



*Vanasse Hangen Brustlin, Inc.*

October 3, 2008

Ref: 40999.03

Mr. Chuck Regulbuto  
Project Director New Tower Builds  
SBA Network Services, Inc.  
One Research Drive, Suite 200C  
Westborough, MA 01581

Re: NEPA Compliance Documentation  
Proposed Wireless Telecommunications Facility  
Bloomfield – Site ID 999-0058  
12 Burr Road in Bloomfield, Connecticut

Dear Mr. Regulbuto:

Vanasse Hangen Brustlin, Inc. (VHB) has been retained by SBA Network Services, Inc. (SBA; formerly Optasite Towers LLC) to review environmental resource information outlined in 47 CFR Ch.1 § 1.1307 sections (a) and (b) for environmental consequences pursuant to the Federal Communications Commission (“FCC or Commission”) requirements. SBA is proposing to construct a new wireless telecommunications facility to be developed on portions of the Maple Hill Farms, Inc. property located at 12 Burr Road in Bloomfield, Connecticut (Site ID 999-0058). Development of this facility includes the installation of a ±130-foot tall monopole tower with associated ground equipment to be situated within an approximate 50-foot by 90-foot fenced lease compound area (to be developed by future carriers). SBA is currently exploring the option of installing a turn-steel monopole, which weathers to a non-reflective natural brownish/rust color. If this material is not available, the monopole will be painted brown. Based on current Site Plans, Omnipoint antennas will be flush-mounted to the top of the monopole with an associated equipment shelter installed at its base. All additional future wireless service transmission/reception antennas will be flush-mounted to the monopole. The proposed access/utilities easement will extend off of Burr Road in a northwesterly direction, portions of which will utilize the existing asphalt driveway on the property. Specifically, VHB reviewed source information outlined below to determine if the proposed facility will be located in an environmentally sensitive area.

National Environmental Policy Act (NEPA) Requirements

As a licensing agency, the FCC complies with NEPA by requiring its licensees to review their proposed actions for environmental consequences. Rules implementing NEPA are found at Title 47 of the Code of Federal Regulations (CFR), Part 1, Subpart I, rule sections 1.1301 to 1.1319.

Section 1.1305 of these rules states that the Commission "has found no common pattern which would enable it to specify" any particular Commission action as a "major action" under NEPA. Thus, section 1.1306 of the rules "categorically excluded from environmental processing" all Commission actions except for those specifically identified in section 1.1307. If a licensee's proposed action falls within one of the categories of 1.1307, section 1.1308(a) requires the licensee to consider the potential environmental effects from its construction of antenna facilities or structures, and disclose those effects in an environmental assessment (EA) which is filed with the Commission for review.

VHB has reviewed the following source information for identification, location, and impacts to environmentally sensitive areas:

1. **Officially designated wilderness areas** - State of Connecticut, Department of Environmental Protection (CTDEP) Geographic Information System (GIS) data layers and United States Department of the Interior – Fish and Wildlife Service (USF&WS), New England Field Office. See attached NEPA screen map prepared by VHB and number 3 of this list regarding USF&WS review.
2. **Officially designated wildlife preserve** – CTDEP GIS data layers, CTDEP Natural Resources Center and USF&WS, New England Field Office. See attached NEPA screen map and number 3 of this list regarding USF&WS review.
3. **Threatened or Endangered Species or designated critical habitats** – CTDEP GIS data, CTDEP Natural Resources Center and NDDDB, and USF&WS, New England Field Office. See attached NEPA screen map and letter from CTDEP. Due to the rapid expansion of the telecommunications industry, the USF&WS New England Field Office has determined that individual project review for certain types of activities associated with communication towers is not required. USF&WS has provided written project review procedures in a letter dated January 7, 2008 (attached). The proposed project area is located in Hartford County, Connecticut. In accordance with current review procedures, VHB personnel (Mr. Dean Gustafson, Senior Environmental Scientist) evaluated the Site with respect to possible federally-listed, threatened or endangered species in order to determine if the proposed communications facility would result in a potential adverse effect to federally-listed species listed in Hartford County. Based on our evaluation, the proposed project will not result in an adverse affect to federally- listed species in Hartford County. Please refer to our USF&WS Compliance Determination memo dated October 1, 2008.
4. **National Register of Historic Places** – State of Connecticut Commission on Culture & Tourism, State Historic Preservation Office (SHPO), and public notice. VHB was provided with original public notice documents from EBI Consulting (EBI), who submitted notification of the proposed project to Ms. Marguerite Phillips (Bloomfield Town Clerk) on January 17, 2006, and published a legal notice in the Hartford Courant newspaper on January 19, 2006. See attached NEPA screen map prepared by VHB, SHPO letter, and a copies of the public notice documents. Please note that SHPO has determined that the proposed project will constitute no adverse effect upon historic properties, based on the following conditions outlined in their letter dated July 23, 2008:
  - *Optasite [now SBA] shall examine the feasibility of installing a turn-steel monopole that weathers to a non-reflective natural brown/rust color. If this option is not feasible, Optasite [now SBA] shall paint the proposed monopole brown.*
  - *Omnipoint antennas shall be flush-mounted to the top of the monopole. All additional future wireless service transmission/reception antenna shall also be flush-mounted.*
  - *If not for six consecutive months, the monopole and associated equipment shall be removed by the telecommunications facility owner within 90 days of the six month non-use time frame.*



5. **Indian Religious Sites** - State of Connecticut, Connecticut Commission on Culture & Tourism, SHPO and all interested Native American Tribes (NAT) and/or Native Hawaiian Organizations (NHO) identified on FCC's online Tower Construction Notification System (TCNS). The proposed project area is not located on an American Indian federal reservation trust land; thus, consultation with the United States Department of Interior Bureau of Indian Affairs (BIA) is not necessary. EBI posted the proposed project on FCC's TCNS website on January 17, 2006 (TCNS #10965). As identified via TCNS, EBI consulted with the Mashantucket Pequot Tribe and the Narragansett Indian Tribe. See attached email correspondence from the Mashantucket Pequot Tribe and letter from the Narragansett Indian Tribe. Please note that in the unlikely event that tribal artifacts or human remains are encountered during construction activities, excavation is required to be halted immediately and the appropriate NATs and SHPO are to be contacted as pursuant to Title 47 CFR Sec. 1.1312 of the Commission's rules.
6. **Flood Plain** – Flood Insurance Rate Maps (FIRM) by Federal Emergency Management Agency (FEMA) Federal Insurance Administration, Office of Risk Assessment 50 C Street, SW Washington, DC 20472. The proposed facility compound is not located within the 100-year flood hazard zone. The proposed access to the facility will utilize an existing paved drive from Burr Road that is currently located in the 100-year flood hazard zone. An underground utility trench will be located within the 100-year flood hazard zone, but will not result in changes to the existing ground elevation. Therefore, no adverse impact to the floodplain will result from the proposed development. (Refer to attached FIRM map number 09003C0334F, dated September 26, 2008, and letter from Clough Harbour & Associates LLP dated August 20, 2008).
7. **Significant change in surface features** – Based on field observations and information provided by SBA and its contractors, the proposed activity by SBA does not appear to involve a significant change in surface features or result in wetland fill, deforestation or water diversion. See attached Wetland Delineation Report prepared by VHB dated October 1, 2008.
8. **High Intensity white lights located in residential neighborhoods** – VHB understands that no lighting is required on this facility.

Based on the information currently available, VHB has found **that the proposed facility does not pose a potential adverse impact to any of the listed categories of Section 1.1307 under NEPA (see attached NEPA checklist)**. The NEPA checklist, NEPA screen map, which outlines the location of the site and the location of the environmental resources, agency correspondence, and current Site Plans are attached to this letter.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.



Nicole Dentamaro  
Environmental/GIS Analyst

Attachments





<b>Site Contact Name:</b> Mr. Chuck Regulbuto	<b>Site type (choose one):</b> <input checked="" type="checkbox"/> Raw land <input type="checkbox"/> Tower colo* <input type="checkbox"/> Other colo*	<b>Site Cascade ID:</b> CT-999-0058	<b>Site Name &amp; Address:</b> Bloomfield 12 Burr Road Bloomfield, CT
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**NEPA Land Use Screening Checklist**

FCC NEPA Category	Consulting Agency to Contact	SSEO Document Reference	Check appropriate box(es) below		
			No Adverse Impact	Potential Adverse Impact	CNPA Applies Exempt From Review*
1. Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management (BLM), CTDEP GIS data layers and CTDEP Natural Resources Center and Natural Diversity Data Base (NDDB), and United States Department of Interior – Fish and Wildlife Service (USF&WS), New England Field Office	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Designated Wildlife Preserves	National Park Service, US Forest Service, BLM, CTDEP GIS data layers and Natural Resources Center and NDDB, and USF&WS, New England Field Office	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Threatened or Endangered Species & Critical Habitats	CTDEP GIS data layers and Natural Resources Center and NDDB, and USF&WS, New England Field Office	Section 3.4.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Historic Places	State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO); Public Notice	Section 3.4.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Indian Religious Sites	SHPO, Tower Construction Notification System (TCNS) website –Native American Tribes (NATs), and/or Native Hawaiian Organizations (NHOs), Bureau of Indian Affairs (BIA)	Section 3.4.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Floodplain	Federal Emergency Management Agency (FEMA)	Section 3.4.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Wetlands & Surface Waterways	US Army Corps of Engineers (ACOE)	Section 3.4.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. High Intensity White Lights in Residential Neighborhoods	Lighting information, if applicable, to be provide by client via FAA form or other relevant lighting documentation	Section 3.4.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*\*\*Based on the Collocation Nationwide Programmatic Agreement (CNPA), the proposed collocation project is exempt from review of the FCC NEPA Category.*

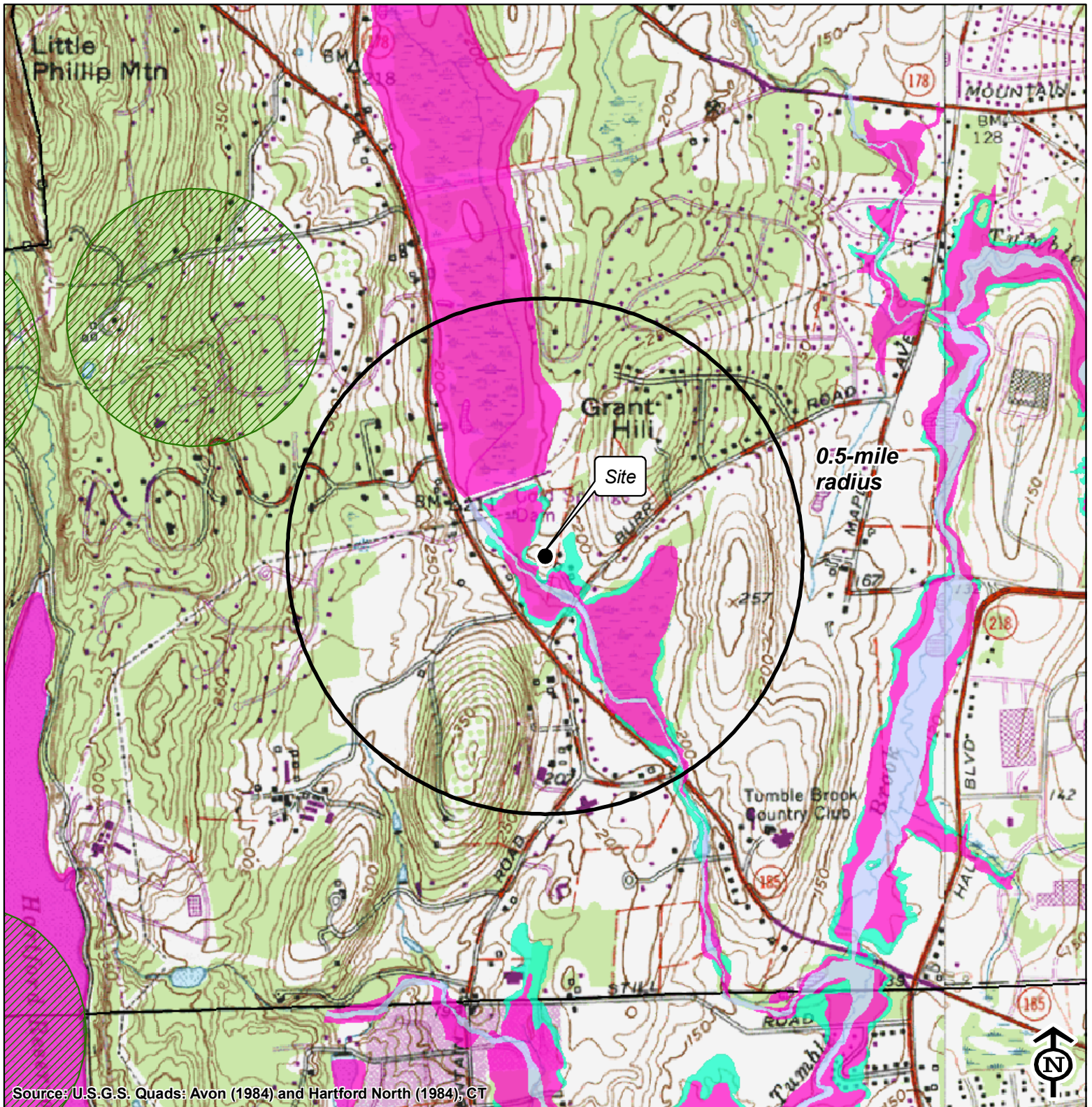
Prepared By: Nicole Dentamaro  
 (print name): Nicole Dentamaro

Company: Vanasse Hangen Brustlin, Inc.  
 Date: October 3, 2008

**The undersigned has reviewed and approved this Checklist prior to commencement of site construction.**

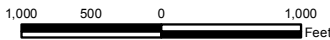
By: \_\_\_\_\_  
 Site Development Manager or Director

Date: \_\_\_\_\_



Source: U.S.G.S. Quads: Avon (1984) and Hartford North (1984), CT

- Site with 0.5-mile radius
- Natural Diversity Database Threatened and Endangered Species (buffered; last updated June 2008)
- National Register Historic Sites\*
- National Register Historic Districts\*
- Reported Archaeological Sites (buffered)\*
- Open Water
- Wetlands
- FEMA Flood Zone**
- 100 Year Flood Zone
- 500 Year Flood Zone
- Floodway in Zone AE
- Other Flood Areas
- Protected Properties (CT DEP; 2007)**
- State Forest
- State Park
- DEP Owned Waterbody
- State Park Scenic Reserve
- Historic Preserve
- Natural Area Preserve
- Fish Hatchery
- Other
- State Park Trail
- Water Access
- Wildlife Area
- Wildlife Sanctuary
- Protected Properties (Federal; 2002)



Vanasse Hangen Brustlin, Inc.

**NEPA Screen Map  
Proposed SBA Facility  
CT-999-0058 - Bloomfield  
Maple Hill Farms, Inc.  
12 Burr Road  
Bloomfield, Connecticut**

**October 3, 2008**



\*none within 1/2 mile of APE



Vanasse Hangen Brustlin, Inc.

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**Memorandum**

To: Chuck Regulbuto  
Project Director New Tower Builds  
SBA Network Services, Inc.  
One Research Drive, Suite 200C  
Westborough, MA 01581

Date: October 1, 2008

Project No.: 40999.03

From: Dean Gustafson  
Senior Environmental Scientist

Re: USFWS Compliance Determination  
Bloomfield - Site ID 999-0058  
12 Burr Road  
Bloomfield, Connecticut

The following Site was evaluated with respect to possible federally-listed, threatened or endangered species in order to determine if the proposed communications facility would result in a potential adverse effect to federally-listed species. This evaluation was performed in accordance with the January 7, 2008 policy statement of the United States Department of the Interior Fish and Wildlife Service (USFWS) New England Field Office. A copy of this policy statement and list of rare species is enclosed for reference.

Project Site:

**State & County:** Connecticut, Hartford  
**Address:** 12 Burr Road, Bloomfield  
**Latitude/Longitude Coordinates:** N 41° 49' 04.2" W 72° 45' 52.4"  
**Size of Property:** 29.54± acres  
**Watershed:** North Branch Park River (basin # 4404)

The following federally listed endangered and threatened species occur in Hartford County according to the USFWS January 1, 2008 policy.

Common Name	Species	Status	County/General Distribution
Eagle, bald	<i>Haliaeetus leucocephalus</i>	D*	<b>Nesting:</b> Hartford, Litchfield <b>Wintering:</b> entire state, major rivers
Wedge mussel, dwarf	<i>Alasmidonta heterodon</i>	E	Hartford
Beetle, Puritan tiger	<i>Cicindela puritana</i>	T	Hartford, Middlesex (Connecticut River floodplain)
Sandplain gerardia	<i>Agalinus acuta</i>	E	Hartford

\* Delisted (Federal Register, July 9, 2007). Protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

## **Habitat Description & Proposed Facility Location**

The telecommunications facility and associated infrastructure (e.g., access drive, utilities, etc.) are proposed to be located within existing developed and disturbed areas on an industrial warehouse property (Maple Hill Farms, Inc.). An existing paved access road, originating from Burr Road, will be used to access the proposed tower location. The tower location is characterized by maintained lawn, pavement and some young staghorn sumac (*Rhus typhina*) saplings.

### **Bald Eagle**

The bald eagle has been delisted and maintains protection under the Bald and Golden Eagle Protection Act (Eagle Act) and the Migratory Bird Treaty Act (MBTA). No bald eagle nests, roosting or foraging areas were observed on the subject property or are known to existing on the surrounding properties. Therefore, the proposed telecommunications facility will not result in disturbance<sup>1</sup> to Bald Eagles.

### **Dwarf Wedge Mussel**

Dwarf wedge mussel is a small (shell rarely exceeds 1.5 inches) freshwater mussel occurring on muddy sand, sand, and gravel bottoms in creeks and rivers of varying sizes, in areas of slow to moderate current and little silt deposition.<sup>2</sup> Its reproductive cycle is typical of other freshwater mussels and requires a host fish on which its larvae (glochidia) parasitize and metamorphose into juvenile mussels, at which time they drop to the stream bed.<sup>3</sup> The decline of dwarf wedge mussel may be the forerunner of a general decline in mussel species of the Atlantic slope drainages<sup>4</sup>. Factors that may be contributing to the decline of dwarf wedge mussel include: impoundment of waterways, siltation, pollution, land use changes and geographic isolation resulting in genetic bottlenecks<sup>5</sup>. Only one known population currently exists in Connecticut, in a one mile stretch of the Muddy Brook in Suffield. This population is described as poor and is not reproducing.<sup>6</sup>

The proposed telecommunications facility will not impact a watercourse resource. The perennial watercourse located on the subject property, Tumbledown Brook, is a shallow perennial flood control stream. The Site watercourse is unlikely to support dwarf wedge mussel habitat and therefore the proposed development will not result in an adverse impact to this listed species.

### **Puritan Tiger Beetle**

Puritan tiger beetle is a medium-sized (11.5 to 12.4mm) terrestrial beetle of the family Cicindelidae.<sup>7</sup> Like many tiger beetles, this species has very specific habitat requirements.<sup>8</sup> The only known extant population of this species in Connecticut occurs on the Connecticut River in Cromwell.<sup>9</sup> The larvae

<sup>1</sup> "Disturb means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior." (Eagle Act)

<sup>2</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Dwarf Wedge Mussel Recovery Plan (Hadley: Region Five, 1993), pg. 2.

<sup>3</sup> "Dwarf wedge mussel," 18 Dec. 2007 [http://en.wikipedia.org/wiki/Dwarf\\_wedge\\_mussel](http://en.wikipedia.org/wiki/Dwarf_wedge_mussel).

<sup>4</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Dwarf Wedge Mussel Recovery Plan (Hadley: Region Five, 1993), pg. 11.

<sup>5</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Dwarf Wedge Mussel Recovery Plan (Hadley: Region Five, 1993), pgs. 11-19.

<sup>6</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Dwarf Wedge Mussel Recovery Plan (Hadley: Region Five, 1993), pg. 20.

<sup>7</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Puritan Tiger Beetle Recovery Plan (Hadley: Region Five, 1993), pg 8.

<sup>8</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Puritan Tiger Beetle Recovery Plan (Hadley: Region Five, 1993), pg. 10.

<sup>9</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Puritan Tiger Beetle Recovery Plan (Hadley: Region Five, 1993), pg 5.

utilize burrows located among scattered herbaceous vegetation at the upper portions of sandy beaches and occasionally near the water's edge.<sup>10</sup> Adults are likely to be found on sediment deposits along large river bends<sup>11</sup>.

The proposed communications facility and associated infrastructure (e.g., access drive, utilities, etc.) are not located within or near habitats that have the potential to support the Puritan tiger beetle. The watercourse located on the subject property does not contain sandy beaches or sediment deposits that could provide suitable habitat for this species. Therefore, the Site is unlikely to support Puritan tiger beetle habitat and the proposed development will not result in an adverse impact to this listed species.

#### **Sandplain gerardia**

Sandplain gerardia is an annual pale green herb, from 5.0 cm to 30.0 cm tall and occasionally up to 40.0 cm tall.<sup>12</sup> Leaves are opposite, linear, scabrous above and up to 2.5 cm long. The pink or purple flowers, which appear from mid-August to mid-October, are 1.0 cm to 1.3 cm long and borne on slender pedicels 1.0 cm to 2.0 cm long. It typically occurs on dry, sandy, nutrient-poor soils of sparsely vegetated sandplain environments and serpentine barrens, whose harshness may eliminate potentially competitive species.<sup>13</sup> While potential habitat for this species exists in Connecticut, no known extant populations are known to occur.

The proposed communications facility and associated infrastructure (e.g., access drive, utilities, etc.) are located within developed and disturbed areas and are not located within or near habitats that have the potential to support sandplain gerardia. Therefore, since the Site is unlikely to provide sandplain gerardia habitat, the proposed development will not result in an adverse impact to this listed species.

#### **Supporting Correspondence**

Based on CTDEP's correspondence (September 17, 2008) there are no documented occurrences of state- or federally-listed species on or near the subject property. Therefore, the proposed development will not result in an adverse affect to any federally-listed species.

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<sup>10</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Puritan Tiger Beetle Recovery Plan (Hadley: Region Five, 1993), pg 10.

<sup>11</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Puritan Tiger Beetle Recovery Plan (Hadley: Region Five, 1993), pg. 11.

<sup>12</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Sandplain Gerardia Recovery Plan (Hadley: Region Five, 1989), pg 1.

<sup>13</sup> United States, U.S. Fish and Wildlife Service, Northeast Region, Sandplain Gerardia Recovery Plan (Hadley: Region Five, 1989), pg. 12.