

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR THE CONSTRUCTION,
MAINTENANCE AND OPERATION OF
A TELECOMMUNICATIONS TOWER
FACILITY ON TOWN OWNED
PROPERTY AT 1363 BOSTON POST
ROAD IN THE TOWN OF
OLD SAYBROOK

DOCKET NO. 411

March 7, 2011

**NEW CINGULAR WIRELESS PCS, LLC ("AT&T")
POST HEARING SUBMISSION OF REQUESTED INFORMATION**

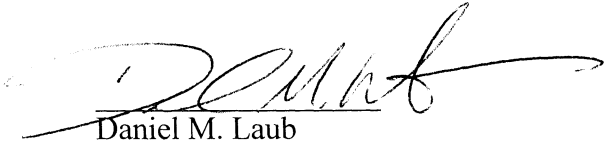
At the February 15, 2011 hearing for the captioned docket the Connecticut Siting Council requested AT&T submit additional information as a follow up to inquiries posed during the proceedings. That information is provided below and attached as requested.

1. Map date: The underlying topographic quadrangle map provided in the view shed map in the Application (Exhibit 1, Tab 4) was originally dated 1958 with Photo Revisions in 1970 and a Photo Inspection in 1977.
2. Date of balloon float review of proposed facility by the State Historic Preservation Officer ("SHPO"): The date of the balloon float review conducted by SHPO was March 2, 2010.
3. Migratory Bird Impact Evaluation: Included as Attachment 1 please find the Migratory Bird Impact Evaluation prepared by VHB for AT&T as discussed at the hearing. As noted therein, the proposed site complies with the United States Fish and Wildlife Service guidelines for minimizing potential impacts to birds and further that no migratory bird species would be impacted by the proposed Facility.
4. Coastal Consistency Analysis: Included as Attachment 2 please find a Coastal Consistency Analysis prepared by VHB which finds that the proposed facility is in keeping with the Connecticut Coastal Management Act and is adequately in keeping with the interests of those regulations and the State's coastal resources generally.
5. FEMA Map and flood elevation information: The flood elevation of "9" shown on the plans prepared by CHA are for a 100 year flood. The base flood elevation 9 contour represents the edge of flood zone AE. The remainder of the host site to the South is in Zone X. The site is being constructed 1' above the flood elevation at its lowest point. Included as Attachment 3 is a color copy of the flood map with the proposed Facility site called out.

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council.

Dated: March 7, 2011



Daniel M. Laub

cc: Michele Briggs, AT&T
David Vivian, SAI
Michael Libertine, VHB
Anthony Wells, C Squared Systems
Peter Perkins, CHA

ATTACHMENT 1



Vanasse Hangen Brustlin, Inc.

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

Memorandum

To: Mr. David Vivian
New Cingular Wireless PCS, LLC
500 Enterprise Drive, Suite 3A
Rocky Hill, Connecticut 06067

Date: February 15, 2011

Project No.: 41502.38

From: Dean Gustafson
Senior Environmental Scientist

Re: Connecticut Siting Council Docket No. 411
Migratory Bird Impact Evaluation
Proposed AT&T SR2597 Facility
1363 Boston Post Road
Old Saybrook, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) is pleased to provide the following information with respect to potential impacts on migratory birds from a proposed wireless telecommunications facility (Facility) proposed by New Cingular Wireless PCS, LLC (AT&T) at 1363 Boston Post Road in Old Saybrook, Connecticut.

VHB understands that AT&T proposes to construct a 100-foot tall monopole (Facility) on the 7.53-acre host property that is currently occupied by existing buildings used for various purposes including an electrical supply wholesaler, car storage, motorcycle parts sales, a martial arts studio and a residence. An active Amtrak rail line is located along the northern property boundary. The proposed Facility is located in an existing cleared and graded gravel area in the rear (northern) portion of the property. Land use within the general vicinity of the proposed Facility is mainly comprised of relatively dense commercial, industrial and residential developments.

VHB's research revealed the proposed Facility complies with the U.S. Fish and Wildlife Service (USFWS) guidelines for minimizing potential impacts to birds and no migratory bird species would be impacted by development of the proposed Facility. As a result, no seasonal restrictions would be recommended in association with construction or operation of the proposed Facility.

Provided below is a detailed analysis of potential impacts to migratory birds from the proposed AT&T Facility and the Facility's compliance with the USFWS guidelines.

Flyways

The proposed Facility is located in a densely developed commercial and residential section of Old Saybrook near the Connecticut coast approximately 0.8 mile north of Chalker Beach, which contains dense residential development right up to the beach and shoreline. The Connecticut coast lies within the Atlantic Flyway, one of the four generalized regional migratory bird flyways (Mississippi, Central, and Pacific being the others). This regional flyway is used by migratory birds traveling to and from summering and wintering grounds. The Atlantic Flyway is particularly important for many species of migratory waterfowl and shorebirds, and Connecticut's coast serves

as vital stopover habitat. Migratory land birds also stop along coastal habitats before making their way inland. In this particular part of Connecticut along the shore, the mouth of the Connecticut River, located approximately 3 miles east/southeast of the proposed Facility, is an important stopover and waterfowl breeding area due to the diverse tidal wetland and open water habitat. Smaller inland migratory flyways are often concentrated along major riparian areas as birds make their way further inland to their preferred breeding habitats. The Connecticut River forms an important secondary flyway as birds move north from the shoreline into interior portions of Connecticut and farther north.

The proposed AT&T Facility would be located primarily within the existing cleared and disturbed limits of the commercial property and would minimize impact to mature vegetation. In addition, the proposed Facility would not directly impact an inland forested and scrub-shrub wetland system located in the northern portion of the subject property that could possibly support some habitat for migratory birds. The closest encroachment to wetlands by the Facility would be with the proposed 12-foot wide gravel access drive located ± 51 feet north of wetland flag 11. Considering that a significantly larger and diverse habitat area is located approximately 1.6 miles to the east associated with the mouth of the Connecticut River, it is anticipated that a large majority of avian species would utilize this relatively close habitat as opposed to areas surrounding the developed subject property or adjoining developed properties. Therefore, although the proposed AT&T Facility is located in the Atlantic Flyway, no significant adverse impact to avian habitat potentially used by migrating species on the subject property is anticipated. In addition, since the proposed Facility complies with the U.S. Fish and Wildlife Service guidelines (as discussed in a following section) for minimizing potential impacts to birds, no migratory bird species would be impacted by development of the proposed Facility and no seasonal restriction is recommended for the project.

Focus Areas

The Atlantic Joint Coast Venture (AJCV) is an affiliation of federal, state, regional, and local partners working together to address bird conservation planning along the Atlantic Flyway. The AJCV has identified focus areas identifying the most important habitats for waterfowl along the Atlantic Flyway. Connecticut contains several of these focus areas. Although the proposed project is not located within one of them (refer to attached map of CT Waterfowl Focus Areas), it is approximately 1.6 miles west of the Connecticut River and Tidal Wetlands Complex Focus Area that was described in the preceding section. Since the proposed project occurs on an existing developed commercial property and would not impact waterfowl habitat, no adverse impact to the nearby focus area is anticipated.

CTDEP Migratory Waterfowl Data

The Connecticut Department of Environmental Protection (CTDEP) created a Geographic Information System (GIS) data layer in 1999 identifying concentration areas of migratory waterfowl at specific locations in Connecticut. The intent of this data layer is to assist in the identification of migratory waterfowl resource areas in the event of an oil spill or other condition that might be a threat to waterfowl species. This data layer identifies conditions at a particular point in time and has not been updated since 1999.

The closest migratory waterfowl area is located in the estuary and tidal wetland complex associated with the Connecticut River, approximately 1.6 mile east of the proposed Facility; refer to the enclosed Avian Resources Map. This important habitat complex includes open water; fresh, salt and brackish tidal wetlands; floodplains, river islands, beaches, and dunes. The system serves as essential habitat for numerous species and forms an extensive biological corridor along the Connecticut River. Many migratory and Neotropical bird species nest or winter in the marshes, which regularly support 18 species of waterfowl. CTDEP reports that the area sees heavy use during migration by species such as American black duck, bufflehead, mallard, blue-winged teal, common merganser and green-winged teal.

Four important factors were considered in the determination that no impact to migratory or wintering waterfowl would result from the proposed development (and therefore no seasonal restrictions are recommended for the project), including: 1) the proposed project would not directly impact this migratory and wintering waterfowl area; 2) there is sufficient buffer from this area to the proposed development; 3) the proposed Facility would not directly impact possible waterfowl habitat (e.g., an inland forested and scrub-shrub wetland system located in the northern portion of the subject property) and, 4) the area surrounding the proposed Facility is characterized by relatively dense commercial, industrial and residential development (including homes right up to the coast line) and high level of human activity.

Important Bird Areas and Sites

Audubon Connecticut has identified 27 Important Bird Areas and Sites (IBAs) in the state. The closest IBA to the proposed Facility is the Menunketesuck/Duck Islands area in Westbrook, located approximately 1.5 miles to the west. Refer to the enclosed Avian Resources Map. This habitat is composed of two small, undeveloped islands off the coast of Westbrook with approximately 200 acres of inter-tidal flats, inter-tidal sandbars and shell-bars situated to the east of the islands. It is an important breeding area for Plovers, American Oystercatchers, Least and Common Terns, waterfowl and other migratory birds. Due to the distance between the proposed Facility and this IBA, no impact to this IBA would result from the proposed development and therefore no seasonal restrictions are recommended for the project.

Critical Habitat

Connecticut Critical Habitats depicts the classification and distribution of 25 rare and specialized wildlife habitats in the state resulting in the creation of habitat maps to be used in land use planning and natural resource protection. It represents a compilation of ecological information collected over many years by state agencies, conservation organizations and many individuals. The Connecticut Critical Habitats information can serve to highlight ecologically significant areas and to target areas of species diversity for land conservation and protection. The nearest Critical Habitat is located approximately 0.6 mile east of the proposed Facility associated with the Oyster River and associated estuary and intertidal salt marsh habitat; refer to the enclosed Avian Resources Map. Due to the distance between the proposed Facility and this nearest Critical Habitat, no impact to this Critical Habitat would result from the proposed development and therefore no seasonal restrictions are recommended for the project.

Breeding Bird Survey Route

The North American Breeding Bird Survey is a cooperative effort between various agencies and volunteer groups to monitor the status and trends of North American bird populations. Routes are randomly located to sample habitats that are representative of an entire region. Each year during the height of the avian breeding season (June for most of the United States) participants skilled in avian identification collect bird population data along roadside survey routes. Each survey route is approximately 24.5 miles long and contains 50 stops located at 0.5-mile intervals. At each stop, a 3-minute count is conducted. During the count, every bird seen within a 0.25-mile radius or heard is recorded. The resulting data are used by conservation managers, scientists, and the general public to estimate population trends and relative abundances and to assess bird conservation priorities. No survey routes are located within 4 miles of the proposed Facility. Bird survey routes do not represent a potential restriction to development, including the proposed Facility.

Hawk Watch Site

The Hawk Migration Association of North America (HMANA) is a membership-based organization committed to the conservation of raptors through the scientific study, enjoyment, and appreciation of raptor migration. HMANA collects hawk count data from almost two hundred affiliated raptor monitoring sites throughout the United States, Canada, and Mexico, identified as "Hawk Watch

Sites." The nearest Hawk Watch Site is located approximately 25 miles west of the proposed Facility in East Haven (beyond the scale of the enclosed Avian Resources Map). Hawk Watch Sites do not represent a potential restriction to development, including the proposed Facility.

Bald Eagle Site

Bald Eagle Sites consist of locations of midwinter Bald Eagle counts from 1986-2005 with an update provided in 2008. This survey was initiated in 1979 by the National Wildlife Federation. This database includes data from 1986-2005 midwinter counts and includes some statewide, regional and national trends. Survey routes are included in the database only if they were surveyed consistently in at least 4 years and where at least 4 eagles were counted in a single year. The nearest Bald Eagle Site is located approximately 1.3 miles east of the proposed Facility; refer to the enclosed Avian Resources Map. Wintering bald eagles are known to utilize the mouth of the Connecticut River. Due to the distance separating the proposed Facility from this Bald Eagle Site and the Connecticut River no impact to Bald Eagles would result from the proposed development and therefore no seasonal restrictions are recommended for the project.

Compliance with USFWS's Interim Guidance on the Siting, Construction, Operation and Decommissioning of Communications Towers

The United States Fish and Wildlife Service's *Interim Guidance on the Siting, Construction, Operation and Decommissioning of Communications Towers* (September 14, 2000), recommends 12 voluntary actions be implemented in order to mitigate tower strikes caused by the construction of telecommunications towers:

1. *Any company/applicant/licensee proposing to construct a new communications tower should be strongly encouraged to collocate the communications equipment on an existing communication tower or other structure (e.g., billboard, water tower, or building mount). Depending on tower load factors, from 6 to 10 providers may collocate on an existing tower.*

Response: Collocation on an existing building, tower or non-tower structure is not available while achieving the required radio frequency (RF) coverage objectives of the proposed Facility.

2. *If collocation is not feasible and a new tower or towers are to be constructed, communications service providers should be strongly encouraged to construct towers no more than 199 feet above ground level (AGL), using construction techniques which do not require guy wires (e.g., use a lattice structure, monopole, etc.). Such towers should be unlighted if Federal Aviation Administration regulations permit.*

Response: The proposed AT&T Facility consists of a 100-foot tall monopole structure which requires neither guy wires nor lighting.

3. *If constructing multiple towers, providers should consider the cumulative impacts of all of those towers to migratory birds and threatened and endangered species as well as the impacts of each individual tower.*

Response: Multiple towers are not proposed to be constructed at the subject property.

4. *If at all possible, new towers should be sited within existing "antenna farms" (clusters of towers). Towers should not be sited in or near wetlands, other known bird concentration areas (e.g., state or Federal refuges, staging areas, rookeries), in known migratory or daily movement flyways, or in habitat of threatened or endangered species. Towers should not be sited in areas with a high incidence of fog, mist, and low ceilings.*

Response: There are no existing antenna farms in the area that would satisfy the RF coverage objectives for this portion of Old Saybrook. Due to the proposed tower's proximity to the coast, incidence of fog, mist, and low ceilings are anticipated over the course of a typical year. Although the proposed Facility is located within the Atlantic Flyway, the low height of the proposed Facility and its distance to known bird concentration areas (e.g., 1.6± miles west of the mouth of the

Connecticut River) mitigate potential impacts to migratory avian species. According to CTDEP, there are no known extant populations of State or Federal Endangered, Threatened or Special Concern Species at the site (D. McKay, CTDEP, pers. comm., November 16, 2009).

5. *If taller (>199 feet AGL) towers requiring lights for aviation safety must be constructed, the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA should be used.*

Response: The proposed tower height of 100 feet is less than 199 feet AGL and does not require lighting as determined by a FAA review.

6. *Tower designs using guy wires for support which are proposed to be located in known raptor or waterbird concentration areas or daily movement routes, or in major diurnal migratory bird movement routes or stopover sites, should have daytime visual markers on the wires to prevent collisions by these diurnally moving species.*

Response: The proposed tower would be unguyed and therefore visual markers are not required.

7. *Towers and appendant facilities should be sited, designed and constructed so as to avoid or minimize habitat loss within and adjacent to the tower "footprint". However, a larger tower footprint is preferable to the use of guy wires in construction. Road access and fencing should be minimized to reduce or prevent habitat fragmentation and disturbance, and to reduce above ground obstacles to birds in flight.*

Response: The proposed tower and appendant Facility is sited, designed, and constructed to accommodate proposed equipment and to allow for future collocations within the smallest footprint possible. The Facility is located on an existing developed commercial property and would minimize disturbance to mature vegetation.

8. *If significant numbers of breeding, feeding, or roosting birds are known to habitually use the proposed tower construction area, relocation to an alternate site should be recommended. If this is not an option, seasonal restrictions on construction may be advisable in order to avoid disturbance during periods of high bird activity.*

Response: Significant numbers of breeding, feeding, or roosting birds are not known to habitually use the proposed tower construction area or surrounding subject property.

9. *In order to reduce the number of towers needed in the future, providers should be encouraged to design new towers structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for at least two additional users (minimum of three users for each tower structure), unless this design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower.*

Response: The proposed unguyed and unlit tower has been designed to accommodate three additional antenna positions.

10. *Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.*

Response: Security lighting for on-ground facilities would be down-shielded using Dark Sky compliant fixtures set on motion sensor with timer.

11. *If a tower is constructed or proposed for construction, Service personnel or researchers from the Communication Tower Working Group should be allowed access to the site to evaluate bird use, conduct dead-bird searches, to place net catchments below the towers but above the ground, and to place radar, Global Positioning System, infrared, thermal imagery, and acoustical monitoring equipment as necessary to assess and verify bird movements and to gain information on the impacts of various tower sizes, configurations, and lighting systems.*

Response: With prior notification to AT&T, USFWS personnel would be allowed access to the proposed Facility for evaluation.

12. *Towers no longer in use or determined to be obsolete should be removed within 12 months of cessation of use.*

Response: If the proposed tower was no longer in use or determined to be obsolete, it would be removed within 12 months of cessation of use.

Summary

Potentially impacted waterfowl species: American Black Duck, Bufflehead, Mallard, Blue-winged Teal, Common Merganser, and Green-winged Teal

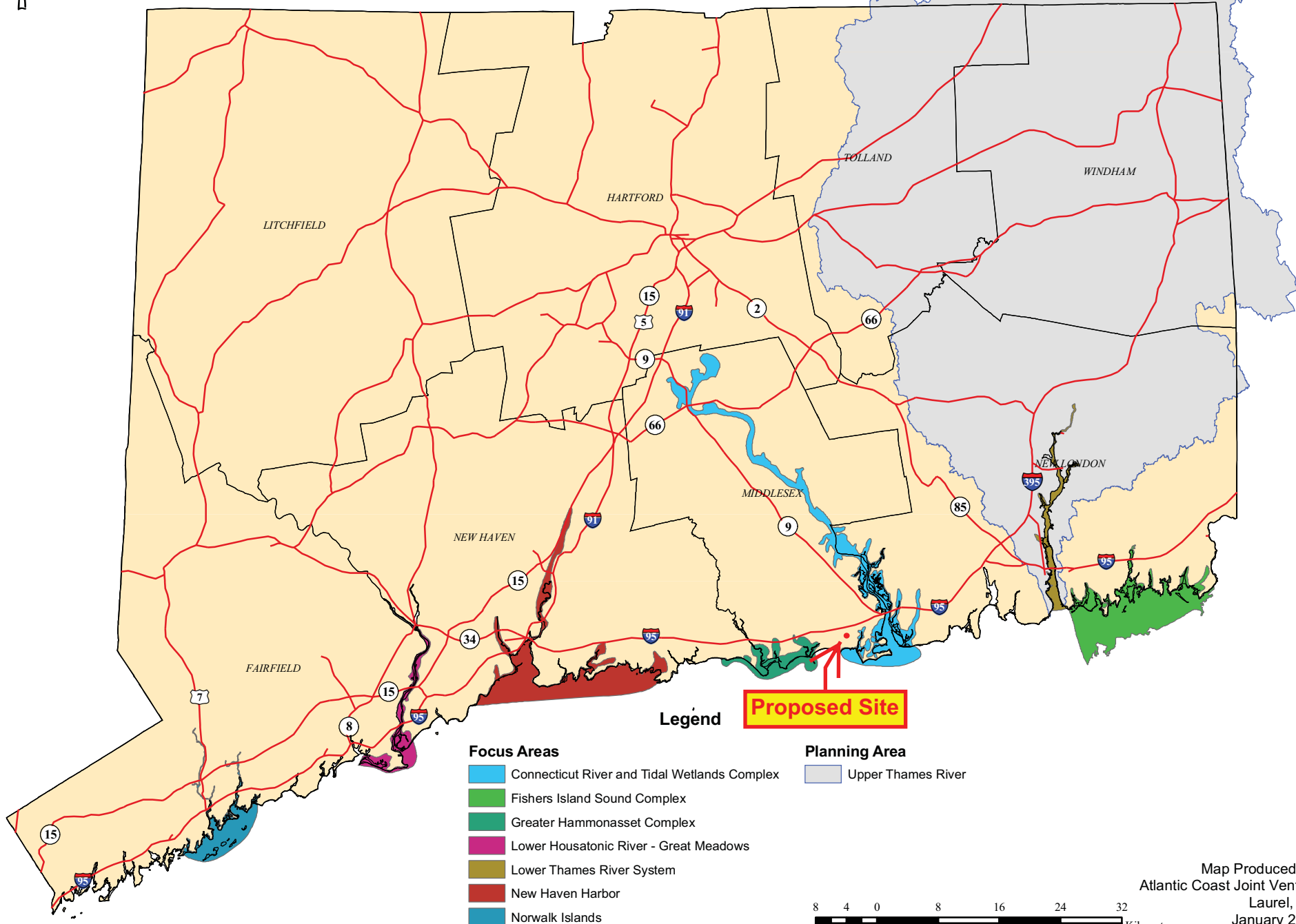
Closest Important Bird Area: Menunketesuck/Duck Islands (1.5± miles west)

Closest CTDEP Critical Habitat: Oyster River and associated estuary/tidal wetlands (0.6± mile east)

Recommended Seasonal Restriction: None

Enclosures

ATLANTIC COAST JOINT VENTURE CONNECTICUT WATERFOWL FOCUS AREAS



Legend

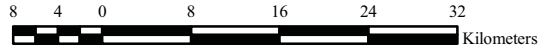
Focus Areas

- Connecticut River and Tidal Wetlands Complex
- Fishers Island Sound Complex
- Greater Hammonasset Complex
- Lower Housatonic River - Great Meadows
- Lower Thames River System
- New Haven Harbor
- Norwalk Islands

Planning Area

- Upper Thames River

Proposed Site





























Map Produced by:
Atlantic Coast Joint Venture
Laurel, MD
January 2005

Avian Resources Map

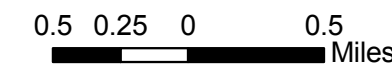
Proposed AT&T Facility
 Old Saybrook - SR2597
 1363 Boston Post Road
 Old Saybrook, Connecticut

Legend

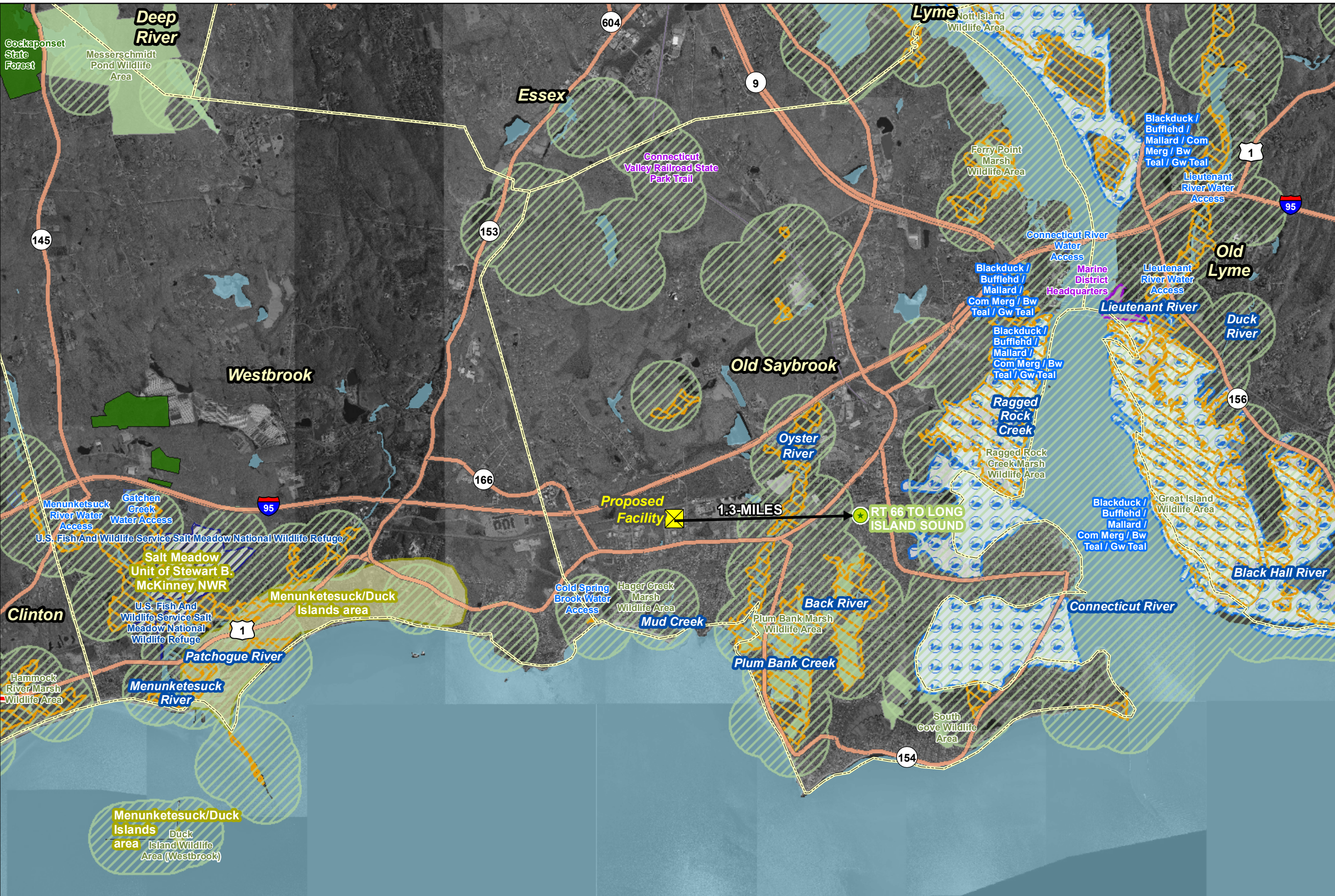
-  Proposed Facility
-  Bald Eagle Site
-  Hawk Watch Site
-  Important Bird Site
-  Bat Site
-  Breeding Bird Survey Route
-  Town Boundary
-  Natural Diversity Database (CTDEP, 12/2010)
-  Critical Habitat (CTDEP, 07/2009)*
-  Migratory Waterfowl (CTDEP, 1999)
-  Important Bird Area
-  Federal Open Space (CTDEP, 2004)
- CT DEP Property (CT DEP, 12/2010)**
-  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
-  Open Water

Bird Data Sources:
 Bald Eagle Sites: U.S. Geological Survey, National Biological Information Infrastr. 2008, Midwinter Bald Eagle Counts, 1986-2005 (update 2008).
 Hawk Watch Sites: Hawk Migration Association of North America (HMANA), Hawk Count website: <http://hawkcount.org/sitesel.php?country=USA&stateprov=Connecticut>
 Migratory Waterfowl: CTDEP GIS, 1999
 Important Bird Sites/Areas: National Audubon Society, Audubon Connecticut
http://ct.audubon.org/BirdSci_IBAs.html
 Breeding Bird Survey Routes: Patuxent Wildlife Research Center of the U.S. Geological Survey and the Canadian Wildlife Service's National Wildlife Research Centre
<http://www.nationalatlas.gov/mid/bbsrsl.html>

Base Map Source: 2004 aerial photograph with 0.5-foot resolution.



\\cmiddatdept\EV\Clients\SAI\Old Saybrook\figures\Old_Saybrook_Avian_Resources_Map.pdf



ATTACHMENT 2



Vanasse Hangen Brustlin, Inc.

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

Memorandum

To: Mr. David Vivian
New Cingular Wireless PCS, LLC
500 Enterprise Drive, Suite 3A
Rocky Hill, Connecticut 06067

Date: February 15, 2011

Project No.: 41502.38

From: Dean Gustafson
Senior Environmental Scientist

Re: Coastal Consistency Analysis
Proposed AT&T SR2597 Facility
1363 Boston Post Road
Old Saybrook, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) provides the following assessment to demonstrate that the proposed New Cingular Wireless PCS, LLC (AT&T) 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.

VHB understands that AT&T proposes to construct a 100-foot tall monopole (Facility) on the 7.53-acre host property that is currently occupied by existing buildings used for various purposes including an electrical supply wholesaler, car storage, motorcycle parts sales, a martial arts studio and a residence. An active Amtrak rail line is located along the northern property boundary. The proposed Facility is located in an existing cleared and graded gravel area in the rear (northern) portion of the property. Land use within the general vicinity of the proposed Facility is mainly comprised of relatively dense commercial, industrial and residential developments.

The proposed Facility location is within the coastal boundary; refer to the enclosed Coastal Boundary and Tidal Wetlands Map, which depicts 1990 state-mapped tidal wetlands data with respect to the proposed Facility location. No federal or state-regulated coastal resources (e.g., tidal wetlands, beaches, estuary, etc.) are located on the host property. The nearest coastal resources consist of tidal wetlands and an estuary area associated with Hager Creek, located approximately 1,300 feet south of the proposed Facility. The Hager Creek system flows into Indiantown Harbor and Long Island Sound located approximately 4,000 feet south of the proposed Facility. An inland forested and scrub-shrub wetland area is located on the host property approximately 51 feet south of the proposed 12-foot wide gravel access drive at its closest encroachment to wetlands (wetland flag 11).

Due to the distance separating nearby coastal resources from the proposed Facility (1,300± feet and beyond) and considering this project consists of development of a 100-foot tall facility on a developed commercial property, no likely adverse impact to coastal resources would result from the proposed AT&T project. The project's consistency with the State's coastal policies and goals are described in detail below.

Coastal Consistency Review

The proposed AT&T project would 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 the potential adverse impacts associated with each resource area and why the proposed project would not adversely affect the resources.

- 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.*

Development and operation of the proposed Facility would not affect water quality within Hager Creek, Indiantown Harbor or associated coastal resources. Since the proposed wireless telecommunications compound creates minimal impervious surface and is underlain by a gravel surface, no significant stormwater runoff would be generated by the proposed project. In addition, erosion and sedimentation controls would be installed and maintained during construction in accordance with the CTDEP 2002 *Connecticut Guidelines For Soil Erosion and Sediment Control* to avoid discharge to nearby coastal resources.

- 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 Facility is located outside of tidally influenced coastal water areas and as such would not impact current drainage or circulation patterns to tidally influenced areas.

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

The proposed Facility would not affect littoral transport of sediments since the Facility location is not on a shoreline (the Facility is located $\pm 4,000$ feet north of the 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 would not be significantly altered by the proposed Facility due to its small size (3,600 square foot compound) and limited impervious surfaces.

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

The proposed Facility would not significantly alter shoreline configurations or bathymetry and would not increase coastal flooding. Based on the most recent available flood hazard mapping data, the proposed Facility 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 would not significantly obstruct views of coastal resources from scenic overlooks or publically accessible areas. Refer to Visual Analysis Report, prepared by CHA and dated April 6, 2010 (Applicant Exhibit 1, Tab 4), in particular photo locations 2, 3 and 19 for representative views from near coastal resource areas located $\pm 4,000$ feet south of the proposed

Facility. Based on this analysis, the proposed Facility would not be considered to significantly obstruct views of coastal resources.

- 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.*

The proposed Facility would not degrade or destroy essential coastal wildlife, finfish or shellfish habitat. The proposed Facility would be located in and immediately adjacent to an existing cleared and disturbed upland area that is bordered to the south, east and west by commercial and industrial developments and to the north by an active railroad line, with the nearest coastal resource 1,300± feet to the south. In addition, due to the location of the 100-foot tall monopole in close proximity to areas of a high level of human activity and the relatively short height of the monopole, the proposed Facility would not significantly alter migratory bird migration patterns.

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






The proposed Facility would not alter the natural characteristics of any coastal resource area. The proposed Facility would be located in and immediately adjacent to an existing cleared and disturbed upland area that is bordered to the south, east and west by commercial and industrial developments and to the north by an active railroad line, with the nearest coastal resource 1,300± feet to the south.

Enclosure



Base Map Source: U.S.G.S. Quad: Essex (1970), CT

Legend

-  Proposed Tower Location
-  Coastal Boundary Line
-  Tidal Wetland 1970s
-  Tidal Wetland 1990s
-  Town Line



Vanasse Hangen Brustlin, Inc.

**Tidal Wetlands & Coastal Boundary Map
Proposed AT&T Facility
Old Saybrook - SR2597
1363 Boston Post Road
Old Saybrook, Connecticut**



ATTACHMENT 3

