



Vanasse Hangen Brustlin, Inc.

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Memorandum

To: Mr. Scott Chasse
All-Points Technology Corp., P.C.
3 Saddlebrook Drive
Killingworth, CT 06419

Date: July 30, 2009

Project No.: 40505.06

From: Dean Gustafson
Senior Wetland Scientist

Re: Coastal Consistency Analysis
T-Mobile Site No. CTNL801A
61-1 Buttonball Road
Old Lyme, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) provides the following assessment to demonstrate that the proposed T-Mobile project meets the requirements of the Connecticut Coastal Management Act (CGS Section 22a-90 through 22a-112) and is adequately protective of the interests of these regulations and the State's coastal resources.

The subject property is improved with a commercial building and associated paved parking areas located just south of the Amtrak rail lines and west of Black Hall Golf Course. Based on a review of plans prepared by All-Points Technology Corporation, P.C. (latest revised date 05/15/09) VHB understands that T-Mobile proposes to construct a wireless communications facility ("Facility") just east of the paved parking lot that serves the commercial building.

The proposed Facility location is within the coastal boundary; refer to the enclosed Coastal Boundary Map. No coastal resources are located on the subject property. No federal or state-regulated tidal wetlands or watercourses were identified (or delineated) on the subject property. The Facility would be located outside the 100-year and 500-year flood plain as shown on the Town of Old Lyme, Connecticut FEMA Flood Insurance Rate Map, Panel Number 090103 0016 D, revised June 16, 1992. According to the 1979 Connecticut Coastal Resources Map, tidal wetlands associated with the Black Hall River are the nearest coastal resource to the subject property, approximately 1,500 feet west of the proposed Facility location.

Due to the absence of coastal resources on and proximate to the Facility location no coastal resources will be adversely affected by the proposed development and the T-Mobile project is consistent with the State's coastal polices and goals as detailed below.

Coastal Consistency Review

The proposed T-Mobile project will not result in adverse impacts to coastal resources as defined in the Connecticut Coastal Management Act (CCMA). The CCMA identifies eight potential adverse impacts to coastal resources. This section provides a definition of each potential adverse impact for each resource area and why the proposed project will not adversely affect each resource.

- 1) *Degrading **water quality** of coastal waters by introducing significant amounts of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity.*

The proposed project will not affect water quality within the Black Hall River or associated tidal wetlands, located 1,500± feet to the west. Since the proposed wireless telecommunications compound creates minimal impervious surface and is underlain by a gravel surface, no significant stormwater runoff will be generated by the proposed project.

- 2) *Degrading **existing circulation patterns of coastal waters** by impacting tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours.*

The proposed project is located on property that is currently developed and outside of tidally influenced coastal water areas and as such will not impact current drainage or circulation patterns.

- 3) *Degrading **natural erosion patterns** by significantly altering littoral transport of sediments in terms of deposition or source reduction.*

The proposed project would not affect littoral transport of sediments since the Facility location is not on a shoreline.

- 4) *Degrading **natural or existing drainage patterns** by significantly altering groundwater flow and recharge and volume of runoff.*

Existing drainage patterns, groundwater flow and recharge and stormwater runoff will not be significantly altered by the proposed Facility due to its limited size and the existing developed nature of the subject property.

- 5) *Increasing the hazard of **coastal flooding** by significantly altering shoreline configurations or bathymetry, particularly within high velocity flood zones.*

The proposed project will not significantly alter shoreline configurations or bathymetry. The proposed project is located outside of the 100-year flood hazard zone.

- 6) *Degrading **visual quality** by significantly altering the natural features of vistas and viewpoints.*

The proposed 100 foot monopole will not significantly alter vistas or viewpoints and does not result in significant visibility from coastal resource areas. Refer to VHB's Visual Resource Evaluation Report, dated July 2009, provided under separate cover.

- 7) *Degrading or destroying **essential wildlife, finfish or shellfish habitat** by significantly altering the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significantly altering the natural components of the habitat.*

No essential wildlife, finfish or shellfish habitat exist on the subject property. The proposed facility location is immediately adjacent to a commercial building and Amtrak rail lines.

- 8) *Degrading **tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments** by significantly altering their natural characteristics or function.*

The proposed project will not alter the natural characteristics of any coastal resource area as none exist on the subject property.



Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Old Lyme (1970)

Legend

- Proposed Site Facility
- Coastal Boundary



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Coastal Boundary Map
 Proposed T-Mobile Wireless
 Telecommunications Facility
 CTNL801A
 61-1 Buttonball Road
 Old Lyme, Connecticut

