Attachment 3

#### SECTION 3 Candidate A <u>General Facility Description</u> Southbury Road (Route 67), Roxbury, Connecticut 06783 Owner: C.N. Builders Tax ID: 32/08 Approximately 96.5 Acre Parcel

The proposed Candidate A Facility consists of a 100' by 100' lease area located in the southcentral portion of an approximately 96.5 acre parcel owned by C.N. Builders at Southbury Road (Route 67) in Roxbury. A new self-supporting monopole tower 170' in height would be constructed. AT&T will install up to 12 panel antennas at the 167' centerline height on the tower together with an associated 12' by 20' radio equipment shelter at the tower base on a concrete pad within the tower compound. The tower compound would consist of a 75' by 75' area to accommodate AT&T's equipment and provide for future shared use of the Facility by other carriers. An 8' high chain link fence would enclose the tower compound. Vehicle access to the Facility would be provided by a 12' wide gravel access drive extending southward from Route 67. Electric and telephone utilities would be extended underground from a new on-site utility pole to the proposed Facility. Provisions are also included for an emergency generator.

#### Site Evaluation Report

#### I. LOCATION

- A. COORDINATES: 41° 30' 53.83" N 73° 15' 46.12" W
- B. GROUND ELEVATION: 723' AMSL
- C. USGS MAP: Roxbury Quadrangle
- D. SITE ADDRESS: Southbury Road (Route 67), Roxbury, Connecticut
- E. ZONING WITHIN 1/4 MILE OF SITE: Residential / Open Space

#### II. DESCRIPTION

- A. SITE SIZE: 100' by 100' lease area, 75' by 75' compound
- B. LESSOR'S PARCEL: ± 96.5 acres
- C. TOWER TYPE/HEIGHT: Monopole / 170' AGL.
- D. SITE TOPOGRAPHY AND SURFACE: The proposed site is located towards the south-central portion of the parcel in an undeveloped wooded area on a hillside.
- E. SURROUNDING TERRAIN, VEGETATION, WETLANDS, OR WATER: The surrounding terrain ranges in elevation from 158' AMSL to 930' AMSL The majority of the surrounding area is covered in heavy vegetation. A review of available information regarding the site through Federal, State and local databases indicates the site is not located within a wetlands mapped on the National Wetland's Inventory and not within a 100-year or 500-year flood zone. Wetlands soils were identified on the parcel approximately 295' east of the proposed equipment compound. The closest surface water bodies are mostly off-premises and include Transylvania Pond located approximately one-mile southeast of the site and a small pond approximately 1.5 miles south of the site. In addition, access to the site will require a crossing over an unnamed perennial stream located nearby Southbury Road.
- F. LAND USE WITHIN 1/4 MILE OF SITE: Land uses within <sup>1</sup>/<sub>4</sub> mile of the site are primarily open space and low-density residential.

#### III. FACILITIES

A. POWER COMPANY: Connecticut Light and Power

- B. POWER PROXIMITY TO SITE: Facilities available from offsite utility pole.
- C. TELEPHONE COMPANY: AT&T
- D. PHONE SERVICE PROXIMITY: Same as power.
- E. VEHICLE ACCESS TO SITE: Access to the facility would be provided initially over a planned subdivision access driveway for a distance of approximately 1,300 feet. From there, AT&T proposes a new 12' wide gravel access drive will extend approximately 210' to the site.
- F. OBSTRUCTIONS: None
- G. CLEARING AND FILL REQUIRED: The compound will require clearing and grading to level the area. Detailed plans would be included in a Development and Management Plan ("D&M" plan) after any approval of the Facility which may be issued by the Connecticut Siting Council.
- IV. LEGAL
  - A. PURCHASE [] LEASE [X]
  - B. OWNER: C.N. Builders, Inc.
  - C. ADDRESS: Tax ID 32/08 (Route 67), Roxbury, Connecticut 06783
  - D. DEED ON FILE AT: Town of Roxbury Vol. 107; page 236

#### Facilities and Equipment Specification

- I. TOWER SPECIFICATIONS:
  - A. MANUFACTURER: To be determined
  - B. TYPE: Self-Supporting monopole

~		
C.	HEIGHT:	170'
	<b>DIMENSIONS:</b>	Approximately 41/2' in diameter at the base, tapering to
		approximately 2' at the top.

D. LIGHTING: None as set forth in attached TOWAIR report

#### II. TOWER LOADING:

- A. AT&T up to 12 panel Antennas
  - a. Model P90-15-XLH-RR or equivalent panel antenna
  - b. Antenna Dimensions 55"H x 11"W x 5"D
  - c. Position on Tower 167' centerline mounted on low profile platform
  - d. Transmission Lines MFG: Commscope; Size 1-5/8"
- B. Future Carriers To be determined

#### III. ENGINEERING ANALYSIS AND CERTIFICATION:

The tower will be designed in accordance with American National Standards Institute TIA/EIA-222-F "Structural Standards for Steel Antenna Towers and Antenna Support Structures" and the 2003 International Building Code with 2005 Connecticut Amendment. The foundation design would be based on soil conditions at the site. The details of the tower and foundation design will be provided as part of the final D&M plan.

#### 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. The construction and operation of the tower and related site improvements will have no effect on any watercourses or water bodies. Best Management Practices to control storm water and soil erosion during 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 in the compound area and access drive and best management practices implemented for soil erosion and sediment control. 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 cumulative worst-case calculation of power density from AT&T's operations at the Facility would be 5.67% of the MPE standard. Attached is a copy of AT&T's Power Density Report dated August 5, 2011.

#### F. VISIBILITY

The potential visual impact of the proposed Facility was determined by preparation of the attached Visual Resource Evaluation Report prepared by VHB/Vanasse Hangen Brustlin, Inc. in February 2011. The potential visibility of the proposed monopole was assessed within an approximate two-mile radius using a computer-based, predictive view shed

model and in-field visual analysis. As shown in the report and photo simulations, only 18 acres (less than 1%) of the 8,042-acre study area (a two mile radius of the proposed Facility) would have views of the proposed tower above the tree canopy. The majority of the anticipated year-round visibility occurs over open, undeveloped land and Transylvania Pond, approximately 1.0 mile to the southeast of the Facility. Such views would generally be intermittent and somewhat distant (1.0 mile or more). Overall, there is intervening topography and an abundance of vegetation in the area that limit visibility.

#### II. SCENIC, NATURAL, HISTORIC & RECREATIONAL VALUES

The parcel on which the Facility is located exhibits no unique scenic, natural, historic or recreational characteristics. The Connecticut State Historic Preservation Officer (SHPO) has reviewed the proposal and determined that it will have no adverse effect on historic resources. Additionally, the Connecticut Department of Energy and Environmental Protection (CTDEEP) has also reviewed the proposal. After review of the Natural Diversity Database (NDDB) map for Roxbury and other information, CTDEEP found that their records indicate that the Eastern Box Turtle (*Terrapene Carolina*) occurs in the vicinity of the project area. Vanasse Hangen Brustlin, Inc., as consultants for AT&T, developed a protective strategy program for the Eastern Box Turtle which has been used successfully on similar projects and which will adequately protect this species of special concern should it be encountered on this site. With this program in place the proposed development will not have an adverse affect on Eastern Box Turtle.

Attachment 3(A)







1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-300b-1 THROUGH 20-300b-20 AND THE "STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS INC. ON SEPTEMBER 26, 1996. THE BOUNDARY LINES SHOWN ON THIS PLAN WERE COMPILED FROM OTHER MAPS, RECORD RESEARCH OR OTHER SOURCES OF INFORMATION. IT IS NOT TO BE CONSTRUED AS HAVING BEEN OBTAINED AS THE RESULT OF A FIELD SURVEY, AND IS SUBJECT TO SUCH CHANGE AS AN ACCURATE FIELD SURVEY MAY

TYPE OF SURVEY: COMPILATION PLAN

2. PROPERTY LINE SHOWN HEREON ARE FROM RECORD DEEDS PLOTS AND TAX MAPS AS OVERLAID ON ANY MONUMENTATION OR OTHER EVIDENCE THAT MAY HAVE BEEN LOCATED DURING THE TOPOGRAPHIC SURVEY. A PROPERTY SURVEY WAS NOT PERFORMED BY CLOUGH HARBOUR & ASSOCIATES LLP AND AS A RESULT THE PROPERTY LINES SHOWN ARE APPROXIMATE AND DO NOT PRESENT A PROPERTY/BOUNDARY OPINION.

3. BASE MAPPING PREPARED BY CHA FROM AN JUNE 2011 FIELD

4. NORTH ORIENTATION IS TRUE NORTH BASED ON GPS OBSERVATIONS TAKEN AT THE TIME OF THE FIELD SURVEY.

5. UNDERGROUND UTILITIES, STRUCTURES AND FACILITIES, IF ANY, HAVE BEEN SHOWN FROM SURFACE LOCATIONS AND MEASUREMENTS OBTAINED FROM A FIELD SURVEY, THEREFORE THEIR LOCATIONS MUST BE CONSIDERED APPROXIMATE ONLY. THERE MAY BE OTHER UTILITIES WHICH THE EXISTENCE OF ARE NOT KNOWN. SIZE, TYPE AND LOCATION OF ALL UTILITIES AND STRUCTURES MUST BE VERIFIED BY PROPER AUTHORITIES PRIOR TO ANY AND ALL CONSTRUCTION. CALL

6. SUBJECT TO ANY STATEMENT OF FACTS THAT AN UP-TO-DATE ABSTRACT OF TITLE WOULD DISCLOSE.

8. LATITUDE/LONGITUDE/ELEVATIONS WERE OBTAINED UTILIZING NGS CORS BASE STATION NAMED "CTGE". LATITUDE/LONGITUDE ARE REFERENCED TO NAD83 CONNECTICUT ZONE. COORDINATES SHOWN, IF ANY, ARE EXPRESSED IN U.S. SURVEY FEET. ELEVATIONS ARE REFERENCED TO NAVD88. TOP OF STRUCTURE HEIGHT AS SHOWN, IF ANY, DETERMINED BY VERTICAL ANGLE OR BY ACTUAL LOCATION. INFORMATION SHOWN BASED ON FAA 2C CERTIFICATION ACCURACY LEVEL DEFINED AS: HORIZONTAL: ±50 FEET / 15 METERS VERTICAL: ±20 FEET / 6 METERS

9. SITE FALLS WITHIN ZONE "X" DEFINED AS AREAS DETERMINED TO BE OUTSIDE 500-YEAR FLOOD PLAIN AS SHOWN ON FLOOD INSURANCE RATE MAP, TOWN OF ROXBURY, CONNECTICUT, LITCHFIELD COUNTY, PANEL 10 OF 10, COMMUNITY PANEL NUMBER 090051 0010 B, EFFECTIVE DATE DECEMBER 3, 1987.

10. WETLAND FLAGS SHOWN AS FOUND DURING FIELD SURVEY. DELINEATION BY AND DATE UNKNOWN.

1. MAP ENTITLED "MAP PREPARED FOR LOTS 2, 4, 5, 6 & THE MEADOW – HIGH MEADOWS' AS PREPARED BY ARTHUR H. HOWLAND, DATED FEBRUARY 15, 2005 AND FILED IN THE TOWN OF ROXBURY CLERKS OFFICE IN VOL.18 PAGE 31 OF MAPS.

2. MAP ENTITLED "DATA ACCUMULATION PLAN DEPICTING LOT LINE REVISION – PREPARED FOR BILL FREDRICKS" AS PREPARED BY STUART SOMERS CO, LLC, DATED 9–16–03, AND FILED IN THE TOWN OF ROXBURY CLERKS OFFICE IN VOL.18 PAGE 33 OF MAPS.

3. MAP ENTITLED "MAP OF PROPERTY PREPARED FOR CHARLES F. NIEWENHOUS" AS PREPARED BY SHAUGHNESSY AND PLAIN, DATED JUNE 24, 1978, AND FILED IN THE TOWN OF ROXBURY CLERKS OFFICE IN VOL.9 PAGE 13 OF MAPS.

4. MAP ENTITLED "RECORD SUBDIVISION MAP BRONSON MOUNTAIN FARM - PREPARED FOR JONATHAN & TERESA METCALF AYER PROPERTY" AS PREPARED BY SMITH 7 COMPANY, DATED 12-1-03, AND FILED IN THE TOWN OF ROXBURY CLERKS OFFICE IN VOL.18 PAGE 7 OF MAPS.

BOUNDARY DETERMINATION CATEGORY: NONE

CLASS OF ACCURACY: HORIZONTAL CLASS A-2 VERTICAL CLASS V-2 TOPOGRAPHIC CLASS T-2

7. SUBJECT TO ALL RIGHTS, EASEMENTS, COVENANTS OR RESTRICTIONS OF RECORD.

5. MAP ENTITLED "MAP OF PROPERTY PREPARED FOR C.N. BUILDERS INC." AS PREPARED BY DENNIS A. DEILUS AND DATED DECEMBER 18,



C02B



DATE: 7/29/2011 1:14 PM FILE: W: \SAI CINGULAR\18301\SITES\1020 SOUTHBURY-ROXBURY 1876\ZD\SOUTHBURY-3 COMPOUND PLAN.DWG



DATE: 7/29/2011 1:16 PM FILE: W: \SAI CINGULAR\18301\SITES\1020 SOUTHBURY-ROXBURY 1876\ZD\SOUTHBURY-4 TOWER ELEVATION.DWG



DATE: 7/29/2011 9:31 AM FILE: W: \SAI CINGULAR\18301\SITES\1020 SOUTHBURY-ROXBURY 1876\ZD\SOUTHBURY-5 USGS.DWG



DATE: 7/29/2011 12:38 PM FILE: W: \SAI CINGULAR\18301\SITES\1020 SOUTHBURY-ROXBURY 1876\ZD\SOUTHBURY-6 AERIAL.DWG



#### Site Number: SR1876 Site Name: SOUTHBURY-ROXBURY Site Address: SOUTHBURY ROAD, ROXBURY, CT 06783

#### Access distances:

Distance of access over future driveway: 1,300' Distance of access over new gravel driveway: 210' Total distance of site access: 1,510'

#### **Distance to Nearest Wetlands:**

97' from flag 7 to limit of nearest grading for compound. Wetlands will need to be crossed with the utilities near Southbury Road.

#### **Distance to Property Lines:**

862' to the northern property boundary 332' to the southern property boundary 132' to the western property boundary 1092' to the eastern property boundary

#### **Residence Information:**

There is 1 residences within 1,000' feet of the tower. The closest residence is 970' to the Southeast.

#### Tree Removal Count:

#### SEE TREE LETTER.

#### Distance to Nearest Town (Must notify town if less than 2,500'):

The nearest town to the proposed tower is Southbury. The town boundary is 870' to the South.



July 29, 2010

New Cingular Wireless PCS, LLC 500 Enterprise Drive Rocky Hill, CT 06067

RE: Tree Inventory Site: Southbury-Roxbury Southbury Road Roxbury, CT 06783 CHA # 18301-1020-43000

A site survey was completed at the subject site in June of 2011. A requirement of the survey involved determining the location of all trees within the topographic survey area with a diameter at breast height of 6" or larger. As can be seen on the site access map, there are one-hundred and twenty-two (122) trees with a diameter of 6" or larger within the area of the proposed access road, compound, and utilities which need to be removed for construction of the facility. The quantity and size of trees being removed is summarized in the below table:

Tree Diameter	Number of Trees
	to be Removed
6"	9
7"	18
8"	11
9"	5
10"	15
12"	18
14"	5
15"	12
16"	4
18"	10
20"	8
22"	5
24"	1
27"	1
TOTAL	122

If you have any questions, comments or need further information, please do not hesitate to contact our office.

Very truly yours, CLOUGH HARBOUR & ASSOCIATES LLP

and Lucitan;

Paul Lusitani Project Engineer

W:\SAI Cingular\18301\Sites\1020 Southbury-Roxbury 1876\ZD\SOUTHBURY-8 TREE INVENTORY.doc

Attachment 3(B)

Transportation Land Development Environmental Service	s RECEIVED JAN	1 2 6 2011	MAR 18 2011
VHB	• magination innovation energy Creating re	sults for our clients and benefit	VANASSE HANGEN BRUSTLIN, INC.
January	25, 2011	V	anasse Hangen Brustlin, Inc.
Ref: 415	502.35		5
Mr. Dar Commis State Hi One Con Hartford	niel Forrest ssion on Culture & Tourism istoric Preservation Office nstitution Plaza, Second Floor 1, CT 06103	Dace 6	SASE EFFE
Re:	Proposed AT&T Wireless Telecommuni SR-1876 – Roxbury - CN Builders Southbury Road Roxbury, Connecticut	cations Facility STATE HIST Date 3	TORIC PRESERVATION OFFICE
Dear Mr	r. Forrest:		

Vanasse Hangen Brustlin, Inc. (VHB) has been retained by SAI Communications representing New Cingular Wireless PCS, LLC ("AT&T") to review environmental resource information outlined in 47 CFR Ch.1 § 1.1307 sections (a) and (b) for environmental consequences pursuant to the Federal Communications Commission ("FCC or Commission") requirements. VHB determines the presence of resources listed under the National Environmental Policy Act (NEPA) on or near sites where AT&T proposes to locate a facility. Results of this screening process for the above referenced proposed facility in Roxbury are depicted on the enclosed Cultural Resources Screen map.

AT&T is proposing to construct a new wireless telecommunications facility on portions of property located off of Southbury Road in Roxbury, Connecticut. The facility, consisting of a  $\pm 170$ -foot tall monopole, antennas, and associated ground equipment, will be installed within a 75' x 75' fenced leased compound area. A proposed 12' wide gravel access drive will initiate off of the pending sub-division access drive to be built by others. AT&T antennas will be attached to the monopole at centerline height of  $\pm 167$  feet above ground level. Associated ground equipment will be installed within the compound area. The monopole and compound area will be developed for use by future wireless service providers. See attached Lease Exhibits for details.

The Cultural Resources Screen did not reveal the existence of any historic resources listed or eligible for listing on the National Register of Historic Places or Indian religious sites at or within a 0.5-mile radius (the area of potential effects; APE) of the project area. As a result, it is VHB's opinion that no visual or direct effects exist within the APE.

A *Preliminary Archaeological Assessment* prepared by Heritage Consultants, LLC dated January 6, 2011 was completed for the proposed project area. Heritage Consultants, LLC concluded that "It is likely that settlement efforts in this area were hampered by the presence of steep slopes and rocky soils. In addition, Figures 10 through 11 revealed that no known historic properties or archeological sites are in the region surrounding the proposed tower location. Based on this information and the unfavorable environmental characteristics, it is the professional opinion of Heritage Consultants, LLC that additional cultural resources investigations of the proposed telecommunications tower location are not warranted." A copy of this Assessment is attached for your review.

J:\41502.35\docs\letters\SHPO letter-Roxbury.doc

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

### **1-A CERTIFICATION**

Client:	AT&T
	500 Enterprise Drive
	Rocky Hill, CT 06067

Site Number: SR1876- CN Builders Site Address: Southbury Road Roxbury, CT 06783

Horizontal Datum: X GPS Survey

Vertical Datum: <u>X</u>GPS Survey

Structure Type:

X New Tower Existing Tower Roof Top Temporary Site

Water Tank Smoke Stack C.O.W. Other:

Latitude:	41°30'53.83" North - NAD 83
Longitude:	73°15'46.17" West - NAD 83
(Center of Proposed N	Monopole Base)

**Ground Elevation:** 723.0 AMSL (Above Mean Sea Level) – NAVD 88 (Ground at Proposed Monopole Base)

Support Structure Height: (Top Proposed Tower)	170.0'	AGL (Above Ground Level)
<b>Proposed Height to AT&amp;T Antenna Tip:</b> (Top of Highest proposed antenna)	170.0'	AGL
<b>Proposed Total Overall AT&amp;T Antenna Height:</b> (Top of Highest proposed antenna)	893.0'	AMSL
Design RAD Center Height:	167.0'	AGL

(Center of Highest proposed antenna)

**Certification:** I certify that the latitude of 41°30'53.83" North and the longitude 73°15'46.107" West are accurate to within +/- 20 feet horizontally, and that the ground elevation of 723.0' AMSL is accurate to within +/- 3 feet vertically. The horizontal datum (coordinate) are in terms of the North American Datum of 1983 (NAD 83) and are expressed in degrees, minutes and seconds. The vertical datum (elevations) are in terms of the North American Datum of 1988 and are expressed in feet.

**Company:** 

Signature:

The LRC Group 160 West Street, Suite E Cromwell, CT 06416 Phone: 860-635-2877; Fax: 860-635-4226

Wagenblatt / John F. S. No. 17791

Date: January 24, 2011

#### \*\*\* **NOTICE** \*\*\*

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

#### DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates	
Latitude	41-30-53.8 north
Longitude	073-15-46.1 west
Measurements (Meters)	
Overall Structure Height (AGL)	51.8
Support Structure Height (AGL)	0
Site Elevation (AMSL)	52.7
Structure Type	

TOWER - Free standing or Guyed Structure used for Communications Purposes

**Tower Construction Notifications** 

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

CLOSE WINDOW)

8/31/2011



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

August 5, 2011

**Connecticut Siting Council** 

Subject: AT&T Wireless, Roxbury, CT

Dear Connecticut Siting Council:

At the request of AT&T Wireless, SAI Comunications has performed an assessment of the RF Power Density at the proposed site located at Southbury Road, Roxbury, 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.

FCC OET Bulletin 65 formula:

c	_	2.56 * 1.64 * <i>ERP</i>
3	=	$4 * \pi * R^2$

Transmission Mode	Antenna Centerline AGL (ft)	Frequency (MHz)	Number of Channels	Effective Radiated Power per Channel (Watts)	Power Density (mW/cm <sup>2</sup> )	Standard Limits (mW/cm <sup>2</sup> )	% MPE (Uncontrolled/ General Public)
AT&T GSM	167	880	3	296.00	0.0115	0.5867	1.95%
AT&T GSM	167	1900	1	427.00	0.0055	1	0.55%
AT&T UMTS	167	850	1	500.00	0.0064	0.5667	1.14%
AT&T UMTS	167	1900	1	500.00	0.0064	1	0.64%
AT&T LTE	167	700	1	500.00	0.0064	0.4667	1.38%
Total						5.67%	

**Conclusion**: AT&T's proposed antenna installation is calculated to be within 5.67% of FCC Standard for General Public/Uncontrolled Maximum Permissible Exposure (MPE).

Sincerely,

Michael Doiron SAI Communications

Attachment 3(C)

**Comparative Visual Resource Evaluation Report** 

## **Proposed Wireless Telecommunications Facility**

# Roxbury

Southbury Road (Route 67) Roxbury, Connecticut

Prepared for New Cingular Wireless PCS, LLC 500 Enterprise Drive, Suite 3A Rocky Hill, CT 06057

Prepared by VHB/Vanasse Hangen Brustlin, Inc. 54 Tuttle Place Middletown, CT 06457

February 2011

VHB

#### Visual Resource Evaluation

New Cingular Wireless PCS, LLC ("AT&T") seeks approval from the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for the construction of a wireless telecommunications facility ("Facility") to be located on property off Southbury Road (Route 67) in the Town of Roxbury, Connecticut (identified herein as the "host property"). This Visual Resource Evaluation was conducted to evaluate the visibility of the proposed Facility within a two-mile radius ("Study Area"). The Study Area also includes land located within the neighboring Connecticut municipalities of Southbury, to the south, and Woodbury to the east. Attachment A contains a map that depicts the location of the proposed Facility and the limits of the Study Area.

#### **Project Introduction**

The proposed Facility would include the installation of a 170-foot tall monopole tower with associated ground equipment to be located at its base. Both the monopole and ground equipment would be situated within a 75-foot by 75-foot fence-enclosed compound. The proposed Facility would be located at a ground elevation of approximately 723 feet Above Mean Sea Level (AMSL). Access to the Facility would be provided via a proposed, 12-foot wide gravel driveway that would extend to the proposed compound area in a northerly direction from Route 67.

#### Site Description and Setting

Identified in the Town of Roxbury Tax Assessor's records as Map 32 Lot 8, the host property consists of approximately 95 acres of heavily wooded and undeveloped land. Land use within the general vicinity of the host property consists primarily of undeveloped woodlands and low-density residential development. In total, the Study Area features approximately 57 linear miles of roadways, including portions of Route 67 and Route 172.

The topography within the Study Area is characterized by rolling hills with ground elevations that range from approximately 158 feet AMSL to approximately 930 feet AMSL. The Study Area contains approximately 94 acres of surface water that includes Transylvania Pond located just over one mile to the southeast of the proposed Facility; Radley Pond located approximately 1.61 miles to the northeast; a gravel pit pond located roughly 1.54 miles to the south; and portions of Hesseky Meadow Pond located nearly two miles to the northeast. The tree cover within the Study Area consists of mixed deciduous hardwood species interspersed with stands of mature evergreens and occupies approximately 6,476 acres of the 8,042-acre study area (81%). During the in-field activities associated with this analysis, a laser range finder was used to determine the average tree canopy height throughout the Study Area. Numerous trees were selected for measurement and the average tree canopy was determined to be 65 feet.

#### METHODOLOGY

In order to represent the visibility associated with the proposed Facility, VHB uses a two-fold approach incorporating both a predictive computer model and in-field analysis. The predictive model is employed to assess potential visibility throughout the entire Study Area, including private property and/or otherwise inaccessible areas for field verification. A "balloon float" and Study Area drive-through reconnaissance are also conducted to obtain locational and height representations, back-check the initial computer model results and provide documentation from publicly accessible areas. Results of both activities are analyzed and incorporated into the final viewshed map. A description of the methodologies used in the analysis is provided below.

#### Visibility Analysis

VHB uses ArcGIS® Spatial Analyst, a computer modeling tool developed by Environmental Systems Research Institute, Inc., to calculate the areas from which at least the top of the proposed Facility is expected to be visible. Project- and Study Area-specific data were incorporated into the computer model, including Facility height, its ground elevation, underlying and surrounding topography and existing vegetation. Information used in the model included Connecticut LiDAR<sup>1</sup>-based digital elevation data and a digital forest (or tree canopy) layer developed for the Study Area. The LiDAR-based Digital Elevation Model (DEM) represents ten-foot spatial resolution elevation information for the state of Connecticut that was derived through the spatial interpolation of airborne LiDAR-based data collected in the year 2000 and has a horizontal resolution of ten (10) feet. The LiDAR-based data was edited in 2007 made available by the University of Connecticut through its Center for Land Use Education and Research (CLEAR). To create the forest layer, mature trees and woodland areas depicted on aerial photographs (ranging in dates from 2004 to 2008) were manually digitized (hand traced) in ArcGIS®, creating a geographic data layer for inclusion in the computer model. The black and white, digital aerial photographs, obtained from the Connecticut Department of Transportation, were flown in the spring of 2004 and selected for use in this analysis because of their image quality and depiction of pre-leaf emergence (i.e., "leaf-off") conditions. These photographs are half-foot pixel resolution. The more recent aerial photographs (2006 and 2008) were overlaid and evaluated to identify any new development resulting in the removal of trees.

Once the specific data layers were entered, the ArcGIS® Spatial Analyst Viewshed tool was applied to achieve an estimate of locations where the proposed Facility could be visible. First, only topography was used as a possible visual constraint; the tree canopy was omitted to evaluate potential visibility with no intervening vegetative screening. The initial omission

<sup>&</sup>lt;sup>1</sup> LiDAR is an acronym for Light Detection and Ranging. It is a technology that utilized lasers to determine the distance to an object or surface. LiDAR is similar to radar, but incorporates laser pulses rather than sound waves. It measures the time delay between transmission and reflection of the laser pulse.

of this data layer resulted in an excessively conservative prediction, but it provided an opportunity to identify areas within potential direct lines of sight of the Facility.

The forest data layer was then overlaid and built into the DEM, using a conservative average tree canopy height of 50 feet, to establish a baseline assessment of intervening vegetation. The resultant preliminary viewshed map was used during the in-field activities (described further below) to compare the outcome of the initial computer modeling with observations of the balloon float to identify any significant deviations that may have occurred due to land use changes. Information obtained from the field reconnaissance was ultimately incorporated into the model to refine the viewshed map.

The average tree canopy height was also refined based on information collected in the field using a combination of a hand-held laser range finder, clinometer and comparative observations. The revised average tree canopy height, in this case 65 feet, was then incorporated into the model and the results displayed on the viewshed map. The forested areas were overlaid on the DEM with a height of 65 feet added to the base elevation and the visibility from within the Study Area calculated.

As a final step, the forested areas were extracted from the areas of visibility, using a conservative assumption that a person standing within the forest will not be able to view the proposed Facility beyond a distance of approximately 500 feet. Depending on the density of the intervening tree canopy and understory of the surrounding woodlands, it is assumed that some locations within this distance could provide visibility of at least portions of the proposed Facility at any time of the year. In "leaf-on" conditions, this distance may be overly conservative for most locations. However, for purposes of this analysis, it was reasoned that forested land beyond 500 feet of the proposed Facility would consist of light-impenetrable trees of a uniform height.

Also included on the map is a data layer, obtained from the State of Connecticut Department of Environmental Protection ("CTDEP"), which depicts various land and water resources such as parks and forests, recreational facilities, dedicated open space, CTDEP boat launches and other categories. Lastly, based on a review of information published by the Connecticut Department of Transportation (ConnDOT) and discussions with municipal officials in Roxbury, Southbury and Woodbury, VHB has determined that Flag Swamp Road and East Flag Swamp in Roxbury are locally-designated scenic roads contained within the Study Area.

#### Balloon Float and Study Area Reconnaissance

On January 6, 2011 Vanasse Hangen Brustlin Inc., (VHB) conducted a balloon float to further evaluate the potential viewshed within the Study Area. The balloon float consisted of raising and maintaining an approximate four-foot diameter, helium-filled balloon at the proposed site location at a height of 170 feet. Once the balloon was secured, VHB staff conducted a drive-by reconnaissance along the roads located within the Study Area with an emphasis on nearby residential areas and other potential sensitive receptors in order to evaluate the

results of the preliminary viewshed map and to document where the balloon was, and was not, visible above and/or through the tree canopy. During the balloon float, the temperature was approximately 30 degrees Fahrenheit with calm wind conditions and partly sunny skies.

#### Photographic Documentation

During the balloon float, VHB personnel drove the public road system within the Study Area to inventory those areas where the balloon was visible. The balloon was photographed from a number of representative vantage points to document the actual view towards the proposed Facility. The locations of the photos are described in the table below:

View	Location	Orientation	Dist. To Site	Visibility
1	Adjacent to #924 Route 67	Northwest	<u>+</u> 1.10-Miles	Year-Round
2	Adjacent to #984 Route 67	Northwest	<u>+</u> 0.99-Mile	Year-Round
3	Route 67 at Route 172	Northwest	<u>+</u> 0.95-Mile	Year-Round
4	Route 172 north of Route 67	Northwest	<u>+</u> 0.89-Mile	Year-Round
5	Adjacent to #610 Upper Grassy Hill Road	Southwest	<u>+</u> 0.74-Mile	Seasonal
6	Adjacent to #18 Transylvania Road	Southwest	<u>+</u> 0.35-Mile	Seasonal
7	Route 172 across from Southbury Training School	North	<u>+</u> 1.78-Miles	Year-Round
8	Adjacent to #99 Coachmans Drive	Northwest	<u>+</u> 1.03-Miles	Seasonal
9	End of Bronson Mountain Road	Northwest	<u>+</u> 0.18-Mile	Year-Round

Photographs of the balloon from the view points listed above were taken with a Nikon D-80 digital camera body equipped with a Nikon 18-135 mm zoom lens. For the purposes of this analysis, the lens was set to 50 mm, "The lens that most closely approximates the view of the unaided human eye is known as the normal focal-length lens. For the 35 mm camera format, which gives a 24x36 mm image, the normal focal length is about 50 mm.<sup>2</sup>"

The locations of the photographic points are recorded in the field using a GPS-enabled tablet computer and were subsequently plotted on the maps contained in the attachments to this document.

#### Photographic Simulation

Photographic simulations were generated for nine representative locations where the balloon was visible during the in-field activities. The photographic simulations portray a scaled rendering of the proposed Facility from these locations, with four wireless service providers represented. Using field data, site plan information and 3-dimension (3D) modeling software, a spatially referenced model of the site area was generated. Geographic

<sup>&</sup>lt;sup>2</sup> Warren, Bruce. *Photography*, West Publishing Company, Eagan, MN, c. 1993, (page 70).

coordinates (latitude and longitude) were collected in the field for all of the photograph locations via GPS and later used to generate virtual camera positions within the spatial 3D model. Photo simulations were then created using a combination of renderings generated in the 3D model and photo rendering software programs. Photographs of the balloon from those locations are included to provide a visual marker and cross-reference of the height and proportions of the proposed Facility. A photolog map, the balloon photos and associated simulations are contained in Attachment A.

#### CONCLUSIONS

Based on this analysis, areas from where the proposed 170-foot tall Facility would be visible above the tree canopy comprise approximately 18 acres within the 8,042-acre Study Area. As depicted on the viewshed map (provided in Attachment B), most of the anticipated yearround visibility associated with the proposed Facility would occur within the general vicinity of the Route 67/Route 172 intersection located roughly 0.90-mile to the southeast and over open water on the east side of Transylvania Pond located approximately 1.10-miles to the southeast. Potential year-round views are also anticipated from select portions of Route 172 adjacent to the Southbury Training School; the Bronson Mountain Road Cul-de-Sac; and from the rear yards of several residential properties located off Upper Grassy Hill Road. VHB estimates that select portions of approximately ten (10) residential properties may have at least partial year-round views of the proposed Facility. The general locations of these properties are identified in the table provided below.

The viewshed map also depicts several additional areas where seasonal (i.e. during "leaf off" conditions) views are anticipated through the deciduous trees. These areas comprise approximately 47 acres and are generally located along an/or adjacent to portions of Route 67, Route 172, Upper Grassy Hill Road, Coachmans Drive and Transylvania Road. VHB estimates that seasonal views of the proposed Facility may be achieved from approximately thirteen (13) additional residential properties within the Study Area. The general locations of these properties are identified in the table provided below.

Location	*Number of Residential Properties	*Number of Residential Properties		
	With Potential Year-Round Visibility	With Potential Seasonal Visibility		
	(Leaf-On)	(Leaf-Off)		
Route 67	6	6		
Upper Grassy Hill Road	4	3		
Transylvania Road	-	3		
Coachmans Drive	-	1		
TOTAL:	10	13		

\*Indicates potential year-round or seasonal visibility from portions of the properties listed in the table above. Potential visibility on a "residential property" does not necessarily mean that the property is developed with a home or views would be achieved from within residential dwellings, exterior decks, porches or patios that might be located on such properties. Further, it may be possible to view the Facility from within portions of the shaded areas indicating potential visibility, but not necessarily from all locations within those shaded areas.

Vanasse Hangen Brustlin, Inc.

### Attachment A

## Photolog Documentation Map, Balloon Float Photographs, and Photographic Simulations

### PHOTOLOG MAP-





### PHOTOGRAPHIC DOCUMENTATION





### PHOTOGRAPHIC SIMULATION



🨂 at&t

### PHOTOGRAPHIC DOCUMENTATION



![](_page_33_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_34_Picture_1.jpeg)

![](_page_34_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_35_Picture_1.jpeg)

![](_page_35_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_36_Picture_1.jpeg)

![](_page_36_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_37_Picture_1.jpeg)

![](_page_37_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_38_Picture_1.jpeg)

![](_page_38_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_39_Picture_1.jpeg)

![](_page_39_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_40_Picture_1.jpeg)

![](_page_40_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_41_Picture_1.jpeg)

![](_page_41_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_42_Picture_1.jpeg)

![](_page_42_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_43_Picture_1.jpeg)

![](_page_43_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_44_Picture_1.jpeg)

![](_page_44_Picture_3.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_45_Picture_1.jpeg)

![](_page_45_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_46_Picture_1.jpeg)

### PHOTOGRAPHIC DOCUMENTATION

![](_page_47_Picture_1.jpeg)

![](_page_47_Picture_3.jpeg)

### PHOTOGRAPHIC SIMULATION

![](_page_48_Picture_1.jpeg)

![](_page_48_Picture_3.jpeg)

VHB

### Attachment B

Viewshed Map

![](_page_50_Picture_0.jpeg)

at&t

Viewshed Analysis Proposed AT&T Wireless Telecommunications Facility Roxbury Southbury Road (Route 67) Roxbury, Connecticut

#### NOTE:

- Viewshed analysis conducted using ESRI's Spatial Analyst.

- Proposed facility height is 170 feet.
  Existing tree canopy height estimated at 65 feet.
  Study Area is comprised of a two-mile radius surrounding the proposed facility and includes 8,042 acres of land.

#### DATA SOURCES:

- Digital elevation model (DEM) derived from Connecticut LiDAR-based Digital Elevation Data (collected in 2000) with a 10-foot spatial resolution produced by the University of Connecticut and the Center for Land Use Education and Research (CLEAR); 2007

- Forest areas derived from 2008 digital orthophotos with 1-meter pixel resolution; digitized by VHB, 2010
- Base map comprised of Woodbury (1984), Newtown (1984), Southbury (1984) and Roxbury (1984) USGS Quadrangle Maps
- Municipal and Private Open Space data layer provided by CT DEP, 1997
   Federal Open Space data layer provided by CT DEP, 2004
- CT DEP Property data layer provided by CT DEP, April 2010 CT DEP boat launches data layer provided by CT DEP, Dec 2009
- Scenic Roads layer derived from available State and Local listings

#### Map Compiled January, 2011

#### Legend

Proposed Tower Location

Photographs - January 6, 2010

- Balloon is visible through trees
- Balloon visible above trees

Year-Round Visibility Area (Approximately 18 acres)

Seasonal Visibility Area (Approximately 47 acres)

Protected Municipal and Private Open Space (CT DEP, 1997) Cemetery Preservation Conservation Existing Preserved Open Space Recreation General Recreation School Uncategorized

CT DEP Property (CT DEP, May 2010) State Forest State Park DEP Owned Waterbody State Park Scenic Reserve Historic Preserve Natural Area Preserve Fish Hatchery Flood Control Other State Park Trail Water Access Wildlife Area Wildlife Sanctuary

![](_page_50_Picture_29.jpeg)

![](_page_50_Picture_30.jpeg)

Attachment 3(D)

![](_page_52_Figure_0.jpeg)

Transportation Land Development Environmental Services

![](_page_53_Picture_1.jpeg)

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

 Memorandum
 To:
 Mr. Josh Delman
 Date:
 June 28, 2011

 New Cingular Wireless PCS, LLC
 500 Enterprise Drive, Suite 3A
 Book
 Rocky Hill, CT 06067

 Project No.:
 41502.35

 From:
 Dean Gustafson
 Re:
 Eastern Box Turtle Protective Measures

 Senior Environmental Scientist
 Proposed New Cingular Wireless
 Telecommunications Facility

 Southbury Road (Route 67)
 Roxbury, Connecticut
 Southbury Road (Route 67)

Vanasse Hangen Brustlin, Inc. (VHB) previously requested a review of the Connecticut's Natural Diversity Data Base (NDDB) from the Connecticut Department of Environmental Protection (CTDEP). Ms. Julie Victoria, a Wildlife Biologist with the CTDEP Bureau of Natural Resources responded in a January 26, 2011 letter that NDDB records reveal a State Special Concern Species, eastern box turtle (*Terrapene Carolina carolina*) is in the vicinity of the proposed New Cingular Wireless Facility; a copy of the letter is enclosed. Ms. Victoria recommended various protective measures if construction of the facility would occur during the turtle's active period, April 1 to November 1.

Based on VHB's experience with this State Special Concern Species and previous recommendations provided by Ms. Victoria on similar projects, the following protective strategy developed by VHB and previously approved by CTDEP to avoid impact to eastern box turtle is recommended.

#### **Eastern Box Turtle Protection Program**

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

It is of the utmost importance that the Contractor complies with the requirement for the installation of protective measures and the education of employees and subcontractors performing work on the project site if work will occur during the Eastern Box Turtle's active period (April 1 to November 1). Vanasse Hangen Brustlin, Inc. will serve as the Environmental Monitor for this project to ensure that Eastern Box Turtle protection measures are implemented properly. The Contractor shall contact Dean Gustafson, Senior Environmental Scientist at Vanasse Hangen Brustlin, Inc., at least 5 business days prior to the pre-construction meeting. Mr. Gustafson can be reached at (860) 632-1500 ext. 2339 and at dgustafson@vhb.com.

The proposed Eastern Box Turtle species protection program consists of several components: isolation of the project perimeter; periodic inspection and maintenance of isolation structures; education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting.

#### 1. Isolation Measures

- a. Installation of conventional silt fencing, which will also serve as an isolation of the work zone from surrounding areas and required for erosion control compliance, shall be performed by the Contractor prior to any earthwork. Vanasse Hangen Brustlin, Inc. will inspect the work zone area prior to and following barrier installation to ensure the area is free of Eastern Box Turtles.
- b. The fencing will consist of conventional erosion control woven fabric, installed approximately six inches below surface grade using a Ditch-Witch or similar machine and staked at seven to ten-foot intervals using four-foot oak stakes or approved equivalent. In addition to required daily inspection by the Contractor, the fencing will be inspected for tears or breeches in the fabric following installation and at approximately one-week intervals or after storm events of 0.5 inch or greater by Vanasse Hangen Brustlin, Inc. Inspections will be conducted by Vanasse Hangen Brustlin, Inc. throughout the course of the construction project.
- c. Weekly inspection reports (brief narrative and applicable photos) will be submitted to the Connecticut Siting Council for compliance verification. Any observations of Eastern Box Turtle will be reported to the Connecticut Department of Environmental Protection Wildlife Division.
- d. The extent of the barrier fencing will be as shown on the site plans.
- e. No equipment, vehicles or construction materials shall be stored outside of barrier fencing.

#### 2. Contractor Education:

- a. Prior to work on site, the Contractor shall attend an educational session at the pre-construction meeting with Vanasse Hangen Brustlin, Inc. This orientation and educational session will consist of an introductory session with photos stressing the non-aggressive nature of Eastern Box Turtles, the absence of need to destroy animals that might be encountered and the need to follow Protective Measures as described in Section 3.
- b. Also stressed in the education session will be means to discriminate between the species of concern and other native species to avoid unnecessary, "false alarms".
- c. The Contractor will be provided with cell phone and email contacts for Vanasse Hangen Brustlin, Inc. to immediately report any encounters with Eastern Box Turtle. Poster materials will be provided

by Vanasse Hangen Brustlin, Inc. and posted on the job site to maintain worker awareness as the season progresses.

#### 3. Protective Measures

- a. Prior to the start of construction each day, the Contractor shall search the entire work area for Eastern Box Turtle.
- b. If a turtle is found, it should be carefully grasped in both hands, one on each side of the shell, between the turtle's forelimbs and the hind limbs, and placed just outside of the isolation barrier in the approximate direction it was heading.
- c. Special care shall be taken by the Contractor during early morning and evening hours so that possible basking or foraging turtles are not harmed by construction activities.

#### 4. Reporting

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

The Eastern Box Turtle protection program detailed above will adequately protect this Special Concern species in the unlikely event that this species is encountered on the subject property during construction activities. With adherence to these protective measures, New Cingular Wireless PCS, LLC's proposed development at this property will not have an adverse affect on Eastern Box Turtle.

Enclosure

![](_page_56_Picture_0.jpeg)

### STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION

FRANKLIN WILDLIFE 391 ROUTE 32 N FRANKLIN CT 06254 860-642-7239

![](_page_56_Picture_3.jpeg)

January 26, 2011

Ms. Coreen Kelsey Vanasse Hangen Brustlin, Inc. 54 Tuttle Place Middletown, CT 06457

re: New Cingular Wireless project, SR-1876 – Roxbury-C&N Builders, Southbury Road, Roxbury Dear Ms. Kelsey:

Your request was forwarded to me on 1/14/2011 by the Department of Environmental Protection (DEP) Natural Diversity Data Base. Their records indicate that a state species of special concern, Eastern Box Turtle (*Terrapene carolina*) occurs in the vicinity of this project.

Past practices at this site do not preclude the existence of Eastern Box Turtles. 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. The DEP Wildlife Division has not been provided with details or a timetable of the work to be done. Ground disturbing work done during the dormant period, November 1 to April 1, will avoid impacts to this species. The DEP Wildlife Division recommends that if work must be done in Box Turtle habitat during the 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, just outside fo the work area.
- 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 turtle habitat.

Standard protocols for protection of wetlands should be followed and maintained during the course of the project. Additionally, all silt fencing should be removed after soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted. Please be advised that the Wildlife Division has not made a field inspection of the project nor have we seen detailed timetables for work to be done. Consultation with the Wildlife Division should not be substituted for site-specific surveys that may be required for environmental assessments. The time of year when this work will take place will affect 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 <u>Julie.Victoria@ct.gov</u>, 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

cc: NDDB - 201100128

http://www.ct.gov/dep An Equal Opportunity Employer