

ATTACHMENT 4

Environmental Assessment Statement

I. PHYSICAL IMPACT

A. WATER FLOW AND QUALITY

No water flow and/or water quality changes are anticipated as a result of the construction or operation of the proposed facility. No wetlands were delineated within or in proximity to the proposed facility area or access drive. Best Management Practices to control storm water and soil erosion during and after construction will be implemented. The equipment associated with the facility will discharge no pollutants to area surface or groundwater systems.

B. AIR QUALITY

Under ordinary operating conditions, the equipment that would be used at the proposed facility would emit no air pollutants of any kind.

C. LAND

Clearing and grading will be necessary for the access drive and compound area. The remaining land of the lessor would remain unchanged by the construction and operation of the facility.

D. NOISE

The equipment to be in operation at the facility would not emit noise other than that provided by the operation of the installed heating, air-conditioning and ventilation system. Some construction related noise would be anticipated during facility construction, which is expected to take approximately four to six weeks. Temporary power outages could involve sound from an emergency generator.

E. POWER DENSITY

The worst-case calculation of power density from AT&T's operations at the facility would be 7.30% of the MPE standard. Attached is a copy of the Power Density Report dated March 28, 2011.

F. VISIBILITY

The potential visual impact of the proposed facility was determined by preparation of the attached Visual Resource Evaluation Report prepared by Infinigy Engineering. The potential visibility of the proposed monopole was assessed within an approximate two-mile radius using data on topographic relief and vegetative cover as a baseline along with a field investigation to verify the findings and present a viewshed map. As demonstrated in the enclosed report, it estimated that only 2.2% of the two mile study area (170 acres

out of the 8,042 acres study area) will have year-round views of the proposed facility. Of this total, approximately 20 acres are located on the host parcel. It is estimated that less than one dozen residential structures will have partial seasonal views of the proposed facility and less than four residential structures, including the structures on the subject site, will have year round views of the proposed facility. No views of the proposed facility are anticipated from Black Rock State Park, the Mattatuck State Forest, Veteran Memorial Park or Echo Lake.

II. SCENIC, NATURAL, HISTORIC & RECREATIONAL VALUES

The parcel on which the facility is located exhibits no unique scenic, natural, historic or recreational characteristics. North Atlantic Towers retained the services of Infinigy Engineering & Surveying (“Infinigy”) to evaluate the proposed Facility in accordance with the FCC’s regulations implementing the National Environmental Policy Act (“NEPA”). Based on Infinigy’s screening, it is anticipated that the proposed Facility will have no significant impact on any of the FCC NEPA regulatory criteria. As part of Infinigy’s screening, the Connecticut State Historic Preservation Officer (“SHPO”) was consulted and the SHPO determined that the proposed facility will have “no adverse effect” on archaeological or architectural resources listed in or eligible for listing in the National Register of Historic Places. A copy of the SHPO’s no adverse effect determination is attached.

March 3, 2010

Mr. Roger Laperna
North Atlantic Towers
1001 3rd Avenue West, Suite 420
Bradenton, FL 34205

Subject: Tree Inventory – NAT/Watertown
Site: 655 Bassett Road, Watertown, CT
Infinigy # 226-015/ CT1140

Dear Mr. Laperna:

As requested, we have conducted a tree inventory for the proposed property located north of the intersection of Linkfield Road and Bassett Road. The review consisted of an area 15 ft of either side of the proposed access road for a total of a 30 ft wide road with associated grading and the 100 foot by 100 foot compound area. Based on our review, **Infinigy** identified the following tree species with a Basal Diameter Height (BDH) of four (4) inches or more within the proposed access road path:

- 1) Shagbark Hickory (*Carya ovate*) - one (1) tree within proposed road limits.
- 2) Sugar Maple (*Acer saccharum*) - nine (9) trees within proposed road limits.
- 3) Pignut (*Carya glabra*) - eight (8) trees within proposed road limits.
- 4) Black walnut (*Juglans nigra*) - three (3) trees within proposed road limits.
- 5) American Beech (*Fagus grandifolia*) - seven (7) trees within proposed road limits.
- 6) Red Oak (*Quercus rubra*) - five (5) trees within proposed road limits.
- 7) Black Cherry (*Prunus serotina*) - four (4) trees within proposed road limits.
- 8) White Oak (*Quercus alba*) one (1) trees within proposed road limits.

The proposed access road is associated with an existing logging road. Many of the trees are less than six (6) inches at the BDH. As such impacts to matured trees will be restricted to only the pignut and red oak trees along the access road edge.

Please feel free to contact me with any question or concerns at (518)-690-0970.

Respectfully Submitted,



Infinigy Engineering and Surveying, PLLC
Mark Kiburz, CPESC
Wetland Ecologist



Michael Doiron
 SAI Communications
 260 Cedar Hill St.
 Marlborough, MA 01752
Mike.Doiron@sai-comm.com

March 28, 2011

Connecticut Siting Council

Subject: AT&T Wireless, Watertown, CT

Dear Connecticut Siting Council:

At the request of AT&T Wireless, SAI Communications has performed an assessment of the RF Power Density at the proposed site located at 655 Bassett Road, Watertown, CT. Calculations were done in compliance with FCC OET Bulletin 65. This report provides an FCC compliance assessment based on a "worst-case" analysis that all transmitters are simultaneously operating at full power and pointing directly at the ground. The MPE calculation assumed that a 6 foot person is standing directly below the antenna to model the RF power density generated on the person's head.

FCC OET Bulletin 65 formula:
$$S = \frac{2.56 * 1.64 * ERP_{rel}}{4 * \pi * R^2}$$

Location	Transmission Mode	Antenna Centerline Height Above Ground Level (feet)	Operating Frequency (MHz)	Number of Channels	Effective Radiated Power Per Channel (Watts)	Power Density (mW/cm ²)	Standard Limits (mW/cm ²)	% FCC MPE Limit General Public / Uncontrolled
Ground Level	AT&T UMTS	147	800 Band	1	500	0.0083	0.5867	1.42
	AT&T UMTS	147	1900 Band	1	500	0.0083	1	0.83
	AT&T LTE	147	700 Band	1	500	0.0083	0.4667	1.78
	AT&T GSM	147	800 Band	3	296	0.0148	0.5867	2.52
	AT&T GSM	147	1900 Band	1	427	0.0071	1	0.71
Total								7.30%

Conclusion: AT&T's proposed antenna installation is calculated to be within 7.3% of FCC Standard for General Public/Uncontrolled Maximum Permissible Exposure (MPE).

Sincerely,

Michael Doiron
 SAI Communications

March 3, 2010

Mr. Roger Laperna
North Atlantic Towers
1001 3rd Avenue West, Suite 420
Bradenton, FL 34205

Subject: Wetland Delineation – NAT/Watertown
655 Bassett Road, Watertown, CT
Infinigy # 226-015/ CT1140

Dear Mr. Laperna:

As requested, **Infinigy** performed a wetland delineation review for the proposed property located north of the intersection of Linkfield Road and Bassett Road. Based on our review, the soils along the proposed access road and the proposed tower area compound are not considered hydric soil. Hydric soils are generally defined as a soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper part. The Connecticut Inland Wetland and Watercourse Regulations use soil type to determine if an area is considered a wetland. The soils on site have a map unit name of Hollis-Chatfield Rock Outcropping. Hollis-Chatfield Rock Outcropping soils are considered to have a property classified as somewhat excessively drained. As such Hollis-Chatfield Rock Outcropping soils are not considered hydric soils.

Soils within the proposed access road and tower compound area were observed to have Munsell Color Chart colors of 10YR4/4 in the 2-8" layer and 10YR 4/6 in the 8-12"+ soil layer. Soils were not mottled or saturated. Several; fourteen inch (14) deep test pits were completed to determine ground water proximity. After one hour, water was not observed within the test pits.

The nearest wetland feature is approximately 800 feet directly south of the proposed site and is identified as a palustrine un-consolidated bottom wetland (pond). The topography at the proposed site conveys sheetwater drainage east and west. Therefore, the natural topography will prevent the pond and associated watercourse from any potential impacts. As such, it is **Infinigy's** opinion that the proposed access road and tower compound area do not contain nor will they impact wetlands as defined by the Town of Watertown "Inland Wetlands and Watercourses Regulations" and field verification.

Please feel free to contact me with any question or concerns at (518)-690-0970.

Respectfully Submitted,



Infinigy Engineering and Surveying, PLLC
Mark Kiburz, CPESC
Wetland Biologist

National Environmental Policy Act (NEPA) Screening Report



Prepared For:

North Atlantic Towers, LLC
1001 3rd Ave West, Suite 420
Bradenton, FL 34205

Watertown CT1140

NAT - Watertown
655 Bassett Road
Watertown, CT 06795



11 Herbert Drive
Latham, New York 12110

Infinigy Project # 226-015

Site Report Issued: February 23, 2011

Executive Summary

Facility: FTP/Watertown CT1140
655 Bassett Road, Watertown, CT 06795
Infinigy Project #226-015

Infinigy Engineering PLLC (Infinigy) was retained by North Atlantic Towers, LLC to complete an environmental screening of the Federal Communication Commission (FCC) Special Interest Items outlined in 47 CFR 1.1307 (a)(1) through (8). The National Environmental Policy Act (NEPA) Screen Report (NEPA Screening), contained here within satisfies the FCC in 47 CFR 1.1307, and general industry standards.

Infinigy has completed the NEPA Screening for the proposed North Atlantic Towers project site known as FTP/Watertown CT1140, located at 655 Bassett Road in the Town of Watertown, Litchfield County, Connecticut. North Atlantic Towers proposes to construct a telecommunications facility including a 150-foot monopole tower. The proposed project facility (Subject Property) consists of 100' x 100' lease area located on the northwest portion of a parent parcel of land identified as tax parcel 15-23-3 on the Town of Watertown tax maps.

The parent parcel consists of approximately ±51.53 acres of land, zoned as R-90 - Residential. The parent parcel of the Subject Property is located along the northern side of Bassett Road, north of the intersection of Linkfield Road and Bassett Road, in the Town of Watertown, Litchfield County, Connecticut. The parent parcel is owned by Frank E. Gustofson Estate/Frank E. Gustofson, Jr. and consists of vacant agricultural and forested land.

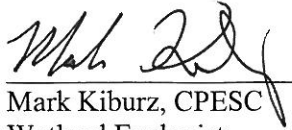
Based upon the findings of the attached National Environmental Policy Act (NEPA) Checklist, NEPA Summary Report and associated documentation for the above referenced site, it appears that the proposed installation will not adversely impact any of the criteria as outlined in 1.1307(a) items (1) through (8) and preparation of an Environmental Assessment (EA) is not required.

This report was completed in accordance with the terms and conditions authorized by North Atlantic Towers. There are no intended or unintended third party beneficiaries to this report, unless specifically named. **Infinigy** 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 **Infinigy** as described in this report. In the event that the design or location of the installation changes, please contact **Infinigy** as additional review and/or consultation may be required.

We appreciate the opportunity to assist North Atlantic Towers with this project. Please contact our office at (518) 690-0790 if you have any questions or if we may be of further assistance.

Respectfully submitted,


Infinigy Engineering PLLC



Mark Kiburz, CPESC
Wetland Ecologist



Lisa Isabella
SHPO/THPO Compliance Coordinator



John L. Favreau, CHMM
Director of Environmental Services

Appendix A – NEPA Checklist
Appendix B – FCC NEPA Summary Report
Appendix C - Figures, Drawings, and Maps
Appendix D – SHPO Correspondence
Appendix E – Tribal Correspondence
Appendix F – Land Capability Map
Appendix G – Federal/State/Local Correspondence and Supporting Documents
Appendix H – National Wetland Inventory and USGS Soil Survey Maps
Appendix I – FEMA Floodplain Maps

NEPA Land Use Screening Checklist

Infinigy Engineering PLLC	Site Type: <input checked="" type="checkbox"/> Raw Land <input type="checkbox"/> Tower Collocation <input type="checkbox"/> Other Collocation <input type="checkbox"/> Tower Replacement	Site ID: NAT/Watertown CT1140 Site Address: 655 Bassett Road Watertown, Connecticut 06795				
FCC NEPA Category	Consulting Agency Contact	NP Reference Document	<i>Check appropriate boxes below</i>			
			No Adverse Impact	Potential Adverse Impact	Exempt form Review	NPA Applies
Designated Wilderness Areas	National Park Service US Forest Service Bureau of Land Management (BLM)	Section 3.4.1	X			
Designated Wildlife Preserves	National Park Service US Forest Service BLM	Section 3.4.1	X			
Threatened or Endangered Species & Critical Habitats	US Fish & Wildlife Service – Field Office (USFWS)	Section 3.4.2	X			
Historic Places	State Historic Preservation Officer (SHPO) Tribal Historic Preservation Officer (THPO)	Section 3.4.3	X SHPO Consultation Completed			Collocation Agreement applies: Nationwide Agreement Exclusion applies:
Indian Religious Sites	American Indian Tribes Bureau of Indian Affairs	Section 3.4.5	X Tribal Consultation Completed			Collocation Agreement applies: Nationwide Agreement Exclusion applies:
Floodplain	Federal Emergency Management Agency (FEMA)	Section 3.4.7	X			
Wetland & Surface Waterways	USFWS NWI Maps US Army Corps of Engineers (ACOE)	Section 3.4.8	X			

Signature: John L. Favreau Company: INFINGY ENGINEERING
 Print Name: JOHN L. FAVREAU Date: 2/22/11

APPENDIX B

FCC NEPA SUMMARY REPORT

FCC NEPA Summary Report

(47 CFR Subpart I, Chapter I, Sections 1.1301 – 1.1319)

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

The National Environmental Policy Act (NEPA) of 1969, the basic national charter for protection of the environment, requires all Federal agencies to incorporate environmental considerations into the decision making process. As a licensing agency, the Federal Communications Agency (FCC) requires all of its licensees, such as wireless communication service provider facilities, to review the potential environmental consequences of their proposed actions. The FCC's regulations for implementing NEPA are found at Title 47 of the Code of Federal Regulations, Part 1, Subpart I, rule sections 1.1301 to 1.1319.

The FCC NEPA regulations define specific situations under §1.1306 that “categorically exclude” certain undertakings from “environmental processing” all actions except those actions specifically identified and defined under §1.1307. Therefore, it is understood that if a proposed facility project site does not and of the listed categories identified in §1.1307, the project is deemed to have *No Significant Impact* and no submission or further action with regard to the FCC is required. However, it is recommended that the client maintain copies of the documentation supporting the finding of No Significant Impact in the event that the information is requested by the FCC (§1.13079).

For applications where it is determined the proposed project may have a significant impact as defined under §1.1308, The FCC's NEPA regulations require license applicants to prepare an Environmental Assessment (EA) and file the EA with the FCC for review by the FCC Enforcement Division. If, after consulting with all appropriate agencies, the Enforcement Division determines that the proposed project will have significant impact upon the environment, the licensee is given the opportunity to mitigate the environmental effects and amend its original application. If the Environmental Division agrees that the mitigation measures taken eliminate the negative environmental impacts they will issue a Finding of No Significant Impact (FONSI) and approve the application.

If the Enforcement Division determines a FONSI is not applicable the applicant must prepare an Environmental Impact Statement (EIS) under §1.1304.

Pursuant to the FCC's regulations, the NEPA Screening prepared by *Infinigy* provides a determination of whether the proposed telecommunications facility will have a significant impact on the environment and therefore be categorically excluded from further environmental processing or review.

Under FCC NEPA regulation §1.1307, an Environmental Assessment must be prepared for any project site that meets one of the following listed conditions:

- Facility is located in an officially designated wilderness area
- Facility is located in an officially designated wildlife preserve
- Facilities that will likely affect listed, threatened or endangered species or designated critical habitats; are likely to jeopardize the continued existence of any proposed threatened or endangered species or designated critical habitats or likely to result in the destruction or adverse modification or proposed critical habitats as defined within the Endangered Species Act of 1973.
- Facilities that may affect districts, sites, buildings or other structures that are considered significant in American history, architecture, archaeology, and engineering or culture that are listed or are eligible for listing in the National Register of Historic Places.

SUMMARY OF FINDINGS

¶1.1307 (a) (1) 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 *Infinigy'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.blm.gov/nhp/facts/index.htm), or within ¼ mile of a National Scenic Trail as identified by the National Park Service (http://www.nps.gov/ncrc/programs/nts/nts_trails.html).

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (2) OFFICIALLY DESIGNATED WILDLIFE PRESERVE

According to a review of the Department of Interior, Department of Fish and Wildlife Service's New England Field Offices *Communication Towers in Connecticut* publication (<http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm>), the Project Site is not located in an officially designated wildlife preserve. In addition, according to *Infinigy's* review of available on-line resources, the Project Site is not located in a United States Fish and Wildlife Service National Wildlife Refuge (<http://www.fws.gov/refuges/refugeLocatorMaps/index.html>).

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (3) LISTED, THREATENED OR ENDANGERED SPECIES/DESIGNATED CRITICAL HABITATS

Section 1.1307(a)(3) of the Commission's rules, 47 C.F.R. §1.1307(a)(3), requires applicants, licensees, and tower owners (Applicants) to consider the impact of proposed facilities under the Endangered Species Act (ESA), 16 U.S.C. s. 1531 et seq. Applicants must determine whether any proposed facilities may affect listed, threatened or endangered species or designated critical habitats, or are likely to jeopardize the continued existence of any proposed threatened or endangered species or designated critical habitats. Applicants are also required to notify the FCC and file an environmental assessment if any of these conditions exist.

According to the US Department of Interior Fish and Wildlife Services "*Service Guidance on the Siting, Construction, Operation and Decommissioning of Communications Towers*" the construction of new towers creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. The Guidance document further states that 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.

In an effort to streamline the evaluation process and aid in the siting of proposed facilities, the following voluntary guidelines and recommendations were established:

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.

As of February 16, 2011, the USFWS has two (2) species identified within Litchfield County classified as endangered (E) or threatened (T). The species are identified in the following table:

Federal Status	Listing	Species Habitat	Habitat at Project Site
Threatened (T)	Bog Turtle	Wetlands in the Town of Sharon	The area of the proposed construction is within a hardwood forest.
Threatened (T)	Small Whorled Pogonia	Forest with somewhat poorly drained soils and/or a seasonally high water table.	

In accordance with the US FWS Connecticut Field Office website instructions: *Project Review Process for Projects WITH Any Federal Agency Involvement*) publication (http://www.fws.gov/newengland/EndangeredSpec-Consultation_Project_Review.htm), the US Fish and Wildlife Service Connecticut Field Office requests the following process be followed:

*Step 1: Determine whether any listed, proposed, or candidate species (T/E species) are likely to occur within the proposed project action area based on **location** of the proposed project:*

- A. Choose your county for a list of Threatened, Endangered, and Candidate Species and List of Extirpated Species.*
- B. Reviewed the Connecticut Department of Environmental Protection (DEP) for additional information on Federally- and State-listed species. Please note that the DEP provides information on **known** occurrences; this information does not replace field surveys as most project sites have not been previously surveyed specifically for listed species.*

If the proposed project occurs in a county with no known listed or candidate species present, no further coordination with the Service is needed. However, until the proposed project is complete, we recommend that you check our species lists every 90 days to ensure that listed species presence/absence information for the proposed project is current.

If the proposed project occurs in a county with known occurrences of T/E species, proceed to Step 2.

*Step 2: Determine whether any T/E species are likely to occur within the proposed project area based on the **habitat** present within the proposed project action area.*

Review the information we have provided, information from DEP, and any other sources of information available to you to determine types of habitat the species use.

Determine whether your proposed project action area has any potential for listed species habitat (e.g., are trees present - Indiana bats, are wetlands present - Bog turtles). After this initial coarse

review, determine whether any more detailed surveys may be appropriate (e.g., Phase 1 survey for Bog turtles).

You will find that survey protocols are available for some species but not for others. Follow the steps provided for each species. If you have any questions regarding species that do not have specific protocols, please contact our office for technical assistance.

If the DEP does not identify any listed species for the proposed project AND there is no potential habitat for any listed species within the action area, no further coordination with the Service is required.

According to the information provide by the USFWS webpage information for “Federally Listed Endangered and Threatened species in Connecticut” both the small whorled pogonia and bog turtle are located in the Town of Sharon.

The mapping provided by CTDEP does not indicate the potential species but rather the general location of known threatened or endangered species. As such, the DEP map for the Town of Watertown does not identify the proposed project area as being potential habitat for threatened or endangered species, or as being within 1/2 mile from a shaded wetland. The review as stated in the DEP State and Federal Listed Species and Significant Natural Communities is “*Locate project boundaries and any additional affected areas on the map. If the project is not within a shaded area; or overlapping a lake, pond or wetland that has any shading; or upstream or downstream (by less than 1/2 mile) from a shaded area, the project is unlikely to affect any known occurrence of listed species or significant natural community. If any part of the project is within a shaded area; or overlapping a lake, pond, or wetland that has any shading; or upstream or downstream (by less than 1/2 mile) from a shaded area, then the project may have a potential conflict with a species or natural community. Complete a Data Base Request Form and submit to the Natural Diversity Data Base along with a project description and a copy of a map clearly showing the project boundaries.*” Additional correspondence with CTDEP regarding threatened and endangered species is not anticipated at this time. Information obtained and reviewed to support this determination is included in Appendix G.

Based upon the proposed design (monopole) and height (under 150 feet AGL) 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.

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (4) SECTION 106 CONSULTATION

In 1966, the implementation of the National Historic Preservation Act (NHPA) successfully delegated Section 106 compliance to the individual State Historic Preservation Offices. The NHPA requires Federal agencies to consider the effects of discretionary Undertakings on Historic Properties that are included or eligible for inclusion in the National Register of Historic Places. In March 2005, the FCC adopted the National Programmatic Agreement (NPA) which effectively:

- excludes from Section 106 review certain Undertakings involving the construction and modification of Facilities; and
- streamlines and tailors the Section 106 review process for other Undertakings involving the construction and modification of Facilities.

- *“This office appreciates the opportunity to have reviewed and commented upon the proposed undertaking.”*
- *“This comment is provided in accordance with the National Historic Preservation Act and the Connecticut Environment Policy Act and supersedes all previous correspondence regarding the proposed undertaking.”*

On March 25, 2010 Infinigy received correspondence from Mr. David Bahlman, Deputy State Historic Preservation Office at the CT SHPO office which stated the following:

- *“The State Historic Preservation Office previously issued a comment letter for a proposed telecommunications facility at “936 Linkfield Road” in Watertown, Connecticut (dated March 2, 2010). It is our understanding that the address of the proposed facilities in the material submitted to this office was incorrect. The facilities will be constructed at 655 Bassett Road in Watertown. Infinigy has informed SHPO that all other information used by SHPO in our evaluation of the potential effects of this undertaking on historic properties was correct.”*
- *“Based on the supplemental information that you have submitted to this office, SHPO reiterates our previous opinion: we expect that the proposed undertaking will have no effect on historic, architectural, or archaeological resources listed on or eligible for the National Register of Historic Places.”*
- *“This comment is provided in accordance with the National Historic Preservation Act and supersedes all previous correspondence regarding the proposed undertaking.”*

Based upon the response from the CT SHPO, it is the opinion of **Infinigy** that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (5) INDIAN RELIGIOUS SITES

Based on the requirements of the Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process (NPA), applicants must demonstrate “good faith efforts” to identify any Indian tribe or Native Hawaiian Organization (NHO) that attaches religious or cultural significance to Historic Properties that may be affected by the Undertaking. As stated within the FCC regulations, use of the FCC’s Tower Construction Notification System (TCNS) to initiate consultation with Indian Tribes and NHO’s, “shall constitute a reasonable and good faith effort with respect to ensuring Section 106 compliance **Infinigy** determined that Tribal and NHO Consultation was required for this project because the proposed tower construction did not meet Exclusions A, B, C or F of the NPA.

Infinigy submitted documentation regarding the proposed project to the FCC's Tower Construction Notification System (TCNS). On November 27, 2009 the FCC's TCNS sent the project information to Tribes listed on their database who have indicated that they have a geographic interest in the area of the proposed Project site. Additionally, **Infinigy** 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.

It should be noted that although the address on the documentation sent to the TCNS was incorrect (936 Linkfield Road), the location coordinates and all maps refer to the actual Subject Property located at 655 Bassett Road.

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	Recommended Action
Mashantucket Pequot Tribe	11/27/2009	1/4/10 Submitted arch. report and site information for review; 1/16/10 response rec'd. – Tribe concurs with findings of arch. studies (no effect).	NA	NA	No Further Action
Narragansett Indian Tribe	11/27/2009	12/2/09 – Tribe initiated consultation; Site information submitted to Tribe for review.	1/4/10 – Requested response from Tribe.	No response – another request sent 6/10/10 along with fee; no response to this request;	No Further Action
Stockbridge-Munsee Band of Mohican Indians	11/27/2009	1/4/10 sent out information to them for review; 1/26/10 response rec'd. - no historic properties	N/A	N/A	No Further Action

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, Independent Towers 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)).

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

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

¶1.1307 (a) (6) FEMA 100 YEAR FLOODPLAIN

Executive Order (EO) 11988 states that “each agency has a responsibility to evaluate the potential effects of any actions it may take in a floodplain; to ensure that its planning programs and budget request reflect consideration of flood hazards and floodplain management”. Furthermore, EO 11988 Section 6 defines a “base flood” and “floodplain” as follows:

- The term "base flood" shall mean that flood which has a one percent or greater chance of occurrence in any given year.
- The term "floodplain" shall mean the lowland and relatively flat areas adjoining inland and coastal waters including flood prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

In compliance with FCC 1.1307, *Infinigy* evaluated the potential that the proposed telecommunication facility would be located within the 100 year flood plain through a review of:

- FEMA Flood Insurance Rate Map, Panel #0900580004-B

According to the FEMA Flood Insurance Rate Map, Panel #0900580004-B for the Town of Watertown, Connecticut (attached as Appendix I), the Subject Property is not located within a 100-year floodplain.

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (7) IMPACTS TO SURFACE FEATURES

It is *Infinigy's* opinion that no documented or potential wetlands are located at or within a 100-foot radius of the proposed tower based upon the following facts:

- Limited or no hydric vegetation was observed at the tower site. Additionally, no surface water was observed at the proposed tower site.
- According to a review of the United States Fish and Wildlife National Wetlands Inventory Wetlands Mapper (information available online at http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS), no mapped wetlands are located at or within close proximity to the proposed tower site (Appendix H).
- According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS) website (<http://websoilsurvey.nrcs.usda.gov/app/>) the dominate soil composition in the vicinity of the proposed tower location is classified as Hollis-Chatfield-Rock outcrop complex (75C), 3 to 15 percent slopes (Appendix H).
- The Hollis-Chatfield-Rock outcrop complex (75C) consists of somewhat excessively drained soils formed in Loamy melt-out till derived from granite and/or schist and/or gneiss with slopes ranging from three (3) to fifteen (15) percent. Depth to restrictive features is generally 10-20 inches, with a depth to water over 80 inches.

The Subject Property is located at an elevation of approximately 839 feet above mean sea level (AMSL) and is generally characterized as a mature forest with flat to steep slopes, owned by Frank Gustofson. Several locations within parent parcel have exposed bedrock. The Subject Property is undisturbed hardwood forest surrounded by sparse residential properties and agricultural land

It is the opinion of *Infinigy* that the proposed project will have no significant impact with regard to this FCC NEPA regulatory item.

¶1.1307 (a) (8) HIGH INTENSITY WHITE LIGHTS/RESIDENTIAL ZONING

The Federal Aviation Administration (FAA) requires the use of high intensity lights on towers over 499 feet above ground surface as part of aviation avoidance marking. Towers that are less than 499 feet above ground level are not required to be equipped with high intensity lights.

According to client representatives and site plans, the proposed installation is less than 499 feet above ground level and will not include high intensity white lights or be located in a residential neighborhood.

τ1.1307 (a) (9) HUMAN RADIO FREQUENCY (RF) EXPOSURE

- 9a. 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?**

According to client representatives and site plans, the proposed installation will not include antennas located less than 10 meters above the ground and is therefore categorically excluded from additional RF compliance showings.