

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NEW CINGULAR WIRELESS
PCS, LLC (AT&T) FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC
NEED FOR THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A TELECOMMUNICATIONS
TOWER FACILITY AT 522 COLEBROOK ROAD
IN THE TOWN OF COLEBROOK

DOCKET NO. 440

November 1, 2013

NEW CINGULAR WIRELESS PCS LLC (AT&T)
SUPPLEMENTAL INFORMATION

Applicant New Cingular Wireless PCS LLC (AT&T) respectfully submits the following responses to questions 1 and 5 from the October 24, 2013 evidentiary hearing.

- Q1. Would it be possible to swing the access road to the west to avoid Wetland 1?
- A1. Yes. AT&T's consultants conducted additional field review to delineate wetlands on the western portion of the site and to determine if an alternative access drive was feasible. Included in Attachment 1 is a preliminary wetlands map depicting the additional wetlands delineation along with a proposed alternative access drive shown as a pink dashed line. As shown in the attached map, the alternate access drive avoids direct impacts to wetland 3 as well as providing a large buffer to wetland 3. The alternative access drive is approximately 250' shorter than the proposed access drive. Moreover, grades for the alternate access drive are comparable to the grades of the proposed access drive.
- Q5. How many square feet of forest that would be removed within 750 feet of a vernal pool would be removed by the construction of the access road? If the result exceeds 5,000 square feet, please note if this would result in a different permit category.
- A5. Potential vernal pool habitat located on the subject property in proximity to the proposed AT&T project is associated with Wetland 4 (assumes the flagged wetland boundary represents the potential limit of vernal pool habitat) and an interior portion of the southern end of Wetland 3 (cryptic style vernal pool habitat limits are depicted on the Vernal Pool Habitat Map included in Attachment 2). The additional limits of Wetland 5 that were recently mapped by All-Points Technology Corp., P.C. ("APT") (see preliminary wetlands map in Attachment 1) do not contain potential vernal pool habitat as it is characterized by hillside seeps with moderately steep grades and an associated intermittent watercourse; no topographic depressions that could contain seasonal inundation were observed.

The proposed access route with the modification to the section near Wetland 2 to avoid the 100 foot Vernal Pool Envelope ("VPE") would result in a linear length of 1,450± feet within the 750 foot Critical Terrestrial Habitat ("CTH"). Assuming a clearing width of

approximately 20 feet (12 foot gravel access drive with shoulders, drainage swales, side slopes, etc.) the resulting area of clearing within the CTH would be 29,000± square feet for the access plus 10,000± square feet for the compound (75 foot by 75 foot compound with perimeter clearing). As a result of the direct wetland impact associated with the proposed crossing of Wetland 3 (710± square feet), the proposed AT&T project would also fall under the jurisdiction of U.S. Army Corps of Engineers (“Corps”) and potentially eligible under the Corps’ Connecticut General Permit (“GP”). As a condition of the GP (General Condition #3. b.):

Secondary impacts to waterway and/or wetland areas, (e.g., areas drained, flooded, cleared, excavated or fragmented) shall be added to the total fill area when determining whether the project qualifies for Category 1 or 2. Site clearing, grading and construction activities in the upland habitat within 750 feet surrounding vernal pools are secondary impacts.

Therefore, the cumulative impact of the proposed project (direct and secondary) would be considered by the Corps to be 39,710± square feet. As a result, the project appears eligible under the GP, likely as a “Category 2” permit review category (cumulative impact between 5,000 square feet and 1 acre). A GP eligibility determination review request is currently in review with the Corps for this project.

The alternate access route would result in a larger buffer to the vernal pool habitats in Wetland 2 and Wetland 3; refer to the Vernal Pool Habitat Map in Attachment 2 for a comparison of buffer distances. In addition, stormwater runoff from the alternate access route would not be directed toward either of these potential vernal pool habitats as flows would travel to the north/northwest eventually entering Wetland 5. Therefore, any potential for adverse effects to the hydrology or water quality of either potential vernal pool habitat would be eliminated with the selection of this alternate access route. The alternate access route would result in a linear length of 1,080± feet within the 750 foot Critical Terrestrial Habitat (“CTH”). Assuming a clearing width of approximately 20 feet (12 foot gravel access drive with shoulders, drainage swales, side slopes, etc.) the resulting area of clearing within the CTH would be 21,600± square feet for the access plus 10,000± square feet for the compound totaling 31,600± square feet. However, since no direct impact to wetlands would result from the alternate access route, the proposed AT&T project would not be subject to jurisdiction by the Corps.

As demonstrated in AT&T’s Application, with the incorporation of the recommended mitigation measures, no likely adverse impacts to wetlands resource areas would occur as a result of the originally proposed access drive. However, considering the alternate access route avoids direct wetland impact, avoids Corps jurisdiction, provides a greater buffer to potential vernal pool habitat, minimizes impact to the CTH and is located in a separate drainage area from potential vernal pool habitat, APT considers the alternate access route be a prudent and feasible alternative to the originally proposed access route.

CERTIFICATE OF SERVICE

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

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Dated: November 1, 2013

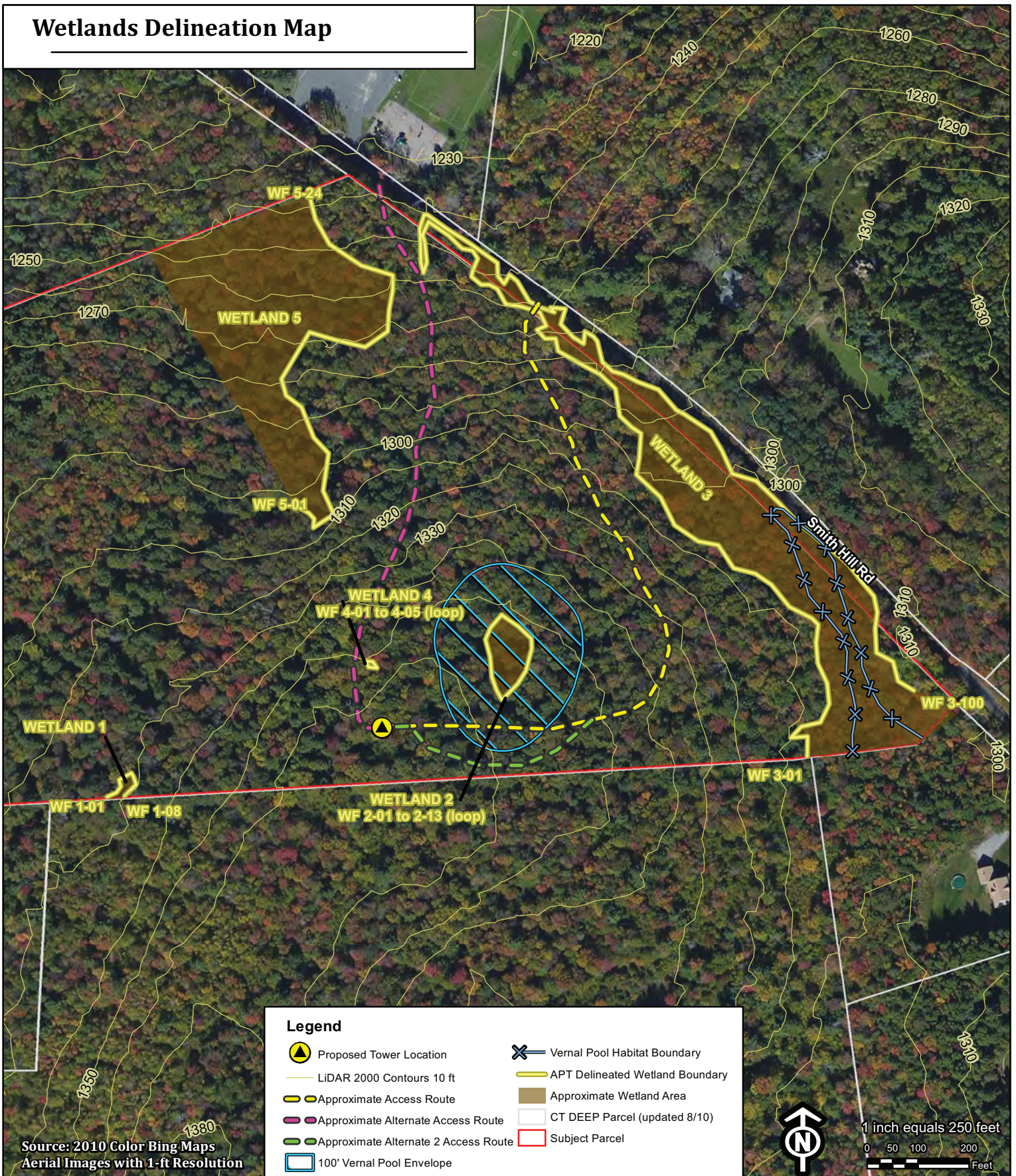


Lucia Chiochio

cc: Michele Briggs, AT&T
David Vivian
Tony Wells
Martin Lavin
Mike Libertine
Dean Gustafson
Paul Lusitani
Christopher B. Fisher, Esq.

ATTACHMENT 1

Wetlands Delineation Map



Proposed AT&T Wireless Communications Facility 522 Colebrook Road Colebrook, Connecticut

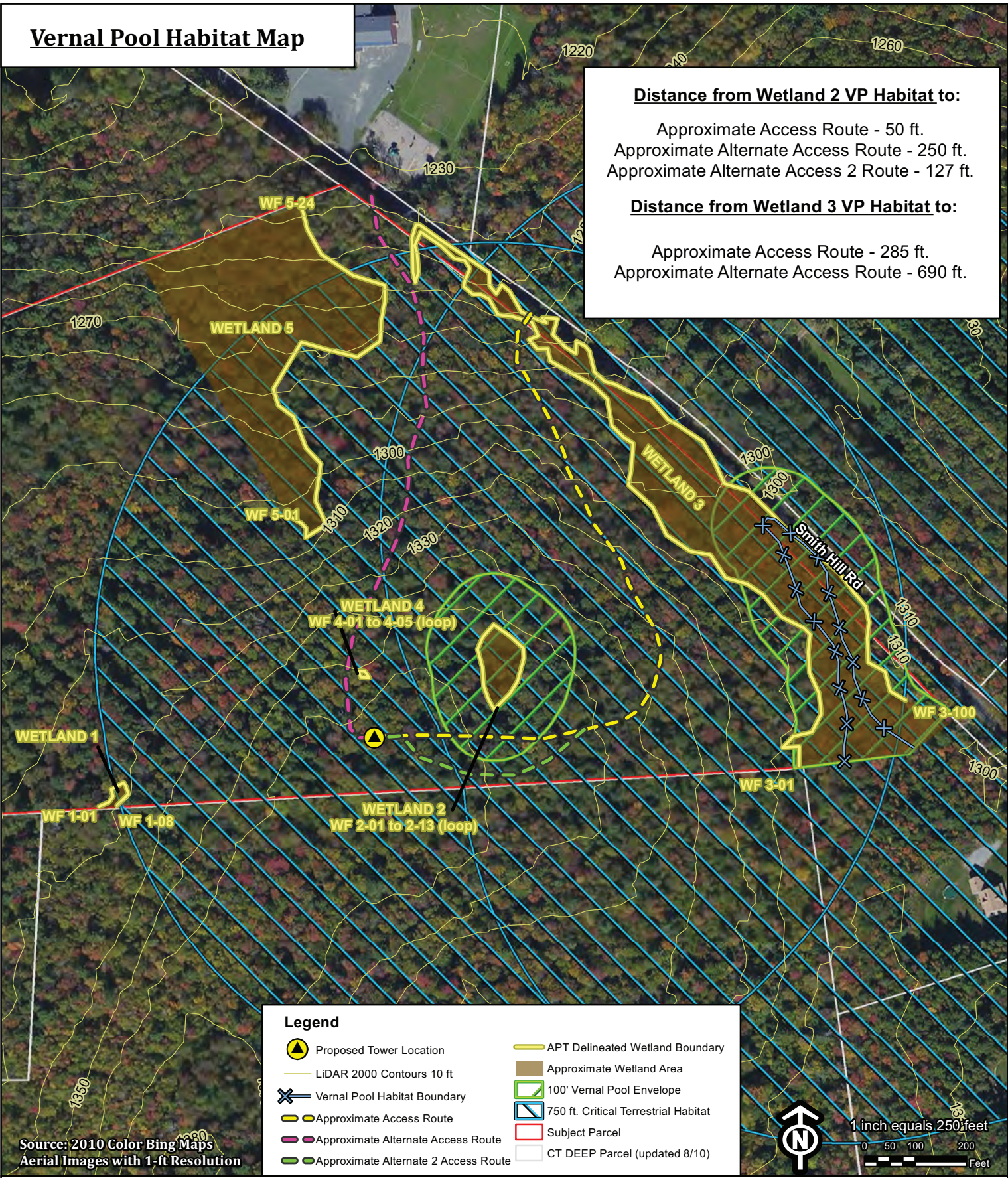


Thursday, October 31, 2013



ATTACHMENT 2

Vernal Pool Habitat Map



Distance from Wetland 2 VP Habitat to:

Approximate Access Route - 50 ft.
 Approximate Alternate Access Route - 250 ft.
 Approximate Alternate Access 2 Route - 127 ft.

Distance from Wetland 3 VP Habitat to:

Approximate Access Route - 285 ft.
 Approximate Alternate Access Route - 690 ft.

Legend

Proposed Tower Location	APT Delineated Wetland Boundary
LIDAR 2000 Contours 10 ft	Approximate Wetland Area
Vernal Pool Habitat Boundary	100' Vernal Pool Envelope
Approximate Access Route	750 ft. Critical Terrestrial Habitat
Approximate Alternate Access Route	Subject Parcel
Approximate Alternate 2 Access Route	CT DEEP Parcel (updated 8/10)

Source: 2010 Color Bing Maps
 Aerial Images with 1-ft Resolution

1 inch equals 250 feet

0 50 100 200 Feet

Proposed AT&T Wireless Communications Facility 522 Colebrook Road Colebrook, Connecticut



Friday, November 01, 2013