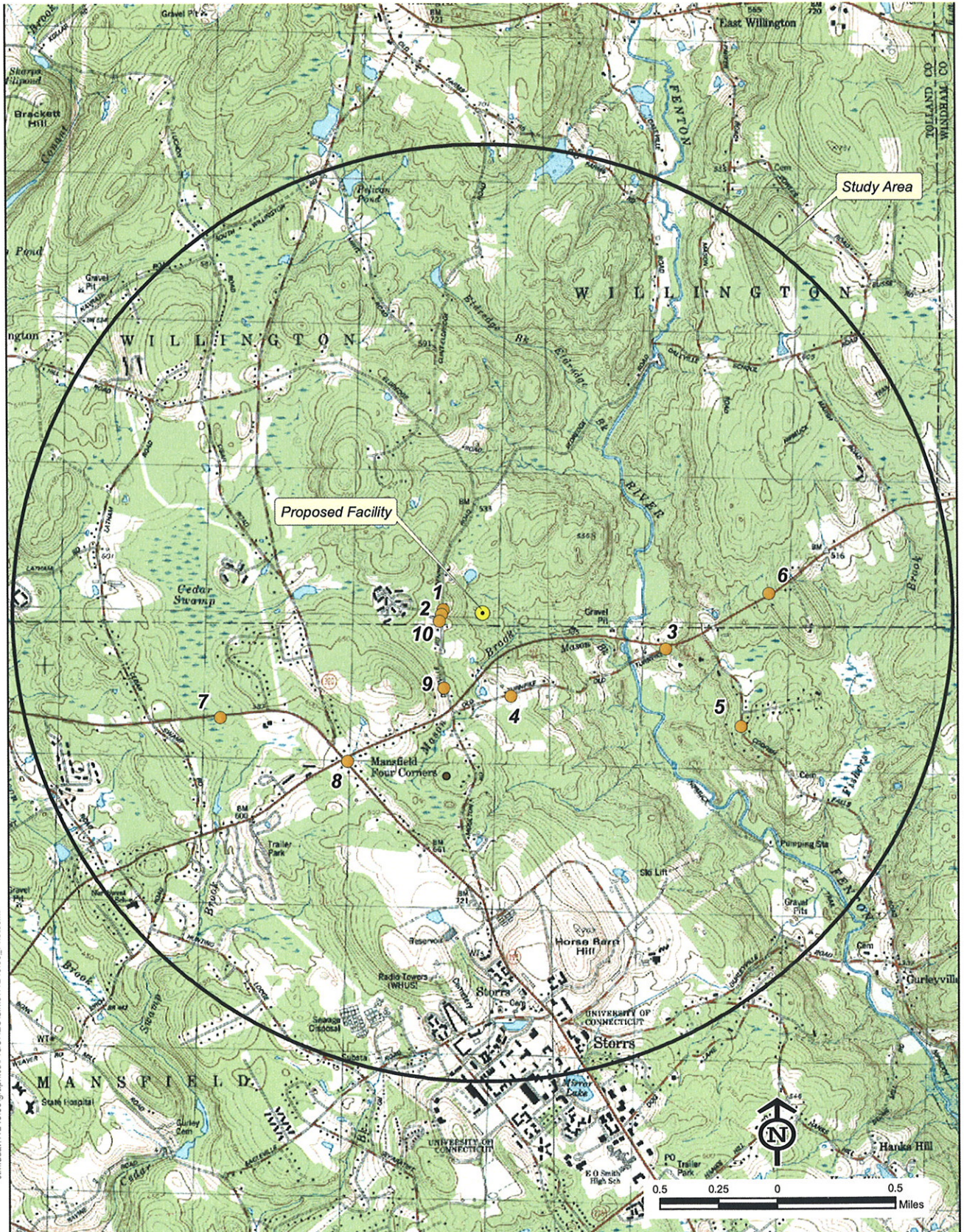


Photolog Documentation

Town of
Willington
Connecticut



ctm004a11240_50_graphics\FIGURES\Smis\41240_50_Photosim

Photographic Documentation



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole

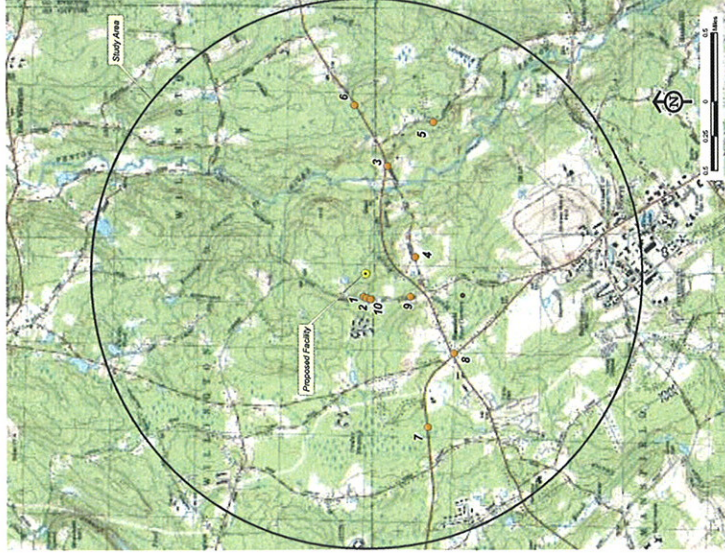


PROPOSED PROJECT AREA

Photographic Documentation and Simulation

View 1

Town of
Willington
Connecticut



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



PHOTO TAKEN FROM DALEVILLE ROAD ADJACENT TO HOUSE #331, LOOKING SOUTHEAST
- BALLOON IS VISIBLE THROUGH TREES
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.15 MILE +/-

Photographic Documentation and Simulation

View 2

Town of
Willington
Connecticut



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole

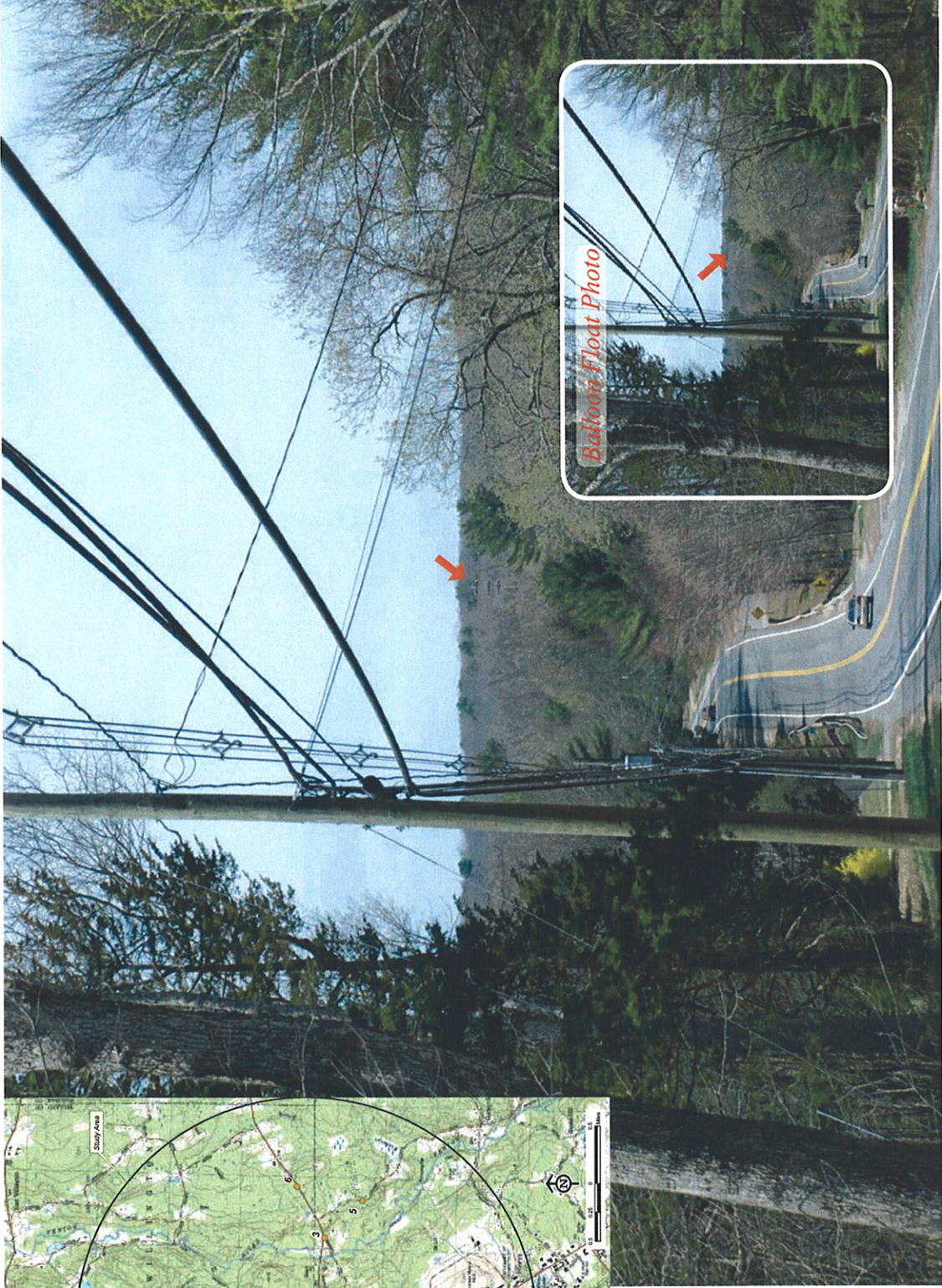


PHOTO TAKEN FROM DALEVILLE ROAD NORTH OF ENTRANCE TO WILLINGTON OAKS APARTMENTS,
LOOKING EAST - BALLOON IS VISIBLE THROUGH TREES
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.16 MILE +/-

Photographic Documentation and Simulation

View 3

Town of
Willington
Connecticut



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



PHOTO TAKEN FROM OLD TURNPIKE ROAD AT ROUTE 44, LOOKING NORTHWEST
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.80 MILE +/-

Photographic Documentation

Town of
Willington
Connecticut

View 4



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



PHOTO TAKEN FROM OLD TURNPIKE ROAD ADJACENT TO HOUSE #54, LOOKING NORTHWEST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.38 MILE +/-

Photographic Documentation

Town of
Willington
Connecticut

View 5



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



**PHOTO TAKEN FROM CODFISH FALLS ROAD, LOOKING NORTHWEST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 1.22 MILES +/-**

Photographic Documentation

View 6



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



**PHOTO TAKEN FROM ROUTE 44, LOOKING WEST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 1.23 MILES +/-**

Photographic Documentation

Town of
Willington
Connecticut

View 7



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



**PHOTO TAKEN FROM ROUTE 195, LOOKING NORTHEAST
- BALLOON IS NOT VISIBLE**

DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 1.19 MILES +/-

Photographic Documentation



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



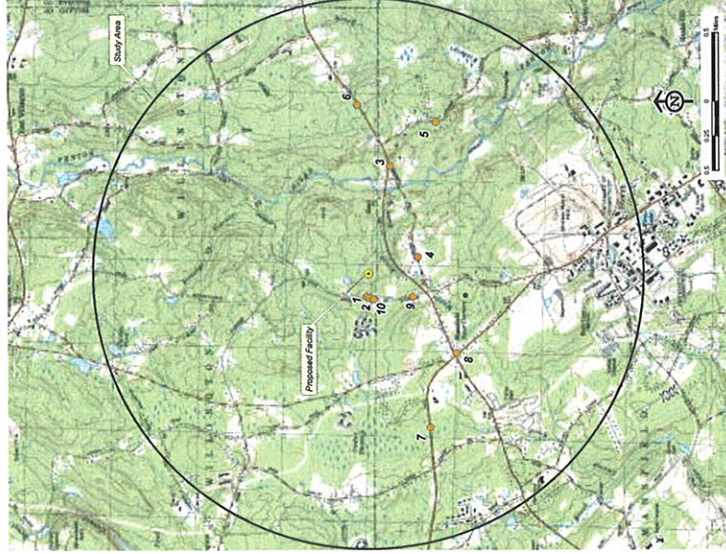
PHOTO TAKEN FROM ROUTE 195 AT ROUTE 44, LOOKING NORTHEAST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.85 MILE +/-



Photographic Documentation

Town of
Willington
Connecticut

View 9



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole

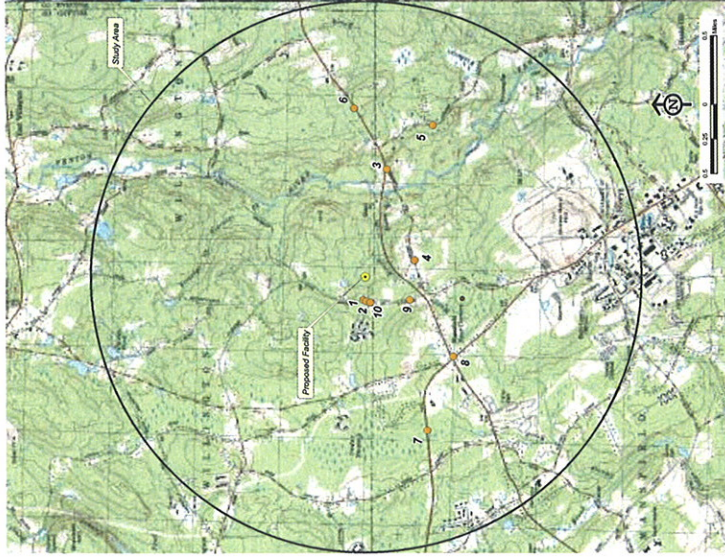


**PHOTO TAKEN FROM DALEVILLE ROAD ADJACENT TO HOUSE #19, LOOKING NORTHEAST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.35 MILE +/-**



View 10

Photographic Documentation



Willington
343 Daleville Road
Willington, CT

Verizon
3 Carrier Monopole



PHOTO TAKEN FROM DALEVILLE ROAD AT ENTRANCE TO WILLINGTON OAKS APARTMENTS, LOOKING NORTHEAST
- BALLOON IS NOT VISIBLE
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 0.18 MILE +/-

Attachment B

Viewshed Map

Viewshed Analysis
Proposed Verizon Wireless
Telecommunications Facility
Willington
343 Daleville Road
Willington, Connecticut

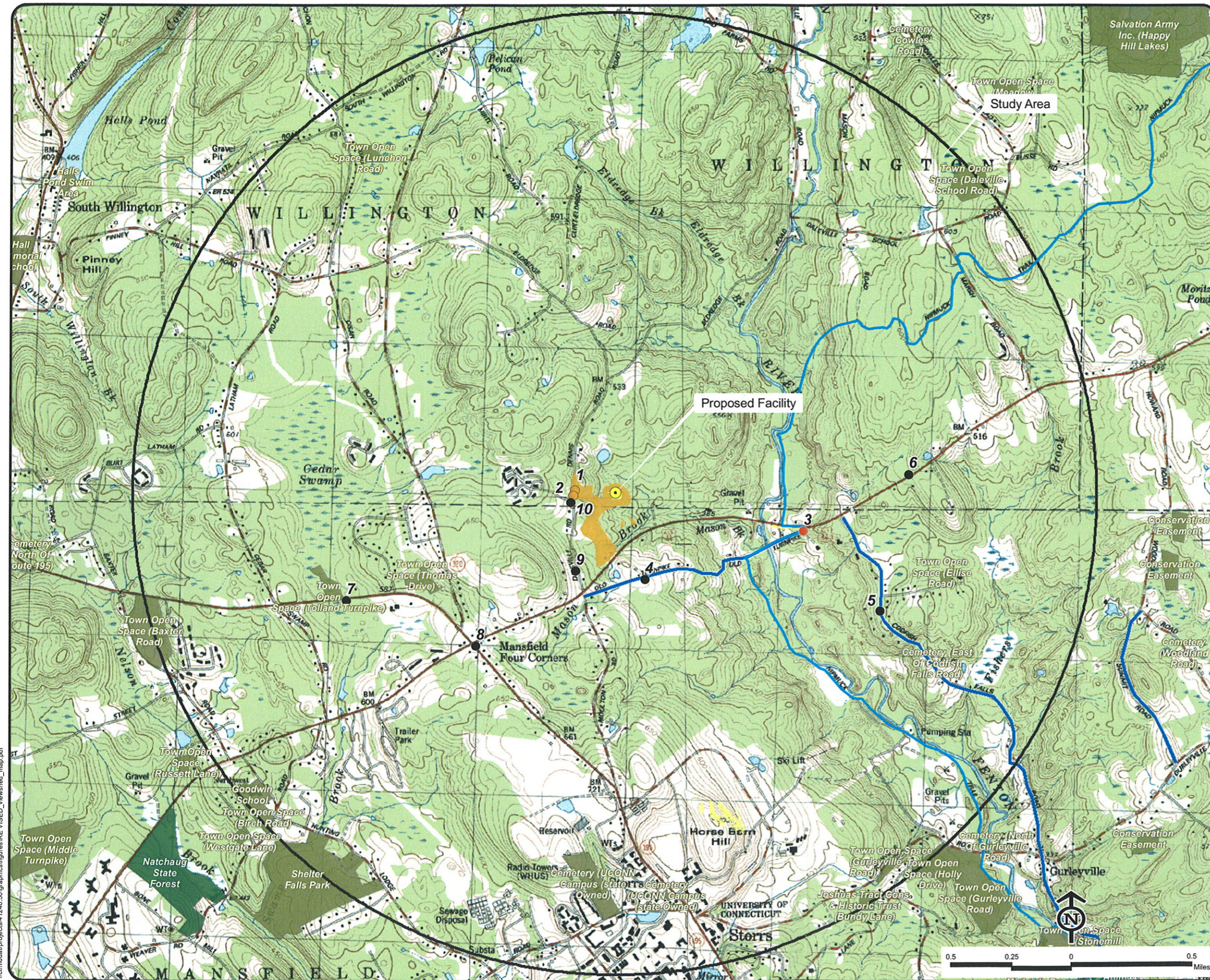
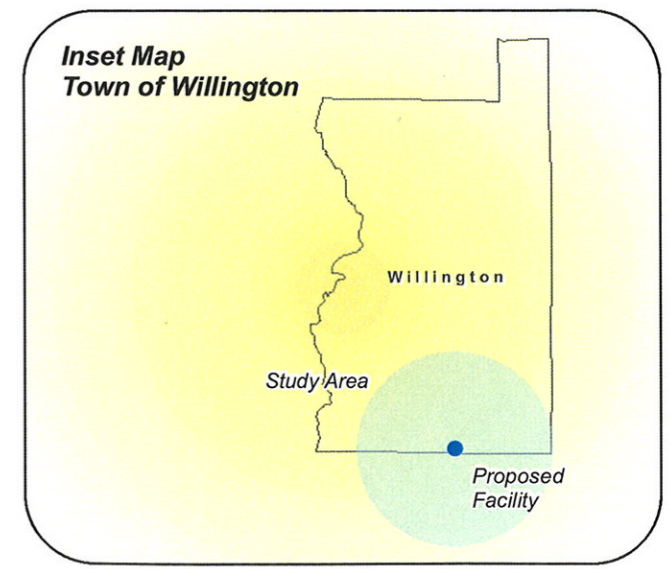
NOTE:
 - Viewshed analysis conducted using ESRI's Spatial Analyst.
 - Proposed Facility height is 100 feet.
 - Existing tree canopy height estimated at 65 feet.
 - Study Area is comprised of a two-mile radius surrounding the proposed facility and includes 8,042 acres of land.

DATA SOURCES:
 - Digital elevation model (DEM) derived from Connecticut LiDAR-based Digital Elevation Data (collected in 2000) with a 10-foot spatial resolution produced by the University of Connecticut and the Center for Land Use Education and Research (CLEAR); 2007
 - Forest areas derived from 2006 digital orthophotos with 1-foot pixel resolution; digitized by VHB, 2008
 - Base map comprised of Coventry (1983) and Spring Hill (1984) USGS Quadrangle Maps
 - Municipal and Private Open Space data layer provided by CT DEP, 1997
 - Federal Open Space data layer provided by CT DEP, 2004
 - CT DEP Property data layer provided by CT DEP, Dec 2009
 - CT DEP boat launches data layer provided by CT DEP, Dec 2009
 - Scenic Roads layer derived from available State and Local listings

Map Originally Compiled June, 2008 and Revised January, 2010

Legend

- Tower Location
- CT DEP Property (CT DEP, Dec 2009)
- Photographs - April 21, 2008
- Balloon is not visible
- Balloon visible above trees
- Balloon visible above trees
- Approximate Year-Round Visibility (Approximately 7 acres)
- Approximate Seasonal Visibility (Approximately 23 acres)
- Protected Municipal and Private Open Space (CT DEP 1997)
- Cemetery
- Preservation
- Conservation
- Existing Preserved Open Space
- Recreation
- General Recreation
- School
- Uncategorized
- State Forest
- State Park
- DEP Owned Waterbody
- State Park Scenic Reserve
- Historic Preserve
- Natural Area Preserve
- Fish Hatchery
- Flood Control
- Other
- State Park Trail
- Water Access
- Wildlife Area
- Wildlife Sanctuary
- Federal Open Space (CT DEP, 2004)
- Boat Launches (CT DEP Dec 2009)
- Scenic Road (State and Local)
- Nipmuck Trail (CT Blue Blaze)
- Town Line



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USE&W COMMENTS

Transportation
Land Development
Environmental
Services



Vanasse Hangen Brustlin, Inc.

54 Tuttle Place
Middletown, Connecticut 06457
860 632-1500
FAX 860 632-7879

Memorandum

To: Alexandria Carter
Verizon Wireless
99 East River Drive
East Hartford, CT 06108

Date: January 21, 2010

Project No.: 41479.53

From: Dean Gustafson
Senior Environmental Scientist

Re: USF&WS Compliance Determination
Proposed Verizon Wireless Facility
Willington
343 Daleville Road
Willington, Connecticut

Project Site:

State: Connecticut

County: Tolland

Address: 343 Daleville Road, Willington

Latitude/Longitude Coordinates: N41°50'11.05" W72°15'17.85"

Size of Property: ±22 acres

Watershed: Fenton River (basin # 4007)

Policies regarding potential conflicts between proposed telecommunications facilities and federally-listed endangered and threatened species are detailed in a January 2, 2009 policy statement of the United States Department of the Interior Fish and Wildlife Service (USFWS) New England Field Office. The referenced Site is located in Willington, Connecticut (Tolland County). No federally-listed endangered or threatened species are known to occur in Willington, Connecticut (refer to the enclosed listing) and as such the proposed development will not result in an adverse affect to any federally-listed endangered or threatened species. A copy of the January 4, 2010 USFWS policy statement as well as a January 4, 2010 USFWS letter regarding federally-listed endangered and threatened species in Willington, Connecticut are enclosed for reference.

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 exist on the surrounding properties. Therefore, the proposed telecommunications facility will not result in disturbance¹ to Bald Eagles.

¹ "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)



**Federally-Listed Endangered
and Threatened Species in Connecticut
List, USFWS January 4, 2010
Telecommunications Policy Statement
and USFWS January 4, 2010
No Known Federally-Listed or
Endangered Species Letter**

**FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES
IN CONNECTICUT**

COUNTY	SPECIES	FEDERAL STATUS	GENERAL LOCATION/HABITAT	TOWNS
Fairfield	Piping Plover	Threatened	Coastal Beaches	Westport, Bridgeport and Stratford
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	Westport and Stratford
	Bog Turtle	Threatened	Wetlands	Ridgefield and Danbury.
Hartford	Dwarf wedgemussel	Endangered	Farmington and Podunk Rivers	South Windsor, East Granby, Simsbury, Avon and Bloomfield.
Litchfield	Small whorled Pogonia	Threatened	Forests with somewhat poorly drained soils and/or a seasonally high water table	Sharon.
	Bog Turtle	Threatened	Wetlands	Sharon and Salisbury.
Middlesex	Roseate Tern	Endangered	Coastal beaches, islands and the Atlantic Ocean	Westbrook and New London.
	Piping Plover	Threatened	Coastal Beaches	Clinton, Westbrook, Old Saybrook.
New Haven	Bog Turtle	Threatened	Wetlands	Southbury
	Piping Plover	Threatened	Coastal Beaches	Milford, Madison and West Haven
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	Branford, Guilford and Madison
New London	Piping Plover	Threatened	Coastal Beaches	Old Lyme, Waterford, Groton and Stonington.
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	East Lyme and Waterford.
	Small whorled Pogonia	Threatened	Forests with somewhat poorly drained soils and/or a seasonally high water table	Waterford
Tolland	None			

-Eastern cougar, gray wolf, seabeach amaranth and American burying beetle are considered extirpated in Connecticut.

-There is no federally-designated Critical Habitat in Connecticut.

7/31/2008



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
<http://www.fws.gov/newengland>

January 4, 2010

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.

January 4, 2010

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:

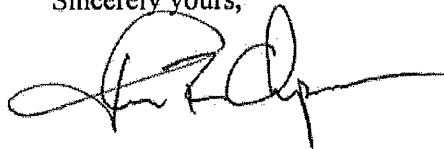
1. If the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building, no further coordination with this office is necessary. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.
2. If the above criteria cannot be met, your review of our 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 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 terns, bog turtles, Jesup's milk-vetch 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 species lists remain valid until January 1, 2011. Updated consultation letters and species lists are available on our website:

(<http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm>)

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

Sincerely yours,



Thomas R. Chapman
Supervisor
New England Field Office



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
<http://www.fws.gov/newengland>

January 4, 2010

To Whom It May Concern:

This project was reviewed for the presence of federally-listed or proposed, threatened or endangered species or critical habitat per instructions provided on the U.S. Fish and Wildlife Service's New England Field Office website:

(<http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm>)

Based on the information currently available, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service (Service) are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes the review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

Thank you for your cooperation. Please contact Mr. Anthony Tur at 603-223-2541 if we can be of further assistance.

Sincerely yours,

Thomas R. Chapman
Supervisor
New England Field Office

DEP COMMENTS

**Transportation
Land Development
Environmental
Services**



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

January 21, 2010

Vanasse Hangen Brustlin, Inc.

Ms. Dawn McKay, Biologist/Environmental Analyst
Connecticut Department of Environmental Protection
Natural Resources Center
Environmental and Geographic Information Center
Natural Diversity Data Base
79 Elm Street - - Store Level
Hartford, CT 06106-5127

Ms. Julie Victoria, Wildlife Biologist
Department of Environmental Protection
Franklin Wildlife Management Area
391 Route 32
N. Franklin, Connecticut 06254

Re: Natural Diversity Data Base Review–NDDB #15989
Proposed Verizon Wireless Facility
Willington
343 Daleville Road
Willington, Connecticut

Dear Ms. McKay and Ms. Victoria:

Vanasse Hangen Brustlin, Inc. (VHB) had previously corresponded with your offices on behalf of Cellco Partnership d.b.a. Verizon Wireless (Verizon Wireless) back in 2008 regarding precautions that would be employed to avoid potential impact to a state species of special concern, the Wood Turtle (*Glyptemys insculpta*). No other rare species were identified in association with this proposed project. Verizon Wireless is currently preparing application to the Connecticut Siting Council and would respectfully request your offices review the proposed project to determine if the previous recommendations made by DEP require updating. A review of the currently available Natural Diversity Data Base (NDDB) data did not reveal additional buffered areas in proximity to the proposed project since our original inquiry in 2008; please concur with our findings. A copy of the updated NDDB map is enclosed.

A Wood Turtle Habitat Survey report prepared by VHB, dated July 25, 2008, had been submitted to Julie Victoria and was subsequently referenced in her letter of August 29, 2008. A copy of Dawn McKay's original March 3, 2008, Julie Victoria's letter of March 13, 2008 and Ms. Victoria's letter of August 29, 2008 are enclosed for your convenience. The Wood Turtle Habitat Survey report contained protection measures to avoid potential impact to Wood Turtle individuals during construction of the proposed Facility, should they be present. Ms. Victoria's letter of August 29, 2008 concurred with the proposed protection measures that would result in avoidance of impact to this species of special concern.

VHB recently inspected the subject property on November 7, 2009 to determine if there have been any significant changes to property conditions as noted in its July 25, 2008 Wood Turtle Habitat Survey report. Aside from a new three car garage located adjacent to the residence, no significant changes to the subject property's habitat or usage have occurred since the investigation from 2008. Therefore, we believe the information contained in VHB's Wood Turtle Habitat Survey is still valid and the protection measures

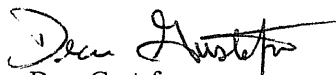
54 Tuttle Place
Middletown, Connecticut 06457-1847
860.632.1500 • FAX 860.632.7879
email: info@vhb.com
www.vhb.com

Ms. Dawn McKay and Ms. Julie Victoria
NDDB - 15989
January 21, 2010
Page 2

noted in the report are still recommended to avoid potential impact to Wood Turtles. Verizon Wireless is committed to incorporating these protection measures during construction of the facility. At your earliest convenience, please let me know if DEP's determination outlined in the August 29, 2008 letter is still valid and if you have any additional comments regarding the project.

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

Very truly yours,


Dean Gustafson
Senior Environmental Scientist











Enclosures





Source: U.S.G.S. Quad: Coventry (1983) and Spring Hill (1983), CT

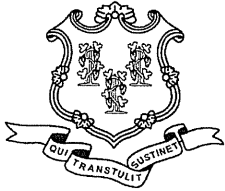
Legend

-  Approximate Facility Layout
-  NDDB Areas (buffered; last updated 12/09)
-  Town Line
-  Open Water
-  Wetlands
-  National Wetland Inventory Wetlands
- FEMA Flood Zone**
-  100 Year Flood Zone
-  500 Year Flood Zone
-  Floodway in Zone AE
-  Other Flood Areas



Vanasse Hangen Brustlin, Inc.
Natural Diversity Data Base (NDDB)
State and Federally Listed Endangered,
Threatened, and Special Concern Species
and Significant Natural Communities Screen
Proposed Verizon Facility
Mansfield 4 Corners
343 Daleville Rd
Willington, Connecticut

January 21, 2010



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

March 3, 2008

Ms. Nicole Dentamaro
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457

RE: Proposed Verizon Wireless Facility in Willington, Connecticut

Dear Ms. Dentamaro:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Verizon Wireless Facility in Willington Connecticut. According to our information, there are records for State Special Concern *Clemmys insculpta* (wood turtle) from the vicinity of this project site. I have sent your letter to Julie Victoria (DEP-Wildlife; 860-642-7239) for further review. She will write to you directly with her comments.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Environmental Protection's Geological and Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 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

Cc: Julie Victoria, NDDB#15989





STATE OF CONNECTICUT
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 FRANKLIN WILDLIFE MANAGEMENT AREA



391 ROUTE 32
 NORTH FRANKLIN, CT 06254
 TELEPHONE: (860) 642-7239

March 13, 2008

Ms. Nicole Dentamaro
 Vanasse Hangen Brustlin, Inc.
 54 Tuttle Place
 Middletown, Ct 06457

re: proposed Verizon Wireless Facility, Willington

Dear Ms. Dentamaro:

Your request was forwarded to me on 3/11/08 from Dawn McKay of the Department of Environmental Protection's (DEP) Natural Diversity Data Base. They have records of a state species of special concern, Wood turtle (*Glyptemys insculpta*) in the vicinity of your project.

Wood turtles require riparian habitats bordered by floodplain, woodland or meadows. Their summer habitat includes pastures, old fields, woodlands, powerline cuts and railroad beds bordering or adjacent to streams and rivers. This species has been negatively impacted by the loss of suitable habitat.

If Wood turtle habitat exists on the proposed site and will be impacted by your project, the Wildlife Division recommends that a herpetologist familiar with the habitat requirements of this species conduct surveys between April and September to see if they are present. A report summarizing the results of such surveys should include habitat descriptions, reptile species list and a statement/resume giving the herpetologist's qualifications. The DEP doesn't maintain a list of qualified herpetologists. A DEP Wildlife Division permit may be required by the herpetologist to conduct survey work, you should ask if your herpetologist has one. The results of this investigation can be forwarded to the Wildlife Division and, after evaluation, recommendations for additional surveys, if any, will be made.

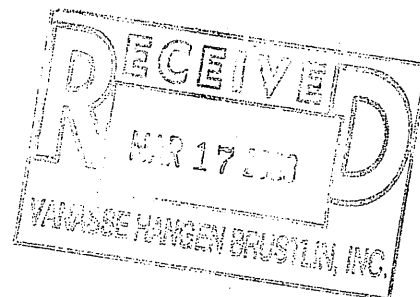
Standard protocols for protection of wetlands should be followed and maintained during the course of the project. Additionally, all silt fencing should be removed after soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted.

Please be advised that the Wildlife Division has not made a field inspection of the project nor have we seen detailed timetables for work to be done. Consultation with the Wildlife Division should not be substituted for site-specific surveys that may be required for environmental assessments. The time of year when this work will take place will affect this species if they are present on the site when the work is scheduled. 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. If you have any additional questions, please feel free to contact me at Julie.Victoria@po.state.ct.us, please reference the NDDB # at the bottom of this letter when you e-mail. Thank you for the opportunity to comment.

Sincerely,

Julie Victoria
 Wildlife Biologist
 Franklin Swamp Wildlife Management Area
 391 Route 32
 N. Franklin, CT 06254

cc: NDDB - 15989





STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FRANKLIN WILDLIFE MANAGEMENT AREA



August 29, 2008

391 ROUTE 32
NORTH FRANKLIN, CT 06254
TELEPHONE: (860) 642-7239

Mr. Dean Gustafson
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457

re: proposed Verizon Wireless Facility, Willington

Dear Mr. Gustafson:

Your additional materials were received by me on 8/26/08. The Wildlife Division concurs with your proposed precautions to avoid impacts to a state species of special concern, the Wood turtle (*Glyptemys insculpta*) in the vicinity of your project, namely:

1. to conduct a visual inspection of the work zone for turtles and to install silt fencing around the construction area.
2. To educate the contractor about wood turtles, their possible presence and to avoid harming them.

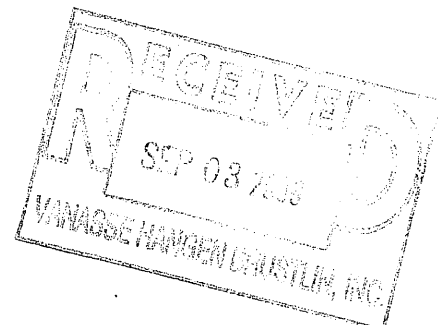
The Wildlife Division thanks you for planning to report any observations and would encourage you to have the contractors move the turtles out of harm's way but to keep them as close to the area that they were found in as this species has a relatively small home range. Again, standard protocols for protection of wetlands should be followed and maintained during the course of the project. Additionally, all silt fencing should be removed after soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted.

Please be advised that the Wildlife Division has not made a field inspection of the project. Consultation with the Wildlife Division should not be substituted for site-specific surveys that may be required for environmental assessments. If you have any additional questions, please feel free to contact me at Julie.Victoria@ct.gov, please reference the NDDB # at the bottom of this letter when you e-mail. Thank you for the opportunity to comment.

Sincerely,

Julie Victoria
Wildlife Biologist
Franklin Swamp Wildlife Management Area
391 Route 32
N. Franklin, CT 06254

cc: NDDB – 15989





July 25, 2008

Vanasse Hangen Brustlin, Inc.

Ref: 41240.50

Ms. Julie Victoria
Wildlife Biologist
Department of Environmental Protection
Franklin Wildlife Management Area
391 Route 32
N. Franklin, Connecticut 06254

Re: Wood Turtle Habitat Survey
Proposed Verizon Wireless Facility
NDDB - 15989
343 Daleville Road, Willington, CT

Dear Ms. Victoria:

Vanasse Hangen Brustlin, Inc. (VHB) has been retained by Cellco Partnership d.b.a. Verizon Wireless (Verizon Wireless) to review environmental resource information, including threatened or endangered species or designated critical habitats, 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. 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, Part 1, Subpart I, rule sections 1.1301 to 1.1319.

VHB understands that Verizon Wireless is proposing to construct a new telecommunications facility on portions of property located at 343 Daleville Road in Willington, Connecticut. Site location and aerial maps are enclosed. The proposed facility will consist of a ±100-foot tall monopole tower within a 60-foot by 60-foot fenced-enclosed compound area. Verizon Wireless antenna will be attached to the monopole and associated ground equipment will be installed at its base. The proposed access/utilities route will extend in a northeasterly direction off of Daleville Road following an existing gravel driveway and wooded path (refer to the attached Site Plans). The subject property contains a residence and horse farm with several paddock areas along with small pasture areas interspersed among a primarily wooded parcel.

A wood turtle (*Glyptemys insculpta*) habitat survey was performed in response to your letter of March 13, 2008 (enclosed). A summary of our inspections is provided below along with recommendations to be implemented during proposed construction activities to avoid possible impact to the Special Concern species.

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Wood Turtle Habitat Survey

Wood turtles require riparian habitats bordered by floodplain, woodland, or meadows, requiring rivers or large streams with deeply undercut banks for hibernation.¹ The Natural Diversity Data Base (NDDB) map (attached) reveals that several overlapping shaded areas are associated with the Fenton River, located approximately 3,500 feet east of the proposed facility.

The subject property is improved with a residence, barn, various small sheds and several horse paddock areas. The proposed development area for the telecommunications facility will encompass existing developed and disturbed areas primarily consisting of a gravel driveway and wooded path. Representative photographs are enclosed. Although wetland areas were identified on the subject property in proximity to proposed development activities, no direct impact to wetlands or watercourses will result from the proposed work. Details of the wetland delineation are contained in the attached Wetlands Delineation Report, dated March 29, 2008. Seasonal intermittent streams are associated with wetland systems located both north and south of the proposed facility. Man-made ponds that are used as part of the horse farm operations are also located in each of the wetland systems. An overall wetland map is enclosed for reference.

Site inspections were performed on April 18, June 9 and July 7, 2008 to see if wood turtles were utilizing the proposed development area or surrounding woods or wetlands on the subject property. No wood turtles were observed during the site inspections.

Wood turtle movement patterns vary widely among individuals, but most adult turtles remain within 300 meters of their home stream.² The wetland systems and associated seasonal streams located on the subject property in proximity to the proposed facility do not provide ideal hibernation or mating habitat for wood turtles. These wetland areas could potentially be used by wood turtles as foraging habitat, although they are located a considerable distance (3,500± feet) from the Fenton River (which does provide wood turtle habitat). In addition, the upland habitat that will be used for the proposed development is not considered suitable terrestrial habitat due to the surrounding horse farm activity and associated disturbance. Despite the remote possibility, VHB recommends the following precautions to avoid potential inadvertent impact to wood turtles during construction activities.

Wood Turtle Protection Measures

The following is a methodological plan that will avoid mortality to a State Special Concern species as a result of construction activities for the site improvements proposed.



¹ Klemens, M. W. (1993). *Amphibians and Reptiles of Connecticut and Adjacent Regions*. State Geological and Natural History Survey of Connecticut, Bulletin 112.

² Kaufman, J.H. (1992). *Habitat use by wood turtles in central Pennsylvania*. *Journal of Herpetology* 26(2):315-321.

It is of the utmost importance that the Contractor comply with the requirement for the installation of protective measures and the education of employees and subcontractors performing work on the project site.

The proposed wood turtle species protection program consists of several components, most notably complete and appropriate isolation of the project perimeter, periodic inspection and maintenance of isolation structures, and mandatory education of all contractors and sub-contractors prior to initiation of work on the site.

1. Isolation Measures

- a. **Schedule:** On-site work is tentatively scheduled to commence upon securing of all necessary permits during the spring of 2009 with an anticipated duration of approximately six weeks. Installation of conventional silt fencing, which will also serve as an isolation of the work zone from surrounding areas and required for erosion control compliance, will be performed prior to any earthwork. Vanasse Hangen Brustlin, Inc. will inspect the work zone area prior to barrier installation to ensure the area is free of wood turtles.
- b. **Specifications:** The fencing will consist of conventional erosion control woven fabric, installed approximately six inches below surface grade using a Ditch-Witch or similar machine and staked at seven to ten-foot intervals using four-foot oak stakes or approved equivalent. The fencing will be inspected for tears or breeches in the fabric following installation and at one-week intervals or after storm events of 0.5 inch or greater by Vanasse Hangen Brustlin, Inc. Inspections will be conducted throughout the course of the construction project.
- c. **Reports:** Weekly inspection reports (brief narrative and applicable photos) will be sent to CTDEP for compliance verification.
- d. **Location:** The extent of the barrier fencing will be as shown on the site plans as attached.

2. Contractor Education:

- a. Prior to work on-site, the Contractor shall attend an educational session with Vanasse Hangen Brustlin, Inc. This orientation and educational session will consist of an introductory session with photos stressing the non-aggressive nature of wood turtles and the absence of need to destroy animals that might be encountered.
- b. Also stressed in the education session will be means to discriminate between the species of concern and other native species to avoid unnecessary, "false alarms".



- c. Contractors will be provided with cell phone and email contacts to be used immediately upon encountering a wood turtle. Poster materials will be provided and posted on the job site to maintain worker awareness as the season progresses. A copy of the Wood Turtle caution poster is enclosed.

3. Reporting

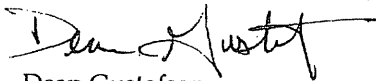
- a. Following completion of the construction project, Vanasse Hangen Brustlin, Inc. will provide a summary report to CTDEP documenting the monitoring and maintenance of the barrier fence.
- b. Any observations of the species of concern will be reported to CTDEP by Vanasse Hangen Brustlin, Inc., with photo-documentation (if possible) and with specific information on the location and disposition of the animal.

The wood turtle protection measures detailed above will adequately protect this Special Concern species in the unlikely event that this species is encountered on the subject property during construction activities. Therefore, Verizon Wireless' proposed development at this property will not have an adverse affect on wood turtle.

We respectfully request a written opinion from your office regarding the potential effect of proposed activities on this State Species of Special Concern in light of documentation contained herein. At your earliest convenience, please forward correspondence to my attention. Thank you in advance for your assistance in this matter.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.

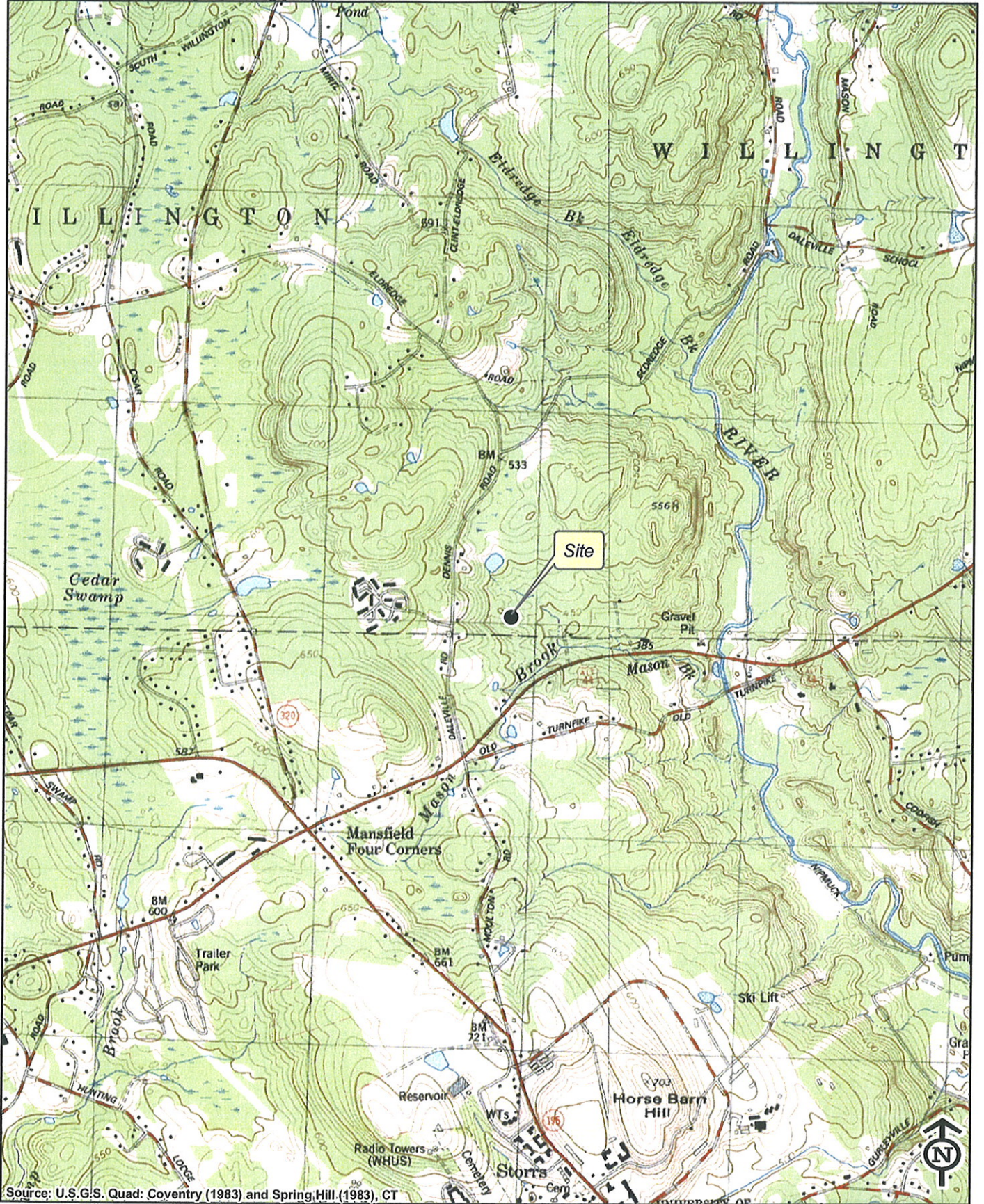


Dean Gustafson
Senior Environmental Scientist

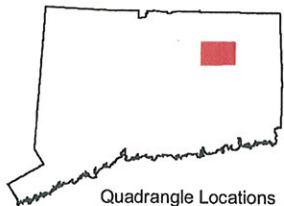
Enclosures

cc: Alexandria Carter, Verizon Wireless





Source: U.S.G.S. Quad: Coventry (1983) and Spring Hill (1983), CT



Quadrangle Locations



Vanasse Hangen Brustlin, Inc.

Figure 1
Site Location Map
Proposed Verizon Facility
Mansfield 4 Corners
343 Daleville Rd
Willington, Connecticut



Base Map Source: 2006 aerial photograph with a 1-foot pixel resolution

Vanasse Hangen Brustlin, Inc.

2006 Aerial Photograph
 Proposed Verizon Wireless
 Telecommunications Facility
 Mansfield Four Corners
 343 Daleville Road
 Willington, Connecticut



Quadrangle Location

