National Environmental Policy Act (NEPA) Screening Report

Prepared for:

T-Mobile Northeast, LLC % Ms. Amy English HPC Development, LLC 5827 Shamrock Court Hamburg, NY 14075



CTNH805A / AMTRAK GUILFORD

Moose Hill Road Guilford, Connecticut 06437

EBI Project No. 61096865

Site Report Date: April 5, 2011





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

Fax: (781) 273.3311

April 5, 2011

Mr. Hans Fiedler T-Mobile Northeast, LLC % Ms. Amy English HPC Development, LLC 5827 Shamrock Court Hamburg, NY 14075

Subject: National Environmental Policy Act (NEPA) Screening Report

CTNH805A / Amtrak Guilford

Moose Hill Road, Guilford, Connecticut

EBI Project #61096865

Dear Mr. Fiedler:

Attached please find our *National Environmental Policy Act (NEPA) Screening Report*, (the *Report*) for the proposed telecommunications installation at the address noted above (the Subject Property). The purpose of this *Report* is to evaluate the above-referenced property for environmental and historical concerns specified by the Federal Communications Commission (FCC) in 47 CFR 1.1307 and general industry standards.

The Subject Property, known as CTNH805A / Amtrak Guilford, consists of an approximately 163-acre lot that is unimproved with the exception a gravel and dirt access driveway.

As of the date of this *Report*, T-Mobile Northeast LLC, (hereinafter, T-Mobile) proposes to construct a 110-foot monopole-style telecommunications tower and associated support equipment, enclosed within a proposed 50-foot by 50-foot fenced compound, on a 50-foot by 60-foot lease area. The tower will be painted a medium gray-brown. T-Mobile will flush mount a total of three panel antennas and six TMAs at a centerline height of 107.75 feet above ground level (AGL) to the proposed tower. Proposed support equipment will be placed on a 10-foot by 20-foot concrete slab at the base of the tower within the fenced compound. The support equipment will connect to the tower via a proposed ice bridge. A meter center, CSC cabinet and step-down transformer will be placed to the west of the tower compound, but within the 50-foot by 60-foot lease area. Power and telco conduits will be routed underground from the support equipment to the meter center, CSC cabinet, and transformer. Conduits will then be routed underground from the tower compound along a proposed 25-foot wide utility and access right of way. The proposed right of way will follow a portion of an existing gravel driveway and require the improvement of a new gravel driveway from the existing driveway to the proposed tower compound. T-Mobile proposes to replace an 18-inch concrete culvert with a new 16 foot long, five foot by four foot concrete box culvert to route a stream and wetland area beneath the access road.

Please find the attached National Environmental Policy Act (NEPA) Checklist, NEPA Summary Report, and associated documentation for the above-referenced site. Based upon the results of our assessment, it appears that the proposed installation will not adversely impact any of the criteria as outlined in 1.1307(a) items (1) through (3), (5), (6), and (8).

Please note regarding Item (3) the Project Site is mapped by the Connecticut Natural Diversity Database Program as being located within close proximity to a critical habitat area for the Eastern Box Turtle. The Connecticut Department of Environmental Protection Wildlife Division recommends that "work should be done during the turtle dormant period November I to April I. Additionally, the DEP

Wildlife Division recommends that if work must be done during these turtles' active period (April 1 to November 1) that the following precautionary measures be implemented to protect the turtles:

- 1. The construction crew be apprised of the species description and possible presence and that the area be searched for turtles each day prior to construction.
- 2. Any turtles encountered during construction be moved out of the way.
- 3. All precautions should be taken to avoid degradation to wetland habitats include any wet meadows and seasonal pools.
- 4. That work conducted in these habitats during the early morning and evening hours should occur with special care not to harm basking or foraging individual turtles.
- 5. That no heavy machinery or vehicles be parked in any habitat."

Regarding item (4), In a letter dated February 16, 2011, the CT SHPO stated that "the undertakings will have 'no adverse effect' on the Route 146 Historic District, which is listed on the National Register of Historic Places, with the following conditions:

- 1. The tower will be painted medium gray-brown, to blend with the bark color of adjacent threes, with flush-mounted antennae and will not exceed 110 feet and
- 2. If not in use for six consecutive months, the antennae and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period. Upon removal, the property shall be restored by the facility owner to its historically appropriate appearance and materials."

Regarding item (7), based on drawings provided to EBI, the project will require the replacement of an existing culvert routing an existing stream/wetland area beneath the access road. Therefore, EBI recommends that an Environmental Assessment (EA) be prepared and submitted to the FCC.

The Report was completed according to the terms and conditions authorized by you. There are no intended or unintended third party beneficiaries to this Report, unless specifically named. EBI is an independent contractor, not an employee of either the property owner or the project proponent, and its compensation was not based on the findings or recommendations made in the Report or on the closing of any business transaction. Note that the findings of this Report are based on the project specifications provided to EBI and described in this Report. In the event that the design or location of the installation changes, please contact EBI as additional review and/or consultation may be required.

Thank you for the opportunity to prepare this Report, and assist you with this project. Please call us if you have any questions or if we may be of further assistance.

Respectfully Submitted,

Ms. Trevelyn Potter Author/Program Manager Mr. Christopher W. Baird Reviewer/NEPA Technical Director

Direct# (617) 715-1846

Ms. Ashley Bonavenia DeCabia Managing Consultant

Appendix A – NEPA Checklist

Appendix B – FCC NEPA Summary Report Appendix C – Figures, Drawings, and Maps

Appendix D – NPA Checklist and SHPO Correspondence

Appendix E – Tribal Correspondence Appendix F – Land Resources Map

Appendix G – Federal and State Fish and Wildlife Service Correspondence

Appendix H – Wetlands Map

Appendix I – FEMA Floodplain Map

APPENDIX A NEPA CHECKLIST

EB	Site type (choose one) Raw land Tower colo Other colo Tower Replaceme	CTNH805A	/ Amtrak Guilford	Site Address: Moose Hill Road Guilford, Conne	
NEPA Land Us	e Screening Checklis	st			
FCC NEPA	Consulting Agency to	Check appropriate b	ooxes below		
Category	Contact	No Adverse Impact	Potential Adverse Impact	Exempt from Review	NPA Applies
Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management (BLM)				
Designated Wildlife Preserves	National Park Service, US Forest Service, BLM	\boxtimes			
Threatened or Endangered Species & Critical Habitats	US Fish & Wildlife Service - Field Office (USF&WS)				
Historic Places	State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO)	SHPO consultation completed			Collocation Agreement: applies Nationwide Agreement Exclusion applies:
Indian Religious Sites	American Indian Tribes, Bureau of Indian Affairs	Tribal consultation completed			Collocation Agreement applies: Nationwide Agreement Exclusion applies:
Floodplain	Federal Emergency Management Agency (FEMA)				
Wetlands & Surface Waterways	USF&WS NWI Maps US Army Corps of Engineers (ACOE)				
Signature:	Treatyn & Potter	Company:	EBI Consulting		
Print name:	Trevelyn Potter	Date:	April 5, 2011		

APPENDIX B FCC NEPA SUMMARY REPORT

FCC NEPA Summary Report (47 CFR Subpart I, Chapter I, Sections 1.1301-1.1319)

	Site type (choose one):	Site ID:	Site Address:
A 86s A6 % *** Acc Cd 36 60 ** Acc Cd 37 86 **	Raw land	CTNH805A / Amtrak Guilford	Moose Hill Road,
ADET IN H	Tower colo		Guilford, Connecticut
	Other colo		
CONSULTING	Tower Replacement		

1. Is the antenna structure located in an officially designated wilderness area?

According to a review of the Land Resources Map (Appendix F) and the Department of Agriculture's list of wilderness areas (http://www.wilderness.net/index.cfm?fuse=NWPS), the Project Site is not located in an officially designated wilderness area. In addition, according to EBI's review of available on-line resources, the Project Site is not located in a National Park (www.nps.gov/gis), NPS Interactive Map Center), a designated Scenic and Wild River (http://www.rivers.gov/wildriverslist.html), a land area managed by the Bureau of Land Management (www.nps.gov/ncrc/programs/nts/nts/trails.html).

2. Is the antenna structure located in an officially designated wildlife preserve?

According to a review of the Land Resources Map (Appendix F), the Project Site is not located in an officially designated wildlife preserve. In addition, according to EBI's review of available on-line resources, the Project Site is not located in a US Fish and Wildlife Service National Wildlife Refuge (http://www.fws.gov/refuges/refugeLocatorMaps/index.html).

3. Will the antenna structure likely affect threatened or endangered species or designated critical habitats? (Ref. 50 CFR Part 402)

EBI reviewed the Connecticut Department of Environmental Protection Natural Diversity Data Base (NDDB) map (Appendix G), which represents approximate locations of endangered, threatened and special concern species and significant natural communities in Connecticut. The NDDB maps are intended to be a pre-screening tool to identify potential impacts to state-listed species. Shaded areas on the NDDB maps depict approximate locations of state and federal listed species and significant natural communities. If a project falls within a shaded area, the applicant must submit an Environmental Review Request Form, a map, and a project description to the NDDB for further review.

According to the NDDB Map, the proposed Project Site is located in close proximity to a shaded NDDB EBI submitted a review request to the CT NDDB program on December 28, 2009. In correspondence dated lanuary 15, 2010, the NDDB office indicated that "there are historic records for State Endangered Laterallus jamaicensis (black rail), State Special Concern Terrapene carolina carolina (box turtle), and Papaipema maritima (maritime sunflower borer moth) for the vicinity of this project site." In correspondence dated January 28, 2010 the NDDB office stated that "maritime sunflower borer moths occur on the edges of salt marshes and are associated with the host plant Heliantheous. Black rails nest along inland tidal creeks and marshes, in salt marshes or salt hay meadows or along edges of sedges or marsh grass flats from May to August. It does not appear from information provided that either of these species will be impacted. Eastern Box Turtles require old field and deciduous forest habitats, which can include power lines and logged woodlands. They are often found near small streams and ponds, the adults are completely terrestrial but the young may be semi-aquatic, and hibernate on land by digging down in the soil from October to April. They have an extremely small home range and can usually be found in the same area year after year. This species is dormant from November 1 to April 1. It has been negatively impacted by the loss of suitable habitat. If this work will negatively impact any Eastern Box Turtle habitat, the Wildlife Division recommends that a herpetologist familiar with the habitat requirements of this reptile conduct surveys during the species active season...the DEP Wildlife Division may recommend that if work must be done during these turtle's active period (April I to November I) that the following precautionary measures should be implemented to protect the turtles, you should work with a herpetologist to prepare a pre- and post construction plan:

- I) The construction crew be apprised of the species description and possible presence and that the area be searched for turtles each day prior to construction.
- 2) Any turtles encountered during construction be moved out of the way.
- 3) All precautions should be taken to avoid degradation to wetland habitats including any wet meadows and seasonal pools.
- 4) That work be conducted in these habitats during the early morning and evening hours should occur with special care not to harm basking or foraging individuals.
- 5) That no heavy machinery or vehicles be parked in any habitat."

A herpetological survey to determine the presence of the Eastern Box Turtle at the Project Site was submitted to the CT DEP Wildlife Division on October I, 2010. This survey concluded that no box turtles or box turtle nests were found, however, the Project Site consists of suitable habitat and the survey recommended that T-Mobile "try to do the majority of excavating and construction during the off season when these animals are not active, October 1st through the end of February. If working during the active period is a must, the area to be impacted should be fenced off using proper silt fencing this will not only keep the soil contained but also help keep any turtles out of harms way."

In correspondence dated October 26, 2010, the CT DEP Wildlife Division concurred with the conclusions of the survey and reiterated the recommended conditions above.

In addition, EBI submitted a request for review to the United States Fish and Wildlife Service on December 28, 2010. In a letter dated January 25, 2010 the USFWS stated that "based on information currently available to us, no federally-listed or proposed, threatened, or endangered species or critical habitat under the jurisdiction of the U.S. Fish & Wildlife 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" (Appendix G).

According to the USFWS' Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning (Appendix G), the USFWS recommends that specific design characteristics be implemented in order to mitigate bird tower strikes caused by the construction of telecommunications towers. Inasmuch as the proposed project adheres to these voluntary guidelines, it is unlikely that the proposed telecommunications installation would adversely impact migratory bird species protected under the Migratory Bird Treaty Act and the Endangered Species Act.

4. Will the antenna structure affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or potentially eligible for listing in the National Register of Historic Places (NRHP)? (Ref. 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act).

EBI reviewed the proposed project plans against the Exclusions of the Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process (NPA). EBI concluded that the proposed tower construction does not meet any of the Exclusions listed in Section III of the NPA. Therefore, consultation with the Connecticut State Historic Preservation Officer (SHPO) was required.

Based on EBI's review of files online at the National Register Information System (www.nr.nps.gov), Connecticut SHPO, and the map of Known Cultural Resources provided by Heritage Consultants, LLC, one NHRP-listed Historic District known as the Route 146 Historic District, as well as one NHRP-Historic Property known as Pelatiah Leete House, were identified within the ½-mile Area of Potential Effect (APE) for visual effects of the proposed tower. Nine other NHRP-eligible properties were also identified within the ½-mile APE of the proposed tower (see Appendix D for a full list).

Additionally, EBI Senior Archaeologist Dr. Christine Kimbrough and EBI Staff Archaeologist Vanessa Sullivan performed a Phase I Cultural Resources Survey, including the advancement of I6 shovel test pits. Dr. Kimbrough concluded that "despite its location in an environmental context that would have been attractive for use in the past, all STP's were negative. Accordingly I recommend that no further archaeological testing be conducted in association with this project."

EBI submitted project plans, the results of the archaeological survey, and a request for comment on FCC Form 620 to the Connecticut SHPO on April 12, 2010.

In email correspondence dated July 8, 2010, Ms. Susan Chandler of the CT SHPO requested a balloon float in the location of the proposed tower. Additional information and photographs were provided to the CT SHPO by T-Mobile.

In a letter dated February 16, 2011, the CT SHPO stated that "the undertakings will have 'no adverse effect' on the Route 146 Historic District, which is listed on the National Register of Historic Places, with the following conditions:

- 1. The tower will be painted medium gray-brown, to blend with the bark color of adjacent threes, with flush-mounted antennae and will not exceed 110 feet; and,
- 2. If not in use for six consecutive months, the antennae and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such sixmonth period. Upon removal, the property shall be restored by the facility owner to its historically appropriate appearance and materials."

5. Will the antenna structure affect Indian religious site(s)

Based on the requirements of the Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process (NPA), Tribal consultation was required for this project because the proposed tower construction did not meet Exclusions A, B, C or F of the NPA.

EBI submitted documentation regarding the proposed project to the FCC's Tower Construction Notification System (TCNS). On December 4, 2009 the FCC's TCNS sent the project information to Tribes listed on their database who have interest in the state in which the project is planned. Additionally, EBI submitted follow-up requests for comment to each of the Tribes indicated by the TCNS to have a potential interest in the area of the project.

Tribal communication to date for this project is summarized in the following table.

#	Tribe Name	Initial Notification (via TCNS)	Response to Initial Contact	Second Contact Attempt	Response to Second Attempt	Third Contact Attempt	Response to Third Attempt	Action Recommended
1	Mashantucket Pequot Tribe	December 4, 2009	Request for Archaeological Survey (December 3, 2009)	March 24, 2010 (via Email)	Accept conclusion; No further interest (March 25, 2010	NA	NA	No Further Action
2	Narragansett Indian Tribe	December 4, 2009	None	December 18, 2010 (Mail)	None	January 20, 2010 (Overnight Mail)	No Interest (January 22, 2010)	No Further Action

Please note, in the unlikely event that unanticipated Historic Properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the proposed construction and associated excavation activities, *T-Mobile* must halt activities immediately and contact the appropriate tribal governments, local officials and state agencies, in accordance with Federal and State regulations (36 CFR 800.13(b)).

Correspondence between EBI and the Tribes that includes copies of the Tower Construction Notification System emails, follow-up correspondence, and Tribal responses are appended to this *Report* (Appendix E).

6. Will the antenna structure be located in a floodplain? (Ref. Executive Order 11988 and 40 CFR Part 6, Appendix A)

According to the FEMA Flood Insurance Rate Map data for Guildford, Connecticut (Community Map #090077, Panel #0015B) included on the Land Resources Map (Appendix F), the Project Site is not located within a 100-year floodplain. A review of the Flood Insight Flood Zone determination (Appendix I) confirmed that the Project Site is not located within a 100-year floodplain.

7. Will construction of the antenna structure involve significant change in surface features (e.g. wetlands, deforestation, or water diversion)? (Ref. Executive Order 11990 and 40 CFR Part 6, Appendix A)

Based on drawings provided to EBI, the project will require the extension of an existing 18-inch culvert routing an existing stream/wetland area beneath the access road. Therefore, EBI recommends that an Environmental Assessment (EA) be prepared and submitted to the FCC.

According to the Fish and Wildlife Service National Wetlands Inventory (NWI) information, which is included on the Land Resources Map, and client-provided drawings, no additional mapped wetlands are located at the Project Site.

The area proposed to be occupied by T-Mobile consists of open grassland and an existing dirt road. The proposed construction plans do not call for the removal of mature trees; therefore, the proposed installation will not result in deforestation.

8. Is the antenna structure located in a residential neighborhood and required to be equipped with high intensity white lights?

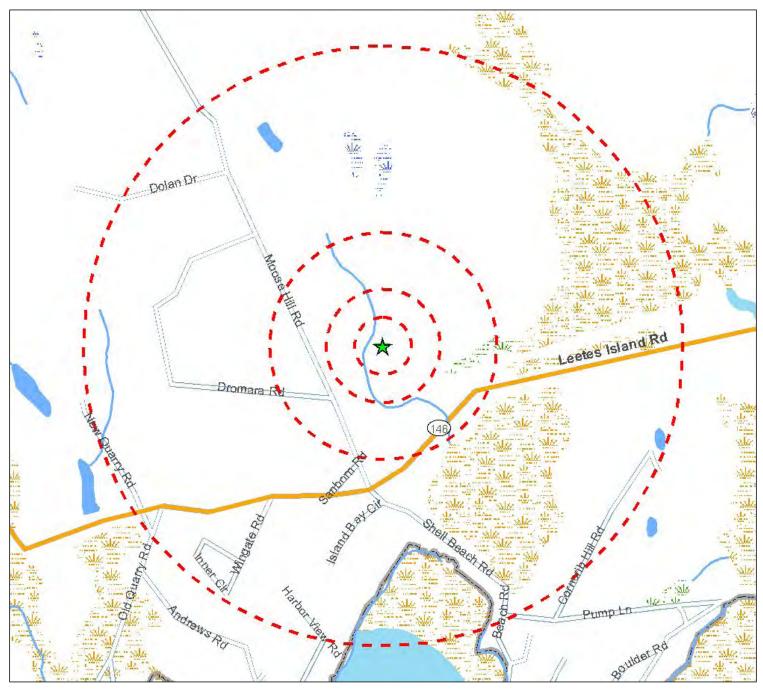
According to client representatives and site plans, the proposed installation will not include high intensity white lights and be located in a residential neighborhood.

9. Will the antenna structure equal or exceed total power (of all channels) of 2000 Watts ERP (3280 EIRP) and have antenna located less than 10 meters above the ground?

An evaluation to determine whether radiofrequency (RF) emissions standards are met was not included as part of this *Report*. EBI understands that client representatives will evaluate the project to ensure compliance with applicable RF standards.

APPENDIX C
FIGURES, DRAWINGS, AND MAPS





Source: Selected data from ESRI, EBI and NWI

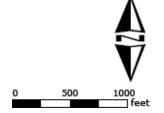
Figure 1 - Site Location Map

Guilford South, CT/P# 2000018269 L# 117585

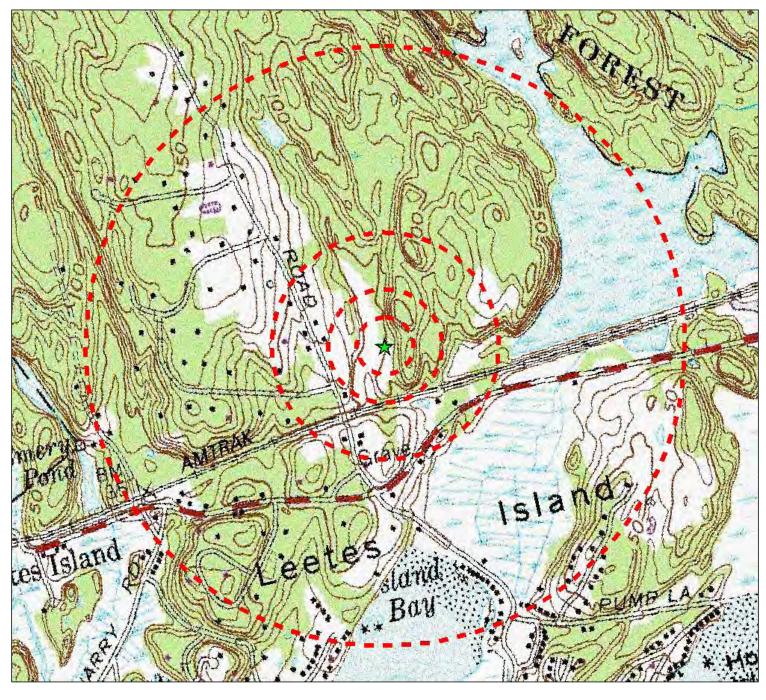
Moose Hill Road

Guilford, CT

PN: 61093359





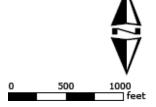


USGS 24k Quad: Guilford, CT 1985

Source: Selected data from ESRI, EBI and USGS

Figure 2 - USGS Quad Location Map

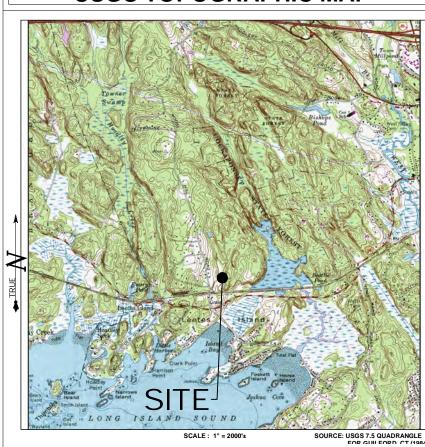
Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT



LOCATION MAP



USGS TOPOGRAPHIC MAP



T- - Mobile -

35 GRIFFIN ROAD BLOOMFIELD, CT 06002

OFFICE: (860)-692-7100 FAX: (860)-692-7159

41° 16' 02.88" N

72° 42' 57 81" W

52'± AMSL

ZONE 'C'

DRAWING INDEX

T-1 TITLE SHEET & INDEX

A-1 ABUTTERS MAP

SP-1 SITE PLAN

SP-2 COMPOUND PLAN AND TOWER ELEVATION

AE-1 AERIAL MAP

-MAP

-BLOCK:.

*SITE INFORMATION: -SITE NAME:. GUII FORD -LATITUDE: -SITE ID NUMBER:. -SITE ADDRESS: MOOSE HILL ROAD -LONGITUDE GUILFORD, CT 06437 -FLEVATION: -FEMA/FIRM DESIGNATION -ACREAGE: N/A

THIS DOCUMENT IS THE CREATION, DESIGN, PROPERTY AND COPYRIGHTED WORK OF T-MOBILE NORTHEAST, LLC ANY DUPLICATION OR USE WITHOUT EXPRESS WRITTEN CONSENT IS STRICTLY PROHIBITED. **DUPLICATION AND USE BY** GOVERNMENT AGENCIES FOR THE PURPOSES OF CONDUCTING THEIR LAWFULLY AUTHORIZED REGULATORY AND ADMINISTRATIVE FUNCTIONS IS SPECIFICALLY ALLOWED

ALL-POINTS TECHNOLOGY CORPORATION, P.C

3 SADDLEBROOK DRIVE **KILLINGWORTH, CT. 06419** PHONE: (860)-663-1697 FAX: (860)-663-0935 www.allpointstech.com

CONTACT PERSONNEL

APPLICANT:

T-MOBILE NORTHEAST, LLC 35 GRIFFIN ROAD BLOOMFIELD, CT 06002

LANDLORD

LEETE ASSOCIATES, INC. P.O. BOX 45 GUILFORD, CT 06437

T-MOBILE PROJECT MANAGER:

PAUL SAENZ (914) 447-3581

T-MOBILE PROJECT ATTORNEY:

JULIE D. KOHLER, ESQ. 1115 BROAD STREET BRIDGEPORT CT 06604 203-337-4157

POWER PROVIDER:

CL&P (203) 245-5423 DION DOWLING - CASE# 1408843

TELCO PROVIDER: AT&T: (800)-727-8368

CALL BEFORE YOU DIG:

(800) 922-4455

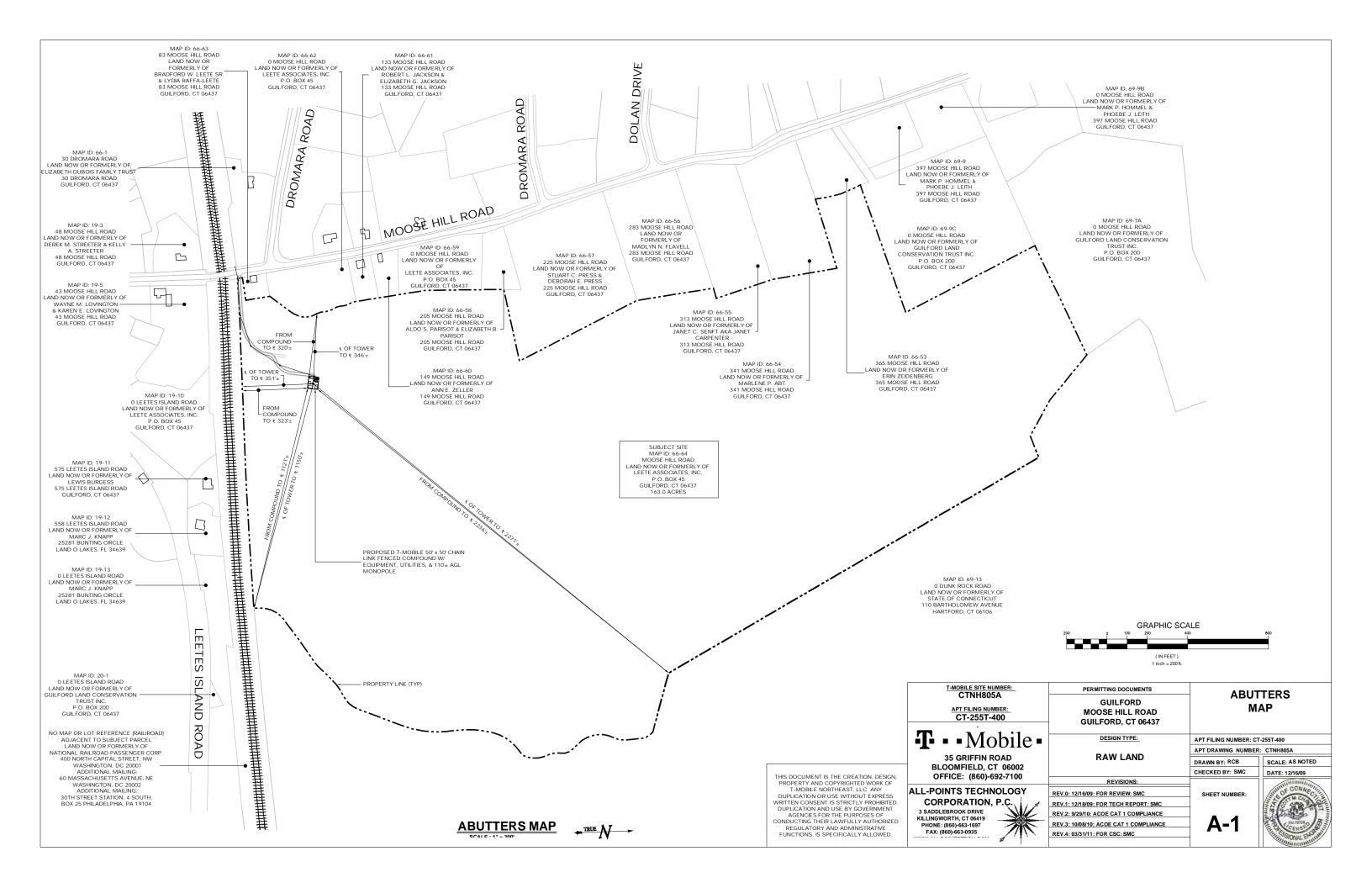
GOVERNING CODEs:

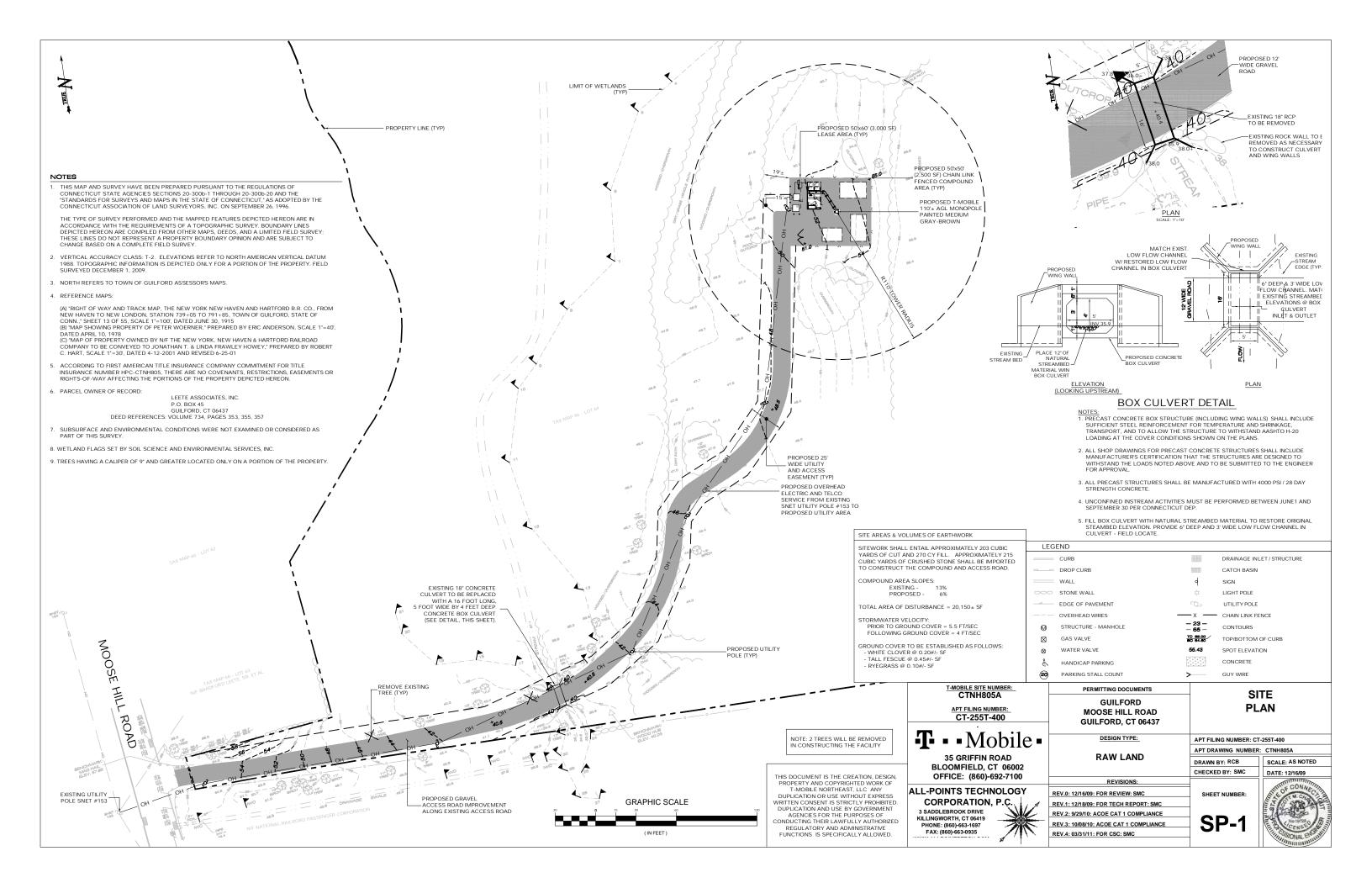
2005 CONNECTICUT BUILDING CODE (2003 IBC BASIS) NATIONAL ELECTRIC CODE

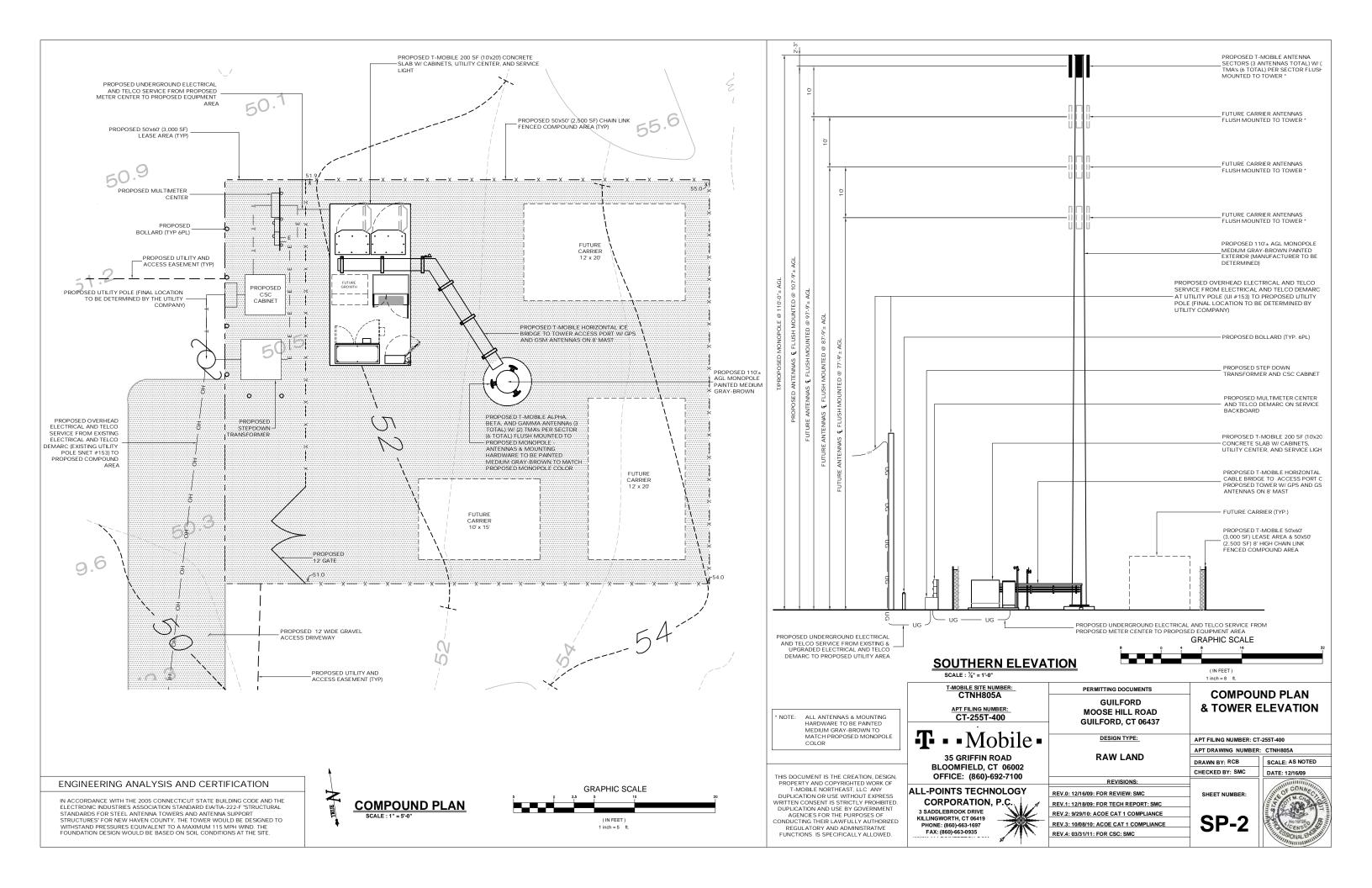
SITE INFORMATION

CTNH805A **GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437**

	PERMITTING DOCUMENTS			
	GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437	TITLE S AND I		
DESIGN TYPE:		APT FILING NUMBER: CT-255T-400		
		APT DRAWING NUMBER: CTNH805A A-1.DWG		
RAW LAND	RAW LAND	DRAWN BY: RCB	SCALE: AS NOTED	
		CHECKED BY: SMC	DATE: 12/16/09	
	REVISIONS:		annimina.	
	REV.0: 12/16/09: FOR REVIEW: SMC	SHEET NUMBER:	CONNECTION CONTRACTOR	
	REV.1: 12/18/09: FOR TECH REPORT: SMC		38 8 2	
	REV.2: 9/29/10: ACOE CAT 1 COMPLIANCE		1 1 The State "]	
	REV.3: 10/08/10: ACOE CAT 1 COMPLIANCE	T-1	No.19725	
	REV.4: 03/31/11: FOR CSC: SMC	• •	SIONAL BESTUM	







ALL-POINTS TECHNOLOGY CORPORATION, P.C. 3 SADDLEBROOK DRIVE KILLINGWORTH, CT. 06419 PHONE: (860)-663-1697 FAX: (860)-663-0935 www.allpointstech.com

APT FILING NUMBER: CT-255T-400

AERIAL MAP

SCALE: AS NOTED DRAWN BY: RCB
DATE: 03/31/11 CHECKED BY: SMC

T • • Mobile •

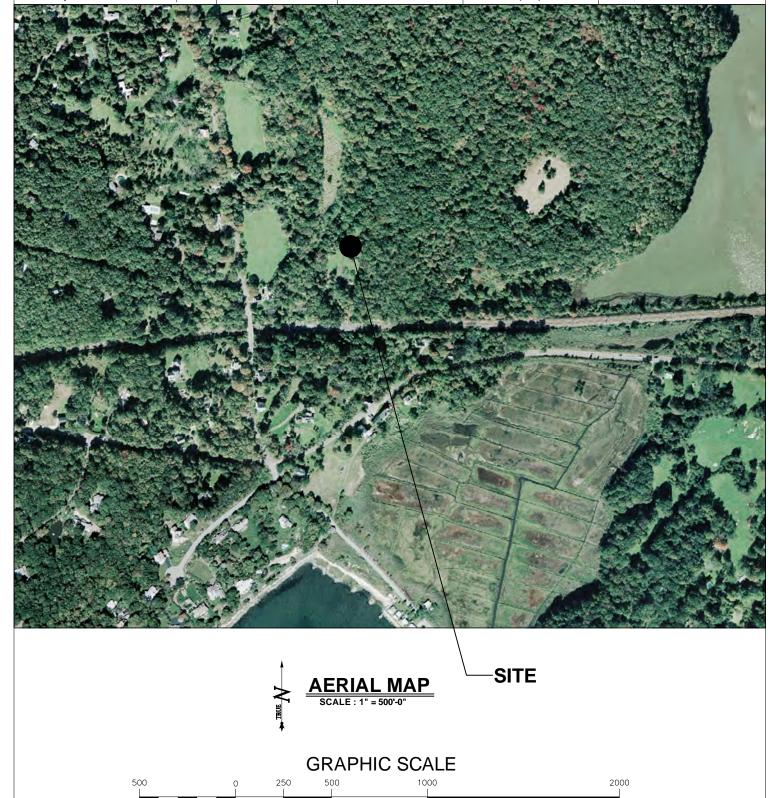
35 GRIFFIN ROAD BLOOMFIELD, CT 06002 OFFICE: (860)-692-7100

T-MOBILE SITE NUMBER CTNH805A

GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437

SOURCE: DIGITAL GLOBAL 2010

DIGITAL ORTHOPHOTOGRAPHS



(IN FEET)

1 inch = 500 ft.

APPENDIX D NPA CHECKLIST AND SHPO CORRESPONDENCE

APPLICABILITY OF NATIONWIDE PROGRAMMATIC AGREEMENT FOR REVIEW OF EFFECTS ON HISTORIC PROPERTIES (NPA)

C O N	EBI	Site type (choose one): Raw land Tower colo Other colo Tower Replacement	Site ID: CTNH805A / Amtrak Guilford	Site Address: Moose Hill Road, Guilford, Connecticut
	Yes 🗌 No 🗌		onsist of a collocation as defined by reate a "substantial increase" in the	
	Yes No mass, or Yes No area surn thirty-fo easement	r size in relation to the existic Could the proposed replace rounding the existing tower Will construction of the proposed radius from the edge of the context of the proposed restricts.	ment tower be considered a "subsing tower located at the site? ement tower increase the boundar	ies of the owned or leased we excavation outside of a e existing access or utility
	Yes 🗌 No 🗌	Will the temporary installat	tions tower or facility (Exclusion involve excavation of soils? ion be in operation for more than	•
	Yes No Shopping Yes No No	Will the proposed tower be Will the proposed tower be center that occupies less the	e located in a locally designated in nan 100,000 square feet? ustrial park, strip mall, or shopping	dustrial park, strip mall, or
	Yes No designate towers of No in relation	Will the proposed tower led by Federal, State, local, or utility transmission and di Could the proposed tower on to existing towers or utili	ity transmission corridors (Exc be located outside of or beyond or Tribal governments as a loc stribution lines? be considered a "substantial increa ty transmission and distribution lin e located within the boundaries of	fifty feet of a right-of-way ation for communications ase" in height, mass, or site es located that the site?
	Yes 🗌 No 🗌	Will the construction of th	IPO permitted zone (Exclusion ne tower occur outside of an area of communications towers and asso	a designated by the SHPO

Yes No V Yes No H historic pr	Vill the collocation resulas the FCC determine operties?	ucted on or before March 16, 20 alt in a substantial increase in the size of that the tower has, or potentially a vironmental review before the FCC	of the tower? has, an "adverse effect" on
		wer owner received notification of ation will have an adverse effect on h	
Yes No H Yes No V	las the tower NOT und Vill the collocation resu	ucted after March 16, 2001 (Stip dergone Section 106 review? ult in a substantial increase in the size	of the tower?
an "advers Yes	e effect" on historic pr las the licensee or tov	d that the tower has or will have, or operties? wer owner received notification of ation will have an adverse effect on h	complaint from the public,
Yes No Is Yes No Is And visible Yes No Is the Nation Yes No H	the building/structure the building/structure from the ground level the building/structure nal Register of Historic las the licensee receive	located within a historic district, or of a historic district? a National Historic Landmark, or lis	r located within 250 feet of sted or eligible for listing on e public, SHPO, or Council
installation does not meet applicable SHPO is require	the criteria and stipuland in accordance with addition, consultation	r if No Exclusions Apply: The proteins set forth in the NPA. There 47 CFR Part 1.1301-1.1319 of the with any Indian Tribe or NHO that	efore, consultation with the e Federal Communications
stipulations set forth in the no adverse effect on historic	NPA. Therefore the to properties, and review eting Exclusions D o	The telecommunications installati elecommunications installation is rec v of the project by the applicable SH r E, consultation with any Indian T	ognized to have minimal or PO is not required.
		above questions to EBI from both knowledge and in good faith.	n the collocation licensee
T-Mobile Northeast LLC	Hans Fiedler	860-692-7123	November 12, 2009
FCC Licensee	Contact	Phone number	Date contacted
Connecticut SHPO		860-566-3005	April 12, 2010
Regulatory Offices		Phone number	Date contacted



Connecticut Commission on Culture & Tourism

Historic Preservation and Museum Division

One Constitution Plaza Second Floor Hartford, Connecticut 06103

860.256.2800 860.256.2763 (f) February 16, 2011

Mr. Jesse A. Langer Cohen and Wolf PO Box 1821 Bridgeport, CT 06601-1821

Subject:

Proposed Telecommunications Facility

Moose Hill Road Guilford, Connecticut

T-Mobile

Dear Mr. Langer:

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

This office has determined that the undertakings will have <u>no adverse effect</u> on the Route 146 Historic District, which is listed on the National Register of Historic Places, with the following conditions:

- the tower will be painted medium gray-brown, to blend with the bark color of adjacent trees, with flush-mounted antennae and will not exceed 110', and
- if not in use for six consecutive months, the antennae and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period. Upon removal, the property shall be restored by the facility owner to its historically appropriate appearance and materials.

The State Historic Preservation Office appreciates the opportunity to provide you, T-Mobile, and EBI with this evaluation. Please contact Susan Chandler, Historical Architect, should you have additional questions concerning this matter.

Ta Colen

Sincerely,

David Bahlman

Division Director and Deputy

State Historic Preservation Officer

CONNECTICUT
www.cultureandtourism.org

Stephen Forrest

From: Chandler, Susan [Susan.Chandler@ct.gov]

Sent: Thursday, July 08, 2010 8:45 AM

To: Stephen Forrest

Subject: RE: Moose Hill Road, Guilford, CT New Tower project (61096865)

Importance: High

Hi Stephen -

Having reviewed the proximity to Route 146 and the viewshed analysis, hoping that we can arrange a site inspection with a balloon float? We have had several proposed tower locations along this corridor in Branford and Guilford lately, which is extremely sensitive to visual impacts. Route 146 is also a State Scenic Road. Hard not to have an adverse effect given the nature of the resource, so need to give this proposed location the most thorough consideration.

I could do it first thing (when the wind is calm) on July 12, 14, 19, or 20. Please let me know your thoughts?

Best, Susan

From: Stephen Forrest [mailto:sforrest@ebiconsulting.com]

Sent: Monday, June 14, 2010 10:44 AM

To: Chandler, Susan

Subject: RE: Moose Hill Road, Guilford, CT New Tower project (61096865)

Hi Susan, I was wondering if you had checked your log and seen whether this submittal was received by your office.

Sorry to bother you about this.

Thanks for any help you can provide.

Stephen Forrest, LEED AP Program Manager EBI Consulting (617) 715-1817 Office (617) 715-6597 Fax sforrest@ebiconsulting.com

From: Chandler, Susan [mailto:Susan.Chandler@ct.gov]

Sent: Wednesday, June 02, 2010 1:42 PM

To: Stephen Forrest

Subject: RE: Moose Hill Road, Guilford, CT New Tower project (61096865)

Hi Stephen -

Thanks for your message. Doesn't sound familiar, but will check our log to see if we received it!

Best, Susan

Susan R. Chandler Historical Architect

State Historic Preservation Office Connecticut Commission on Culture & Tourism One Constitution Plaza, Second Floor Hartford, CT 06103

860-256-2800 (main) 860-256-2764 (direct) 860-256-2763 (fax)

www.cultureandtourism.org

From: Stephen Forrest [mailto:sforrest@ebiconsulting.com]

Sent: Wednesday, June 02, 2010 12:34 PM

To: Chandler, Susan

Subject: Moose Hill Road, Guilford, CT New Tower project (61096865)

Good afternoon Susan, I apologize for emailing you about this. We submitted an FCC form 620 for a new telecommunications tower on Moose Hill Road in Guilford (EBI# 61096865) to your office on April 12, 2010. We have not yet received a response and I wanted to check and make sure that the submission package was received. I didn't know if a response was being worked on or if you thought your office was not likely to respond. Please let me know if you think a response for that submission will be coming if you can. I am sorry to ask you about this, we are just trying to figure out what we need to do from here.

Thanks

Stephen Forrest, LEED AP Program Manager EBI Consulting (617) 715-1817 Office (617) 715-6597 Fax sforrest@ebiconsulting.com



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

Fax: (781) 273-3311

April 12, 2010

Mr. David Poirier, Staff Archaeologist Connecticut Commission on Culture and Tourism One Connecticut Plaza; Second Floor Hartford, CT 06103

Subject: Submission Packet, FCC Form 620, for proposed New Tower Project

Moose Hill Road, Guilford, New Haven County, Connecticut

Amtrak Guilford / CTNH805A EBI Project Number: 61096865

Dear Mr. Poirier:

In accordance with the Federal Communication Commission (FCC) National Environmental Policy Act (NEPA) rules and Section 106 of the National Historic Preservation Act (NHPA), the above-referenced telecommunications project is being evaluated by EBI for its potential effects to districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or potentially eligible for listing in the National Register of Historic Places (NRHP). Based on EBI's review of the characteristics and location of the proposed project, the project does not meet the exclusions stated in the "Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission," dated September 2004 ("Nationwide Agreement"); therefore, the project is required to undergo Section 106 review with the State Historic Preservation Office.

In accordance with the Nationwide Agreement, please find the attached Submission Packet, FCC Form 620, which presents the details on the proposed project as well as efforts that have been taken to identify, assess, and make determinations of effect on the impacts of the proposed project on Historic Properties.

We would appreciate your review of the data for the proposed project presented above and shown on the attached form and attachments. On behalf of T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter T-Mobile), I would appreciate your comments on this proposed telecommunications installation in a letter directed to the address noted above. Please do not hesitate to contact us if you have any questions or concerns on the proposed project or the information contained in this Submission Packet.

Sincerely,

Ms. Vanessa P. Sullivan Author/Field Archaeologist

P. 5.111

Mr. Stephen Forrest

Historian

Federal Communications Commission Washington, DC 20554

New Tower ("NT") Submission Packet FCC FORM 620 Introduction

The NT Submission Packet is to be completed by or on behalf of Applicants to construct new antenna support structures by or for the use of licensees of the Federal Communications Commission ("FCC"). The Packet (including Form 620 and attachments) is to be submitted to the State Historic Preservation Office ("SHPO") or to the Tribal Historic Preservation Office ("THPO"), as appropriate, before any construction or other installation activities on the site begin. Failure to provide the Submission Packet and complete the review process under Section 106 of the National Historic Preservation Act ("NHPA")¹ prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules.

The instructions below should be read in conjunction with, and not as a substitute for, the "Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission," dated _____ 2004, ("Nationwide Agreement") and the relevant rules of the FCC (47 C.F.R. §§ 1.1301-1.1319) and the Advisory Council on Historic Preservation ("ACHP") (36 C.F.R. Part 800).²

Exclusions and Scope of Use

The NT Submission Packet should not be submitted for undertakings that are excluded from Section 106 Review. The categories of new tower construction that are excluded from historic preservation review under Section 106 of the NHPA are described in Section III of the Nationwide Agreement.

Where an undertaking is to be completed but no submission will be made to a SHPO or THPO due to the applicability of one or more exclusions, the Applicant should retain in its files documentation of the basis for each exclusion should a question arise as to the Applicant's compliance with Section 106.

The NT Submission Packet is to be used only for the construction of new antenna support structures. Antenna collocations that are subject to Section 106 review should be submitted using the Collocation ("CO") Submission Packet (FCC Form 621).

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

¹ 16 U.S.C. § 470f.

² Section II.A.9. Of the Nationwide Agreement defines a "historic property" as: "Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian Organization that meet the National Register criteria."

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

General Instructions: NT Submission Packet

Fill out the answers to Questions 1-5 on Form 620 and provide the requested attachments. Attachments should be numbered and provided in the order described below.

For ease of processing, provide the Applicant's Name, Applicant's Project Name, and Applicant's Project Number in the lower right hand corner of each page of Form 620 and attachments.³

1. Applicant Information

Full Legal Name of Applicant: <u>T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in interest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter T-Mobile)</u>				
FCC Registration Number (FRN): N/A				
Name and Title of Contact Person: Ms. Christina Fleming				
Address of Contact Person (including Zip Code): 15 Commerce Way, Suite B, Norton, MA 02766				
Phone: <u>(401) 241-7325</u> Fax: <u>N/A</u>				
E-mail address: Christina.Fleming@T-Mobile.com				
2. Applicant's Consultant Information				
Full Legal Name of Applicant's Section 106 Consulting Firm: <u>EnviroBusiness Inc. d/b/a EBI Consulting</u>				
Name of Principal Investigator: Mr. Stephen Forrest				
Title of Principal Investigator: Historian				
Investigator's Address: 21 B Street				
City: Burlington State: MA Zip Code: 01803				
Phone: <u>(617) 715-1817</u> Fax: <u>(617) 715-6597</u>				
E-mail Address: sforrest@ebiconsulting.com				
Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards? ⁴ YES/NO.				
Areas in which the Principal Investigator meets the Secretary of the Interior's Professional Qualification Standards: <u>Historian</u>				

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

FCC Form 620 December 2007

Page 2

³ Some attachments may contain photos or maps on which this information cannot be provided.

⁴ The Professional Qualification Standards are available on the cultural resources webpage of the National Park Service, Department of the Interior: http://www.cr.nps.gov/local-law/arch_stnds_9.htm. The Nationwide Agreement requires use of Secretary-qualified professionals for identification and evaluation of historic properties within the APE for direct effects, and for assessment of effects. The Nationwide Agreement encourages, but does not require, use of Secretary-qualified professionals to identify historic properties within the APE for indirect effects. See Nationwide Agreement, §§ VI.D.1.d, VI.D.2.b, VI.E.5.

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Other "Secretary of the Interior qualified" staff who worked on the Submission Packet (provide name(s) as well as well as the area(s) in which they are qualified): Mr. William F. Keegan, Historical Geographer with Heritage Consultants, LLC				
Dr. Christine Kimbrough, PhD, RPA, Senior Archaeologist with EBI Consulting				
3. Site Information				
a. Street Address of Site: Moose Hill Road				
City or Township: Guilford				
County / Parish: New Haven County State: CT Zip Code: 06437				
b. Nearest Cross Roads: <u>Dromara Road</u> / <u>Moose Hill Road</u>				
c. NAD 83 Latitude/Longitude coordinates (to tenth of a second):				
N <u>41 ° 16 ′ 2.9 ″;</u> W <u>72 ° 42′ 57.9</u> ″				
d. Proposed tower height above ground level: ⁵ <u>140</u> feet; <u>42.67</u> meters				
e. Tower type:				
☐ Guyed lattice tower ☐ self-supporting lattice ☒ monopole				
Other (briefly describe tower)				
4. Project Status: ⁶				
 a.				
5. Applicant's Determination of Effect (For Above Ground Historic Properties):				
a. Direct Effects (check one):				
 i. No Historic Properties in Area of Potential Effects ("APE") for direct effects; ii. Mo effect" on Historic Properties in APE for direct effects; iii. Mo adverse effect" on Historic Properties in APE for direct effects; iv. Mo adverse effect" on one or more Historic Properties in APE for direct effects. 				
b. Visual Effects (check one):				
 i. No Historic Properties in Area of Potential Effects ("APE") for visual affects; ii. Mo effect" on Historic Properties in APE for visual effects; 				
⁵ Include top-mounted attachments such as lightning rods.				
⁶ Failure to provide the Submission Packet and complete the review process under Section 106 of the NHPA prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules. See Section X of the Nationwide Agreement. Applicant's Name: T-Mobile Northeast, LLC				

FCC Form 620 December 2007

Project Name: Amtrak Guilford
Project Number: CTNH805A

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

iii. iv.	"No adverse effect" on Historic Properties in APE for visual effects; "Adverse effect" on one or more Historic Properties in APE for visual effects.
	Certification and Signature
	I certify that all representations on this FCC Form 620 and the accompanying attachments are true correct, and complete.
	Atril 12, 2010 Signature April 12, 2010 Date
	Mr. Stephen Forrest Historian Printed Name Title

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1) AND/ OR FORFEITURE (U.S. Code, Title 47, Section 503).

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachments

Provide the following attachments in this order and numbered as follows:

Attachment 1. Résumés / Vitae.

Provide a current copy of the résumé or curriculum vitae for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in the Submission Packet for this proposed facility.

A current copy of the résumé for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in the Submission Packet for this proposed facility is attached unless already on file with the SHPO office.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford

Project Number: CTNH805A



Vanessa Sullivan

Field Archaeologist / Research Assistant 21 B Street Burlington, MA 01803

Office: 781-715-1813 Mobile: 781-522-9917

SUMMARY OF EXPERIENCE

Ms. Sullivan is a field archaeologist under the supervision of senior archaeologist, Christine Kimbrough, PhD, RPA. Ms. Sullivan has conducted cultural resource surveys of pre-historic and historic archaeological sites at all levels, including Phase I sensitivity assessments and field reconnaissance, Phase II site evaluations, and Phase III data recovery. She has developed a strong ability to identify cultural remains and become skilled in excavation methodology. Ms. Sullivan also has laboratory experience in the analysis, cataloguing, and conservation of artifacts.

RELEVANT PROJECT EXPERIENCE

Ms. Sullivan has assessed prior ground disturbance at telecommunications sites and has completed archaeological site file reviews at the Massachusetts Historical Commission on behalf of EBI. Her field experience prior to EBI includes but is not limited to: site walk over and shovel test pits throughout Pennsylvania and New York; Phase II excavation at a golf course development in Northwestern Pennsylvania; and, attendance at a Register of Professional Archaeologists (RPA)-certified field school in Killeen, Texas, which provided both training and experience in prehistoric and historic archaeological field methods.

Ms. Sullivan takes part in the ongoing research at the pre-historic site of Scarem-Kramer in Washington County, Pennsylvania. This research stems from her undergraduate thesis: "Scarem-Kramer Cordage Impression Analysis: An examination of cordage twist direction." In addition, Ms. Sullivan has conducted lab analysis on artifacts from Irvine Flats (Warren County, Pennsylvania) and artifacts housed at the Boston Archaeology Lab, primarily from the excavation of the Boston Common

EDUCATION

Bachelor of Arts Major: Anthropology / Archaeology, Mercyhurst College, Erie, PA

Concentration: Archaeology

Minor: Geology

PROFESSIONAL AFFILIATIONS

Society of American Archaeology



Stephen Forrest, LEED AP

Program Manager 21 B Street Burlington, MA 01803 Office: 617.715.1817 Mobile: 781-552-9034

SUMMARY OF EXPERIENCE

Stephen Forrest is a Program Manager/Historian/ Environmental Scientist specializing in Section 106 and NEPA environmental compliance reviews for the telecommunications industry as well as environmental investigations and site assessments. Mr. Forrest meets the requirement as a historian as specified in 36CFR61 by the Department of the Interior and is a LEED accredited professional.

At EBI, Mr. Forrest focuses on Federal Communication Commission (FCC) Section 106 projects for wireless industry clients, including cellular/pcs companies, tower construction companies, and turnkey telecommunications network development companies. These environmental reviews include analysis of historic properties and sites, wetlands, endangered species habitats, floodplains, and other areas of environmental concern and address the potential impacts of telecommunication installations upon these sites. Mr. Forrest has executed dozens of visual effects assessments, architectural field surveys, historic property evaluations, and Section 106 and NEPA compliance reports on behalf of EBI's clients.

Mr. Forrest has also conducted numerous environmental due diligence assignments for a wide range of properties throughout the New England region. These assessments have been performed to evaluate site conditions, potential off-site liabilities, historic site and vicinity usage, environmental control systems, and site remediation costs in order to advise prospective buyers, current operators, and owners of potential and existing environmental concerns.

RELEVANT PROJECT EXPERIENCE

NEPA Assessments: Mr. Forrest prepares and manages NEPA reviews and Environmental Assessments for telecommunications sites throughout the New England area. Mr. Forrest has helped clients facilitate the environmental review process to ensure compliance with Federal Communications Commission (FCC) requirements under the National Environmental Policy Act (NEPA). Environmental reviews include analysis of historic properties, wetlands, endangered species habitat, floodplains, and other areas of environmental concern and the possible impacts of telecommunications installations on these sensitive areas.

Cultural Resource Assessments: Mr. Forrest has more than 5 years of experience Section 106 Compliance. He has conducted and participated in surveys on a variety of historic property types including rural, urban, commercial, residential, and industrial sites. Mr. Forrest meets the requirement as a historian as specified in 36CFR61 by the Department of the Interior. Mr. Forrest is both an author and reviewer of Cultural Resource reports pertaining to the assessment of above-ground historic resources.

Environmental Site Assessments: In addition to Nepa/Section 106 assessments Mr. Forrest has successfully completed ASTM and Client-specific Phase I Environmental Site Assessments, Preliminary Environmental Site Screenings, Limited Phase II Subsurface Investigations for a variety of properties located within the New England area. These assessments have been performed to evaluate site conditions, potential off-site liabilities, environmental control systems, and site remediation costs in order to advise prospective buyers, current operators, and owners of potential and existing environmental concerns. These properties have included industrial, commercial, multi-family residential and mobile telecommunications properties.

EDUCATION

1992 BA, History, Villanova University, Villanova, PA
 BA, Political Science, Villanova University, Villanova, PA

1994 Media/Journalism Studies, Emmanuel College, Boston, MA

PROFESSIONAL AFFILIATIONS

U.S. Green Building Council, LEED, AP

PROFESSIONAL REGISTRATIONS

OSHA 40-Hour Hazardous Waste Operations (HAZWOPER) Certification Asbestos Inspector Certification from Institute for Environmental Education, Inc. 2005 RF Site Safety Awareness December 2008

SUMMARY OF EXPERIENCE

Dr. Kimbrough has both practical and academic experience in archaeology. She has been working as a professional archaeologist in the field of cultural resource management since 2002. During this period, she assisted clients in negotiating local, state, and federal historic preservation compliance requirements. Dr. Kimbrough has experience in all phases of archaeological research, including project design, field supervision, and report preparation. Before entering the field of cultural resource management, Dr. Kimbrough participated in archaeological field projects in Europe and the Middle East, and possesses a truly international understanding of archaeological methods and the importance of preserving the past.

RELEVANT PROJECT EXPERIENCE

Prior to joining EBI Consulting, Dr. Kimbrough worked as an independent archaeological researcher and full-time employee for cultural resource management firms in New York. She was responsible for completing all phases of archaeological research projects including proposal preparation, field supervision, archival background research, report illustrations, authorship of technical reports, project budget oversight, and other project-supervision tasks.

EDUCATION

PhD Anthropology New York UniversityMA Anthropology New York UniversityAB Anthropology Rollins College

PROFESSIONAL AFFILIATIONS

Society for American Archaeology American Anthropological Association



WILLIAM F. KEEGAN

HISTORICAL GEOGRAPHER & GIS SPECIALIST

EDUCATION

Bachelor of Arts in Anthropology and Geography, University of Connecticut, Storrs, 1996

Master of Arts Candidate in Geography, University of Connecticut, Storrs (all but thesis)

Certificate in Geographic Information Systems, University of Connecticut, Storrs (application pending)

PROFESSIONAL EXPERIENCE

Partner, Heritage Consultants, LLC, April 2004 - Present

Partner, Keegans Associates, LLC, April 1997 - April 2004

Teaching Assistant, Department of Geography, University of Connecticut, Storrs, 2000-2001

PROFESSIONAL MEMBERSHIPS

- Archeological Society of Connecticut
- Northeast Arc Users Group
- Council for Northeastern Historic Archaeology

SPECIAL SKILLS

- Geographic Information Systems
- Cartography
- Archival, Cartographic, and Historical Research

INVITED LECTURES AND PUBLIC PRESENTATIONS

1994a Census Records as a Source for Archeological Research. Archeological Society of Connecticut.

1994b Reconstructing the Enfield Shaker Site Through Census Records. Annual Meeting of the Sons of the American Revolution, Connecticut.

1995a The Enfield Shakers: Industry and Archaeology. Boston Area Shaker Study Group.

1995b Industry and Archaeology at the Shaker Village in Enfield. Wadsworth Athenaeum, Hartford, Connecticut; associated with the exhibition Shaker: The Art of Craftsmanship.

- 1996 Industry and Archaeology at the Shaker Village in Enfield. East Granby Historical Society.
- 1997 GIS Applications in Archaeology: Connecticut National Guard Project. Conference for Northeast Archaeology, Altoona, Pennsylvania.
- 1998 Archeological Site Locations and Characteristics in the Connecticut River Valley. Prepared with Nicholas Bellantoni, Conn. State Archaeologist. Archeological Societies of Connecticut and Massachusetts.
- 1999 Residence Patterns of Nineteenth Century Industrial Workers in Hartford, Connecticut. Annual Northeast ARC Users Conference.
- 2001 Planning for the Future, Dealing with the Past. Annual meeting of the Connecticut Chapter of the American Planning Association.
- Survey Methods and Results: Cultural Resources Along the Appalachian Trail in Connecticut. With Nicholas Bellantoni, Connecticut State Archaeologist, and Kristen N. Keegan. Biannual meeting of the Appalachian Trail Conference.
- 2004a Cultural Resources Along the Appalachian Trail in Connecticut: Survey Methods and Results. With Nicholas Bellantoni, Connecticut State Archaeologist, and Kristen N. Keegan. Annual Meeting of the Society of American Anthropologists, Montreal.
- 2004b Cultural Resources Along the Appalachian Trail in Connecticut: Survey Methods and Results. With Nicholas Bellantoni, Connecticut State Archaeologist, and Kristen N. Keegan. Annual Meeting of the Archaeological Society of Connecticut.
- 2004c Data Recovery Excavations at the Daniel Benton Homestead in Tolland, Connecticut. With Catherine Labadia and David George. Presented at the Town of Tolland, Connecticut Celebration on the Green.

A SAMPLE OF PUBLICATIONS, TECHNICAL MONOGRAPHS, AND RESEARCH PROJECTS

- Illustration maps in *Achieving Racial Balance: Case Studies of Contemporary School Desegregation* by Sondra Astor Stave. Contributions to the Study of Education, Number 65. Westport, Connecticut: Greenwood Press.
- History and Geography of the Enfield Shaker Community, Enfield, Connecticut. Research reports prepared for Office of State Archaeology.
- 1995c History and Geography of the Meriden School for Boys Cemetery, Meriden, Connecticut. Research reports prepared for the Office of State Archaeology.
- History of the Huntington Family Home, Scotland, Connecticut. Research reports prepared for Dr. Harold Juli of Connecticut College.
- 1997a History and Geography of Ashford project area (archeological reconnaissance survey). Prepared for Archeological Research Specialists.
- History and Geography of Wolf Rocks project area, Rhode Island (archeological reconnaissance survey). Prepared for Archeological Research Specialists.
- 1998a Illustration maps in *The Boys From Rockville*, Robert L. Bee, ed. Knoxville, Tennessee: University of Tennessee Press.

William	F. Keegan, B.A. Page 3
1998b	Historical and Cultural Reconnaissance Survey, Cultural Resource Management Plan, Connecticut National Guard Properties, Camp Rowland, Camp Hartell, Stone's Ranch [Windsor Locks, East Lyme, and Lyme, Connecticut]. Prepared for the Office of Connecticut Archaeology.
1998c	Camp Rowland Historical Report: An Overview of Town History, Military History, and Landholdings [East Lyme, Connecticut]. Prepared for Archeological Research Specialists, Inc. and United International Corporation.
1998d	Preparation of GIS map series for use in Route 11 archeological reconnaissance survey, Connecticut. Prepared for PAST, Inc.
1998e	Development of GIS data layer of open space in the Town of Willington, Connecticut. Prepared for Town of Willington.
1999a	Contributing co-editor, <i>The Archaeology of Connecticut: The Human Era, 11,000 Years Ago to the Present.</i> Storrs, Connecticut: Bibliopola Press; Hanover, NH: New England University Press.
1999b	Historical materials in <i>Phase I Archeological Reconnaissance Survey, Long Lane School, Middletown, Connecticut.</i> Prepared for PAST Inc.
1999c	Historical and cartographic research reports for archeological surveys in Seymour and Killingworth, Connecticut. Prepared for American Cultural Specialists, Inc.
1999d	Development of GIS data layers of Hartford architectural resources. Prepared for Connecticut Historical Commission.
1999e	Cartographic research in support of archeological survey of Adriaen's Landing Development, Hartford, Connecticut. Prepared for PAST, Inc.
1999f	Historical research and mapping of General Rochambeau march routes in Connecticut. Prepared for PAST, Inc.
1999g	Cartographic research on property of Talcott Mountain Science Center, Avon, Connecticut. Prepared for Talcott Mountain Science Center.
2000a	Archeological Reconnaissance Survey: Cell Tower Connecticut33XC021-3 (located south of Bull Road and west of Plymouth Road), Harwinton, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2000b	Historical and cartographic research reports for archeological surveys in Glastonbury, Newtown, and Windham, Connecticut. Prepared for American Cultural Specialists, Inc.
2000c	Development of GIS data layers of cultural resource locations in East Hartford, Connecticut. Prepared for Town of East Hartford, Connecticut.
2000d	Cartographic research on Newtown and Monroe town boundary. Prepared for Surveying Associates, P.C.
2001a	Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC108-2, Goshen, Connecticut

2001b Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC024-5 (located east of Looking Glass Hill Road), Litchfield, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.

(416 Old Middle Street). Prepared for Vanasse, Hangen, Brustlin Inc.

- 2001c Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC024-4, Litchfield, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
- 2001d Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC572-3, Woodstock, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.

2002q

2002r

for GeoTrans, Inc.

2001e	Archeological Reconnaissance Survey: Cell Tower Site Connecticut54XC704, Voluntown, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002a	Archeological Investigations at Herindeen Landing, Woodstock, Connecticut. Prepared for Marc Banks.
2002b	Archeological Reconnaissance Survey: Fitts Road Cell Tower Site, Ashford, Connecticut. Prepared for Tower Ventures, Inc.
2002c	Archeological Reconnaissance Survey: Sprint PCS Cell Tower Site #Connecticut33XC087-2 (located off of Rockland Road), Guilford, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002d	Archeological Reconnaissance Survey: 72 Boggy Hole Road Cell Tower Site, Old Lyme, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc. and Wireless Solutions LLC.
2002e	Archeological Reconnaissance Survey: Sprint PCS Site #Connecticut33XC612 (located at 576 Hamburg Road), Lyme, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002f	Archeological Reconnaissance Survey, 148 Roberts Street Cell Tower Site, East Hartford, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002g	Archeological Reconnaissance Survey: Farmstead Acres Project, New Milford, Connecticut. Prepared for Artel Engineering Group.
2002h	Archeological Reconnaissance Survey: Sprint PCS #Connecticut54XC702A, Sprint PCS#54XC702B, Plainfield, Connecticut. Prepared for Apex Environmental, Inc.
2002i	Archeological Reconnaissance Survey: Cell Tower Site Connecticut54XC771, Woodbury, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002j	Archeological Reconnaissance Survey: Spring Cell Tower #Connecticut33XC613-D (located at 97 Chaplain Road), Eastford, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002k	Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC587 (located at 175 Dibble Hill Road), Cornwall, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
20021	Archeological Reconnaissance Survey: Cell Tower Connecticut-266.2, Monroe, Connecticut. Prepared for GeoTrans, Inc.
2002m	Archeological Reconnaissance Survey: Liberty Croft Estates (located at Broadway and Joshua Lane), Coventry, Connecticut. Prepared for Gardner & Peterson.
2002n	Archeological Reconnaissance Survey: Telecommunications Tower, #Connecticut-01513, Brooklyn, Connecticut. Prepared for Tower Ventures, Inc.
2002o	Archeological Reconnaissance Survey: Cell Tower #Connecticut54XC717, Southbury, Connecticut. Prepared for Vanasse, Hangen, Brustlin Inc.
2002p	Phase I Archeological Reconnaissance Survey for Stone's Ranch, East Lyme, Connecticut. Prepared for Maguire Group, Inc.

Cartographic research for archeological reconnaissance survey of Goodspeed Opera House Expansion,

Archeological Reconnaissance Survey: Cell Tower Connecticut-462.3, Killingly, Connecticut. Prepared

East Haddam, Connecticut. Prepared for American Cultural Specialists, Inc.

- 2003a Archeological Reconnaissance Survey: Cell Tower Site Connecticut33XC577 (located at 165 South Main Street), Marlborough, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003b Phase IA Reconnaissance Survey: Cell Tower Site Connecticut092, 370 North Avenue, Bridgeport, Connecticut. Prepared for GeoTrans, Inc.
- 2003c Phase IA Reconnaissance Survey: Cell Tower Connecticut11-307C, 82 Mechanic Street, Stonington, Connecticut. Prepared for Lessard Environmental, Inc.
- 2003d Archeological Reconnaissance Survey: Unnamed Wireless Communications Equipment Site, 496 Box Hill Road, Vernon, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003e Archeological Reconnaissance Survey: Sprint Site #Connecticut33XC271 (170 Southeast Road, east of Spencer Road), New Hartford, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003f Archeological Reconnaissance Survey: Sprint PCS Cell Tower #Connecticut33XC579, Farmington, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003g Phase I Archeological Reconnaissance Survey: Connecticut-11-357C (cell phone tower site on the west side of Umpawaug Road, 500 feet east of the Saugatuck River), Redding, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003h Phase I Archeological Reconnaissance Survey: Connecticut33XC583 (cell tower site located south of Palmer Road, midway between the villages of Chaplin and South Chaplin), Chaplin, Connecticut. Prepared for Vanasse, Hangen, Brustlin, Inc.
- 2003i Archeological Reconnaissance Survey: Knowlton Farm Cell Tower Site, Ashford, Connecticut. Prepared for Tower Ventures, Inc.
- 2003j Preliminary Phase IA Archeological Reconnaissance Survey of Property on Westcott Road, Killingly, Connecticut. Prepared for Clough, Harbour & Associates.
- 2003k Historical Research and Reporting and GIS services for ATC project in Windsor Locks, Connecticut. Prepared for R. Christopher Goodwin & Associates, Inc.
- 2004a Phase Ia Cultural Resource Sensitivity Assessment: Proposed Valley Road Development, Killingly, Connecticut. Prepared for R. A. Daddario Builders.
- 2004b Archeological Reconnaissance Survey: Moosup Pond Sewer Project, MGI No.: 15892, Phase IA and Phase IB, Plainfield, Connecticut. Prepared for Maguire Group, Inc.
- 2004c Phase I Cultural Resources Reconnaissance Survey of Proposed Sprint PCS Wireless Communications Facility Numbers CT-11-390-G and CT-11-390-J, North Branford, Connecticut (with Catherine Labadia and David George). Submitted to Vanasse Hangen Brustlin, Inc., Middletown, Connecticut.
- 2004d Phase I Cultural Resources Reconnaissance Survey of Proposed AT&T Wireless Communications Facility Numbers CT-668-A and CT-668-B, Madison, Connecticut (with Catherine Labadia and David George). Submitted to Vanasse Hangen Brustlin, Inc., Middletown, Connecticut.
- 2004e Historic Research and Building Documentation of the Hanford House, 180-182 Main Street, Bridgeport, Connecticut. (with Catherine Labadia and David George). Submitted to Vanasse Hangen Brustlin, Inc., Middletown, Connecticut.
- 2004f Phase I Cultural Resources Survey and Archeological Inventory of a 8.09 ha (20 ac) Project Parcel Associated with the Proposed Fieldstone Commons Commercial Development, Tolland, Connecticut. Submitted to Prospect Enterprises Hartford, Connecticut.

- 2004g Phase I Cultural Resources Reconnaissance Survey of the Proposed Rockville Bank Branch Office Location, Tolland, Connecticut. Submitted to Rockville Bank, South Windsor, Connecticut.
- 2004h Phase I Cultural Resources Reconnaissance Inventory of a Proposed Housing Subdivision in Goshen, Connecticut. Submitted to Henne Development, Southbury, Connecticut.
- Archeological Investigation of Stone Piles Located on a 16.8 ha (41.5 ac) parcel of land in Stafford, Connecticut. Submitted to Vanasse Hangen Brustlin, Inc., Middletown, Connecticut.
- 2004j Phase IA Cultural Resources Assessment Survey of a Proposed Housing Subdivision at 25 Starrs Ridge Road in Redding, Connecticut. Submitted to Mr. Jason Addison.
- 2004k Connecticut State Historic Preservation Office Project Submittal for the Proposed Pine Meadow Senior Rental Facility, Windsor Locks, Connecticut. Submitted on behalf of Fahey, Landolina & Associates, Inc.

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 2. Additional Site Information

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site in conjunction with the proposed facility.

The Subject Property, located off Moose Hill Road, approximately 200 feet southeast of the intersection of Dromara Road and Moose Hill Road. The property is situated within a rural residential neighborhood. Properties to the north and south of the property date back to the 1800s with limited modern contemporary development on distant northern properties along Moose Hill Road and Dromara Road. The Route 146 Historic District with structures dating as far back as the 1700s is located to the south, southeast and southwest of the Subject Property.

The Subject Property consists of an approximately 163-acre lot that is unimproved with the exception a gravel and dirt access driveway.

T-Mobile proposes to construct a 140-foot monopole-style telecommunications tower within a proposed 50-foot by 50-foot fenced compound. T-Mobile will mount a total of nine antennas at a centerline height of 139.75-feet above ground level to the proposed tower. Proposed support equipment will be placed on a proposed 10-foot by 20-foot concrete slab at the base of the proposed tower within the proposed fenced compound. The proposed support equipment will connect to the proposed tower via a proposed ice bridge. A proposed meter center, CSC cabinet and step-down transformer will be placed to the west of the proposed tower compound within the proposed 50-foot by 60-foot lease area. Proposed power and telco conduits will be routed underground from the proposed support equipment to the proposed meter center, CSC cabinet and transformer. Proposed conduits will then be routed underground from the proposed tower compound along a proposed utility and access right of way. The proposed right of way will follow a portion of an existing gravel driveway and require the improvement of a new gravel driveway from the existing driveway to the proposed tower compound.

Please refer to the Project Plans for the proposed project, which are included in Attachment 12, Maps.

Attachment 3. Tribal and NHO Involvement

At an early stage in the planning process, the Nationwide Agreement requires the Applicant to gather information from appropriate Indian Tribes or Native Hawaiian Organizations ("NHOs") to assist in the identification of Historic Properties of religious and cultural significance to them. Describe measures taken to identify Indian tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the undertaking within the Areas of Potential Effects ("APE") for direct and visual effects. If such Indian tribes or NHOs were identified, list them and provide a summary of contacts by either the FCC, the Applicant, or the Applicant's representative. Provide copies of relevant documents, including correspondence. If no such Indian tribes or NHOs were identified, please explain.

EBI Consulting completed the Tower Construction Notification System (TCNS) on December 4, 2009. The attached FCC Notification email lists the Tribes identified through the TCNS process. Follow up correspondence, when necessary, will be completed via the methods listed on the attached email considered acceptable to that Tribe.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Proiect Number: CTNH805A

Theodore Tomich

From: towernotifyinfo@fcc.gov

Sent: Friday, December 04, 2009 3:01 AM

To: Ami Senechal-Anderson

Cc: kim.pristello@fcc.gov; diane.dupert@fcc.gov

Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER

CONSTRUCTION NOTIFICATION INFORMATION - Email ID #2363600

Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribes and in making further contacts, the City and State of the Seat of Government for each Tribe and NHO, as well as the designated contact person, is included in the listing below. We note that Tribes may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribes and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribe or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribes and NHOs who have set their geographic preferences on TCNS. If the information you provided relates to a proposed antenna structure in the State of Alaska, the following list also includes Tribes located in the State of Alaska that have not specified their geographic preferences. For these Tribes and NHOs, if the Tribe or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribe or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event such a Tribe or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribe or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

- 1. THPO Kathleen Knowles Mashantucket Pequot Tribe Mashantucket, CT electronic mail Details: For every tower construction this Tribe requires a site location map, site plans for every project that will result in ground disturbance, and a detailed description of the proposed site. If the proposed tower construction is on an already existing building, the Tribe would like to be informed of that as well.
- 2. Cell Tower Coordinator Sequahna Mars Narragansett Indian Tribe Wyoming, RI electronic mail and regular mail

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States. For these Tribes and NHOs, you are required to use reasonable and good faith efforts to determine if the Tribe or NHO may attach religious and cultural significance to historic properties that may be affected by its proposed undertaking. Such efforts may include, but are not limited to, seeking information from the relevant SHPO or THPO, Indian Tribes, state agencies, the U.S. Bureau of Indian Affairs, or, where applicable, any federal agency with land holdings within the state (NPA, Section IV.B). If after such reasonable and good faith efforts, you determine that a Tribe or NHO may attach religious and cultural significance to historic properties in the area and the Tribe or NHO does not respond to TCNS notification within a reasonable time, you should make a reasonable effort to follow up, and must seek guidance from the Commission in the event of continued non-response or in the event of a procedural or substantive disagreement. If you determine that the Tribe or NHO is unlikely to attach religious and cultural significance to historic properties within the area, you do not need to take further action unless the Tribe or NHO indicates an interest in the proposed construction or other evidence of potential interest comes to your attention.

None

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

- 3. SHPO John W Shannahan Connecticut Historical Commission Hartford, CT electronic mail
- 4. SHPO Cara Metz Massachusetts Historical Commission Boston, MA electronic mail
- 5. Deputy SHPO Brona Simon Massachusetts Historical Commission Boston, MA electronic mail
- 6. SHPO Frederick C Williamson Rhode Island Historic Preservation & Heritage Comm Providence, RI regular mail
- 7. Deputy SHPO Edward F Sanderson Rhode Island Historic Preservation & Heritage Comm Providence, RI electronic mail
- 8. SHPO Karen J Senich Connecticut Commission on Culture and Tourism Hartford, CT electronic mail

If you are proposing to construct a facility in the State of Alaska, you should contact Commission staff for guidance regarding your obligations in the event that Tribes do not respond to this notification within a reasonable time.

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/30/2009

Notification ID: 58485

Tower Owner Individual or Entity Name: T-Mobile USA

Consultant Name: Ami Senechal Street Address: 21 B Street

City: Burlington State: MASSACHUSETTS Zip Code: 01803 Phone: 781-552-9711

Email: asenechal@ebiconsulting.com

Structure Type: UTOWER - Unguyed - Free Standing Tower

Latitude: 41 deg 16 min 2.9 sec N Longitude: 72 deg 42 min 57.9 sec W Location Description: Moose Hill Road

City: Guilford State: CONNECTICUT County: NEW HAVEN

Ground Elevation: 24.4 meters

Support Structure: 42.7 meters above ground level Overall Structure: 42.7 meters above ground level Overall Height AMSL: 67.1 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

http://wireless.fcc.gov/outreach/notification/contact-fcc.html.

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8 a.m. to 7:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you, Federal Communications Commission

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 4. Local Government

a. Has any local government agency been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Agreement? If so, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (*e.g.*, correspondence or notices).

The Guilford Town Clerk has been notified of the proposed project and has been invited to comment on the proposed project's potential effects on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. A copy of our correspondence with the local government office is attached. As of the date of this submission packet, no comments from the Guilford Town Clerk have been received by EBI. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

b. If a local government agency will be contacted but has not been to date, explain why and when such contact will take place. N/A

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A



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

Fax: (781) 273-3311

December 16, 2009

Ms. Rebecca Bunting (Clerk)
Guilford Historic District Commission
Town Hall South
50 Boston Street
Guilford, CT 06437

Subject: Invitation to Comment

CTNH805A / Amtrak Guilford

Moose Hill Road, Guildford, New Haven County, Connecticut

EBI Project #61096865

Dear Ms. Bunting:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc. on behalf of T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter T-Mobile) provides this notice of a proposed telecommunications facility installation at the address listed above.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached Project Summary Form for complete details regarding this proposed project.

Please note that we are requesting your review of the attached information as part of the Section 106 process only and not as part of the local zoning process. We are only seeking comments related to the proposed project's potential effect to historic properties.

Please submit your comments regarding the proposed project's potential effect on historic properties to EBI Consulting, to my attention at 21 B Street, Burlington, MA 01803 or contact me via telephone at the number listed below. Please reference the EBI project number. We would appreciate your comments as soon as possible within the next 30 days. Please do not hesitate to contact me if you have any questions or concerns about the proposed project.

Respectfully Submitted,

Mr. Stephen Forrest

Historian

(617) 715-1817 Office

(617) 715-6597 Fax

sforrest@ebiconsulting.com

Stephen J. Lonet

Attachment A - Project Summary Form Attachment B - Figures, Drawings, and Maps Print Page 1 of 1

Shipped via Optima Worldwide Shipping on behalf of:

EBI Consulting 21 B Street Burlington, MA 01803



SHIP DATE	12/16/2009	TRACKING NUMBER	Z70085319095303
ACCOUNT #	9510-6964	PROJECT NUMBER-REPORT TYPE	61096865

Ship To Address:

Ms. Rebecca Bunting (Clerk)
Guilford Historic District Commission
Town Hall South
50 Boston Street
Guilford, CT 06437
US





Phone:

SERVICE LEVELS	VALUE	OTHER SERVICES	SHIPMENT NOTES/SPECIAL INSTRUCTIONS
2ND DAY	100		

1 OF 1



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Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 5. Public Involvement

Describe measures taken to obtain public involvement in this project (*e.g.*, notices, letters, or public meetings). Provide copies of relevant documentation.

Attached, please find a copy of legal notice regarding the proposed telecommunications installation that was posted in *New Haven Register* on December 17, 2009. As of the date of this submission packet, no comments regarding this notice have been received by EBI. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

FCC Form 620 December 2007



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

Fax: (781) 273-3311

December 15, 2009

New Haven Register 40 Sargent Drive New Haven, CT 06511

Subject: Request for Public Notice EBI Project #61096730

EBI Consulting (EBI), on behalf of T-Mobile Northeast LLC, a Delaware limited liability company, as successor-ininterest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter T-Mobile) would like to place the following ad in your paper for print on the next available date of publication. Please place this ad in the paper and send a tear sheet of the ad for confirmation to the address noted on the letterhead. The following is the text of the Public Notice:

T-Mobile Northeast LLC provides this notice of a proposed telecommunications facility installation off Moose Hill Road, Guilford, Connecticut. The new facility will consist of a 140-foot monopole style telecommunications tower, with 9 antennas, and support equipment within a proposed 50-foot by 50-foot fenced equipment compound within a 50-foot by 60-foot lease area. Any interested party wishing to submit comments regarding the potential effects the proposed facility may have on any historic property may do so by sending such comments to: Project 61096865-SJF c/o EBI Consulting, 21 B Street, Burlington, MA 01803, or via telephone at (781) 273-2500.

Please send an invoice for the cost of the posting to the address noted above. Please reference **EBI Project #61096865** on any correspondence pertaining to this project, to ensure prompt processing.

Please e-mail or call me with any questions or concerns concerning this publication. Thank you for your time.

Sincerely,

Ami Senechal-Anderson Environmental Scientist

im Sembril

(781) 552-9711 (781) 418-2367

Sales Representative

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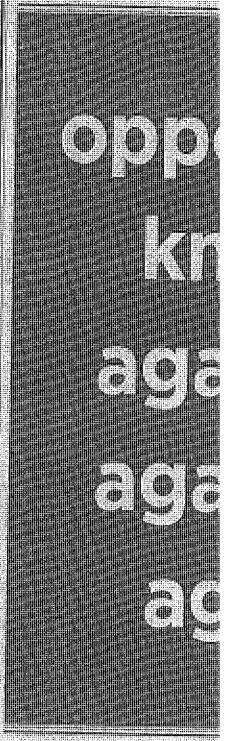
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Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 6. Additional Consulting Parties

List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.

The Guilford Historical District Commission and the Guilford Historical Society have been identified and invited to comment on the proposed project's effect on Historic Properties. Attached, please find copies of relevant correspondence to date with this party these parties. As of the date of this submission packet, no comments from the Guilford Historical District Commission and the Guilford Historical Society have been received by EBI. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford

Project Number: <u>CTNH805A</u>



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

Fax: (781) 273-3311

December 16, 2009

Guilford Historical Society 171 Boston Street P.O. Box 363 Guilford, Connecticut 06437

Subject: Invitation to Comment

CTNH805A / Amtrak Guilford

Moose Hill Road, Guildford, New Haven County, Connecticut

EBI Project #61096865

To Whom it May Concern:

Pursuant to Section 106 of the National Historic Preservation Act, the regulations promulgated thereunder and interagency agreements developed thereto, EBI Consulting, Inc. on behalf of T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter T-Mobile) provides this notice of a proposed telecommunications facility installation at the address listed above.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached Project Summary Form for complete details regarding this proposed project.

Please note that we are requesting your review of the attached information as part of the Section 106 process only and not as part of the local zoning process. We are only seeking comments related to the proposed project's potential effect to historic properties.

Please submit your comments regarding the proposed project's potential effect on historic properties to EBI Consulting, to my attention at 21 B Street, Burlington, MA 01803 or contact me via telephone at the number listed below. Please reference the EBI project number. We would appreciate your comments as soon as possible within the next 30 days. Please do not hesitate to contact me if you have any questions or concerns about the proposed project.

Respectfully Submitted,

Mr. Stephen Forrest

Historian

(617) 715-1817 Office

(617) 715-6597 Fax

sforrest@ebiconsulting.com

Attachment A - Project Summary Form Attachment B - Figures, Drawings, and Maps Print Page 1 of 1

Shipped via Optima Worldwide Shipping on behalf of:

EBI Consulting 21 B Street Burlington, MA 01803



SHIP DATE	12/16/2009	TRACKING NUMBER	Z70085319091303
ACCOUNT #	9510-6964	PROJECT NUMBER-REPORT TYPE	61096865

Ship To Address:

Guilford Historical Society 171 Boston Street Guilford, CT 06437 US





Phone:

SERVICE LEVELS	VALUE	OTHER SERVICES	SHIPMENT NOTES/SPECIAL INSTRUCTIONS
2ND DAY	100		

1 OF 1



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Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 7. Areas of Potential Effects

a. Describe the APE for direct effects and explain how this APE was determined.

The APE for direct effects is defined as the area of potential ground disturbance and any property, or any portion thereof, that will be physically altered or destroyed by the Undertaking. On November 24, 2008, the FCC further clarified that the APE-Direct Effects is limited to the lease area including the access route and utility corridor. Ms. Ami Senechal-Anderson, of EBI Consulting completed a field survey on November 24, 2009 and determined that the APE for direct effects is limited to the proposed fenced equipment compound, and the access/utility route.

b. Describe the APE for visual effects and explain how this APE was determined.

The APE for visual effects is the geographic area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register. The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible: a. Within a half mile from the tower site if the proposed Tower is 200 feet or less in overall height; b. Within 34 of a mile from the tower site if the proposed Tower is more than 200 but no more than 400 feet in overall height; or c. Within 1 ½ miles from the proposed tower site if the proposed Tower is more than 400 feet in overall height.

Due to the height of the proposed tower, the presumed APE for visual effects for this project is a half-mile radius from the tower site.

Attachment 8. Historic Properties Identified in the APE for Visual Effects

a. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.1.a. of the Nationwide Agreement.⁷

Based on a review of the Connecticut SHPO files conducted by Mr. William F. Keegan, Historical Geographer of Heritage Consultants, LLC at the Connecticut SHPO on November 16, 2009, the following Historic Properties were identified within the APE for visual effects:

Listed/ NRHP Eligibility	NRHP/ SHPO Inventory No.	Historic Property Name	Address or Nearest Intersection (including U.S. Postal Service ZIP Code)	Distance from Project Site	EBI Photo No.
Listed on	District -	Route 146	Route 146 from Flat Rock Road	Approx.	27-29,
NRHP	#90000569	Historic District	to West River Bridge	800 feet	31, and
			, and the second	south	32
Listed on	N/A	Pelatiah Leete	Leetes Island Road, Guilford, CT	Approx.	28 &
NRHP		House	06437	1,000 feet	30

⁷ Section VI.D.1.a. of the Nationwide Agreement requires the Applicant to review publicly available records to identify within the APE for visual effects: i) properties listed in the National Register; ii) properties formally determined eligible for listing by the Keeper of the National Register; iii) properties that the SHPO/THPO certifies are in the process of being nominated to the National Register; iv) properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local government representing the Department of Housing and Urban Development (HUD); and, v) properties listed in the SHPO/THPO Inventory that the SHPO/THPO has previously evaluated and found to meet the National Register criteria, and that are identified accordingly in the SHPO/THPO Inventory.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

				southeast	
Eligible	N/A	588 Leetes Island	588 Leetes Island Road,	Approx.	38 &
		Road	Guilford, CT 06437	1,000 feet	39
Eligible	NA	48 Moose Hill	48 Moose Hill Road, Guilford,	Approx.	12 &
		Road	CT 06437	800 feet	13
				southwest	
Eligible	NA	133 Moose Hill	133 Moose Hill Road, Guilford,	Approx.	15 &
		Road	CT 06437	700 feet	17
				northwest	
Eligible	NA	144 Moose Hill	144 Moose Hill Road, Guilford,	Approx.	14 &
		Road	CT 06437	700 feet	17
				northwest	
Eligible	NA	149 Moose Hill	149 Moose Hill Road, Guilford,	Approx.	16 &
		Road	CT 06437	700 feet	17
				northwest	
Eligible	NA	172 Moose Hill	172 Moose Hill Road, Guilford,	Approx.	18 &
		Road	CT 06437	2,000	19
				northwest	
Eligible	NA	283 Moose Hill	283 Moose Hill Road, Guilford,	Approx.	20 &
		Road	CT 06437	2,250	21
				northwest	
Eligible	NA	7 Old Quarry	7 Old Quarry Road, Guilford,	Approx.	23 &
		Road	CT 06437	2,800 feet	24
Eligible	NA	15 Wingate Road	15 Wingate Road, Guilford, CT	Private	34 &
			06437	Road	35

b. Provide the name and address (including U.S. Postal Service ZIP Code) of each Historic Property in the APE for visual effects, not listed in Attachment 8a, identified through the comments of Indian Tribes, NHOs, local governments, or members of the public. Identify each individual or group whose comments led to the inclusion of a Historic Property in this attachment. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63).

As of the date of this report, EBI has not received comments from Indian Tribes, NHOs, local governments, or members of the public that identify Historic Properties in the APE for visual effects that are not listed in Attachment 8a.

c. For any properties listed on Attachment 8a that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

No Historic Properties were identified during a review of the SHPO's files. Additionally, as of the date of this report, EBI has not received comments from Indian Tribes, NHOs, local governments, or members of the public that identify Historic Properties in the APE for visual effects that are not listed in Attachment 8a.

Attachment 9. Historic Properties Identified in the APE for Direct Effects

a. List all properties identified in Attachment 8a or 8b that are within the APE for direct effects.

Based on a review of Connecticut SHPO files conducted by Mr. William F. Keegan, Historical Geographer of Heritage Consultants, LLC at the Connecticut SHPO on November 16, 2009, no Historic Properties were identified within the APE for direct effects.

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC
Amtrak Guilford
CTNH805A

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

b. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for direct effects, not listed in Attachment 9a, that the Applicant considers to be eligible for listing in the National Register as a result of the Applicant's research. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63). For each property that was specifically considered and determined not to be eligible, describe why it does not satisfy the criteria of eligibility.

NRHP Eligibility Recommendation	Resource Age	Brief Description of Resource	Basis for Recommendation	Distance from Project Site	EBI Photo No.
Not Eligible	N/A	Raw Land	The vicinity of the Project	Includes	1-8
			Site is not recommended for	Project	
			listing on the National	Site	
			Register of Historic Places		
			due to the fact that no		
			buildings or structures are		
			present at the site.		
			Furthermore, there is no		
			documented evidence of a		
			historic event taking place at		
			the site. For these reasons,		
			the Project Site does not		
			meet the criteria set forth		
			by the National Register of		
			Historic Places.		

c. Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.⁸ If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.⁹

As noted in Attachment 9a, a review of files at the Connecticut SHPO on November 16, 2009 was conducted by Mr. Bill Keegan, Historical Geographer, of Heritage Consultants, LLC, in order to identify listed Historic Properties within the APE for direct effects. In addition, Ms. Ami Senechal-Anderson, Environmental Scientist, of EBI Consulting completed a field survey of the APE for direct effects in order to identify any additional Historic Properties located within the APE for direct effects that were not listed in the SHPO inventories. The results of these activities were provided to Mr. Stephen Forrest, Historian, of EBI Consulting who then completed an evaluation of National Register eligibility for properties located within the APE for direct effects.

Dr. Christine Kimbrough, PhD, RPA, of EBI Consulting completed an evaluation of the proposed Project Site for the likelihood of containing archeological Historic Properties. Additionally, the Mashantucket Pequot Tribal Historic Preservation Office (MPTHPO) requested that a Phase I archaeological survey be conducted for this project. Therefore, archaeological testing in the form of shovel test pits (STPs) was recommended

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

⁸ Pursuant to Section VI.D.2.a. of the Nationwide Agreement, Applicants shall make a reasonable and good faith effort to identify above ground and archeological historic properties, including buildings, structures, and historic districts, that lie within the APE for direct effects. Such reasonable and good faith efforts may include a field survey where appropriate.

⁹ Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if none of these conditions applies, if an Indian tribe or NHO provides evidence that supports a high probability of the presence of intact archeological Historic properties within the APE for direct effects.

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

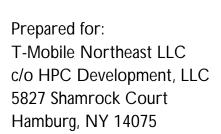
for the level, dry portions of the APE-DE. Please refer to the attached report documenting the findings of this project review by a qualified archaeologist including a description of the techniques and the methodology used to identify Historic Properties within the APE for direct effects. This report concludes that the APE-DE for the present project is not sensitive for the presence of significant precontact and/or historical archaeological resources. Despite its location in an environmental context that would have been attractive for use in the past, all STPs were negative. It is recommended that no further archaeological testing be conducted in association with this project. Archeological resources are not expected to be impacted by the construction of the proposed tower and installation of associated support equipment at the Project Site.

Applicant's Name:
Project Name:

T-Mobile Northeast, LLC Amtrak Guilford

Project Number: CTNH805A

Phase I Archaeological Survey





CTNH805A/Amtrak Guilford Moose Hill Road Guilford, New Haven County Connecticut 06437 EBI Project No. 61096865

March 2010



EBI CONSULTING
21 B STREET
BURLINGTON, MASSACHUSETTS 01803
(800) 786-2346
PROJECT NO. 61096865

Management Summary

The Project Site is located northeast of the intersection of Moose Hill Road and the Amtrak rail line in Guilford, New Haven County, Connecticut (Figure 1). T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (herein after T-Mobile), proposes to construct an 140' (42.7m) monopole within a proposed 50' by 50' (15.2m by 15.2m) fenced compound in a 50' by 60' (15.2m by 18.2m) lease area on the southeastern portion of the Subject Property. Access to the site will be via an existing gravel drive, which will be extended to the northeast. Utilities will be routed underground along the access drive within a 25' (7.6m) wide easement to existing sources on Moose Hill Road. A CSC cabinet, transformer and bollards are to installed on the west side of the fenced compound (Figures 2 and 3).

The Area of Potential Effects—Direct Effects (APE-DE) includes the 50' by 60' (15.2m by 18.2m) lease area, access easement and drive, and 25' (7.6m) wide utility easement.

The historic maps of the Project Site demonstrate that the Project Site remained undeveloped from the mid-19th century. The site visit further indicates that there has been no significant historic use of the Project Site. No further testing of the Project Site is necessary for historic resources; however, the Project Site is in an environmental context would have been particularly attractive by Native American groups. The potential for encountering precontact resources cannot be ruled out. In addition, the Mashantucket Pequot Tribal Historic Preservation Office (MPTHPO) requested that a Phase I archaeological survey be conducted for this project. Therefore, archaeological testing in the form of shovel test pits (STPs) was recommended for the level, dry portions of the APE-DE.

In light of available information, it is my professional opinion that the APE-DE for the present project is not sensitive for the presence of significant precontact and/or historical archaeological resources. Despite its location in an environmental context that would have been attractive for use in the past, all STPs were negative. Accordingly, I recommend that no further archaeological testing be conducted in association with this project.



Introduction

The Federal Communications Commission (FCC) requires licensees and their representatives to consider the effects of their actions on historic properties, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and the National Environmental Policy Act of 1969 (NEPA) (Federal Communications Commission 1996). Historic properties include Native American or European-American archaeological sites, architectural resources (historic districts and standing structures), objects, and traditional cultural properties. Applicants are required to assess and report all potential environmental effects as part of Section 106 process prior to construction.

The survey was conducted by Christine Kimbrough, PhD, RPA, from December 3, 2009, to March 18, 2010, in partial fulfillment of Section 106 of the National Historic Preservation Act of 1966, and in accordance with state guidelines (Connecticut State Historic Preservation Office). It is intended to provide information that will enable the Connecticut State Historic Preservation Office to review the subject project. The Principal Investigator meets and/or exceeds the qualifications described in the Secretary of the Interior's Professional Guidelines (Federal Register 48:190:44738-44739) (United States Department of the Interior1983). Background research was conducted at the State Archaeologist Office. The objective of the archaeological fieldwork was to identify any archaeological sites within the Area of Potential Effects—Direct Effects (APE-DE).

The Project and Project Site

The Project Site is located northeast of the intersection of Moose Hill Road and the Amtrak rail line in Guilford, New Haven County, Connecticut (Figure 1). T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (herein after T-Mobile), proposes to construct an 140' (42.7m) monopole within a proposed 50' by 50' (15.2m by 15.2m) fenced compound in a 50' by 60' (15.2m by 18.2m) lease area on the southeastern portion of the Subject Property. Access to the site will be via an existing gravel drive, which will be extended to the northeast. Utilities will be routed underground along the access drive within a 25' (7.6m) wide easement to existing sources on Moose Hill Road. A CSC cabinet, transformer and bollards are to be installed on the west side of the fenced compound (Figures 2 and 3).

The Area of Potential Effects—Direct Effects (APE-DE) includes the 50' by 60' (15.2m by 18.2m) lease area, access easement and drive, and 25' (7.6m) wide utility easement.

Subject Property

The Subject Property is an irregularly shaped 163-acre (66.0ha) lot that is unimproved except for an existing gravel drive. The property is predominantly wooded, but the Project Site is to be located in a clearing on the parcel.

Environmental Setting



According to the 1985 Guilford, CT United States Geological Survey (USGS) 7.5- Minute Topographic Quadrangle (USGS 1985; Figure 1), the Project Site is located in a hilly area approximately .25 miles (.4km) north of Long Island Sound. The site is at an elevation of approximately 100′ (30.5m) above mean sea level (amsl). There are numerous water resources in the general vicinity, including the Sound and adjacent wetlands to the south. The proximity of the site to wetlands and other water resources may have made it attractive for use by precontact groups.

The Connecticut Department of Environmental Protection indicates that the Project Site is underlain by Stony Creek Granite Gneiss and Narragansett Pier Granite. Nearby bedrock (Plainfield Formation) contains quartzite inclusions (Rodgers 1985). The possible presence of quartzite in the vicinity would indicate that there may have been resources for stone tool production available to precontact groups.

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS), the dominant soil type on the Project Site is Cheshire-Holyoke Complex on 3% to 15% slopes (77C). These are deep, well-drained fine sandy loams over gravelly sandy loam from melt-out till derived from basalt and/or sandstone and shale. Just east of the Project Site the dominant soil type is Holyoke-Rock Outcrop complex on 15% to 45% slopes. The possible proximity to rock outcrops and shallow bedrock deposits raises the possibility that access to materials for stone-tool production were readily available (Web Soil Survey 2009).

Known Archaeological Sites

According to the site files of the Connecticut Office of the State Archaeologist (OSA), there are four previously documented archaeological sites located within one mile (1.6km) of the APE-DE. The file for site 60-15, a historic site approximately 1 mile (1.6km) northeast of the Project Site, was missing from the OSA records. Brief descriptions of the remaining three sites are provided below.

One additional historic site was identified. Hanna's Quarry (60-11) is located 3000' (914.4m) east of the Project Site. The site consisted of stone carvings, foundations, and the bed of a narrow gauge railroad. This site will not be impacted by the current project.

Two prehistoric sites were identified within the search radius. The Cockaponsett Site (60-02), adjacent to wetlands 1 mile (1.6km) southeast of the Project Site, is a Contact-Period camp. Artifacts included pottery, a quartz point tip, charcoal, historic ceramics, and petroglyphs. The Indian Cave Site (60-12), 4000' (1219.2m) northeast of the Project Site, is a Late-Woodland rockshelter. Artifacts include pottery, quartz flakes, calcined bone, lead, and shell. Occupation at the site may have extended into the Contact Period. Neither of these sites will be impacted by the current project; however, they are both in similar environmental contexts to the Project Site, indicating the possible archaeological sensitivity of the APE-DE.

Prior Cultural Resource Surveys

According to files at the Connecticut Office of the State Archaeologist (OSA), no cultural resource surveys have been conducted on or adjacent to the Project Site.



National/State Register Files

According to the site files of the Connecticut State Historic Preservation Office there are no previously documented National / State Register properties located on or adjacent to the APEDE.

Historic Map Review

A review of historical cartographical evidence available from the University of Connecticut and other sources revealed some details about the development of the Project Site over the past 160 years. Moose Hill Road, off which the Project Site is located, was in place by 1852 (Whiteford 1852; Figure 4), but was not shown on earlier maps of Connecticut (e.g., Blodgett 1792 and Warren 1811). The railroad (now Amtrak) was also in place by this time. There are no buildings/structures shown on or adjacent to the Project Site. The situation remains the same on the available 19th-century maps (Beers 1868 and USGS 1893; Figures 5 and 6, respectively). Examination of 20th-century USGS topographic maps suggests that the Project Site remained undeveloped, although there appears to be a building/structure adjacent the Subject Property, adjacent to Moose Hill Road by 1943 (USGS 1943 and 1985; Figures 7 and 1, respectively). Currently, the Subject Property is unimproved (Bing Maps 2010; Figure 8). The Project Site is located in a clearing near the southwest corner of the parcel.

Cultural Background

Archaeological research into the prehistory of the Northeast has provided an emerging consensus that the region experienced both increasing sedentism and economic complexity from at least the Middle Archaic period (ca. 8000 B. P.). The development of mast forest cover during this time would have provided significant food both for human groups and the animals they hunted. Over time, and increasing preference (or perhaps visibility) for sites located on the margins of different ecological zones (e.g. upland and wetland, or marine and estuarine) can be discerned. In terms of this project, the location of the Project Site on a hill overlooking what was likely a sizable wetland not distant from the coast would have made it an attractive location for hunting, as well as gathering wetland and coastal resources (McWeeney and Perry 1999; Jones 1999). Such activities remained important even after the introduction of maize horticulture in the Middle Woodland, and would have continued to be significant through the cultural disruptions and population movements of the contact period (Chilton 2002; Bragdon 1996). While similar contexts and resources were also utilized in earlier prehistory (McWeeney 2007; Forrest 1999), environmental conditions were markedly different, and are not as likely to have approximated present conditions. While the prehistoric use of this location during the Paleoindian and early Archaic periods is not impossible, the most likely evidence to be present is that from the Archaic through the Contact period. Such evidence is likely to consist of small artifact scatters representing the varied use of this location rather than large-scale settlements. Such archaeological evidence is becoming increasingly important to our understanding of the past in the Northeast (c.f. Reith 2008).



Archaeological Sensitivity of the APE-DE

The sensitivity of the APE-DE for historic resources is low. Review of the historic maps and aerial photos revealed no buildings/structures or other features on or adjacent to the Project Site. There is little chance the proposed project will disturb historical archaeological resources.

The precontact sensitivity of the site is moderate to high. The APE-DE is on a low rise in close proximity to water resources, including wetlands and the Long Island Sound. In addition, there are possible sources of quartzite in the vicinity, making the site a potential location for stone tool production. Finally, there are two previously-documented prehistoric archaeological sites within one-mile of the Project Site that are in environmental contexts similar to that of the APE-DE.

Site Visit and Recommendations

The APE-DE is located in the southwestern portion of the Subject Property, which is located at off of Moose Hill Road in Guilford, Connecticut, north of the Amtrak rail line. The portion of the APE-DE where is tower compound is to be located is relatively level and grass-covered (Photos 1 through 4). To the south of the Project Site, the area is gently sloped (Photo 5), but the incline is much greater to the east and north (Photos 6 and 7), and relatively level to the west (Photo 8). Rock outcrops are located to the east of the Project Site (Photos 6 and 7), but visible quartzite inclusions were observed (Photo 9).

The access/utility easement is to extend south from the Project Site, over a grassy area and then to an existing gravel drive (Photos 10-16). This easement extends parallel to the Amtrak line for some distance (Photo 13), down the rise (Photo 14), over a culvert that is to be expanded (Photo 15), and to Moose Hill Road (Photo 16). The culvert carries the road over a small stream and adjacent wetlands.

The historic maps of the Project Site demonstrate that the Project Site remained undeveloped from the mid-19th century. The site visit further indicates that there has been no significant historic use of the Project Site. No further testing of the Project Site is necessary for historic resources; however, the Project Site is in an environmental context would have been particularly attractive by Native American groups. The potential for encountering precontact resources cannot be ruled out. In addition, the Mashantucket Pequot Tribal Historic Preservation Office (MPTHPO) requested that a Phase I archaeological survey be conducted for this project. Therefore, archaeological testing in the form of shovel test pits (STPs) was recommended for the level, dry portions of the APE-DE.

Phase IB Archaeological Field Survey

Further surface reconnaissance and subsurface testing of the APE-DE was completed on January 6 and March 12, 2010 by Ms. Vanessa P. Sullivan, Field Archaeologist, EBI Consulting. As per the request of via the Tower Construction Notification System (TCNS#58485), the MPTHPO was notified of the impending archaeological testing.



Shovel test pits (STPs) were excavated to document the presence/absence of archaeological resources in the APE-DE. Each STP was 50 centimeters (20 in) across and placed at 15 meter (50 ft) intervals or less. The soil from each STP was screened through 0.64 centimeter (0.25 in) hardware cloth and carefully examined for precontact and historic cultural materials. The location and depth of each shovel test was recorded including depth and description of each soil level (Munsell 2000). Artifacts were to be washed, processed, catalogued, and curated at EBI Consulting, Burlington, Massachusetts. None were recovered. The ground surface was restored to original contours upon the completion of each STP.

A total of 16 STPs (Photos 16-22) were excavated in the APE-DE (see Figures 9 and 10). Four additional STPs were considered along the end of the access/utility easement near Moose Hill Road; however, the existing roadsides were excessively sloped and not testable (Photos 16 and 22). The maximum depth of the excavated STPs was 41cm (1.3ft) below ground surface (bgs). There were three general soil profiles within the APE-DE. STPs 1-8 (Photos 17-19) in the tower compound and upper part of the access/utility easement were typified by up to 37cm (1.2ft) of brown (7.5YR4/3) silty loam, underlain in STPs 3-5 by strong brown (7.5YR4/6) silty loam. STPs 9-11 (Photo20) and 13-16, along the access/utility easement, were typified by 28cm to 33cm (.9ft to 1.1ft) of very dark gray (7.5YR3/1) loam with gravel over 6cm to 13cm (.2ft to .4ft) of brown (7.5YR4/2) silty clay. Natural soils were encountered in these STPs. Only field trash (modern glass bottle and plastic piping) were recovered. No other cultural materials were encountered.

STP 12 (Photo 20) consisted of 21cm of black (10YR/2/1) fine silty loam over 13cm of dark yellowish brown (10YR4/4) silty loam. A piece of aluminum can was recovered, noted as modern trash and discarded. The soils in this STP appeared to be disturbed and the ground surface was covered by moss instead of grass. It was likely used as a trash/burn pit in the recent past.

No foundations or other features indicative of a building/structure were identified during the excavation. Due to the negative results of the subsurface testing of the APE-DE, no further archaeological testing is warranted in conjunction with this project.

Conclusions and Recommendations

In light of available information, it is my professional opinion that the APE-DE for the present project is not sensitive for the presence of significant precontact and/or historical archaeological resources. Despite its location in an environmental context that would have been attractive for use in the past, all STPs were negative. Accordingly, I recommend that no further archaeological testing be conducted in association with this project.

Should any archaeological deposits be encountered during the course of the construction of the telecommunications facility, all work must stop immediately and the Connecticut State Historic Preservation Office should be contacted.



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EBI Consulting

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Moose Hill Road, Guilford, New Haven County, CT

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1811 Connecticut, from actual survey. Hudson & Goodwin, Hartford, CT.

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1852 Map of the County of New Haven, Connecticut. Friend & Aub. Lith. Engravers, Philadelphia.







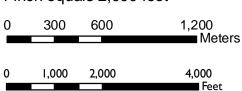
Legend

Project Site

Project Site Radius at 1 Mile

USGS 24k Quad: Guilford, CT 1985

1 inch equals 2,000 feet





Source: Selected data from USGS and EBI.

Figure I - USGS Quad Location Map CTNH805A/Amtrak Guilford **Moose Hill Road** Guilford, CT 06437

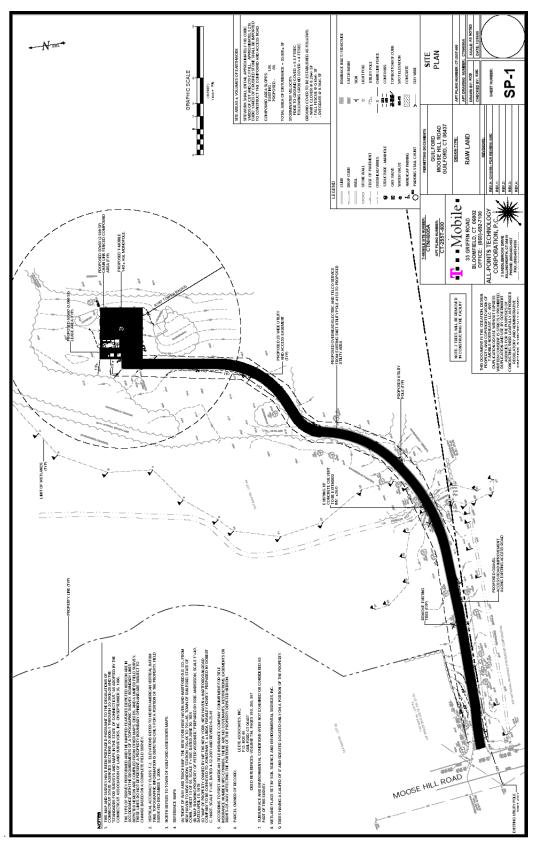


Figure 2 Site Plan



Figure 3 Project Plan





Figure 4 1852 Whiteford Map of County of New Haven, Connecticut



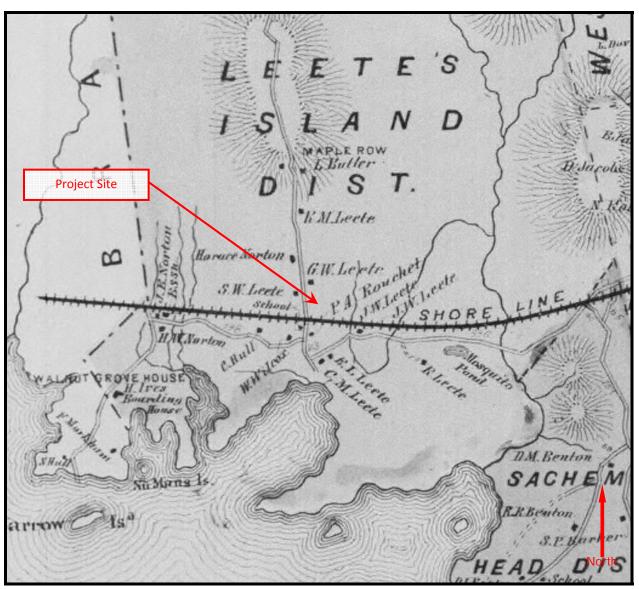


Figure 5 1868 Beers *Town of Guilford*



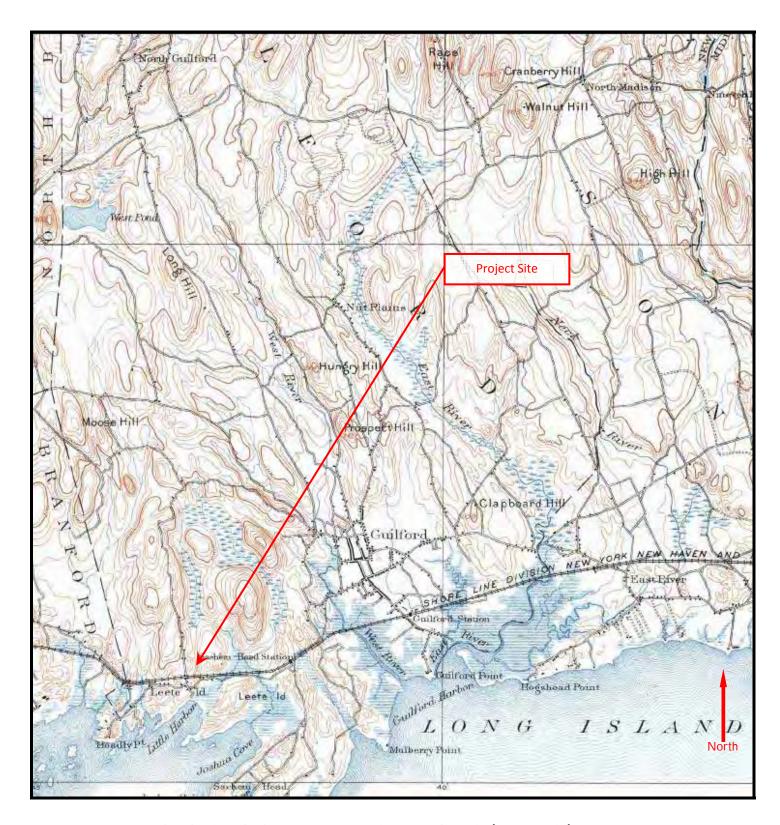


Figure 6 1893 USGS Guilford, CT 15' Topographic Quadrangle (1"=1 mile)



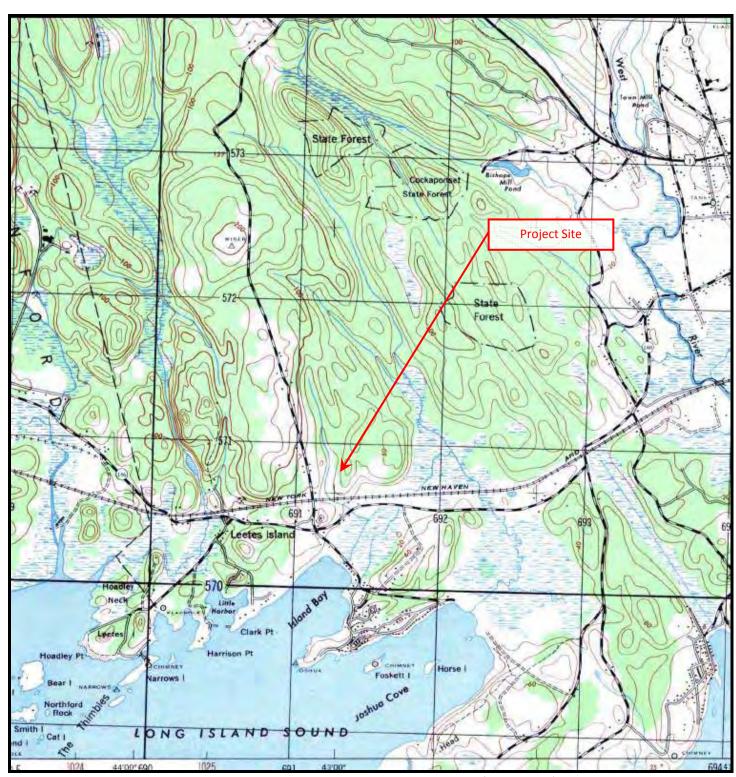


Figure 7 1943 USGS Guildford, CT 7.5' Topographic Quadrangle (1"=2000')



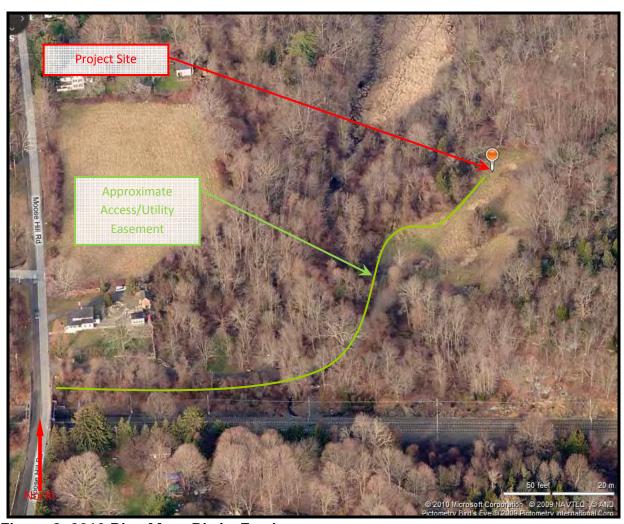


Figure 8 2010 Bing Maps Bird's-Eye Image



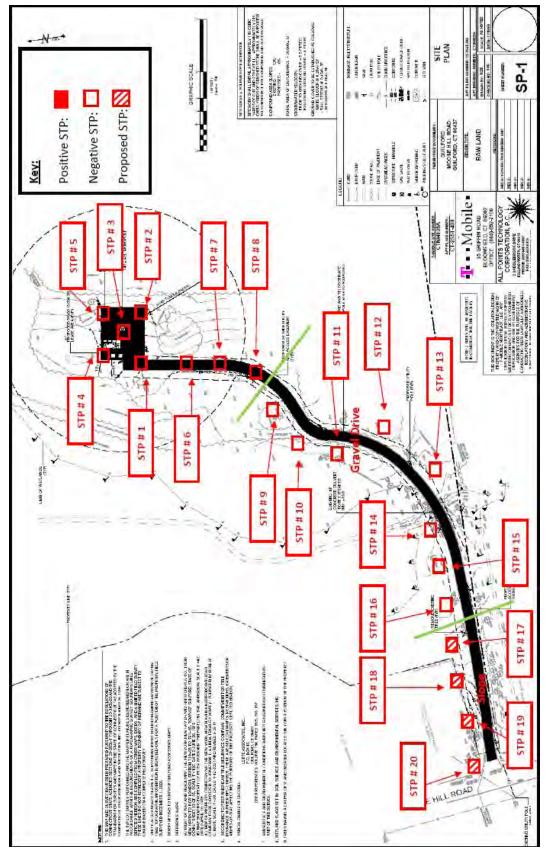


Figure 9 Shovel Test Pits (STP) Map



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HHI		SHOVEL TEST PIT LOG				
CONSULTING						
	Date:	1/6/2010	EBI Proj#:	61096865		
		&	-			
		3/12/2010				
TEST #	<u>DEPTH</u>	STRATUM	MUNSELL	COLOR	SOIL TYPE	ARTIFACTS/
						COMMENTS*
1	29cm	Α	7.5 YR 4/3	Brown	Silty Loam	Plastic piping pieces painted
						fluorescent orange; Sterile Soil
2	38cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM; Sterile Soil
3	16cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM
3	37cm	В	7.5 YR 4/6	Strong	Silty Loam	NCM; Sterile
				Brown		
4	22cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM
4	35cm	В	7.5 YR 4/6	Strong	Silty Loam	NCM; Sterile
				Brown		
5	20cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM
5	36cm	В	7.5 YR 4/6	Strong	Silty Loam	NCM; Sterile
				Brown		
6	32cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM; Sterile Soil
7	31cm	A	7.5 YR 4/3	Brown	Silty Loam	Glass Bottle; Sterile Soil
					-	
8	35cm	Α	7.5 YR 4/3	Brown	Silty Loam	NCM; Sterile Soil
9	30cm	Α	7.5 YR 3/1	Very Dark	Loam w/	NCM
				Gray	gravel	
9	36cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
10	29cm	Α	7.5 YR 3/1	Very Dark	Loam w/	NCM
				Gray	gravel	
10	39cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
11	30cm	Α	7.5 YR 3/1	Very Dark	Loam w/	NCM
11	300111		7.5 IN 5/1	Gray	gravel	ITOIVI
11	41cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
12	21cm	A	10 YR 2/1	Black	Fine Silty	Aluminum Piece to a can
12	21011		10 11(2/1	Diack	Loam	Administration Field to a Call
12	34cm	В	10 YR 4/4	Dark	Silty Loam	NCM; Sterile
	3		20 11. 4/4	Yellowish	Jacy 25din	
				Brown		



TEST #	<u>DEPTH</u>	STRATUM	MUNSELL	COLOR	SOIL TYPE	ARTIFACTS/ COMMENTS*
13	32cm	A	7.5 YR 3/1	Very Dark Gray	Loam w/ gravel	NCM
13	40cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
14	33cm	Α	7.5 YR 3/1	Very Dark Gray	Loam w/ gravel	NCM
14	39cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
15	28cm	Α	7.5 YR 3/1	Very Dark Gray	Loam w/ gravel	NCM
15	41cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
16	31cm	Α	7.5 YR 3/1	Very Dark Gray	Loam w/ gravel	NCM
16	38cm	В	7.5 YR 4/2	Brown	Silty Clay	NCM; Sterile
*NCM: no cu	*NCM: no cultural material in stratum/CM: cultural material in					
stratum						



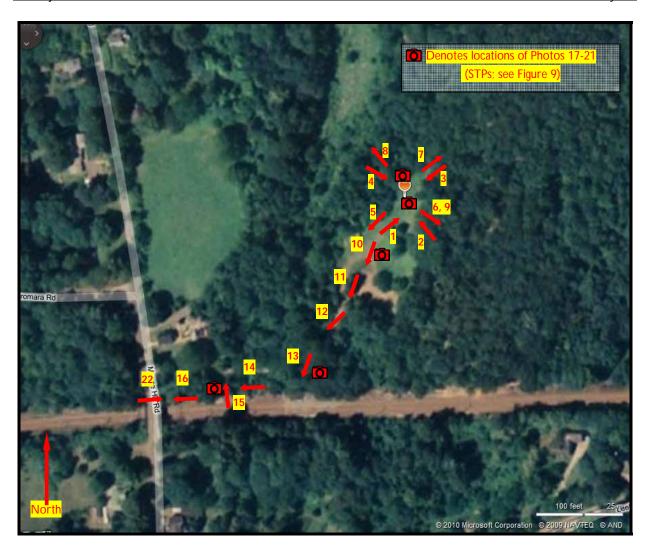


Photo Angles (Base Image: Bing Maps 2010)





1. Facing northeast across the Project Site (Note: rock outcrops).



2. Facing northwest across the Project Site.





3. Facing southwest across the Project Site toward the proposed access easement.



4. Facing southeast across the Project Site (Note: rock outcrops and compost area).











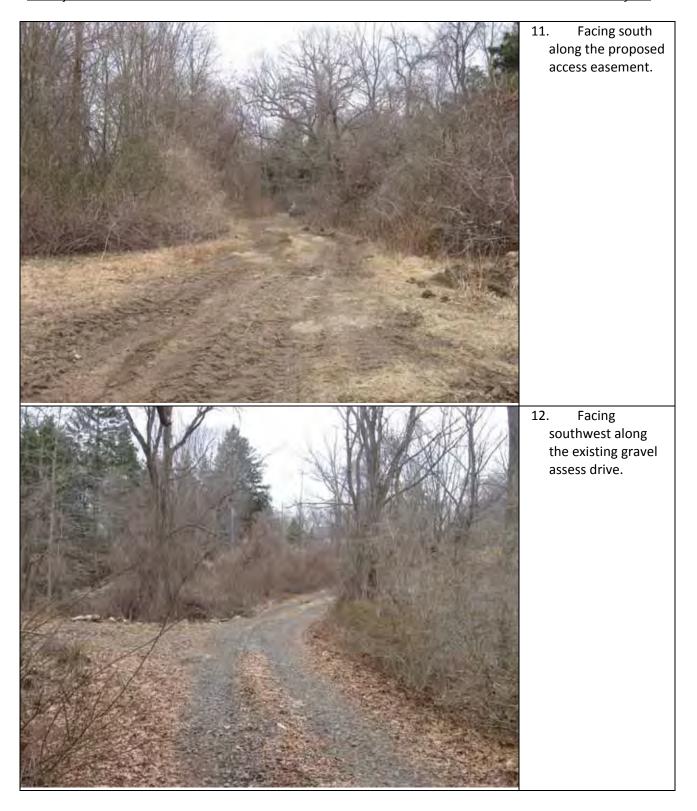


9. Close-up of rock outcrops.



10. Facing south along the proposed access easement.







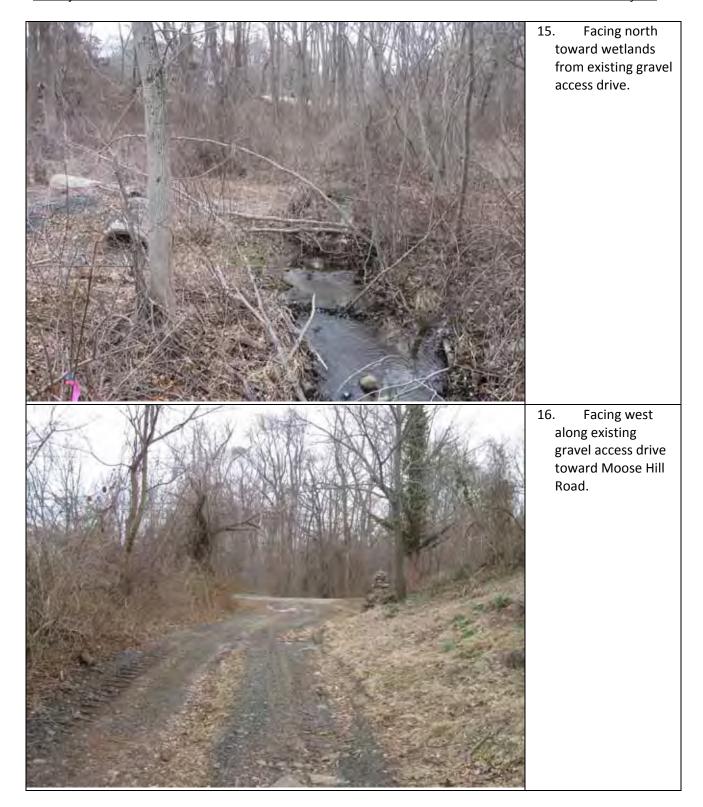


13. Facing southwest toward Amtrak railroad from the existing gravel access drive.



14. Facing west along the existing gravel access drive (Note: incline at the top of the access drive).

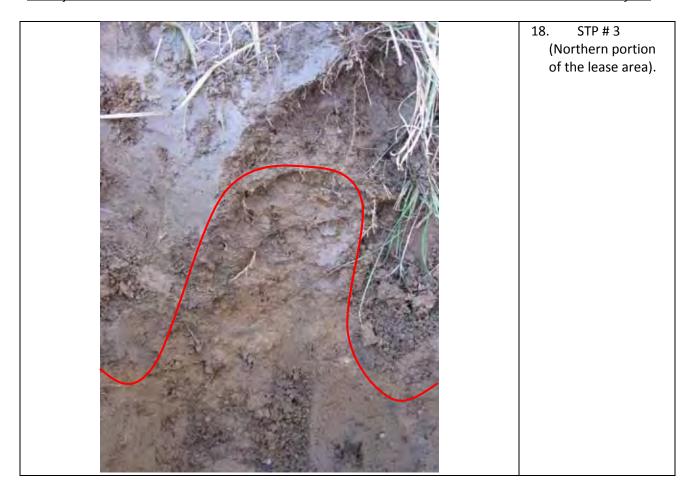




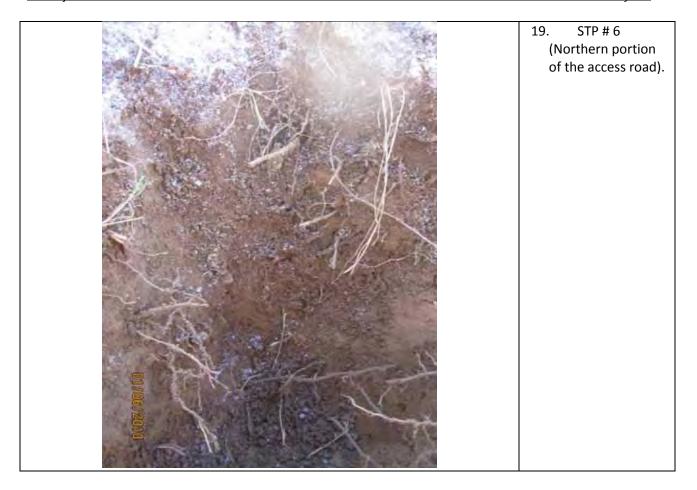
















20. STP # 12
(Within the wetlands area on the southern side of the existing gravel access drive).





21. STP # 15
(Along the southwestern end of the existing access drive, on the northern side).



22. Sloped area for proposed STP's 17-20.



Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 10. Effects on Identified Properties

For each property identified as a Historic Property in Attachments 8 and 9:

a. Indicate whether the Applicant believes the proposed undertaking would have a) no effect; b) no adverse effect; or, c) an adverse effect. Explain how each such assessment was made. Provide supporting documentation where necessary.

Based on a review of Connecticut SHPO files conducted by Mr. William F. Keegan, Historical Geographer of Heritage Consultants, LLC at the Connecticut SHPO on November 16, 2009, the results of any comments received from Indian Tribes, NHOs, local governments, or members of the public that identify Historic Properties in the APE for visual effects that are not listed in Attachment 8a, and the results of Mr. Stephen Forrest, Historian, of EBI Consulting evaluation of each property in the APE for direct effects, not listed in Attachment 9a, according to the National Register of Historic Places criteria of eligibility (36 C.F.R. Part 63), the following Historic Properties have been identified within the APE and the effect of the project on each property are outlined as follows.

NRHP/ Inventory Number	Historic Property Name	Effect Determination	Explanation of Effect Determination	EBI Photo No.
District -	Route 146	No Adverse	The proposed tower will be visible for a 460-	27-29,
#90000569	Historic District	Effect	foot stretch of Route 146 year round. Given the length of the Historic District, 460 feet is	31, and 32
	District		a small percentage of the overall area.	32
			Additionally The proposed installation will	
			not impact the architecture or historical	
			significance of the Historic District.	
			Therefore, the proposed facility will have no	
			adverse effect on this historic resource.	
N/A	Pelatiah	No Adverse	Due to existing topography, mature tree	28 &
	Leete	Effect	growth and dense development, the	30
	House		proposed monopole will be only minimally	
			visible from this location. Additionally The proposed installation will not impact the	
			architecture or historical significance of the	
			Pelatiah Leete House. Therefore, the	
			proposed facility will have no adverse effect	
			on this historic resource.	
N/A	558 Leetes	No Adverse	Due to existing topography, mature tree	38 &
	Island Road	Effect	growth and dense development, the	39
			proposed monopole will be only minimally	
			visible from this location. Additionally The	
			proposed installation will not impact the	
			architecture or historical significance of the house at 558 Leetes island Road. Therefore,	
			the proposed facility will have no adverse	
			effect on this historic resource.	
NA	48 Moose	No Adverse	Due to existing topography, mature tree	12 &
	Hill Road	Effect	growth and dense development, the	13
			proposed monopole will be only minimally	
			visible from this location. Additionally The	
			proposed installation will not impact the	
			architecture or historical significance of the	

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				to 10 hours
			48 Moose Hill Road building. Therefore, the	
			proposed facility will have no adverse effect	
			on this historic resource.	
NA	133 Moose	No Adverse	Due to existing topography, mature tree	15 &
	Hill Road	Effect	growth and dense development, the	17
			proposed monopole will be only minimally	
			visible from this location. Additionally The	
			proposed installation will not impact the	
			architecture or historical significance of the 133 Moose Hill Road building. Therefore, the	
			proposed facility will have no adverse effect	
			on this historic resource.	
NA	144 Moose	No Adverse	Due to existing topography, mature tree	14 &
	Hill Road	Effect	growth and dense development, the	17
			proposed monopole will be only minimally	
			visible from this location. Additionally The	
			proposed installation will not impact the	
			architecture or historical significance of the	
			144 Moose Hill Road building. Therefore, the	
			proposed facility will have no adverse effect	
			on this historic resource.	4.4
NA	149 Moose	No Adverse	Due to existing topography, mature tree	16 &
	Hill Road	Effect	growth and dense development, the	17
			proposed monopole will be only minimally	
			visible from this location. Additionally The proposed installation will not impact the	
			architecture or historical significance of the	
			149 Moose Hill Road building. Therefore, the	
			proposed facility will have no adverse effect	
			on this historic resource.	
NA	172 Moose	No Adverse	Due to existing topography, mature tree	18 &
	Hill Road	Effect	growth and dense development, the	19
			proposed monopole will be only minimally	
			visible from this location. Additionally The	
			proposed installation will not impact the	
			architecture or historical significance of the	
			179 Moose Hill Road building. Therefore, the	
			proposed facility will have no adverse effect on this historic resource.	
NA	283 Moose	No effect	Due to existing topography, mature tree	20 &
INA	Hill Road	NO effect	growth and dense development, the	20 Q 21
	Tim Rodd		proposed monopole will not be visible from	21
			this location. Additionally The proposed	
			installation will not impact the architecture or	
			historical significance of the 283 Moose Hill	
			Road building. Therefore, the proposed	
			facility will have no effect on this historic	
			resource.	
NA	7 Old	No Effect	Due to existing topography, mature tree	23 &
	Quarry		growth and dense development, the	24
	Road		proposed monopole will not be visible from	
			this location. Additionally The proposed	
			installation will not impact the architecture or	

Applicant's Name: T-Mobile Northeast, LLC
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			historical significance of the 7 Old Quarry Road building. Therefore, the proposed facility will have no effect on this historic resource.	
NA	15 Wingate Road	NA	Property is located on a private road therefore was not accessible.	33

b. Provide copies of any correspondence and summaries of any oral communications with the SHPO/THPO.

As of the date of this report, there has been no correspondence with the SHPO/THPO.

c. Describe any alternatives that have been considered that might avoid, minimize, or mitigate any adverse effects. Explain the Applicant's conclusion regarding the feasibility of each alternative.

As noted in Attachment 10, no adverse effects are expected as a result of the proposed facility; therefore alternatives that might avoid, minimize, or mitigate any adverse effects need not be considered.

Attachment 11. Photographs

Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map (*see* Item 12 below) or text, and dated; the focal length of the lens should be noted. The source of any photograph included but not taken by the Applicant or its consultant (including copies of historic images) should be identified on the photograph.

- a. Photographs taken from the tower site showing views from the proposed location in all directions. The direction (*e.g.*, north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed tower.
- b. Photographs of all listed and eligible properties within the Areas of Potential Effects.
- c. If any listed or eligible properties are visible from the proposed tower site, photographs looking at the tower site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included.
- d. Aerial photos of the APE for visual effects, if available.

Please see the attached Photographs, which were taken by Ms. Ami Senechal-Anderson, of EBI Consulting on November 24, 2009, unless otherwise noted. A photograph location map is included in Attachment 12, Maps.

Applicant's Name: T-Mobile Northeast, LLC
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CTNH805A

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CTNH805A

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Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

Amtrak Guilford

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Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC Amtrak Guilford

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Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

Amtrak Guilford

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

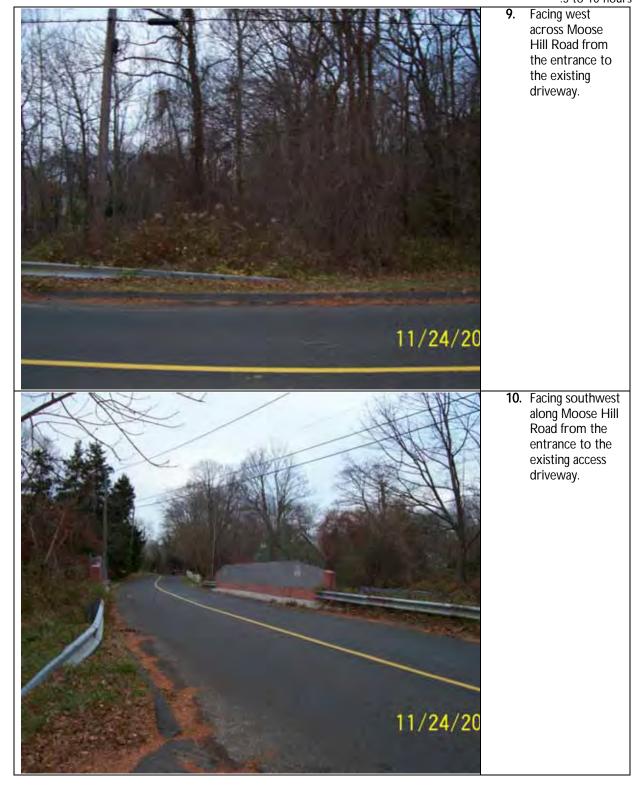


Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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Applicant's Name: Project Name: Project Number:

T-Mobile Northeast, LLC

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11. Facing southwest along Moose Hill Road from the entrance to the existing access driveway.



12. Facing northwest toward the 48 Moose Hill Road house.

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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13. Facing northeast toward the Project Site from Moose Hill Road in the vicinity of 48 Moose Hill Road.



14. Facing northeast toward 144 Moose Hill Road.

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

Amtrak Guilford

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15. Facing northwest toward 133 Moose Hill Road.



16. Facing southeast toward 149 Moose Hill Road.



Applicant's Name: _ Project Name: _ Project Number: _ T-Mobile Northeast, LLC

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17. Facing southeast toward the Project Site past 149 Moose Hill Road from the vicinity of 144 and 133 Moose Hill Road, approximately 800 feet to the northwest.



18. Facing southwest toward 172 Moose Hill Road.

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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19. Facing southeast toward the Project Site along Moose Hill Road from the vicinity of 172 Moose Hill Road, approximately 2,000 feet to the northwest of the Project Site.



20. Facing southeast toward 283

Moose Hill Road.

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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21. Facing southeast toward the Project Site from the vicinity of 283 Moose Hill Road, approximately 2,250 feet to the northwest.



22. Facing southsoutheast toward the Project Site from Moose Hill Road, approximately ½ mile to the north-northwest.

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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23. Facing southwest toward 7 Old Quarry Road. Photo taken January 7, 2010



24. Facing northeast toward the Project Site from the vicinity of 7 Old Quarry Road, located approximately ½ mile to the southwest (photo taken January 7, 2010).

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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25. Facing north toward 715
Leetes Island
Road located within the Route 146 Historic District.



26. Facing northeast toward the Project Site from the vicinity of the 715 Leetes Island Road within the Route 146 Historic District. This photo was taken from approximately 1,500 feet to the southwest.

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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27. Facing southwest along the Route 146 Historic District.



28. Facing northwest toward the Project Site from the Route 146 Historic District in the vicinity of 588 Leetes Island Road and the Pelatiah Leete House, approximately 800 feet to the southeast.

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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29. Facing southwest toward 588
Leets Island
Road, part of the Route 146
Historic District.



30. Facing north toward the Pelatiah Lette House, located within the Route 146 Historic District. Note: Photo taken July 18, 2009.

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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31. Facing westnorthwest
toward the
Project Site along
Leetes Island
Road (a portion
of the Route 146
Historic District)
from
approximately ½
mile to the eastsoutheast.



32. Facing westnorthwest along
Leetes Island
Road
approximately
3,250 feet from
the Project Site.
This area is part
of the Route 146
Historic District.

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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33. Facing westnorthwest along Leetes Island Road from approximately 3,250 feet to the east-southeast. This area is part of the Route 146 Historic District.



34. Street sign for Wingate Road (location of 15 Wingate Road). Signage indicates that road is private. Photo taken January 7, 2010

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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35. Facing northeast toward the Project Site from 15 Wingate Road. (Google Maps Street Viewer, 2010)



36. Signage for southern portion of Shell Beach Road (private road). Photo taken January 7, 2010

Applicant's Name:
Project Name:
Project Number:

T-Mobile Northeast, LLC

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37. Facing northwest toward the Project Site from the terminus of the public portion of Shell Beach Road, approximately 2,500 to the south. Photo taken January 7, 2010



38. Facing southeast toward 558
Leetes Island
Road, located within the Route
146 Historic
District. (Google Maps Street
Viewer, 2010)

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

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39. Facing northwest/west toward the Project Site from 558 Leetes Island Road, located within the Route 146 Historic District. (Google Maps Street Viewer, 2010)

Applicant's Name: Project Name: Project Number: T-Mobile Northeast, LLC

Amtrak Guilford CTNH805A

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attachment 12. Maps

Include one or more 7.5-minute quad USGS topographical maps that:

- a. Identify the Areas of Potential Effects for both direct and visual effects. If a map is copied from the original, include a key with name of quad and date.
- b. Show the location of the proposed tower site and any new access roads or other easements including excavations.
- c. Show the locations of each property listed in Attachments 8 and 9.
- d. Include keys for any symbols, colors, or other identifiers.

The following maps have been attached to this report:

Street Map (Figure 1)

Topographic Map (Figure 2)

Photo-location Map (Figure 3)

Aerial Map(s) (Figure 4)

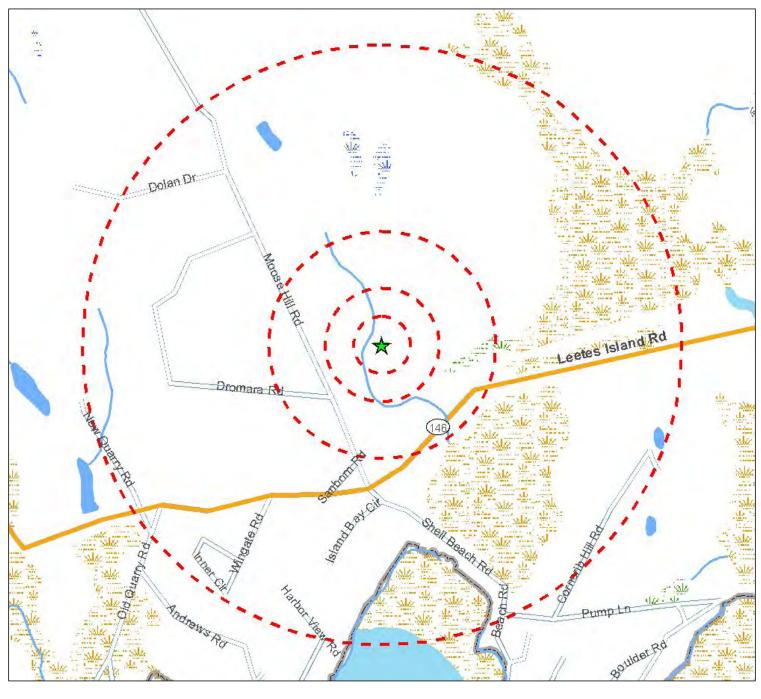
Viewshed Reports

Site Plans/Lease Exhibits provided by T-Mobile Northeast, LLC

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

FCC Form 620 December 2007





Source: Selected data from ESRI, EBI and NWI

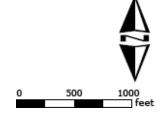
Figure 1 - Site Location Map

Guilford South, CT/P# 2000018269 L# 117585

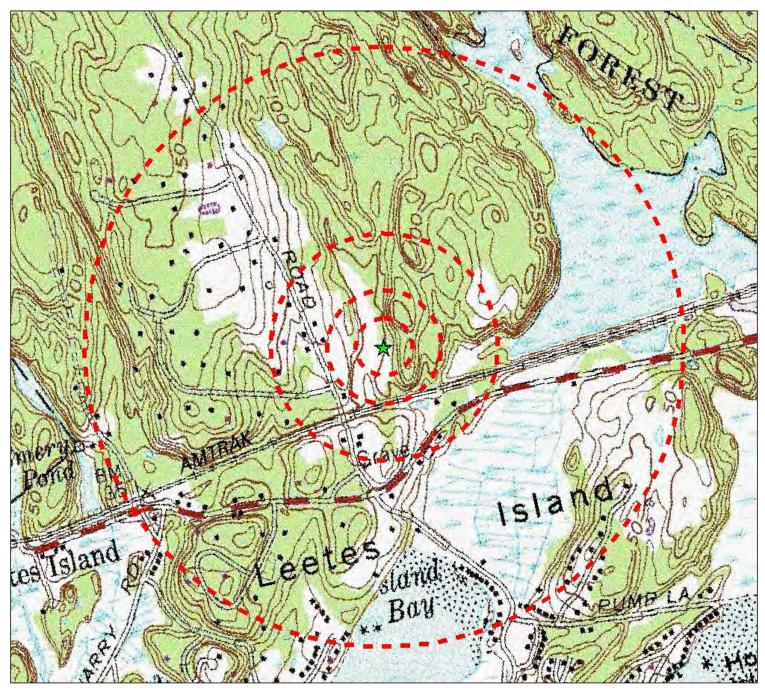
Moose Hill Road

Guilford, CT

PN: 61093359





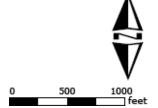


USGS 24k Quad: Guilford, CT 1985

Source: Selected data from ESRI, EBI and USGS

Figure 2 - USGS Quad Location Map

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT





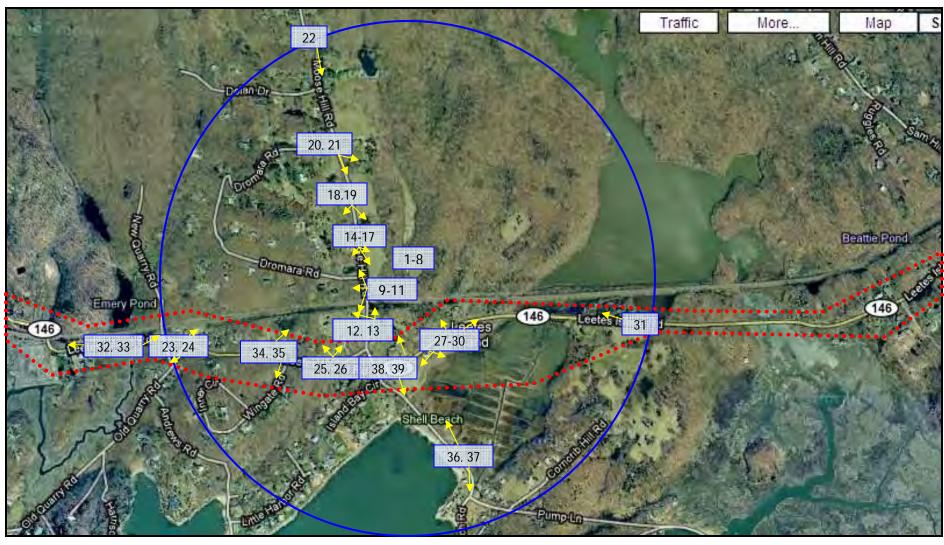
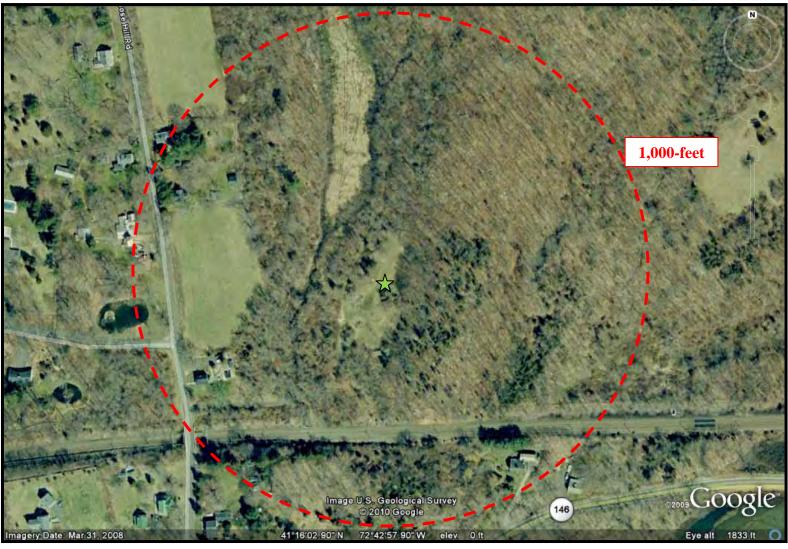


Photo Location Map

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT





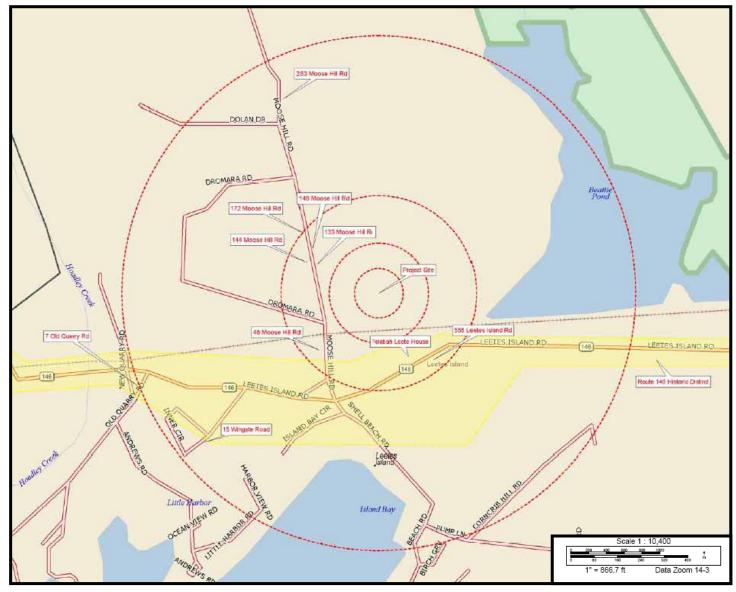


Aerial Photograph

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT

PN: 61093359





Historic Resources Map (DeLorme, 2007)

Amtrak Guilford / CTNH805A Moose Hill Road, Guilford New Haven County, Connecticut 06437

PN: 61096865



Visual Analysis Report

AMTRAK GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437

CHA Project Number: 14957.2001.1101

Prepared for: T-Mobile Northeast LLC 35 Griffin Road Bloomfield, CT 06002

Prepared by:



January 2010 Rev. 0



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1.0 INTRODUCTION

CHA conducted a visibility study for the proposed 140'-0" monopole located at Moose Hill Road in Guilford, CT. The purpose of the study was to determine the visual impact, if any, that a proposed 140'-0" monopole would have on the surrounding community within a two mile radius study area. Two techniques were utilized to determine the visual impact within the study area: a computer model using topography and vegetation as constraints to estimate the visual limits, and a field analysis to verify the visual limits determined from the computer model. Research of the study area was also conducted to determine locations of sensitive visual receptors.

2.0 SITE AND STUDY AREA DESCRIPTION

The subject parcel is approximately 163 acres. A majority of the parcel is wooded, and there are no residences on the subject parcel. The proposed facility is located in an existing tree clearing in the southwest corner of the property. The base of the tower will be 52' AMSL. The wooded area surrounding the proposed facility will act as a visual buffer to the adjacent residential and wooded parcels.

The topography within the study area consists of hills ranging from 50' AMSL to 150' AMSL. Approximately 3,420 acres, or 42.5%, of the 8,053 acre study area is covered with vegetation. The rolling hills and heavy vegetation in the study area will help screen the facility in the surrounding study area. Watercourses occupy approximately 2,180 acres, or 27.1%, of the study area. There are 10 historical sites, 3 parks/recreational areas, 2 trail systems, 3 schools, 1 church, and 1 cemetery within the study area. There is one state designated scenic road, State Route 146, within the study area.

3.0 COMPUTER MODEL VISUAL ANALYSIS

A computer model was developed using a proprietary AutoCAD-based application developed by our Technology Solutions Group to estimate how the surrounding topography and vegetation within a 2 mile radius may obstruct the monopole's visibility. The visibility calculations are completed using digital elevation models (DEM), which are models of the earth's surface represented by a grid of elevations spaced 10 or 30 meters and is based on USGS topography maps. Each point in the DEM is independently tested for visibility based on the surrounding topography developed from the USGS maps. Once all points have been tested, a map is generated showing areas of visibility and areas screened by topography. Knowing which areas are screened by topography will assist in field determining which areas within the study area may have seasonal visibility. Next, vegetation within the study area is added to the map by digitizing it from 2004 aerial photographs. CHA's application utilizes a vegetation outline layer which is assigned the standard 65' height. A new map is generated showing only areas of visibility based on topography and the vegetation constraint. The visible areas on the map based on the surrounding topography and vegetation will be verified during the field visual analysis.

4.0 VISUAL RECEPTOR RESEARCH

Research of the surrounding study area was conducted to determine the locations of sensitive visual receptors such as historic sites, historic districts, schools, churches, cemeteries, parks, playgrounds, recreational areas, walking trails, beaches, and scenic roads. Historic sites and districts were determined from the National Register of Historic Places. State parks and walking trail systems were determined from the CTDEP website. Surrounding schools, churches, cemeteries, parks, playgrounds, recreational areas, and beaches were determined from street maps, internet searches, and available mapping from town

Visual Analysis Report Amtrak Guilford

websites. Scenic roads were determined from the CTDOT list of designated scenic roads. Inquiries were also made to the Towns of Guilford and Branford to determine if there are any locally designated scenic roads, historic districts or properties, or walking trails within the study area. All of the above sensitive visual receptors were added to the viewshed map.

Scenic lands acquired by the State of Connecticut pursuant to P.A. 445 were researched to determine proximity to the proposed site. Connecticut Heritage Areas pursuant to Public Act No. 09-221 (The Quinebaug and Shetucket Rivers Valley National Heritage Corridor, and The Upper Housatonic Valley National Heritage Area) were also researched to determine possible visual impacts. Neither of these research categories was found to be within the two mile radius study area.

5.0 FIELD VISUAL ANALYSIS

On January 21, 2010 a field visual analysis was conducted to verify the sensitive visual receptors and the limit of visibility determined from our research and computer model. Weather conditions were favorable on the date of the visibility study as it was a clear and sunny day with winds between 7 and 8 MPH; therefore, visibility of the balloon from surrounding areas was not affected. In general, the field visibility study was conducted as follows: A 60" diameter red balloon was flown at a height of 140'-0" above existing grade. Once the balloon was flown, CHA completed a field drive of the surrounding area to determine the visibility of the balloon, and thus the proposed tower. Visibility from the sensitive visual receptors was our primary focus so photos were taken from each of these locations. Photos were also taken from major streets, intersections, and residential areas; from key areas where the balloon was visible; and from key areas where it was not visible. The limits of visibility determined from the computer model were field verified and adjusted as needed. Areas of potential seasonal visibility were field determined and marked on the viewshed map. Finally, the number of residences within the seasonal and year round visible areas was determined.

6.0 CONCLUSION

The results of our visual study are summarized in the following documents: Section 7.0: Viewshed Map, and Section 8.0: Photosims. In conclusion, the year round visual impact to the surrounding community within a two mile radius is limited to the red hatched areas on the viewshed map, which is approximately 15.7%, or 1,260.6 acres, of the total study area. The limit of year round visibility includes the area surrounding the following public streets: a 255' and a 265' stretch along Moose Hill Road, a 190' stretch along Dromara Road, a 460' stretch along Leete's Island Road (State Route 146), a 100' and a 375' stretch along Old Sachems Head Road, a 220' and a 585' stretch along Uncas Point Road, a 290' stretch along Uncas Circle, a 1,975' stretch along Shell Beach Road, a 1,025' stretch along Joshua Point Road, a 330' stretch along Rockledge Circle, a 480' stretch along Birch Grove, a 315' stretch along Beach Road, a 300' stretch along Hickory Lane, and a 170' stretch along Juniper Knolls. These areas contain residential properties and will impact the following number of residences: 4 residences along Moose Hill Road, 1 residence along Leetes Island Road (State Route 146), 23 residences along Old Sachems Head Road, 8 residences along Uncas Point Road, 1 residence along Uncas Circle, 14 residences along Shell Beach Road, 8 residences along Joshua Point Road, 8 residences along Rockledge Circle, 10 residences along Birch Grove, 9 residences along Beach Road, 4 residences along Hickory Lane, and 1 residence along Juniper Knolls. The proposed monopole will be seen year round from the following sensitive visual receptors: a 460' stretch along the Route 146 Historic District (State designated scenic roadway), offshore sections of the Stony Creek-Thimble Islands Historic District, a small section of the Westwoods Trails system (white square trail) adjacent to Lost Lake, the Pelatiah Leete House, and Shell Beach.

Visual Analysis Report Amtrak Guilford

Immediately outside some of the limits of year round visibility, trees start to screen the proposed monopole giving the potential for seasonal views. The blue hatched areas on the viewshed map indicate the seasonal visual impact determined during leaf off conditions, which is approximately 0.7%, or 58.3 acres, of the total study area. The limit of seasonal visibility includes the area surrounding the following public streets: a 325', 885' and 1140' stretch along Moose Hill Road, a 140', 450' and 470' stretch along Dromara Road, a 440', 740' and 2,060' stretch along Leetes Island Road (State Route 146), a 350' stretch along Sanborn Road, a 150', 240' and 275' stretch along Old Sachems Head Road, and a 370' stretch along Shell Beach Road. Some of these areas contain residential properties and will impact the following number of residences: 11 residences along Moose Hill Road, 7 residences along Dromara Road, 1 residence along Leetes Island Road (State Route 146), 1 residence along Sanborn Road, 3 residences along Old Sachems Head Road, and 1 residence along Arrowhead Drive. The proposed monopole will be seen seasonally from stretches (440', 740', and 2060') along the Route 146 Historic District, which is one of the sensitive visual receptors identified during research of the study area. Route 146 is also a state designated scenic roadway in the study area.

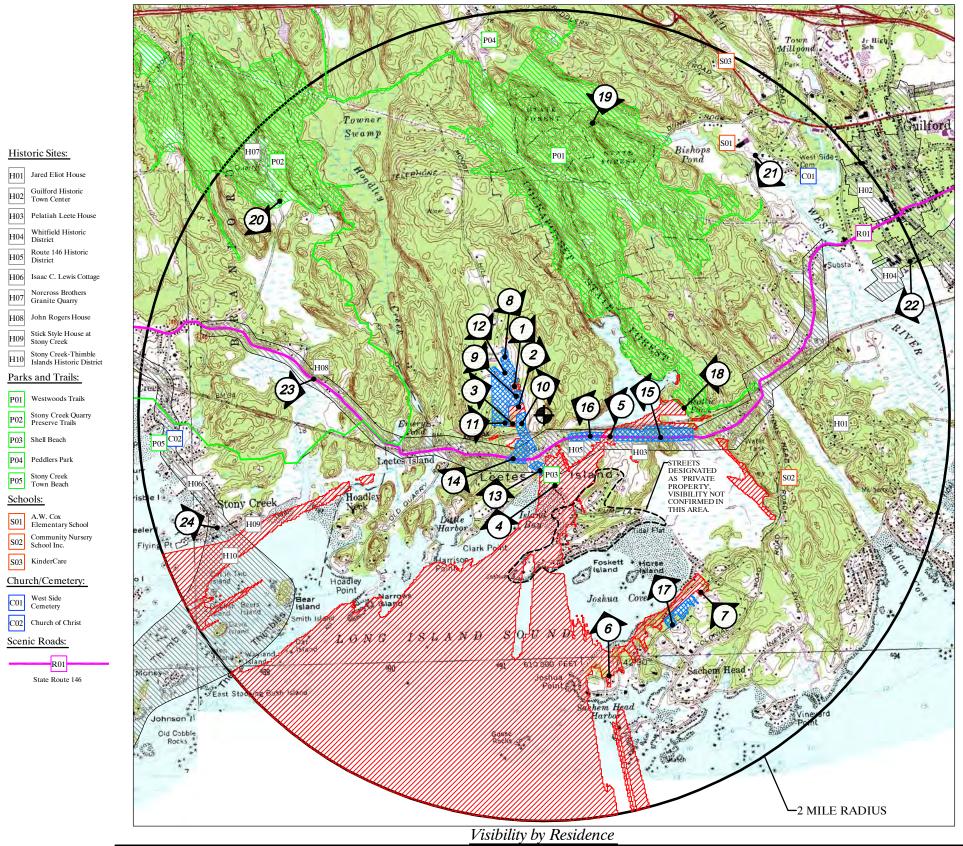
The remainder of the two mile radius study area is screened by topography (2,963.5 acres, 36.8%) and vegetation (3,770.6 Acres, 46.8%). Photos documenting the visible conditions described above have been included in the photo-simulations with their locations marked on the viewshed map. Following is a summary of each view with a description of the tower visibility:



View Number	Location	Distance from Tower	Visibility	Amount of Tower Visible (Ft/%)	Quantity of Nearby Residences with Views	Nearby Visual Receptors with Views
1	Moose Hill Road	1,075	Visible	75' / 53.6%	Moose Hill Road-2	None
2	Moose Hill Road	694	Visible	Year Round - 30' / 21.4% Seasonal - 60' / 42.9%	Moose Hill Road-2	None
3	Dromara Road	842	Visible	Year Round - 15' / 10.7% Seasonal - 90' / 64.3%	None	None
4	Shell Beach Road	1,849	Visible	85' / 60.7%	Shell Beach Road-14 Joshua Point Road-8 Rockledge Circle-8 Birch Grove-10 Beach Road-9 Hickory Lane-4 Juniper Knolls-1	P03
5	Leetes Island Road	1,809	Visible	65' / 46.4%	Leetes Island Road-1	H05, R01
6	Uncas Point Road	6,987	Visible	35' / 25%	Old Sachem Head Road-12 Uncas Point Road-8 Uncas Circle-1	None
7	Old Sachems Head Road	6,156	Visible	10' / 7.1%	Old Sachems Head Road-11	None
8	Moose Hill Road	1,829	Seasonal	35' / 25%	Moose Hill Road-3	None
9	Moose Hill Road	875	Seasonal	40' / 28.6%	Moose Hill Road-3	None
10	Moose Hill Road	620	Seasonal	90' / 64.3%	Moose Hill Road-1	None
11	Dromara Road	1,030	Seasonal	85' / 60.7%	Dromara Road-5	None
12	Dromara Road	1,503	Seasonal	80' / 57.1%	Dromara Road-2	None
13	Shell Beach Road	1,441	Seasonal	10' / 7.1%	None	None
14	Leetes Island Road	1,386	Seasonal	30' / 21.4%	Leetes Island Road-1 Sanborn Road-1 Moose Hill Road-4	H05, R01
15	Leetes Island Road	3,089	Seasonal	45' / 32.1%	None	H05, R01, H03
16	Leetes Island Road	1,321	Seasonal	35' / 25%	None	H05, R01
17	Old Sachems Head Road	6,401	Seasonal	10' / 7.1%	Old Sachems Head Road-3 Arrowhead Drive-1	None
18	Westwoods Trails	3,656	Visible	5' / 3.6%	None	P01
19	Westwoods Trails (Scenic Viewpoint)	7,713	Non-Visible	Non-Visible	None	None
20	Quarry Road	8,856	Non-Visible	Non-Visible	None	None
21	3 Mile Course	8,728	Non-Visible	Non-Visible	None	None
22	Norton Avenue	10,343	Non-Visible	Non-Visible	Non-Visible None	
23	Leetes Island Road	6,069	Non-Visible	Non-Visible	None	None
24	Flying Point Road	9,003	Non-Visible	Non-Visible	None	None

Visual Analysis Report CHA Project No: 14957.2001.1101

7.0 VIEWSHED MAP



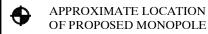
*Streets designated as 'Private Property'. Visibility not confirmed in these areas. Residence counts derived from computer visibility model and aerial imagery.

			v isidiliy t	<i>y</i> Residence	_			
STREET	YEAR ROUND TOTAL	SEASONAL TOTAL	STREET	YEAR ROUND TOTAL	SEASONAL TOTAL	STREET	YEAR ROUND TOTAL	SEASONAL TOTAL
Moose Hill Road	4	11	Uncas Circle	1	-	Joshua Point Road*	8	-
Dromara Road	-	7	Arrowhead Drive	-	1	Rockledge Circle*	8	-
Leetes Island Road	1	1	Shell Beach Road	10		Birch Grove*	10	-
Sanborn Road	-	1	(North of Pump Lane)	10	-	Beach Road*	9	-
Old Sachems Head Road	23	3	Shell Beach Road* (South of Pump Lane)	4		Hickory Lane*	4	-
Uncas Point Road	8	-		4	-	Juniper Knolls*	1	-

NOTES:

- 1. Only visible areas are shown on the map utilizing the process described in note 2. The remainder of the map has been estimated to be nonvisible utilizing the process described in note 3.
- 2. Seasonal and year round areas of visibility were estimated from a field visual analysis within public R.O.W. and public properties. Areas shown on private property were interpolated from the field visual analysis.
- 3. Nonvisible areas were estimated from a computer generated topography & vegetation analysis and field verification of vegetation & building screening within public R.O.W and public properties. Vegetation limits were determined from 2004 aerial photos and is assumed to be 65' high. Verification of vegetation height, coverage, and type within private areas not visible from public R.O.W or public properties was not field verified.
- 4. Historical areas were determined from the National Register of Historic Places
- 5. Parks, schools, cemeteries, and churches were determined from street maps and field observations.
- 6. Scenic roads, if any, were determined from the CTDOT list of designated scenic roads and field observations.

Legend





COMPUTER SIMULATION PHOTOGRAPH LOCATION



APPROXIMATE LIMIT OF SEASONAL TOWER VISIBILITY



APPROXIMATE LIMIT OF YEAR ROUND TOWER VISIBILITY





APPROXIMATE LIMIT OF HISTORIC DISTRICT

H# HISTORICAL SITE
SCENIC ROAD

s# SCHOOL
TRAIL

APPROXIMATE LIMIT OF TRAIL SYSTEM

Visibility by Acreage

ITEM	APPROXIMATE ACRES	% OF TOTAL AREA
2 MILE RADIUS AREA	8,053	100%
NOT VISIBLE DUE TO TOPOGRAPHY	2,963.5	36.8%
NOT VISIBLE DUE TO VEGETATION	3,770.6	46.8%
VISIBLE YEAR ROUND	1,260.6	15.7%
POTENTIAL SEASONAL VISIBILITY	58.3	0.7%

Distances from Photo Locations to Tower

	РНОТО	DIST. (FT)	РНОТО	DIST. (FT)	РНОТО	DIST. (FT)
	01	1,075	09	875	17	6,401
	02	694	10	620	18	3,656
	03	842	11	1,030	19	7,713
E	04	1,849	12	1,503	20	8,856
	05	1,809	13	1,441	21	8,728
Г	06	6,987	14	1,386	22	10,343
	07	6,156	15	3,089	23	6,069
	08	1,829	16	1,321	24	9,003

2 MILE VIEWSHED ANALYSIS MAP

MOOSE HILL ROAD, GUILFORD, CT VISUAL IMPACT ASSESSMENT

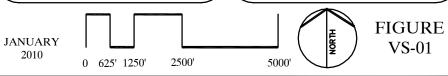
PREPARED FOR:

T-MOBILE NORTHEAST LLC

35 GRIFFIN ROAD BLOOMFIELD, CT 06002 OFFICE: (860)-692-7100



HA Project No. 4957-2001-1101



8.0 PHOTOSIMS





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 1 - EXISTING VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 1 - PROPOSED VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 2 - EXISTING VIEW FROM MOOSE HILL ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 2 - PROPOSED VIEW FROM MOOSE HILL ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 3 - EXISTING VIEW FROM DROMARA ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 3 - PROPOSED VIEW FROM DROMARA ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 4 - EXISTING VIEW FROM SHELL BEACH ROAD LOOKING NORTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 4 - PROPOSED VIEW FROM SHELL BEACH ROAD LOOKING NORTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 5 - EXISTING VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 5 - PROPOSED VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 6 - EXISTING VIEW FROM UNCAS POINT ROAD LOOKING NORTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 6 - PROPOSED VIEW FROM UNCAS POINT ROAD LOOKING NORTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 7 - EXISTING VIEW FROM OLD SACHEMS HEAD ROAD LOOKING NORTHWEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE

SITE: AMTRAK GUILFORD VIEW 7 - PROPOSED VIEW FROM OLD SACHEMS HEAD ROAD LOOKING NORTHWEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 8 - EXISTING VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 8 - PROPOSED VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 9 - EXISTING VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 9 - PROPOSED VIEW FROM MOOSE HILL ROAD LOOKING SOUTHEAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 10 - EXISTING VIEW FROM MOOSE HILL ROAD LOOKING NORTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 10 - PROPOSED VIEW FROM MOOSE HILL ROAD LOOKING NORTHEAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC

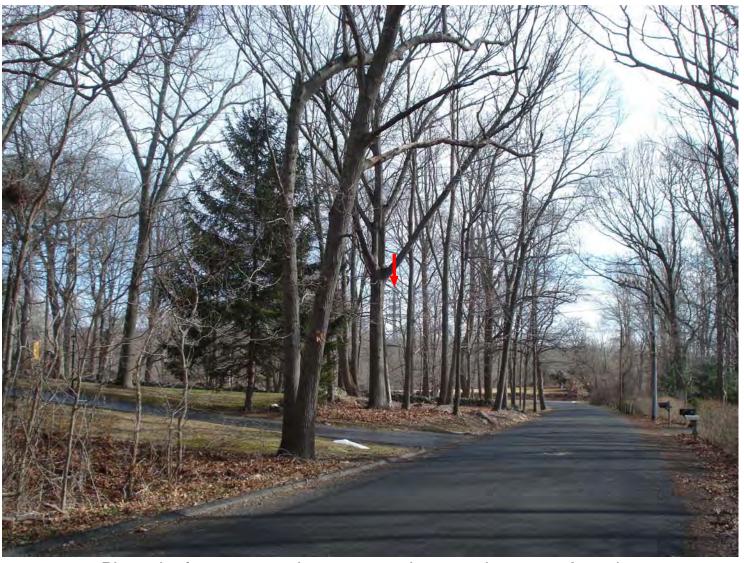




DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 11 - EXISTING VIEW FROM DROMARA ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 11 - PROPOSED VIEW FROM DROMARA ROAD LOOKING EAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 12 - EXISTING VIEW FROM DROMARA ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 12 - PROPOSED VIEW FROM DROMARA ROAD LOOKING SOUTHEAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 13 - EXISTING VIEW FROM SHELL BEACH ROAD LOOKING NORTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 13 - PROPOSED VIEW FROM SHELL BEACH ROAD LOOKING NORTH TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 14 - EXISTING VIEW FROM LEETES ISLAND ROAD LOOKING NORTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 14 - PROPOSED VIEW FROM LEETES ISLAND ROAD LOOKING NORTHEAST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 15 - EXISTING VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 15 - PROPOSED VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 16 - EXISTING VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC

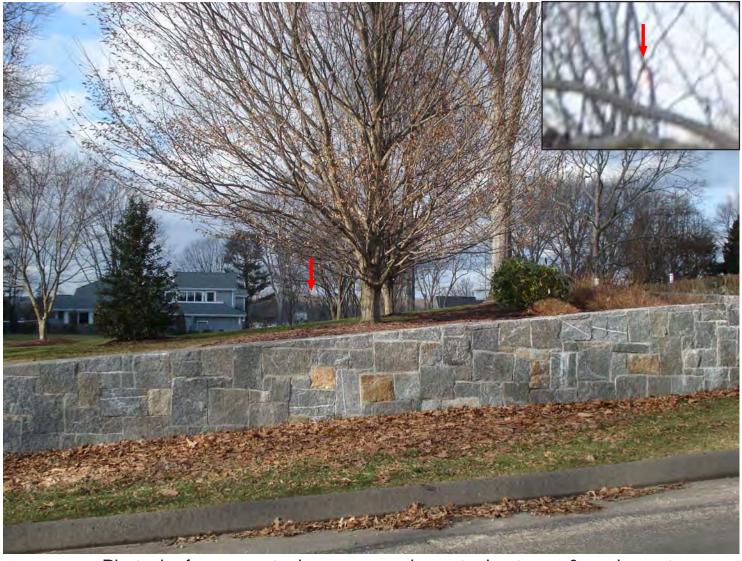




DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 16 - PROPOSED VIEW FROM LEETES ISLAND ROAD LOOKING WEST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010 SITE: AMTRAK GUILFORD

VIEW 17 - EXISTING VIEW FROM OLD SACHEMS HEAD ROAD LOOKING NORTHWEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 17 - PROPOSED VIEW FROM OLD SACHEMS HEAD ROAD LOOKING NORTHWEST TOWARDS SITE (SEASONAL VISIBILITY)

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 18 - EXISTING VIEW FROM WESTWOODS TRAILS LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 18 - PROPOSED VIEW FROM WESTWOODS TRAILS LOOKING WEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 19 - NON-VISIBLE VIEW FROM SCENIC VIEWPOINT ON WESTWOODS TRAILS LOOKING SOUTH TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 20 - NON-VISIBLE VIEW FROM QUARRY ROAD LOOKING SOUTHEAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 21 - NON-VISIBLE VIEW FROM 3 MILE COURSE LOOKING SOUTHWEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 22 - NON-VISIBLE VIEW FROM NORTON AVENUE LOOKING SOUTHWEST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

SITE: AMTRAK GUILFORD VIEW 23 - NON-VISIBLE VIEW FROM LEETES ISLAND ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC





DATE: JAN 2010

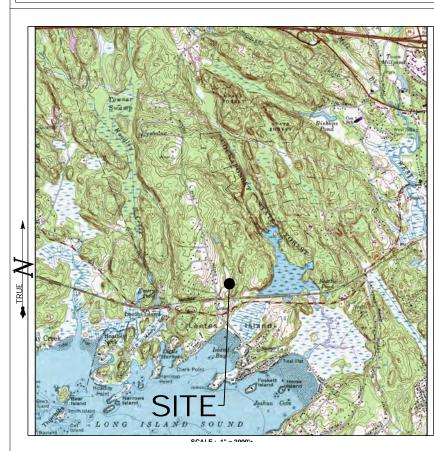
SITE: AMTRAK GUILFORD VIEW 24 - NON-VISIBLE VIEW FROM FLYING POINT ROAD LOOKING EAST TOWARDS SITE

T-MOBILE NORTHEAST LLC

LOCATION MAP



USGS TOPOGRAPHIC MAP



- Mobile -

35 GRIFFIN ROAD BLOOMFIELD, CT 06002 OFFICE: (860)-692-7100 FAX: (860)-692-7159

41° 16' 02.88" N

72° 42' 57 81" W

52'± AMSL

ZONE 'C'

DRAWING INDEX

T-1 TITLE SHEET & INDEX

A-1 ABUTTERS MAP

SP-1 SITE PLAN

SP-2 COMPOUND PLAN AND TOWER ELEVATION

AE-1 AERIAL MAP

*SITE INFORMATION: -SITE NAME: GUII FORD -LATITUDE: -SITE ID NUMBER:. -SITE ADDRESS:.. MOOSE HILL ROAD -LONGITUDE GUILFORD, CT 06437 -FLEVATION: -FEMA/FIRM DESIGNATION -ACREAGE: -BLOCK:. N/A

-MAP

THIS DOCUMENT IS THE CREATION, DESIGN, PROPERTY AND COPYRIGHTED WORK OF T-MOBILE NORTHEAST, LLC ANY DUPLICATION OR USE WITHOUT EXPRESS WRITTEN CONSENT IS STRICTLY PROHIBITED. **DUPLICATION AND USE BY** GOVERNMENT AGENCIES FOR THE PURPOSES OF CONDUCTING THEIR LAWFULLY AUTHORIZED REGULATORY AND ADMINISTRATIVE FUNCTIONS IS

SPECIFICALLY ALLOWED

CORPORATION, P.C 3 SADDLEBROOK DRIVE **KILLINGWORTH, CT. 06419** PHONE: (860)-663-1697 FAX: (860)-663-0935 www.allpointstech.com

ALL-POINTS TECHNOLOGY

CONTACT PERSONNEL

APPLICANT:

T-MOBILE NORTHEAST, LLC 35 GRIFFIN ROAD BLOOMFIELD, CT 06002

LANDLORD

LEETE ASSOCIATES, INC. P.O. BOX 45 GUILFORD, CT 06437

T-MOBILE PROJECT MANAGER:

JOHN LUISI (860) 680-9104

T-MOBILE PROJECT ATTORNEY:

JULIE D. KOHLER, ESQ. 1115 BROAD STREET BRIDGEPORT CT 06604 203-337-4157

POWER PROVIDER:

CL&P (203) 245-5423 DION DOWLING - CASE# 1408843

TELCO PROVIDER: AT&T: (800)-727-8368

CALL BEFORE YOU DIG:

(800) 922-4455

GOVERNING CODEs:

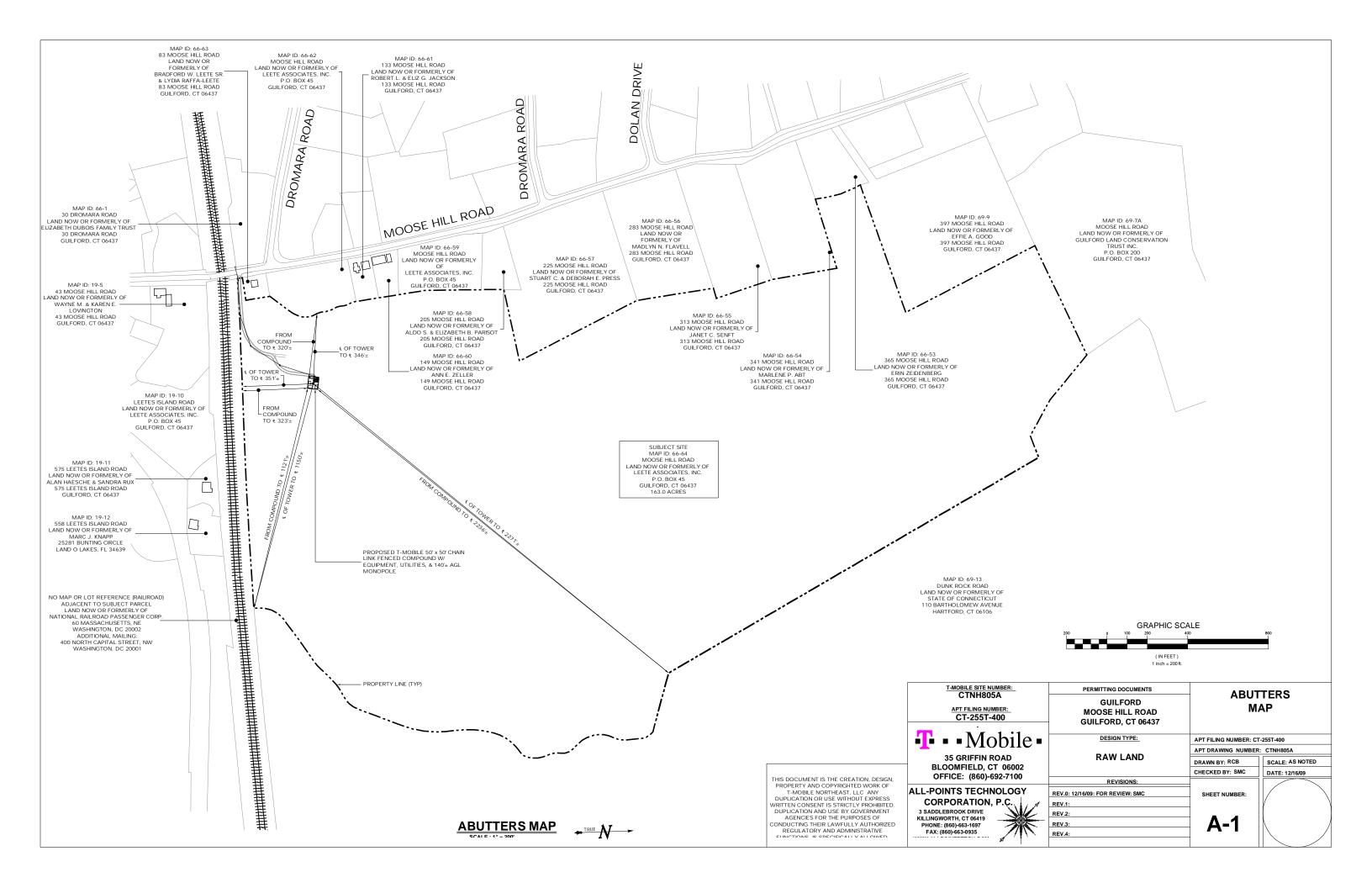
2005 CONNECTICUT BUILDING CODE (2003 IBC BASIS) NATIONAL ELECTRIC CODE

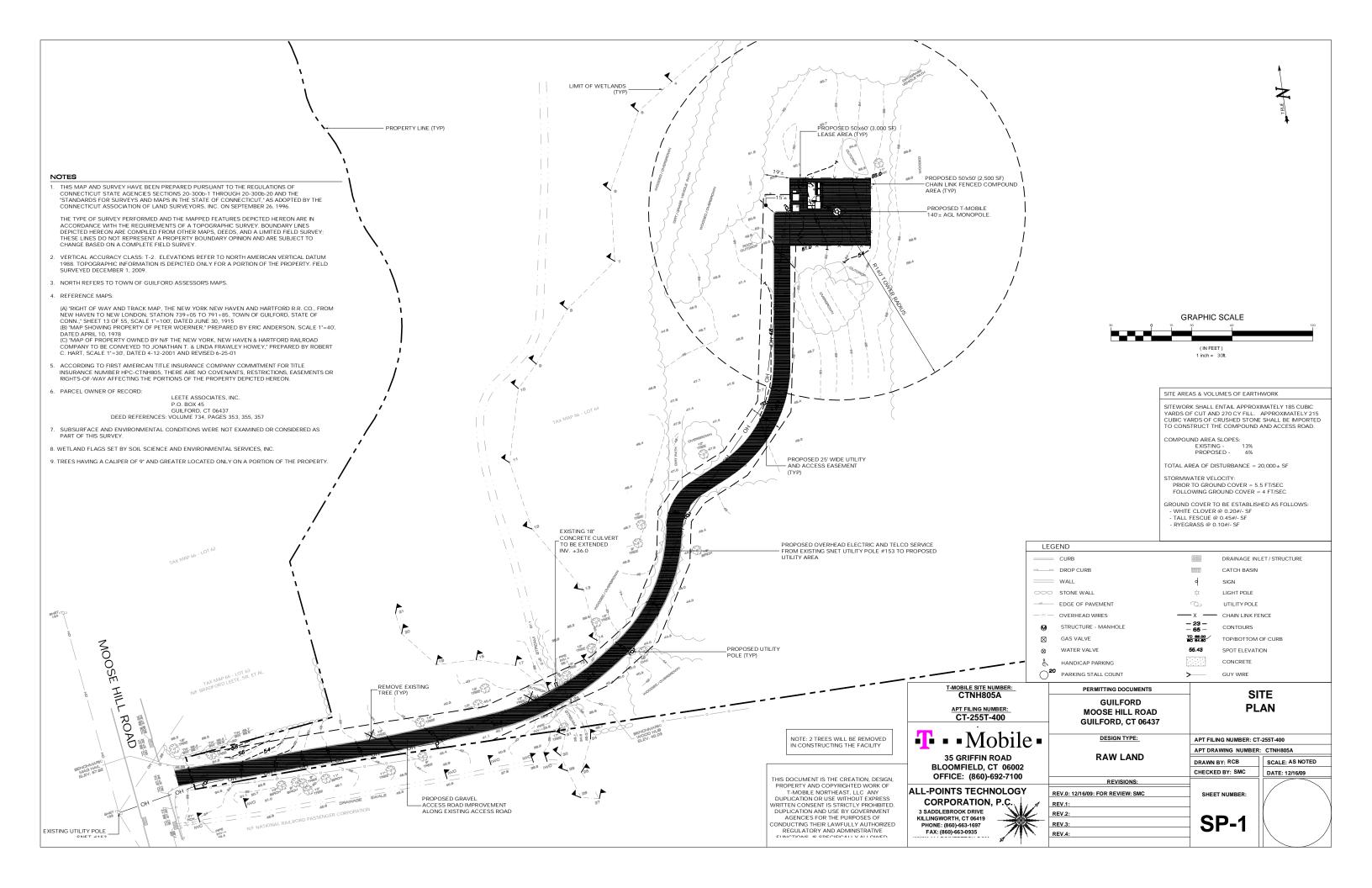
SITE INFORMATION

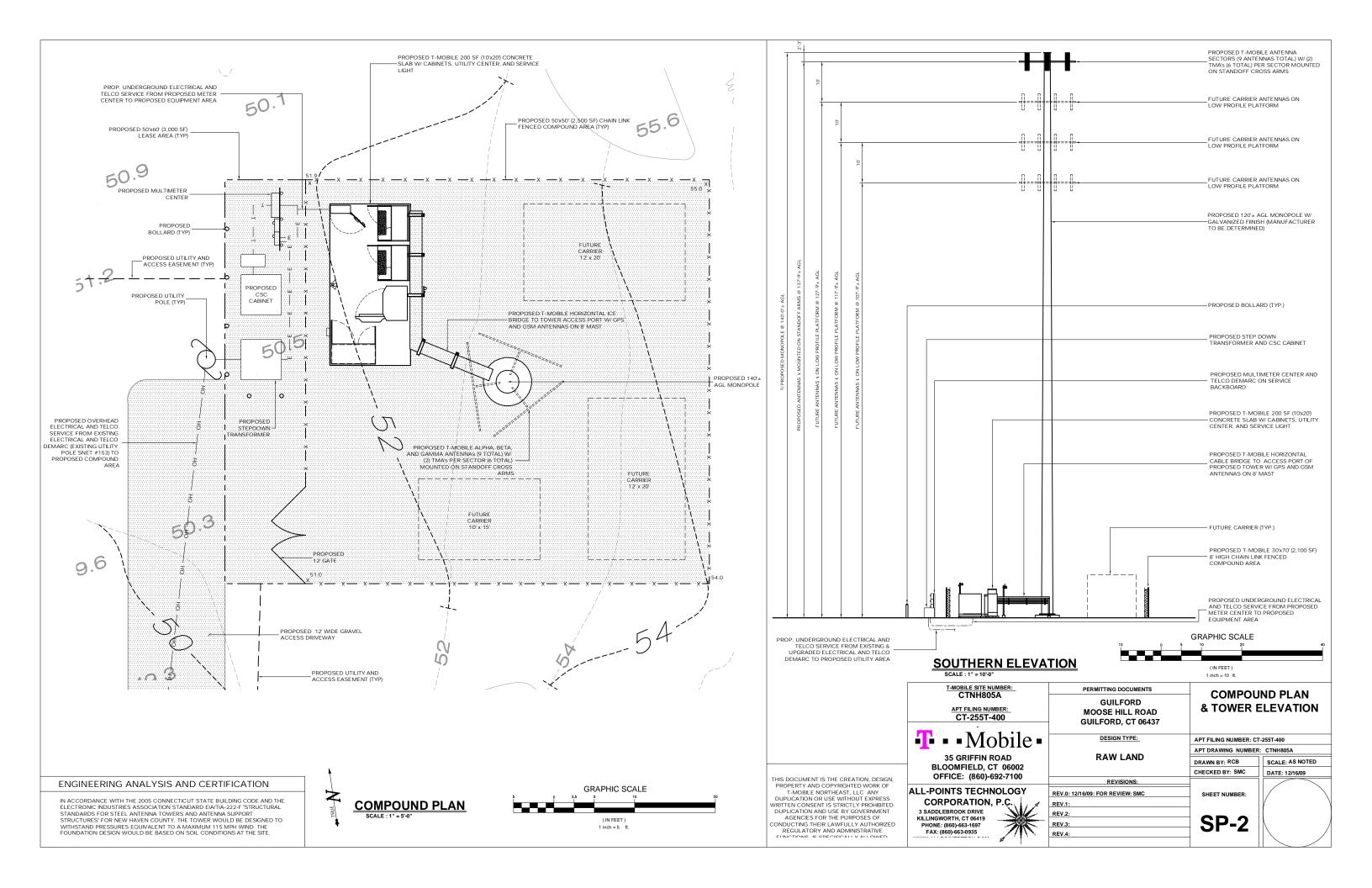
CTNH805A **GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437**

PERMITTING DOCUMENTS

PERIMITTING DOCUMENTS	TITLE SHEET AND INDEX	
GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437		
DESIGN TYPE:	APT FILING NUMBER: CT-255T-400	
RAW LAND	APT DRAWING NUMBER: CTNH805A A-1.DWG	
	DRAWN BY: RCB	SCALE: AS NOTED
	CHECKED BY: SMC	DATE: 12/16/09
REVISIONS:		
REV.0: 12/16/09: FOR REVIEW: SMC	SHEET NUMBER:	\
REV.1:		/
REV.2:	 │	
REV.3:	I T-1 ∣	\
REV.4:	• •	







ALL-POINTS TECHNOLOGY CORPORATION, P.C. 3 SADDLEBROOK DRIVE KILLINGWORTH, CT. 06419 PHONE: (860)-663-1697 FAX: (860)-663-0935 www.allpointstech.com

APT FILING NUMBER: CT-255T-400

AERIAL MAP

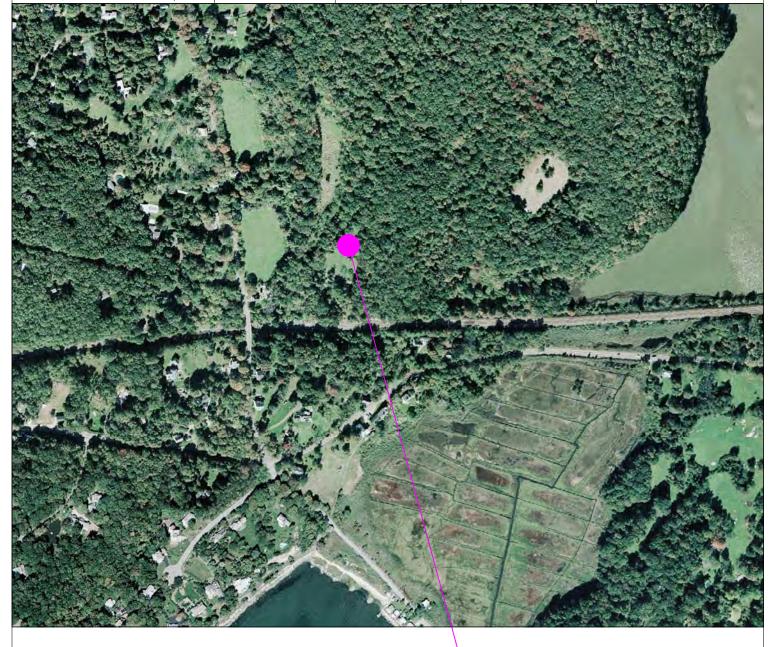
SCALE: AS NOTED DRAWN BY: RCB
DATE: 12/16/09 CHECKED BY: SMC

T • • Mobile •

35 GRIFFIN ROAD BLOOMFIELD, CT 06002 OFFICE: (860)-692-7100

T-MOBILE SITE NUMBER CTNH805A

GUILFORD MOOSE HILL ROAD GUILFORD, CT 06437



SITE

AERIAL MAP



1 inch = 500ft.

NT SUBMISSION PACKET - FCC FORM 620

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

Attribution and Bibliographic Standards. All reports included in the Submission Packet should be footnoted and contain a bibliography of the sources consulted.

- a. Footnotes may be in a form generally accepted in the preparer's profession so long as they identify the author, title, publisher, date of publication, and pages referenced for published materials. For archival materials/documents/letters, the citation should include author, date, title or description and the name of the archive or other agency holding the document.
- b. A bibliography should be appended to each report listing the sources of information consulted in the preparation of the report. The bibliography may be in a form generally accepted in the preparer's profession.

Submission Packet Works Cited:

Bing Maps

2010 http://www.bing.com/maps/?FORM=Z9FD. Accessed April 1, 2010

CHA

2010 *Visual Analysis Report: Amtrak Guilford, Moosehead Road, Guilford, CT 06437.* Dated January 2010. On file with EBI Consulting, Burlington, MA.

Google Maps

2010 www.google.com. Accessed April 1, 2010.

Keegan, William F.

File Review Results and Heritage Consultant, LLC data clip. Dated October 13, 2009. On file with EBI Consulting, Burlington, MA.

T-Mobile Northeast, LLC

2009 Site Drawings of Moosehead Road Guilford, CT. Dated December 16, 2009. On file with EBI Consulting, Burlington, MA.

Town of Guilford

2010 http://www.guilfordct.com/. Accessed April 1, 2010.

United States Geological Survey (USGS)

1985 Guilford, CT 7.5' Topographic Quadrangle. USGS, Reston, Virginia

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Project Number: CTNH805A

FCC Form 620 December 2007

NT SUBMISSION PACKET - FCC FORM 620

Approved by OMB 3060-1039 Estimated Time Per Response: .5 to 10 hours

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information provided in the application to determine whether approving this application is in the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; (b) any employee of the FCC; or (c) the United States Government is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection.

If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized.

If you do not provide the information requested on this form, the application may be returned without action having been taken upon it or it processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

We have estimated that each response to this collection of information will take an average of .50 to 10 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-1039), Washington, DC 20554. We will also accept your comments via the Internet if your send them to PRA@fcc.gov. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number of if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1039.

All parties and entities doing business with the Commission must obtain a unique identifying number called the FCC Registration Number (FRN) and supply it when doing business with the Commission. Failure to provide the FRN may delay the processing of the application. This requirement is to facilitate compliance with the Debt Collection Improvement Act of 1996 (DCIA). The FRN can be obtained electronically through the FCC webpage at http://www.fcc.gov or by manually submitting FCC Form 160. FCC Form 160 is available from the FCC's web site at http://www.fcc.gov/formpage.html, by calling the FCC's Forms Distribution Center 1-800-418-FORM (3676), or from Federal Communications Commission Fax Information System by dialing (202) 418-0177.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

Applicant's Name: T-Mobile Northeast, LLC
Project Name: Amtrak Guilford
Proiect Number: CTNH805A

Print Page 1 of 1

From: Origin ID: BEDA (800) 872-4004

EBI Consulting 21 B Street

Burlington, MA 01803



J10101002220224

SHIP TO: (781) 425-5114

BILL SENDER

Mr. David Poirier, Staff Archaeolog Connecticut Commission on Culture a One Connecticut Plaza; Second Floor

Hartford, CT 06103



Ship Date: 12APR10 ActWgt: 1.0 LB CAD: 100863325/WSXI2250

Delivery Address Bar Code



Ref # 61096865 SHPO Invoice #

Invoice # PO # Dept #

TRK# 7934 3976 2884

TUE - 13 APR A1 STANDARD OVERNIGHT

06103

00 KXAA

CT-US BDL



APPENDIX E TRIBAL CORRESPONDENCE

Michelle Egan

From: towernotifyinfo@fcc.gov

Sent: Friday, December 04, 2009 3:01 AM

To: Ami Senechal-Anderson

Cc: kim.pristello@fcc.gov; diane.dupert@fcc.gov

Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER

CONSTRUCTION NOTIFICATION INFORMATION - Email ID #2363600

Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribes and in making further contacts, the City and State of the Seat of Government for each Tribe and NHO, as well as the designated contact person, is included in the listing below. We note that Tribes may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribes and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribe or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribes and NHOs who have set their geographic preferences on TCNS. If the information you provided relates to a proposed antenna structure in the State of Alaska, the following list also includes Tribes located in the State of Alaska that have not specified their geographic preferences. For these Tribes and NHOs, if the Tribe or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribe or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event such a Tribe or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribe or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

- 1. THPO Kathleen Knowles Mashantucket Pequot Tribe Mashantucket, CT electronic mail Details: For every tower construction this Tribe requires a site location map, site plans for every project that will result in ground disturbance, and a detailed description of the proposed site. If the proposed tower construction is on an already existing building, the Tribe would like to be informed of that as well.
- 2. Cell Tower Coordinator Sequahna Mars Narragansett Indian Tribe Wyoming, RI electronic mail and regular mail

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States. For these Tribes and NHOs, you are required to use reasonable and good faith efforts to determine if the Tribe or NHO may attach religious and cultural significance to historic

properties that may be affected by its proposed undertaking. Such efforts may include, but are not limited to, seeking information from the relevant SHPO or THPO, Indian Tribes, state agencies, the U.S. Bureau of Indian Affairs, or, where applicable, any federal agency with land holdings within the state (NPA, Section IV.B). If after such reasonable and good faith efforts, you determine that a Tribe or NHO may attach religious and cultural significance to historic properties in the area and the Tribe or NHO does not respond to TCNS notification within a reasonable time, you should make a reasonable effort to follow up, and must seek guidance from the Commission in the event of continued non-response or in the event of a procedural or substantive disagreement. If you determine that the Tribe or NHO is unlikely to attach religious and cultural significance to historic properties within the area, you do not need to take further action unless the Tribe or NHO indicates an interest in the proposed construction or other evidence of potential interest comes to your attention.

None

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

- 3. SHPO John W Shannahan Connecticut Historical Commission Hartford, CT electronic mail
- 4. SHPO Cara Metz Massachusetts Historical Commission Boston, MA electronic mail
- 5. Deputy SHPO Brona Simon Massachusetts Historical Commission Boston, MA electronic mail
- 6. SHPO Frederick C Williamson Rhode Island Historic Preservation & Heritage Comm Providence, RI regular mail
- 7. Deputy SHPO Edward F Sanderson Rhode Island Historic Preservation & Heritage Comm Providence, RI electronic mail
- 8. SHPO Karen J Senich Connecticut Commission on Culture and Tourism Hartford, CT electronic mail

If you are proposing to construct a facility in the State of Alaska, you should contact Commission staff for guidance regarding your obligations in the event that Tribes do not respond to this notification within a reasonable time.

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/30/2009

Notification ID: 58485

Tower Owner Individual or Entity Name: T-Mobile USA

Consultant Name: Ami Senechal

Street Address: 21 B Street

City: Burlington

State: MASSACHUSETTS

Zip Code: 01803 Phone: 781-552-9711

Email: asenechal@ebiconsulting.com

Structure Type: UTOWER - Unguyed - Free Standing Tower

Latitude: 41 deg 16 min 2.9 sec N Longitude: 72 deg 42 min 57.9 sec W Location Description: Moose Hill Road

City: Guilford

State: CONNECTICUT County: NEW HAVEN

Ground Elevation: 24.4 meters

Support Structure: 42.7 meters above ground level Overall Structure: 42.7 meters above ground level Overall Height AMSL: 67.1 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

http://wireless.fcc.gov/outreach/notification/contact-fcc.html.

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8 a.m. to 7:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you, Federal Communications Commission

Trevelyn Potter

Subject: RE: Reply to Proposed Tower Structure (Notification ID: 58485) - Email ID #2444737

----Original Message----

From: towernotifyinfo@fcc.gov [mailto:towernotifyinfo@fcc.gov]

Sent: Thursday, March 25, 2010 9:09 AM

To: asenechal@ebiconsulting.com

Cc: tcns.fccarchive@fcc.gov; Knowles, Kathleen

Subject: Reply to Proposed Tower Structure (Notification ID: 58485) - Email ID #2444737

Dear Ami Senechal,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from THPO Kathleen Knowles of the Mashantucket Pequot Tribe in reference to Notification ID #58485:

Dear Ms Senechal,

Regarding Notification ID # 58485, I have reviewed the Phase I Archaeological Survey entitled "CTNH805A/Amtrak Guilford, Moose Hill Road, Guilford, New Haven County, Connecticut 06437, EBI Project No. 61096865," submitted by EBI Consulting. The research design and testing strategy meets acceptable professional standards, and I agree with the recommendations and conclusions. Please keep me informed of any further developments with respect to this project.

Kathleen Knowles, Tribal Historic Preservation Officer Mashantucket Pequot Tribe

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 11/30/2009

Notification ID: 58485

Tower Owner Individual or Entity Name: T-Mobile USA

Consultant Name: Ami Ami Street Address: 21 B Street

City: Burlington State: MASSACHUSETTS Zip Code: 01803 Phone: 781-552-9711

Email: <u>asenechal@ebiconsulting.com</u>

Structure Type: UTOWER - Unguyed - Free Standing Tower

Latitude: 41 deg 16 min 2.9 sec N Longitude: 72 deg 42 min 57.9 sec W Location Description: Moose Hill Road

City: Guilford State: CONNECTICUT County: NEW HAVEN Ground Elevation: 24.4 meters

Support Structure: 42.7 meters above ground level
Overall Structure: 42.7 meters above ground level
Overall Height AMSL: 67.1 meters above mean sea level

Trevelyn Potter

From: Trevelyn Potter

Sent: Wednesday, March 24, 2010 10:28 AM

To: 'Knowles, Kathleen'

Subject: archaeology report for TCNS ID 58485

Attachments: 61096865 Guilford CT Archaeological Survey.pdf

Kathleen,

Attached please find the archaeology survey report for TCNS ID 58485, a proposed tower on Moose Hill Road in Guilford, Connecticut.

Sincerely,

Trevelyn Potter

Project Scientist

EBI Consulting 21 B Street Burlington, MA 01803

Tel:617-715-1832 Fax: 617-715-6532

tpotter@ebiconsulting.com www.ebiconsulting.com

Michelle Egan

From: towernotifyinfo@fcc.gov

Sent: Thursday, December 03, 2009 10:44 AM

To: Ami Senechal-Anderson

Cc: tcns.fccarchive@fcc.gov; KKnowles@mptn-nsn.gov

Subject: Reply to Proposed Tower Structure (Notification ID: 58485) - Email ID #2365910

Dear Ami Senechal,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from THPO Kathleen Knowles of the Mashantucket Pequot Tribe in reference to Notification ID #58485:

Dear Ms Senechal,

Regarding Notification ID # 58485, after reviewing the information provided, we have no knowledge of properties of religious and cultural importance to the Mashantucket Pequot Tribe. However, we recommend a Phase I Archaeological Reconnaissance Survey be conducted to identify previously unknown properties of cultural and religious importance. We would appreciate a copy of any work performed on this project. Kathleen Knowles,

Tribal Historic Preservation Officer Mashantucket Pequot Tribe

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 11/30/2009

Notification ID: 58485

Tower Owner Individual or Entity Name: T-Mobile USA

Consultant Name: Ami Ami Street Address: 21 B Street

City: Burlington

State: MASSACHUSETTS Zip Code: 01803 Phone: 781-552-9711

Email: asenechal@ebiconsulting.com

Structure Type: UTOWER - Unguyed - Free Standing Tower

Latitude: 41 deg 16 min 2.9 sec N Longitude: 72 deg 42 min 57.9 sec W Location Description: Moose Hill Road

City: Guilford

State: CONNECTICUT County: NEW HAVEN

Ground Elevation: 24.4 meters

Support Structure: 42.7 meters above ground level Overall Structure: 42.7 meters above ground level Overall Height AMSL: 67.1 meters above mean sea level

Narragansett Indian Tribal Historic Preservation Office Section 106 Review Consultation Response Form

TCNS Notification ID Number: 58485		****
Project ID Number	61096865	·
Consultant/Environmental Firm:	EBI Consulting	****
Address or Location Description:	Off Moose Hill Road	
City, State:	Guilford, CT	
Point of Contact/Initial Submission	Ami Senechal-Anderson	

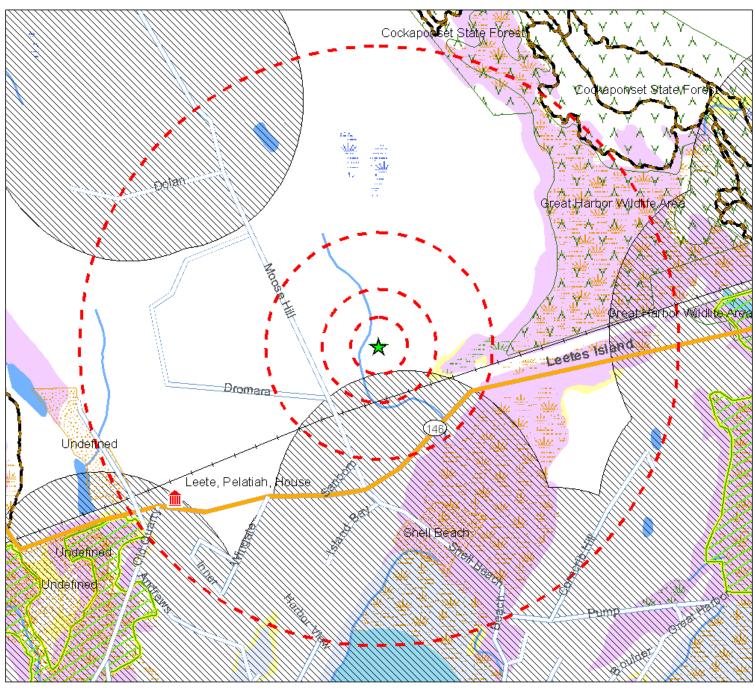
Point of Contact/Initial Submission	Ami Senechal-Anderson				
Response:					
We have no comments related to the pro	posed project.				
resources. On behalf of the Narragansett in compliance with and cleared of the Na NITHPO anticipates no inadvertent enco	NITHPO's site examination revealed no indicators of the presence of past tribal cultural resources. On behalf of the Narragansett Indian Tribe, the NITHPO considers this projec in compliance with and cleared of the Narragansett Tribe's section 106 concerns. NITHPO anticipates no inadvertent encounters by you or your client with significant intact cultural resources (burials, village sites or ceremonial sites).				
Based on information provided to us the is therefore found to be in compliance w section 106 concerns.	site is not to include any ground disturbance and ith and cleared of the Narragansett Tribe's				
NITHPO's site examination revealed procultural resources, and recommends the	bable indicators of the presence of past tribal following actions:				
Exception: If archaeological materials of construction, the Narragansett Indian Transfer Historic Preservation Office(s) will be not	or human remains are encountered during ribal Historic Preservation Office and applicable otified.				
Sequalina Mars, Project Manager, NITH	PO				

Narragansett Indian Tribal Historic Preservation Office P.O. Box 350 Wyoming, RI 02898

Email: <u>Sequahna@yahoo.com</u> Phone: 401-419-2959 Fax: 401-491-9044

APPENDIX F LAND RESOURCES MAP



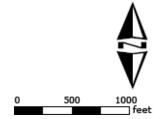


See associated legend for additional map symbology Land and Historic Resources Map

Source: See associated map legend

CTNH805A/Amtrak Guilford Moose Hill Road Guilford, CT 06437

PN: 61096865



National Datalayers Legend*

National Register Historic Site



National Register Historic District

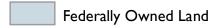
Source: NPS National Register of Historic Places, updated July 2008

National Park Service Trail

Source:U.S. National Parks Serivce. Various dates. NR/GIS WebSite, U.S.Dept.o fthe Interior, NPS, Wash., D.C. http://science.nature.nps.gov/nrdata/index.cfm.

National Scenic Parkway

National Wild and Scenic River



Source: National Atlas of the U.S., Reston, VA, 12/05, Federal Land Features of the U.S.

- -Parkways and Scenic Rivers
- -Federal Lands of the United States

FWS Critical Habitat

Source: U.S. Fish and Wildlife Service. Various dates. FWS Critical Habitat for Threatened & Endangered Species website. U.S. Dept. of the Interior, FWS, Wash, D.C. http://crithab.fws.gov/.

*Includes data obtained from federal agencies developed to be consistent throughout the US.

National Wetlands Inventory

Stream or Creek

Freshwater Forested/Shrub Wetland

Freshwater Emergent Wetland

Estuarine & Marine Wetland

Unconsolidated Shore

Freshwater Lake, Pond, or River



Estuarine & Marine Deepwater



Open Water

Source: U.S. Fish and Wildlife Service. Various dates. National Wetlands Inventory website. U.S. Dept. of the Interior, FWS, Wash, D.C. http://www.fws.gov/nwi/.

FEMA Q3 Flood Zone

500-year inundation area.

100-year inundation area.

100-year inundation area with velocity hazard.

Area not included on any FIRM publication.

Undetermined but possible flood hazard area.

Floodway area, including watercourse extent.

No Flood Data No Flood Data Available

Source: FEMA

Connecticut - State Specific Datalayers Legend



CT - Natural Diversity Database Area

Source: CT DEP Data Date: December 2009 http://www.ct.gov/dep/gis



△ CT - DEP Property

Source: CT DEP Data Date: October 2009 http://www.ct.gov/dep/gis



CT - DEP Municipal and Open Space

Source: CT DEP Office of Information Management

Data Date: 1997

http://www.ct.gov/dep/gis

CT - DEP Critical Habitat

Source: CT DEP Data Date: December 2009 http://www.ct.gov/dep/gis

CT - Aquifer Protection Area

Final

Source: CT DEP



Preliminary

Data Date: March 2010 http://www.ct.gov/dep/gis



CT - DEP Trails

Source: CT DEP Data Date: January 2010 http://www.ct.gov/dep/gis



Appendix G FEDERAL AND STATE FISH AND WILDLIFE CORRESPONDENCE



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



October 26, 2010

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

re: proposed telecommunication monopole (Amtrak-Guilford) for T-Mobile off Moose Hill Road, Guilford

Dear Ms. Potter:

Your Eastern Box Turtle survey report and cover letter were redirected to me from the Hartford Office on 10/14/10. Although the target species was not detected, the surveyor indicated that suitable habitat is present. The surveyor recommends, and the DEP Wildlife Division concurs, that the work should be done during the turtle dormant period November 1 to April 1.

Additionally, the DEP Wildilfe Division recommends that if work must be done during these turtle's active period (April 1 to November 1) that the following precautionary measures be implemented to protect the turtles:

1. the construction crew be apprised of the species description and possible presence and that the area be searched for turtles each day prior to construction.

2. any turtles encountered during construction be moved out of the way.

- all precautions should be taken to avoid degradation to wetland habitats including any wet meadows and seasonal pools
- 4. that work conducted in these habitats during the early morning and evening hours should occur with special care not to harm basking or foraging individuals.
- 5. that no heavy machinery or vehicles be parked in any habitat.

Standard protocols for the 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 these 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 the proposed project has not been initiated within 12 months of this review, contact the NDDB for an updated review. 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 or write. 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 - 17365

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

Fax: (781) 273.3311

October 1, 2010

Connecticut Department of Environmental Protection Bureau of Natural Resources Division of Wildlife 79 Elm Street, 6th Floor Hartford, CT 06106 Attn: Julie Victoria

Subject: Section 7 Review: Construction of a 140-foot Telecommunications Monopole

Amtrak-Guilford/CTNH805A Off Moose Hill Road

Guilford, CT

EBI Project #61096865

Dear Ms. Victoria:

EBI CONSULTING (EBI) is preparing an environmental review on behalf of *T-Mobile Northeast*, *LLC*, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc. a Delaware Corporation (heirinafter *T-Mobile*) for the project noted above (herein, the Subject Property) as part of its permit process and regulatory review by the Federal Communications Commission (FCC). The review is focused on compliance with the Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307.

In your response dated January 28, 2010 you indicated that the Wildlife Division recommends that a herpetologist familiar with the habitat requirements of the Eastern Box Turtle conduct surveys during the species' active season.

Attached please find an Eastern Box Turtle survey for the proposed tower location

On behalf of *T-Mobile*, I would appreciate your additional comments on this proposed telecommunications installation in a letter directed to my attention at the address noted above.

Sincerely,

Ms. Trevelyn Potter Program Manager (617) 715-1832

tpotter@ebiconsulting.com

Appendix A – Response dated January 28, 2010

Appendix B - Eastern Box Turtle Survey

HERPETOLOGICAL SURVEYS, LLC.

16 Fox Hill Drive • Clinton, Connecticut 06413 203.675.1199 cell • herpn@sbcglobal.net

July 5, 2010

EBI Consulting Attn: Ms. Ashley Bonavenia Four A Street Burlington, MA 01803

RE: Box Turtle (*Terrapene c. carolina*) Survey Moose Hill Road, Guilford, CT

The following information was compiled and is now complete as of Wednesday, June 30th, 2010. Michael Klemens book <u>Amphibians and Reptiles of Connecticut and Adjacent Regions</u> was used as a reference for this survey as well as my 25 years of field experience finding Box Turtles in the wild.

"Eastern Box Turtles require old field and deciduous forest habitats, which can include power lines and logged woodlands. They are often found near small streams and ponds, the adults are completely terrestrial but the young may be semi aquatic, and hibernate on land by digging down in the soil from October to April. They have an extremely small home range and can usually be found in the same area year after year." ¹

I visited this site twenty-four times between March 28th, 2010 and June 29th, 2010. I also enlisted the help of Arick Barsch and he surveyed the property 7 times. I surveyed this area during early emergence from hibernation through the peak nesting season for Eastern Box Turtles and no Box Turtles or sings of nesting were found. I concentrated my efforts on early mornings following rain events. Although no Box Turtles were found during any of my surveys, the DEP states that they have historic records of Eastern Box Turtles in the vicinity of this project site. Since surveying the property I agree that the surrounding area does look favorable for Box Turtles. The area that will be impacted consists of a field edge. A portion of this area is deciduous forest and the other is an over grown field. This property where the proposed tower will go encompasses approximately 150 acres. Again no box Turtles were found during this survey. I contacted a local Box Turtles expert (JH) in Guilford, he has been marking box

-

State of CT Department of Environmental Protection

turtles for over 30 years in Guilford. In speaking with him, he said that he had marked some Box Turtles from Moose Hill Road but not on this property.

During the survey I found the wet meadow just to the West of the proposed site to be a breeding area for Spotted Salamanders (Ambystoma maculatum) and Wood Frogs (Rana sylvatica). I counted over seventy Spotted Salamander egg masses and 20 Wood Frog egg masses. Spring peepers were calling on the property as well. Green Frogs were found throughout the property. American toads (Bufo americanus). A few pieces or cover were laid out early during the survey and this cover produced Garter snakes (Thamnophis sirtalis) on a regular basis (almost every visit). Black Racers (Coluber *constrictor*) were also seen in the vicinity of the proposed site. There were several Spotted Turtles seen during this survey some were in a vernal pool and others were walking close to the stream. I would guesstimate at least four different Spotted Turtles were seen, these were not marked so there was no way of telling for sure if they were the same turtles. Four Spotted Turtles were seen in one day so we can conclude that there were at least four Spotted Turtles using the property. One turtle was photographed and measured and the location was recorded. Also one Wood Turtle was found during this survey and was measured and photographed. The location of this animal was also recorded. Wood Turtles (Glyptemys insculpta) are a Species of Special Concern in Connecticut. None of the turtles found during the survey were found very close to the proposed site to be impacted.

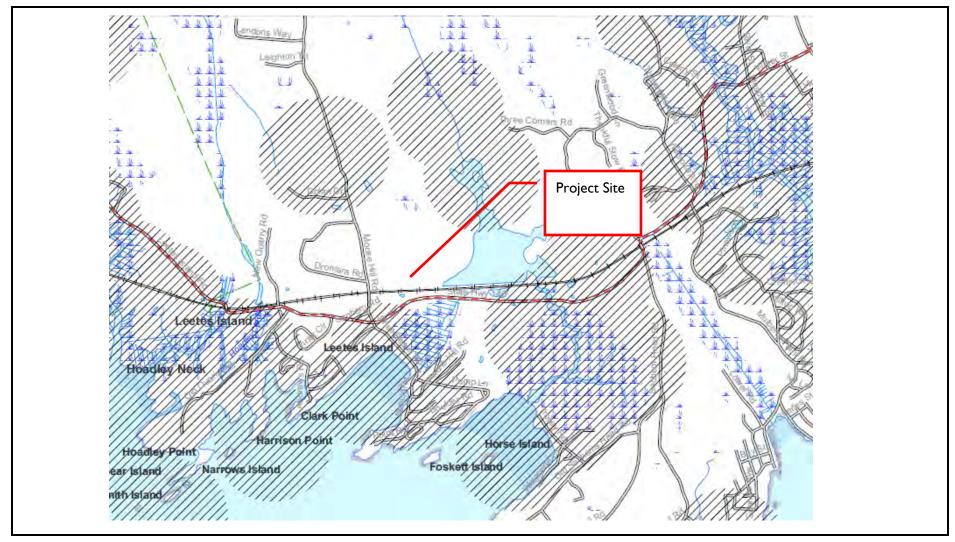
I suggest the following for moving forward with this project. Try to do the majority of excavating and construction during the off season when these animals are not active, October 1st through the end of February. If working during the active period is a must, the area to be impacted should be fenced off using proper silt fencing this will not only keep the soil contained but also help keep any turtles out of harms way.

Please contact me for any further information you may need.

Charles Mannieuri II

Charles H. Annicelli, III





CT NDDB Map

CTNH805A / Amtrak Guilford Moose Hill Road Guilford, Connecticut

EBI Project No.: 61096865



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



Vanuary 28, 2010

Ms. Ami Senechel-Anderson

EBI Consulting 21 B Street Burlington, MA 01803

re: proposed telecommunication monopole (Amtrak-Guilford) for T-Mobile off Moose Hill Road, Guilford

Dear Ms. Senechel-Anderson:

Your request for information was forwarded to me on 1/21/10 by Dawn McKay of the Department of Environmental Protection's (DEP) Natural Diversity Database. Their records indicate that a historic record for endangered species: Black rail (Laterallus jamaicensis) and current records for two Species of Special Concern: Maritime sunflower borer moth (Papaipema maritime) and Eastern Box Turtle (Terrapene carolina) occurs in the vicinity of your project.

Maritime sunflower borer moths occur on the edges of salt marshes and are associated with the host plant Heliantheous. Black rails nest along inland tidal creeks and marshes, in salt marshes or salt hay meadows or along edges of sedges or marsh grass flats from May to August. It does not appear from information provided that either of these species will be impacted.

Eastern Box Turtles require old field and deciduous forest habitats, which can include power lines and logged woodlands. They are often found near small streams and ponds, the adults are completely terrestrial but the young may be semiaquatic, and hibernate on land by digging down in the soil from October to April. They have an extremely small home range and can usually be found in the same area year after year. This species is dormant from November 1 to April 1. It has been negatively impacted by the loss of suitable habitat.

If this work will negatively impact any Eastern Box Turtle habitat, the Wildlife Division recommends that a herpetologist familiar with the habitat requirements of this reptile conduct surveys during the species active season. A report summarizing the results of such surveys should include habitat descriptions, reptile species list and a statement/resume giving the herpetologist' qualifications. The DEP doesn't maintain a list of qualified herpetologists. The results of this investigation can be forwarded to the Wildlife Division and, after evaluation, recommendations for additional surveys, if any, will be made. The DEP Wildilfe Division may recommend that if work must be done during these turtle's active period (April 1 to November 1) that the following precautionary measures be implemented to protect the turtles, you should work with a herpetologist to prepare a pre- and post construction plan:

- 1. the construction crew be apprised of the species description and possible presence and that the area be searched for turtles each day prior to construction.
- 2. any turtles encountered during construction be moved out of the way.
- 3. all precautions should be taken to avoid degradation to wetland habitats including any wet meadows and seasonal pools
- 4. that work conducted in these habitats during the early morning and evening hours should occur with special care not to harm basking or foraging individuals.
- 5. that no heavy machinery or vehicles be parked in any habitat.

Standard protocols for the 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.



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

January 15, 2010

Ms. Ami Senechal-Anderson **EBI** Consulting 21 B Street Burlington, MA 01803

> re: Construction of a 140 Foot Telecommunications Monopole (Amtrack-Guilford) for T-Mobile Off Moose Hill Road in Guilford, Connecticut

Dear Ms. Senechal-Anderson:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed construction of a telecommunications monopole off Moose Hill Road in Guilford, Connecticut. According to our information, there are historic records for State Endangered Laterallus jamaicensis: (black-rail), State Special Concern Terrapene carolina carolina (box turtle) and Papaipema maritima (maritime sunflower borer moth) from the vicinity of this project site. I have sent your letter to Julie Victoria (DEP-Wildlife; 860-642-7239, julie.victoria@ct.gov) 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,

Biologist/Environmental Analyst

endre Merika del del 1812 et al 12 et febret. Et Major de persona habitat desse fallet et el 1919 et Cc; Julie Victoria, NDDB # 17365

Western Date to the company of the company of the company



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 25, 2010

Reference:

Project

Location

Telecommunications facility

Guilford, CT

Ami Senechal-Anderson EBI Consulting 21 B Street Burlington, MA 01803

Dear Ms. Senechal-Anderson:

This responds to your recent correspondence requesting information on the presence of federally-listed and/or proposed endangered or threatened species in relation to the proposed activity(ies) referenced above.

Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife 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 our 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.

In order to curtail the need to contact this office in the future for updated lists of federally-listed or proposed threatened or endangered species and critical habitats, please visit the Endangered Species Consultation page on the New England Field Office's website:

www.fws.gov/newengland/endangeredspec-consultation.htm

In addition, there is a link to procedures that may allow you to conclude if habitat for a listed species is present in the project area. If no habitat exists, then no federally-listed species are present in the project area and there is no need to contact us for further consultation. If the above conclusion cannot be reached, further consultation with this office is advised. Information describing the nature

JAN 27 2010

Ami Senechal-Anderson January 25, 2010

and location of the proposed activity that should be provided to us for further informal consultation can be found at the above-referenced site.

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

Sincerely-yours.

Thomas R. Chapman

Supervisor

New England Field Office



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

Fax: (781) 273.3311

December 28, 2009

Natural Diversity Data Base 79 Elm Street Hartford, CT 06106 Attn: Dawn McKay 860-424-3592

Subject:

Request for Section 7 Review Amtrak Guilford / CTNH805A

Moose Hill Road, Guilford, New Haven County, CT 06437 Latitude & Longitude: 41° 16' 3.0" North; 72° 42' 58.0" West

EBI Project #61096865

Dear Ms. McKay:

EBI CONSULTING (EBI) is preparing an environmental review on behalf of T-Mobile Northeast LLC, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (hereinofter T-Mobile) for the project noted above (herein, the Subject Property) as part of its permit process and regulatory review by the Federal Communications Commission (FCC). The review is focused on compliance with the Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307.

EBI would like to inquire if you would be interested in commenting on this proposed project. Please refer to the attached Project Summary Form for complete details regarding this proposed project.

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

We would appreciate your assistance on determining if the proposed project will have an impact on any listed and/or proposed threatened or endangered species or designated and/or proposed critical habitats. On behalf of *T-Mobile*, I would appreciate your comments on this proposed telecommunications installation in a letter directed to my attention at the address noted above.

Sincerely,

Ms. Ami Senechal-Anderson Environmental Scientist

(781) 552-9711

asenechal@ebiconsulting.com

Appendix A – Project Summary Form Appendix B – Figures, Drawings, and Maps

Appendix C - Photographs



Connecticut Natural Diversity Data Base Review Request Form

Please complete this form *only* if you have conducted a review which determined that your activity is located in an area of concern.

Name: Ami Senechal - Anderson					
Affiliation: Cansult - 1 FBT Consult					
Affiliation: Consultant, EBI consulting Mailing Address: 21 BS+. State: MA Zin Codo: 01803					
City/Town: Burlington Business Phone: 781-552-9711 Contact Person: Am. Sevechal - Anderson Project or Site Name: Am to the angle of the state of					
Business Phone: 781-552-97// ext. — Fax: 781-418-2367					
Contact Person: Am: Sevechal - Anderson Title: Environmental Scients st					
Project or Site Name: Amtrak Guilford					
Project Location OFF Mosse Hill Road, Map 66 10+64 USGS Quad: Guilford, CT Brief Description of Proposed Activities:					
Town: 64 150-1 KO22, Map 66 10+64 USGS Quad: (1)					
Brief Description of Proposed Activities:					
Construction of a 140-foot telecommunications ucropole					
within a proposed 50-foot by 60-foot lease area					
Utilities will follow proposed and existing prostrong as					
Within a proposed 50-foot by 60-foot lease area. Proposed Utilities will follow proposed and existing portions of an access driveway extending from Moose Hill Rd. D portions of an access Have you conducted a "State and Federal Listed Species and Natural Communities Map" review?					
Yes Date of Map: December 2009					
Has a field survey been previously conducted to determine the presence of any endangered, threatened or special concern species?					
If yes, provide the following information and submit a copy of the field survey with this form.					
Biologists Name:					
Address:					
If the project will require a permit, list type of permit, agency and date or proposed date of application:					

(See reverse side - you must sign the certification on the reverse side of this form)

The Connect	ticut Natural Diversity Data Base (CT NDDB) information will be used for:				
	environmental assessment (give reasons for assessment):				
	NEPA				
	other (specify):				
"I certify that the CT NDDE	the information supplied on this form is complete and accurate, and that any material supplied by B will not be published without prior permission."				
<u>llui</u> Signature	<u>Aulul</u> 12/28/09 Date				

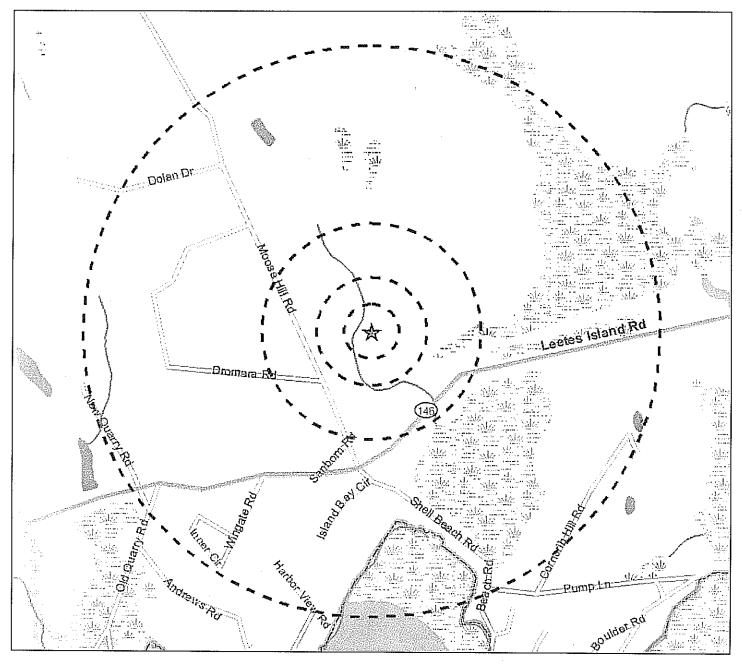
All requests must include a USGS topographic map with the project boundary clearly delineated.

Return completed form to:

WILDLIFE DIVISION BUREAU OF NATURAL RESOURCES DEPARTMENT OF ENVIRONMENTAL PROTECTION 79 ELM ST, 6TH FLOOR HARTFORD, CT 06106-5127

^{*} You must submit a copy of this completed form with your registration or permit application.



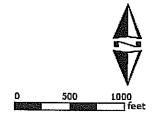


Legend

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

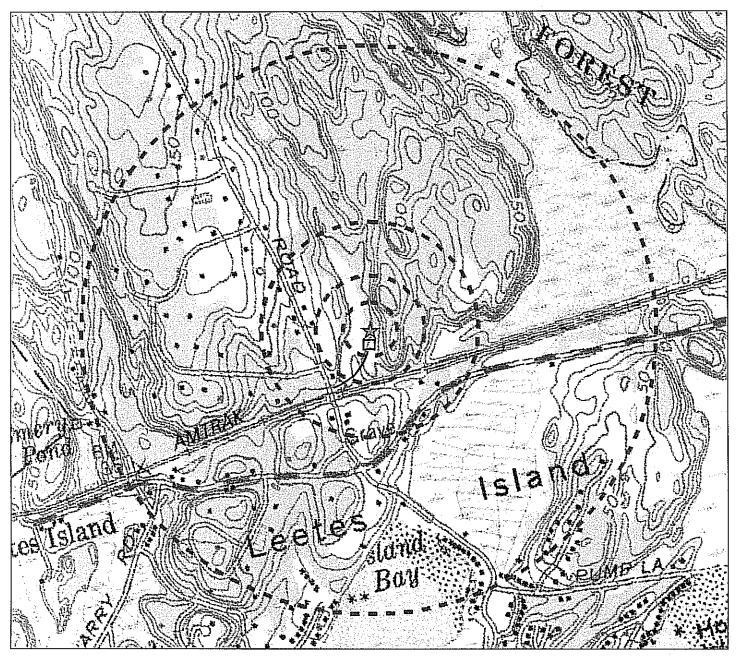
Figure 1 - Site Location Map
Guilford South, CT/P# 2000018269 L# 117585
Moose Hill Road
Guilford, CT

PN: 61093359



Source: Selected data from ESRI, EBI and NWI





Legend

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

USGS 24k Quad: Gullford, CT 1985

Source: Selected data from ESRI, EBI and USGS

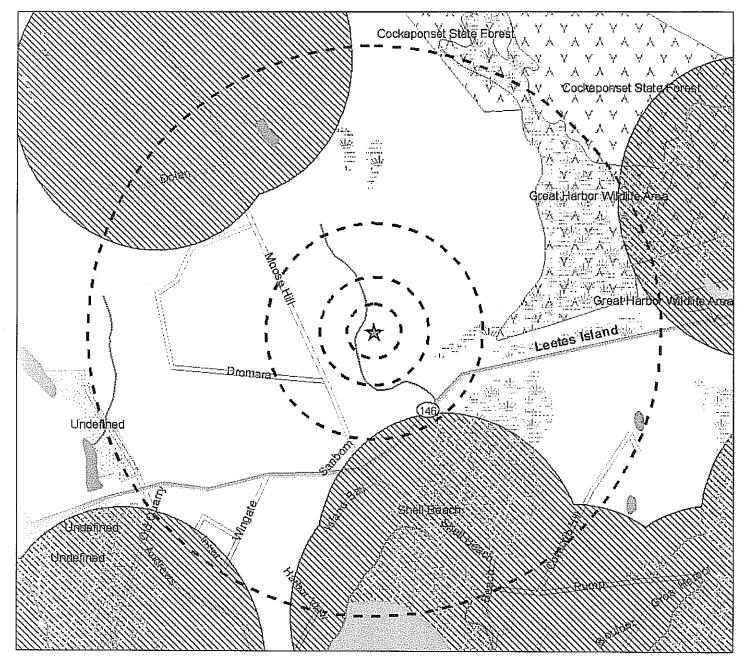
Figure 2 - USGS Quad Location Map

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT

9 500

PN: 61093359





Legend

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

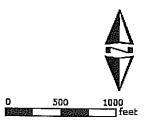
See associated legend for additional map symbology

Land Resources Map

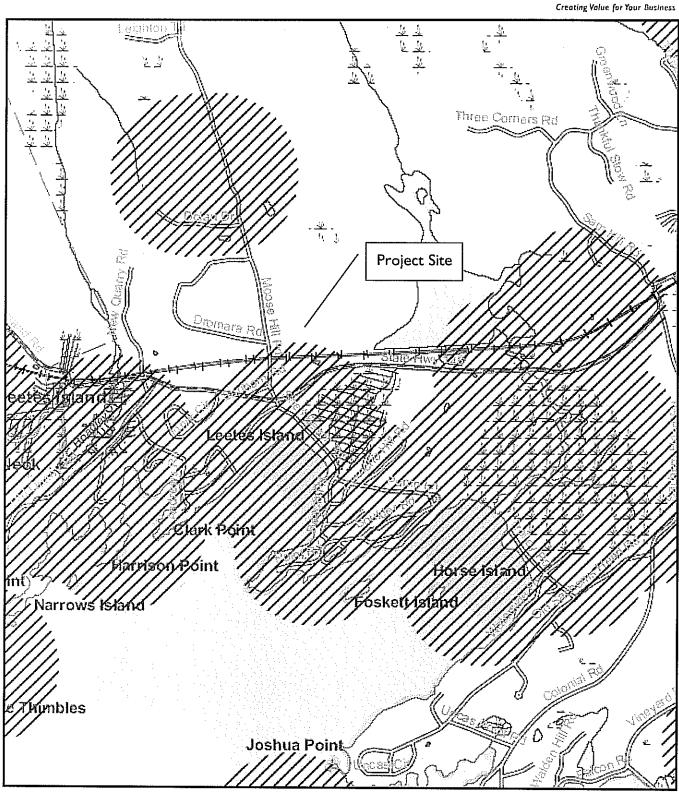
CTNH805A/Amtrak Guilford Moose Hill Road Guilford, CT 06437

PN: 61096865

Source: See associated map legend







CT NDDB Map

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT





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

December 28, 2009

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

Phone: 603-223-2541, Fax: 603-223-0104

Subject:

Request for Section 7 Review Amtrak Guilford / CTNH805A

Moose Hill Road, Guilford, New Haven County, CT 06437 Latitude & Longitude: 41° 16' 3.0" North; 72° 42' 58.0" West

EBI Project #61096865

Dear Mr. Amaral:

EBI CONSULTING (EBI) is preparing an environmental review on behalf of *T-Mobile Northeast LLC*, a Delaware limited liability company, as successor-in-interest to Omnipoint Communications, Inc., a Delaware corporation (hereinafter *T-Mobile*) for the project noted above (herein, the Subject Property) as part of its permit process and regulatory review by the Federal Communications Commission (FCC). The review is focused on compliance with the Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307.

EBI would like to inquire if you would be interested in commenting on this proposed project. Specifically, EBI is interested in the USFW's opinion of the proposed telecommunications facility's potential impact on the Roseate Tern, listed as an Endangered Species in the Town of Guilford. Please refer to the attached Project Summary Form for complete details regarding this proposed project.

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

We would appreciate your assistance on determining if the proposed project will have an impact on any listed and/or proposed threatened or endangered species or designated and/or proposed critical habitats. On behalf of *T-Mobile*, I would appreciate your comments on this proposed telecommunications installation in a letter directed to my attention at the address noted above.

Sincerely,

Ms. Ami Senechal-Anderson Environmental Scientist

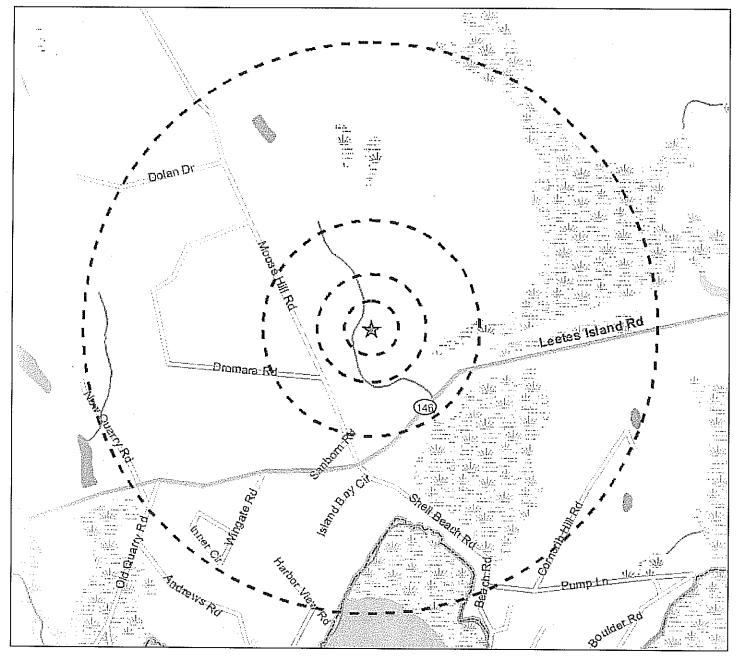
(781) 552-9711

asenechal@ebiconsulting.com

Appendix A – Project Summary Form Appendix B – Figures, Drawings, and Maps

Appendix C - Photographs





Legend

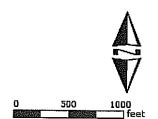
A Project Site L Site Buffer at 250', 500', 1000' and 1/2 mile

Figure 1 - Site Location Map

Guilford South, CT/P# 20000

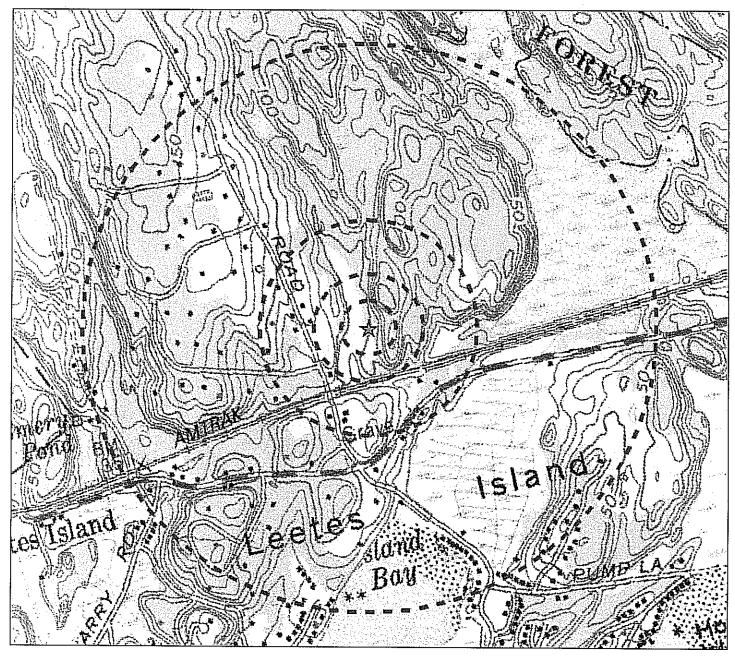
Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT

PN: 61093359



Source: Selected data from ESRI, EBI and NWI





Legend

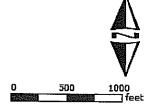
↑ Project Site L Site Buffer at 250', 500', 1000' and 1/2 mile

USGS 24k Quad: Guilford, CT 1985
Figure 2 - USGS Quad Location Map

Source: Selected data from ESRI, EBI and USGS

Guilford South, CT/P# 2000018269 L# 117585 Moose Hill Road Guilford, CT

PN: 61093359



FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN CONNECTICUT

COUNTY	SPECIES	FEDERAL	GENERAL	TOWNS
		STATUS	LOCATION/HABITAT	
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.

7/31/2008

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

United States Department of Interior Fish and Wildlife Service Washington, DC 20240

September 14, 2000

To: Regional Directors

From: Director /s/ Jamie Rappaport Clark

Subject: Service Guidance on the Siting, Construction, Operation and Decommissioning of

Communications Towers

Construction of communications towers (including radio, television, cellular, and microwave) in the United States has been growing at an exponential rate, increasing at an estimated 6 percent to 8 percent annually. According to the Federal Communication Commission's 2000 Antenna Structure Registry, the number of lighted towers greater than 199 feet above ground level (AGL) currently number over 45,000 and the total number of towers over 74,000. Non-compliance with the registry program is estimated at 24 percent to 38 percent, bringing the total to 92,000 to 102,000. By 2003, all television stations must be digital, adding potentially 1,000 new towers exceeding 1,000 feet AGL.

The construction of new towers creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. Communications towers are estimated to kill 4-5 million birds per year, which violates the spirit and the intent of the Migratory Bird Treaty Act and the Code of Federal Regulations at Part 50 designed to implement the MBTA. Some of the species affected are also protected under the Endangered Species Act and Bald and Golden Eagle Act.

Service personnel may become involved in the review of proposed tower sitings and/or in the evaluation of tower impacts on migratory birds through National Environmental Policy Act review; specifically, Sections 1501.6, opportunity to be a cooperating agency, and 1503.4, duty to comment on federally-licensed activities for agencies with jurisdiction by law, in this case the MBTA, or because of special expertise. Also, the National Wildlife Refuge System Improvement Act requires that any activity on Refuge lands be determined as compatible with the Refuge system mission and the Refuge purpose(s). In addition, the Service is required by the ESA to assist other Federal agencies in ensuring that any action they authorize, implement, or fund will not jeopardize the continued existence of any Federally endangered or threatened species.

A Communication Tower Working Group composed of government agencies, industry, academic researchers and NGO's has been formed to develop and implement a research protocol to determine the best ways to construct and operate towers to prevent bird strikes. Until the research study is completed, or until research efforts uncover significant new mitigation measures, all Service personnel involved in the review of proposed tower sitings and/or the evaluation of the impacts of towers on migratory birds should use the attached interim guidelines when making recommendations to all companies, license applicants, or licensees proposing new tower sitings. These guidelines were developed by Service personnel from research conducted in several eastern, midwestern, and southern states, and have been refined through Regional review. They are based on the best information available at this time, and are the most prudent and effective measures for avoiding bird strikes at towers. We believe that they will provide significant protection for migratory birds pending completion of the Working Group's recommendations. As new information becomes available, the guidelines will be updated accordingly.

Implementation of these guidelines by the communications industry is voluntary, and our recommendations must be balanced with Federal Aviation Administration requirements and local

community concerns where necessary. Field offices have discretion in the use of these guidelines on a case by case basis, and may also have additional recommendations to add which are specific to their geographic area.

Also attached is a <u>Tower Site Evaluation Form</u> which may prove useful in evaluating proposed towers and in streamlining the evaluation process. Copies may be provided to consultants or tower companies who regularly submit requests for consultation, as well as to those who submit individual requests that do not contain sufficient information to allow adequate evaluation. This form is for discretionary use, and may be modified as necessary.

The Migratory Bird Treaty Act (16 U.S.C. 703-712) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. While the Act has no provision for allowing unauthorized take, it must be recognized that some birds may be killed at structures such as communications towers even if all reasonable measures to avoid it are implemented. The Service's Division of Law Enforcement carries out its mission to protect migratory birds not only through investigations and enforcement, but also through fostering relationships with individuals and industries that proactively seek to eliminate their impacts on migratory birds. While it is not possible under the Act to absolve individuals or companies from liability if they follow these recommended guidelines, the Division of Law Enforcement and Department of Justice have used enforcement and prosecutorial discretion in the past regarding individuals or companies who have made good faith efforts to avoid the take of migratory birds.

Please ensure that all field personnel involved in review of FCC licensed communications tower proposals receive copies of this memorandum. Questions regarding this issue should be directed to Dr. Benjamin Tuggle, Chief, Division of Habitat Conservation, at (703)358-2161, or Jon Andrew, Chief, Division of Migratory Bird Management, at (703)358-1714. These guidelines will be incorporated in a Director's Order and placed in the Fish and Wildlife Service Manual at a future date.

Service Interim Guidelines For Recommendations On

Communications Tower Siting, Construction, Operation, and Decommissioning

- 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.
- 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.
- 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.
- 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.

- 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. Unless otherwise required by the FAA, only white (preferable) or red strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA. The use of solid red or pulsating red warning lights at night should be avoided. Current research indicates that solid or pulsating (beacon) red lights attract night-migrating birds at a much higher rate than white strobe lights. Red strobe lights have not yet been studied.
- 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. (For guidance on markers, see *Avian Power Line Interaction Committee (APLIC)*. 1994. Mitigating Bird Collisions with Power Lines: The State of the Art in 1994. Edison Electric Institute, Washington, D.C., 78 pp, and Avian Power Line Interaction Committee (APLIC). 1996. Suggested Practices for Raptor Protection on Power Lines. Edison Electric Institute/Raptor Research Foundation, Washington, D.C., 128 pp. Copies can be obtained via the Internet at http://www.eei.org/resources/pubcat/enviro/, or by calling 1-800/334-5453).
- 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.
- 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.
- 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.
- 10. Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.
- 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.

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

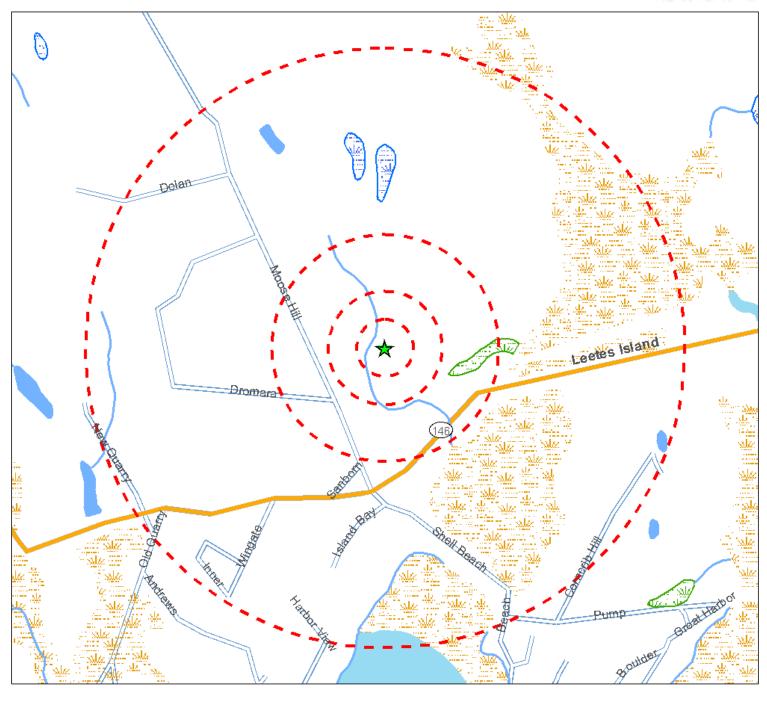
In order to obtain information on the extent to which these guidelines are being implemented, and to identify any recurring problems with their implementation which may necessitate modifications, letters provided in response to requests for evaluation of proposed towers should contain the following request:

"In order to obtain information on the usefulness of these guidelines in preventing bird strikes, and to identify any recurring problems with their implementation which may necessitate modifications, please advise us of the final location and specifications of the proposed tower, and which of the measures recommended for the protection of migratory birds were implemented. If any of the recommended measures can not be implemented, please explain why they were not feasible."

Return to **Home Page**

APPENDIX H WETLANDS MAPS



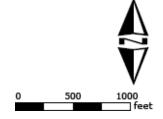


See associated legend for additional map symbology

Source: See associated map legend

Wetlands Map

CTNH805A/Amtrak Guilford Moose Hill Road Guilford, CT 06437



APPENDIX I FEMA FLOODPLAIN MAP

The Flood Insights Test Results For:

Latitude: 41.2674999833107 Longitude: -72.7161111235619

Original Input Address: Latitude: 41.2674999833107 Longitude: -72.7161111235619

Flood Zone Determinations

SFHA Within 250 feet of multiple flood zones?

Out No

Map Number

09009C0489H

Community Community_Name Zone Panel Panel_Dte COBRA

090077 GUILFORD, TOWN OF X 0489H 20101217 COBRA_OUT

FIPS CensusTract

09009 1902.00

Copyright 2000, First American Flood Data Services. All rights reserved.



FloodMap Legend

Flood Zones

Areas inundated by 500-year flooding

Areas outside of the 100- and 500-year floodplains

Areas inundated by 100-year flooding

Areas inundated by 100-year flooding with velocity hazard

Floodway areas

Floodway areas with velocity hazard

Areas of undetermined but possible flood hazards

Areas not mapped on any published FIRM

Copyright 2005, CDS Business Mapping. All rights reserved.

Alquist Priolo Fault Zones



Area Defined as an Earthquake Hazard