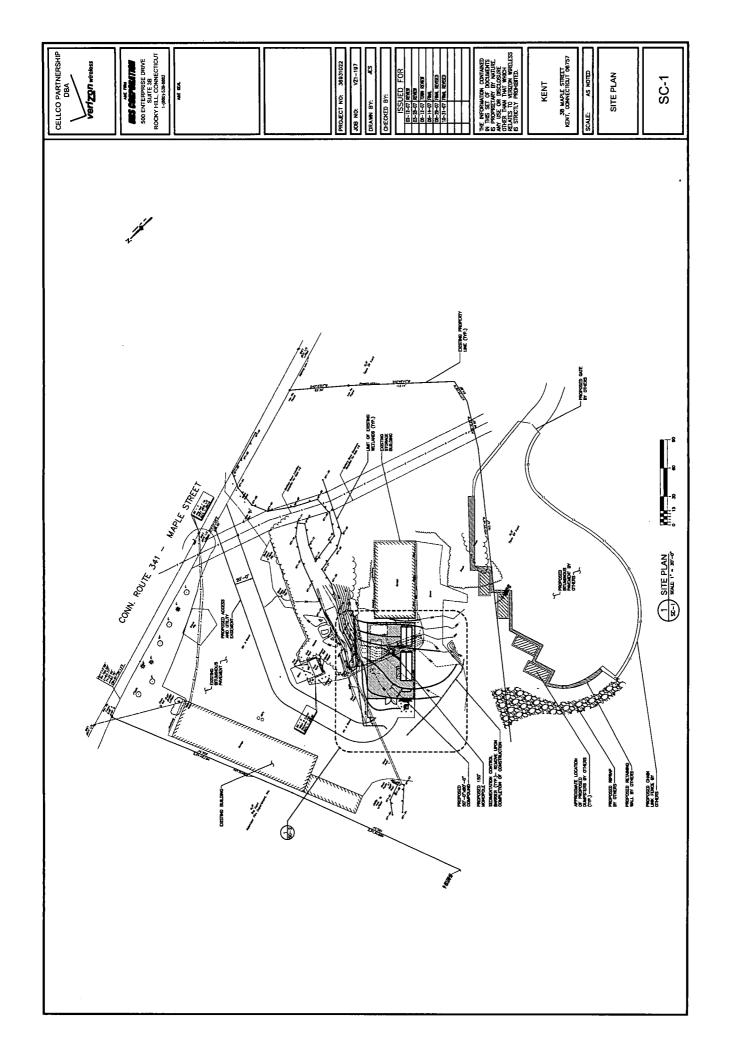
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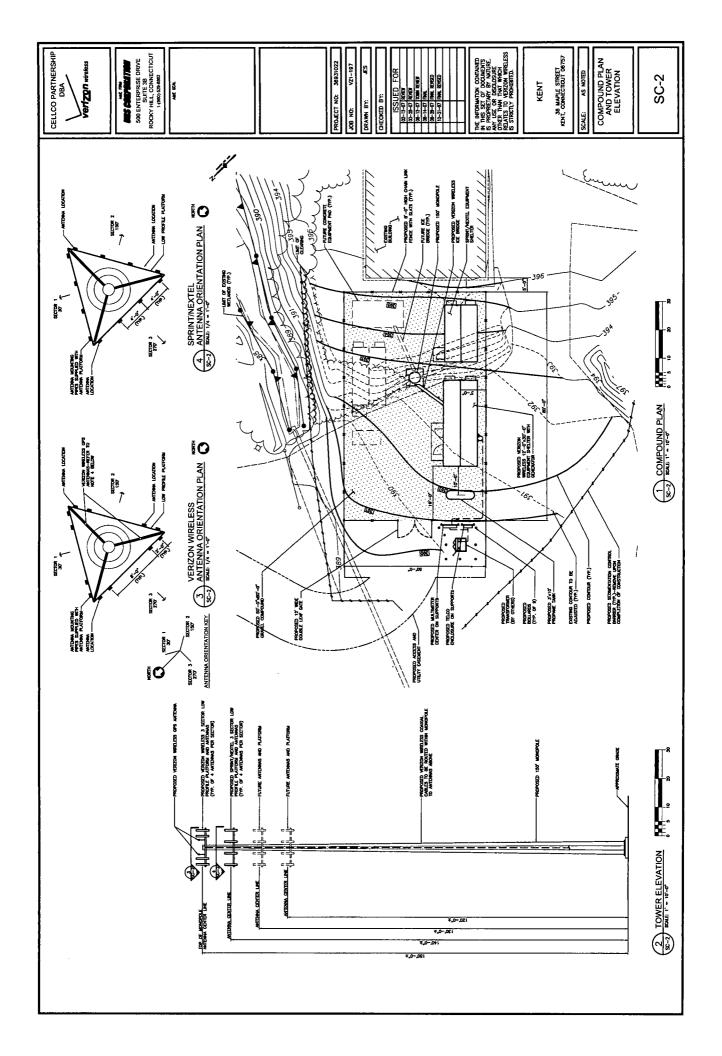
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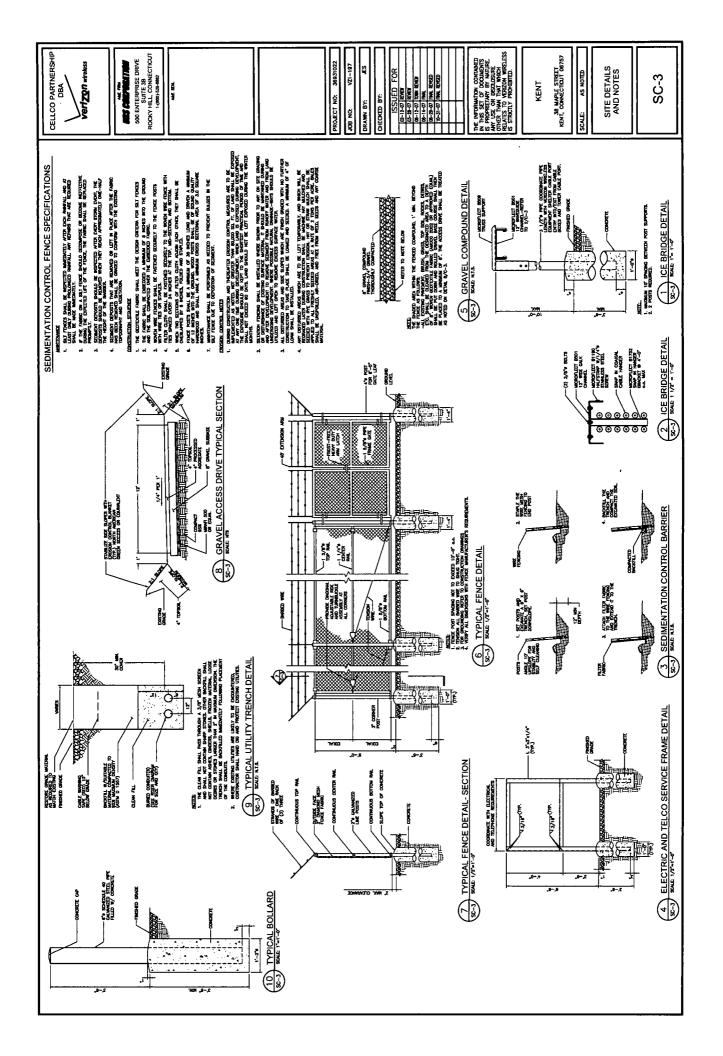


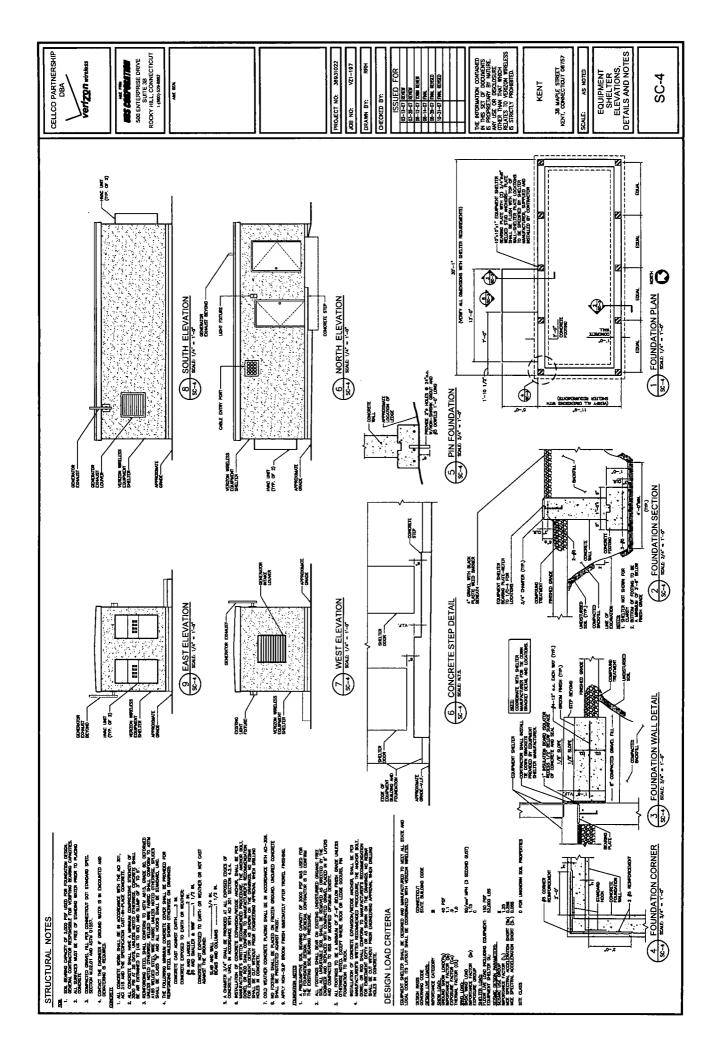
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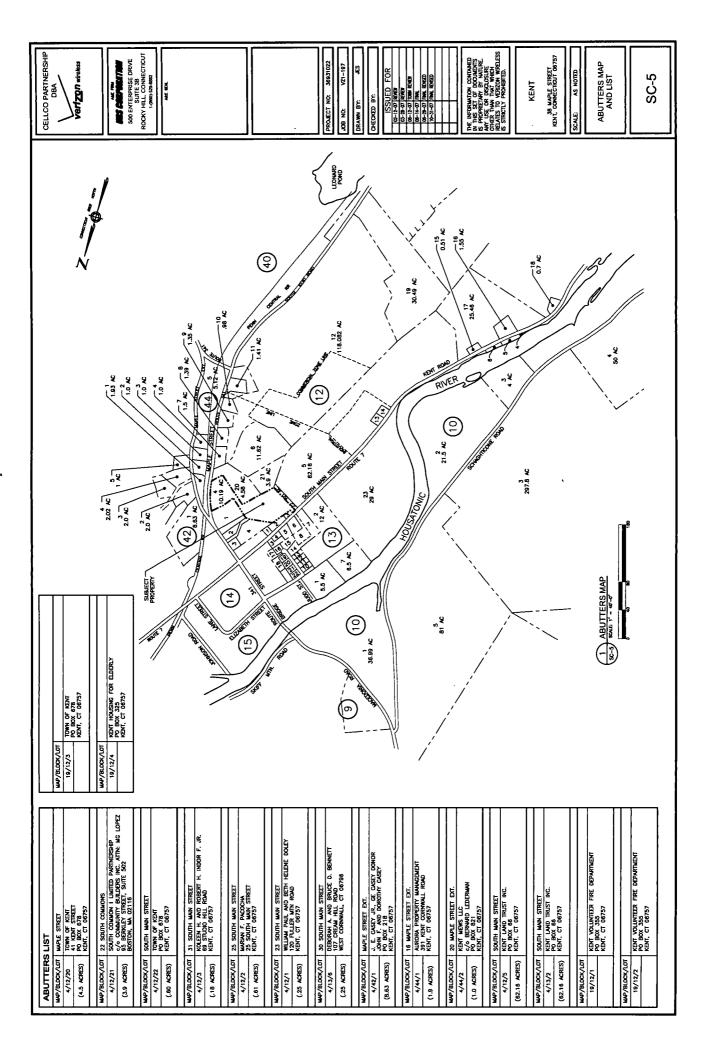












Vanasse Hangen Brustlin, Inc. PHOTOLOG DOCUMENTATION

Proposed Verizon Wireless Kent Facility October 4, 2007

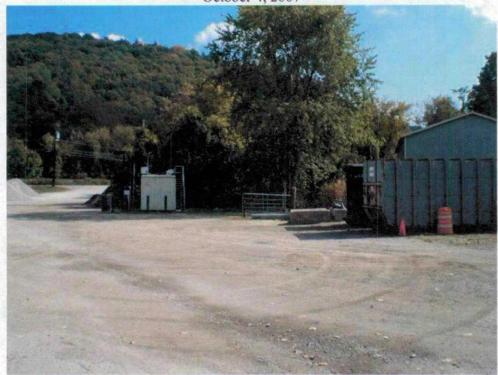


Photo 1: View of transfer station gravel drive with Wetland 1 in background and proposed Verizon Wireless facility to the right near dumpster and just out of the photo, looking northeast.



Photo 2: Overview of Wetland 1, looking south from highway garage/transfer station access.

Vanasse Hangen Brustlin, Inc.

PHOTOLOG DOCUMENTATION

Proposed Verizon Wireless Kent Facility October 4, 2007



Photo 3: View of interior of Wetland 1, looking west from pond outfall.

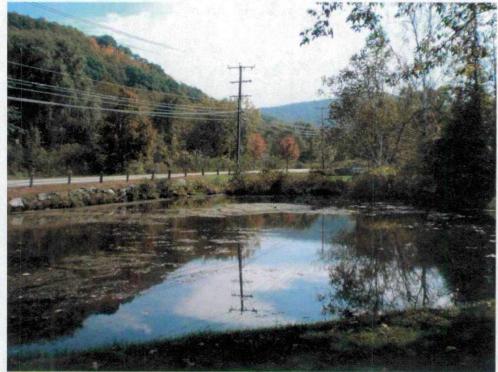


Photo 4: View of pond (Kent Kid's Fishing Hole), looking east with Maple Street in the background.

Vanasse Hangen Brustlin, Inc.

PHOTOLOG DOCUMENTATION

Proposed Verizon Wireless Kent Facility October 4, 2007



Photo 5: View of Town of Kent Highway Dept. garage with white spruce trees behind, looking north.



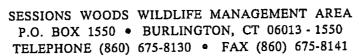
Photo 6: View of white spruce trees behind garage, looking south from adjoining property.



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

WILDLIFE DIVISION





Ms. Trevelyn Potter **EBI** Consulting 21 B Street Burlington, MA 01803

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JD/Is cc: D. McKay - 15426

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STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Natural Resources
Division of Wildlife
79 Elm Street, 6th Floor
Hartford, CT 06106
Natural Diversity Data Base

June 7, 2007

Ms. Trevelyn Potter EBI Consulting 21 B Street Burlington, MA 01803

> re: New Verizon Wireless Telecommunication Facility at 38 Maple Street in Kent, Connecticut

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Sincerely,

Biologist/Environmental Analyst 3

Cc: Jenny Dickson, NDDB #15426

CONNECTICUT STATE HISTORIC PRESERVATION OFFICER



Connecticut Commission on Culture & Tourism

October 24, 2006

Historic Preservation & Museum Division

Mr. Kenneth C. Baldwin Robinson & Cole 280 Trumbull Street Hartford, CT 06106

Subject:

Proposed Telecommunications Facility

38 Maple Street Kent, Connecticut

Verizon Wireless

59 South Prospect Street Hartford, Connecticut 06106

(v) 860.566.3005 (f) 860.566.5078

Dear Mr. Baldwin:

The State Historic Preservation Office is in receipt the above-referenced project, submitted for review and comment pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations.

After an on-site inspection facilitated by use of a 150' crane, this office has determined that while the proposed installation is partially visible from certain limited areas within the town center, it appears to have no adverse effect on cultural resources listed or eligible for listing on the National Register of Historic Places, with the following condition:

if not in use for six consecutive months, the antennae and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period.

The State Historic Preservation Office appreciates the opportunity to provide R&C with this evaluation. Please contact Susan Chandler, Historical Architect, should you have additional questions concerning this matter.

Sincerely,

Karen Senich

Deputy State Historic Preservation Officer

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