ATTACHMENT 5

ATTACHMENT 5

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 off-site 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

Some tree removal, clearing and grading will be necessary in the compound area and access drive. 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. Once the facility is in operation, temporary power outages could involve sound from the emergency generator.

E. POWER DENSITY

The cumulative worst-case calculation of power density from AT&T's operations at the facility would be 7.71% of the MPE standard. Attached is a copy of AT&T's Power Density Report.

F. VISIBILITY

The potential visual impact of the proposed facility was determined by preparation of the attached Visibility Analysis. 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. A total of 75± acres within the Study Area would have some visibility of the proposed Facility above the tree canopy year-round (that is, during both "leaf-off" and "leaf-on" conditions). This represents less than one percent of the 8,042-acre Study Area. As depicted on the visibility analysis map, year-round visibility associated with proposed Facility is mostly limited to an area within approximately 0.25 mile of the host Property, characterized as a mix of year-round and seasonal (during "leaf off" conditions) visibility. Year-round views appear to be limited to specific locations in the general Perkins Road and Brown Brook Road as

well as select locations on private properties which will have at least partial views. More distant year-round views are anticipated over elevated open agricultural fields on the Southbury Training School property to the east and along a short section of Minor Bridge Road to the northwest. It is estimated that approximately 26 residential properties may attain at least partial year-round views of the proposed Facility.

II. SCENIC, NATURAL, HISTORIC & RECREATIONAL VALUES

The parcel on which the facility is located and the nearby areas exhibit no scenic, natural, historic or recreational characteristics which are unique. The Connecticut State Historic Preservation Officer (SHPO) has issued a determination of "no effect" for this proposal. Additionally, the Connecticut Department of Energy and Environmental Protection (CTDEEP) Natural Diversity Database ("NDDB") maps for the proposed site have been reviewed. CTDEEP has indicated that the eastern box turtle may be present in the area and protection protocols have been developed and submitted to CTDEEP review. In addition, occurrences of bog turtles are known in the Town of Southbury. While field investigations and research indicate the host parcel and surroundings present no bog turtle habitat, the protective measure developed for the eastern box turtle will be equally effective in avoiding mortality of bog turtles.

SHPO DETERMINATION

Department of Economic and Community Development

Connecticut
still revolutionary

July 12, 2013

Mr. Michael Libertine
All-Points Technology Corporation
3 Saddlebrook Drive
Killingworth, CT 06457-1847

Subject: Proposed New Tower Project
257 Perkins Road
Southbury, CT
AT&T

Dear Mr. Libertine:

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

After completing review of 257 Perkins Road, All-Points Technology Corporation has in their professional opinion stated that there will be no historic properties affected by the project to develop a new wireless telecommunications facility, which consists of a 170' monopole and a 12' x 20' equipment shelter enclosed by a 38' x 60' fenced gravel compound.

Based on the information provided to this office, SHPO concurs that no historic properties will be affected by this project.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Todd Levine, Environmental Reviewer, at (860) 256-2759 or todd.levine@ct.gov.

Sincerely,

Daniel T. Forrest
State Historic Preservation Officer

FCC & FAA COMPLIANCE DOCUMENTATION

Antenna Structure Registration

TOWAIR Determination Results

HELP

New Search Printable Page

*** 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	41-30-24.0 north
Longitude	073-17-57.0 west
Measurements (Meters)	
Overall Structure Height (AGL)	51.8
Support Structure Height (AGL)	NaN
Site Elevation (AMSL)	184.1
Structure Type	
MTOWER - Monopole	

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

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

July 5, 2013

Connecticut Siting Council

Subject: AT&T Wireless, CT2040 - Southbury

Dear Connecticut Siting Council:

At the request of AT&T Wireless, SAI Communications has performed an assessment of the RF Power Density for the proposed site located at 257 Perkins Road, Southbury, 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:

$$S = \frac{2.56 * 1.64 * ERP}{4 * \pi * R^2}$$

Transmission Mode	Antenna Centerline AGL (ft)	Frequency (MHz)	Number of Channels	Effective Radiated Power per Channel (Watts)	Power Density (mW/cm^2)	Standard Limits (mW/cm^2)	% MPE (Uncontrolled/ General Public)
AT&T UMTS	170	850	2	500.00	0.0124	0.5667	2.20%
AT&T UMTS	170	1900	2	500.00	0.0124	1	1.24%
AT&T LTE	170	700	2	500.00	0.0124	0.4667	2.67%
AT&T LTE	170	2100	2	500.00	0.0124	1	1.24%
Total							**11.48%**

Conclusion: AT&T's proposed antenna installation is calculated to be within 11.48% of FCC Standard for General Public/Uncontrolled Maximum Permissible Exposure (MPE).

Sincerely,

Michael Lawton
SAI Communications

Wetlands, Habitat & Species Review

Natural Diversity Data Base Areas

SOUTHBURY, CT

June 2013

State and Federal Listed Species & Significant Natural Communities

Town Boundary

NOTE: This map shows general locations of State and Federal Listed Species and Significant Natural Communities. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDB) from a number of data sources . Exact locations of species have been buffered to produce the general locations. Exact locations of species and communities occur somewhere in the shaded areas, not necessarily in the center. A new mapping format is being employed that more accurately models important riparian and aquatic areas and eliminates the need for the upstream/downstream searches required in previous versions.

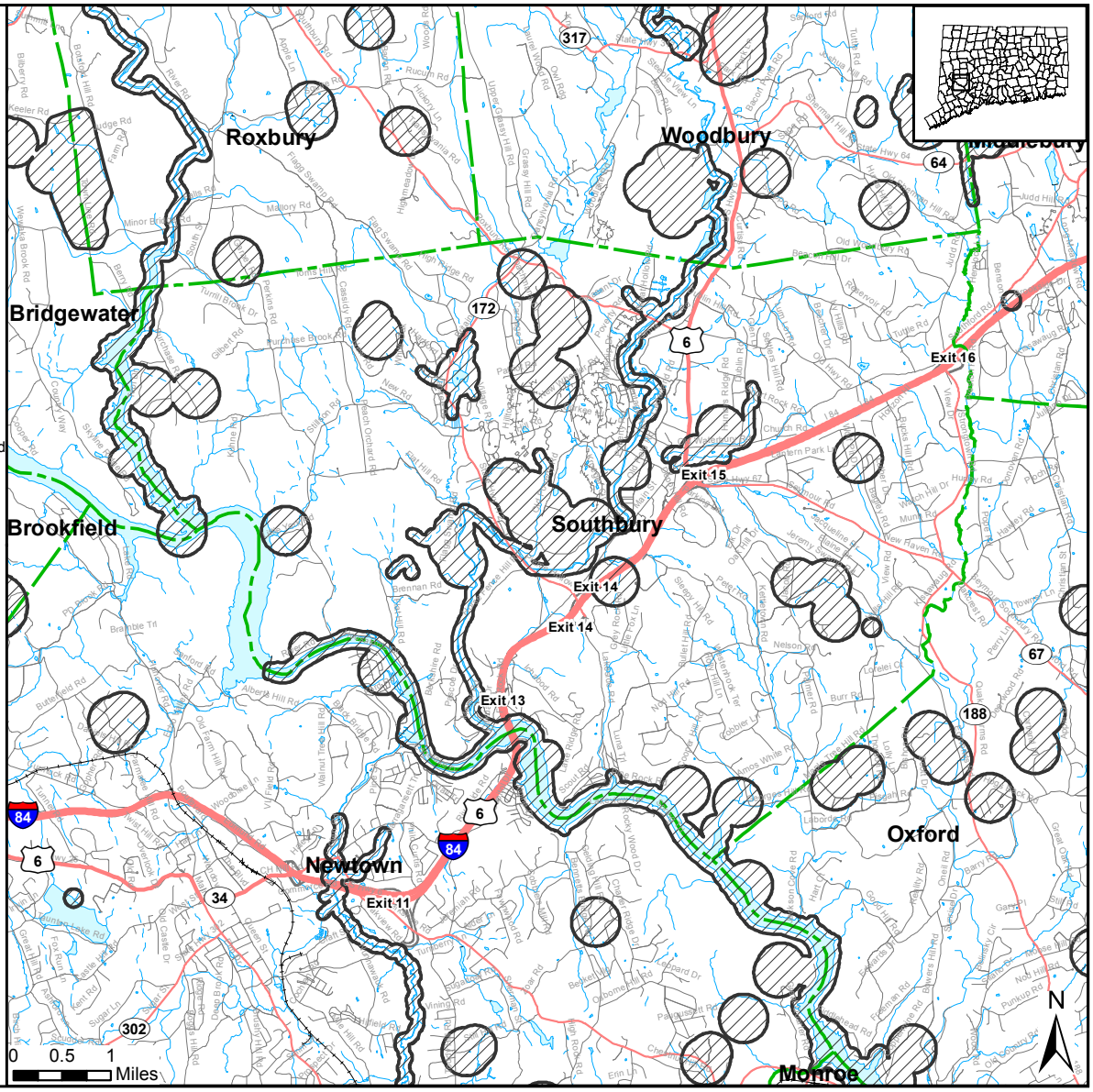
This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a shaded area there may be a potential conflict with a listed species. For more information, complete a Request for Natural Diversity Data Base State Listed Species Review form (DEP-APP-007), and submit it to the NDDB along with the required maps and information. More detailed instructions are provided with the request form on our website.

www.ct.gov/deep/nddbrequest

This file has PDF Layers. Look for the Layers tab on the left. Expand the layers and use the "eye" icons to change visibility.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)
79 Elm St., Hartford CT 06106
Phone (860) 424-3011

Connecticut Department of Energy & Environmental Protection
Bureau of Natural Resources
Wildlife Division



WETLAND INSPECTION REPORT

July 8, 2013

Site Acquisitions, Inc.
500 Enterprise Drive
Rocky Hill, CT 06067

APT Project No.: CT1931090

Attn: Tim Burks

Re: Proposed AT&T Southbury
Site No. CT2040
257 Perkins Road
Southbury, Connecticut

Dear Mr. Burks,

At your request, Dean Gustafson, a Professional Soil Scientist with All-Points Technology Corp., P.C. ("APT"), conducted an inspection of the above-referenced project on June 24, 2013 to determine the presence or absence of wetland and watercourse resources. Specifically, the area of wetland investigation consisted of areas within 200 feet of the proposed development ("Study Area") which consists of AT&T's proposal to site a 170-foot monopole communications facility at 257 Perkins Road in Southbury, Connecticut ("Subject Property"). The Subject Property consists of a 3.038± acre residentially developed parcel with an existing gravel driveway that provides access to Perkins Road. APT understands that AT&T proposes a gravel drive starting from the existing driveway near the residence, traveling along the north, west and south property boundaries to gain access to the proposed facility in the property's southeast corner. The delineation methodology followed was consistent with both the Connecticut Inland Wetlands and Watercourses Act (IWWA) and the 1987 Corps of Engineers Wetland Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region, Version 2.0 (January 2012).

No wetlands or watercourses were identified within the Study Area on the Subject Property. The nearest wetland or watercourse resource to the proposed AT&T development is associated with relatively narrow forested hillside seep wetland and intermittent watercourse located on the adjoining parcel approximately 150 feet to the southwest. Please refer to the enclosed Wetland Inspection Map for the approximate location of the identified resource area. General weather conditions encountered during the above-referenced inspection include low 90° F temperatures with generally sunny skies.

Regulation of Wetlands:

Wetlands and watercourses are regulated by local, state and federal regulations, with each regulatory agency differing slightly in their definition and regulatory authority of resource areas, as further discussed below. The proposed Facility is under the exclusive jurisdiction of the State of Connecticut Siting Council and therefore exempt from local regulation, although local wetland regulations are considered by the Siting Council. Wetlands identified within the Study Area may be considered Waters of the United States and therefore any activity that would result in direct impact would also be subject to jurisdiction by the U.S. Army Corps of Engineers ("ACOE") New England District.

Town of Southbury: The Town of Southbury Inland Wetlands Commission regulates activities within wetlands and watercourses and within 50 feet of wetlands and watercourses through administration of the Connecticut Inland Wetlands and Watercourses Act (IWWA).

State of Connecticut: The IWWA requires the regulation of activities affecting or having the potential to affect wetlands under Sec. 22a-36 through 22a-45 of the Connecticut General Statutes. The IWWA is administered through local municipalities. The IWWA defines wetlands as areas of poorly drained, very poorly drained, floodplain, and alluvial soils, as delineated by a soil scientist. Watercourses are defined as bogs, swamps, or marshes, as well as lakes, ponds, rivers, streams, etc., whether natural or man-made, permanent or intermittent. Intermittent watercourse determinations are based on the presence of a defined permanent channel and bank, and two of the following characteristics: (1) evidence of scour or deposits of recent alluvium or detritus; (2) the presence of standing or flowing water for a duration longer than a particular storm incident; and (3) the presence of hydrophytic vegetation.

ACOE: The U.S. Army Corps of Engineers ("Corps") regulates the discharge of dredged or fill material into waters of the United States under the Clean Water Act. Waters of the United States are navigable waters, tributaries to navigable waters, wetlands adjacent to those waters, and/or isolated wetlands that have a demonstrated interstate commerce connection. The Corps Wetlands Delineation Manual defines wetlands as "[t]hose areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) prohibits the unauthorized obstruction or alteration of any navigable water of the United States. This section provides that the construction of any structure in or over any navigable water of the United States, or the accomplishment of any other work affecting the course, location, condition, or physical capacity of such waters is unlawful unless the work has been approved by the ACOE.

Site and Soil Descriptions:

The Subject Property is dominated by an existing residence and associated maintained lawn and landscaping. Upland early successional forest and scrub/shrub habitat generally dominate along the north, west and south property boundaries. The area of the proposed AT&T facility consists of relatively young upland forest habitat dominated by white ash, black birch, multiflora rose, autumn olive, Asiatic bittersweet, hayscented fern and mugwort. Soils field identified within and surrounding the AT&T facility and proposed access drive are classified as Hollis-Chatfield-Rock outcrop complex; Hollis consists of somewhat excessively drained shallow (10 to 20 inches to bedrock) glacial till soils and Chatfield consists of well drained moderately deep (20 to 40 inches to bedrock) glacial till soils. The nearest wetland or watercourse resource to the proposed AT&T development is associated with relatively narrow forested hillside seep wetland and intermittent watercourse located on the adjoining parcel approximately 150 feet to the southwest. Wetland areas were also observed along either side of the existing gravel driveway that serves the Subject Property residence. However, APT understands that no improvements are currently proposed along the existing driveway so those wetland features were not delineated since they would not be subject to possible disturbance from the proposed AT&T development.

Conclusion:

Based on APT's understanding of the proposed AT&T development, no direct impact to wetlands is anticipated. Although portions of the proposed gravel access are located in proximity to wetland resources (approximately 150 feet to the southwest), no temporary impacts associated with construction activities are anticipated provided sedimentation and erosion controls are designed, installed and maintained during construction in accordance with the *2002 Connecticut Guidelines For Soil Erosion and Sediment Control*. Long term secondary impacts to wetland resources possibly associated with the operation of this Facility are minimized by the fact the wetland system is currently surrounded by existing residential development and AT&T's development is unmanned, minimizes impervious surfaces with the use of a gravel compound and gravel access, and creates minimal traffic (far less than the existing nearby residences). APT recommends that stormwater generated by the proposed development be properly handled and treated in accordance with the *2004 Connecticut Stormwater Quality Manual*. Provided these recommendations are implemented, it is APT's opinion that the proposed AT&T development will not result in a likely adverse impact to wetland resources.

If you have any questions regarding the above-referenced information, please feel free to contact me at (860) 984-9515 or dgustafson@allpointstech.com.

Sincerely,

All-Points Technology Corporation, P.C.

Dean Gustafson
Professional Soil Scientist

Enclosure

Wetland Inspection Map

Wetland Inspection Map

Legend

- Proposed Tower Location
- APT Field Confirmed Wetland Location
- Proposed Access Drive
- CT DEEP Watercourse
- CT DEEP Inland Wetland Soils
- Subject Parcel
- CT Parcel

Proposed AT&T Wireless Communications Facility
257 Perkins Road
Southbury, Connecticut

Sunday, July 07, 2013

at&t

ALL-POINTS TECHNOLOGY CORPORATION

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ALL-POINTS TECHNOLOGY CORPORATION

October 9, 2013

Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

APT Project No.: CT1931090

Attn: Elaine Hinsch
via EMail

Re: NDDB #201303212
AT&T Southbury CT2040
139 North Main Street
Southbury, Connecticut

Dear Ms. Hinsch,

All-Points Technology Corporation, P.C. ("APT") had previously submitted a Natural Diversity Data Base ("NDDB") State Listed Species Review request on behalf of New Cingular Wireless PCS, LLC ("AT&T") for a proposed wireless communications facility at 257 Perkins Road in Southbury, Connecticut. APT understands that NDDB records reveal eastern box turtle (*Terrapene c. carolina*), a State Special Concern Species, in the vicinity of the proposed project[1].

The enclosed protective measures, which follow recommendations contained in your September 5, 2013 NDDB review response letter, will be incorporated into the construction drawings (Development and Management Plans) should the project receive approval by the Connecticut Siting Council. AT&T is committed to implementing these protective measures to avoid unintentional mortality to eastern box turtle as a result of proposed construction activities for the referenced facility. The proposed eastern box turtle protection program consists of several components: isolation of the project perimeter; periodic inspection and maintenance of isolation structures; turtle sweeps; awareness training of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting. An example of the educational material that would be posted at the construction site as part of the contractor education component is also enclosed. With adherence to this eastern box turtle protection program, the proposed development at this property would not have an adverse effect on this state-listed species.

Please feel free to contact me by phone at (860) 984-9515 or via email at dgustafson@allpointstech.com with any questions or if additional information is required.

Sincerely,

Dean Gustafson
Senior Environmental Scientist

Enclosures

[1] NDDB response letter, #201303212, dated September 5, 2013

Eastern Box Turtle Protection Plan

ENVIRONMENTAL NOTES

Eastern Box Turtle Protection Program

Eastern box turtle, a State Special Concern species afforded protection under the Connecticut Endangered Species Act, is known to occur on or within the vicinity of the site. The following protective measures shall be followed to help avoid unintentional mortality to eastern box turtle as a result of construction activities for the site improvements proposed. These protective measures satisfy recommendations from the Connecticut Department of Energy & Environmental Protection ("CTDEEP") Wildlife Division as specified in a September 5, 2013 letter. This protection plan is valid until September 5, 2014, at which point if construction has not been initiated, a new Natural Diversity Data Base review request from CTDEEP is required.

It is of the utmost importance that the Contractor complies with the requirements for the installation of protective measures and the education of its 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). All-Points Technology Corporation, P.C. ("APT") will serve as the Environmental Monitor for this project to ensure that eastern box turtle protection measures are implemented properly and will provide an education session on eastern box turtle prior to the start of construction activities. The Contractor shall contact Dean Gustafson, Senior Environmental Scientist at APT, at least 5 business days prior to the pre-construction meeting. Mr. Gustafson can be reached by phone at (860) 984-9515 or via email at dgustafson@allpointstech.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. The Environmental Monitor will inspect the work zone area prior to and following barrier installation to ensure the area is free of eastern box turtles prior to start of construction activities.

    b. The fencing will consist of conventional erosion control woven fabric, installed approximately six inches below surface grade 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 either on a weekly or biweekly inspection frequency by the Environmental Monitor. If inspections are performed on a biweekly basis, such inspections will also include inspections following storm events of 0.25 inch or greater. Inspections will be conducted by the Environmental Monitor throughout the course of the construction project.

    c. Biweekly inspection reports (brief narrative and applicable photos) will be submitted by the Environmental Monitor to the Connecticut Siting Council for compliance verification. Any observations of eastern box turtle will be

reported to CTDEEP Wildlife Division.

d. The extent of the barrier fencing will be as shown on the site plans. The Contractor shall have additional barrier fencing should field conditions warrant extending the fencing as directed by the Environmental Monitor.

e. No equipment, vehicles or construction materials shall be stored outside of barrier fencing.

f. All silt fencing shall be removed within 30 days of completion of work and permanent stabilization of site soils so that reptile and amphibian movement between uplands and wetlands is not restricted.

2. Contractor Awareness Program:

a. Prior to work on site, the Contractor shall attend an educational session at the pre-construction meeting with the Environmental Monitor. This orientation and educational session will consist of an introductory meeting with the Environmental Monitor providing photos of eastern box turtles and emphasizing 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 below. Workers will also be provided information regarding the identification of other turtle species that could be encountered.

b. The education session will also focus on means to discriminate between the species of concern and other native species to avoid unnecessary "false alarms". Encounters with any species of turtles will be documented.

c. The Contractor will be provided with cell phone and email contacts for the Environmental Monitor to immediately report any encounters with eastern box turtle or other turtle species. Educational poster materials will be provided by the Environmental Monitor and displayed on the job site to maintain worker awareness as the project 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 shall be immediately moved, unharmed, by 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 walking.

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. The Contractor shall immediately report any encounters with eastern box

turtle, along with photographs of the animal, its location and disposition to the Environmental Monitor.

b. Following completion of the construction project, the Environmental Monitor will provide a summary report to CTDEEP documenting the monitoring and maintenance of the barrier fence.

c. Any observations of eastern box turtle will be reported to CTDEEP by the Environmental Monitor, 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, if implemented and adhered to adequately, will adequately protect this Special Concern species in the event that it is encountered in the project area during construction activities.

Eastern Box Turtle Poster

CAUTION

EASTERN BOX TURTLES ARE KNOWN TO INHABIT THIS AREA

Identification: Eastern Box Turtles *(Terrapene c. carolina)* are small, terrestrial turtles ranging from 4.5 to 6.6 inches in length. The shell (carapace) is readily distinguished by its high domed shaped. The color of the shell is brown or black with numerous irregular yellow, orange or reddish markings. The belly (plastron) typically has a light and dark variable pattern, but may be completely tan, brown or black. The head, neck and legs also vary in color but are generally dark with orange or yellow mottling. Box turtles are terrestrial and inhabit many types of habitats including deciduous forests, brushy fields, thickets, streams, ponds and wetlands.

What to do if you find a box turtle: Box turtles are protected by Connecticut's threatened and endangered species legislation and **cannot** be injured, killed, or retained as a pet. If you find a box turtle move the turtle to a safe location away from any construction activity in the direction that the turtle was heading. Carefully pick up the turtle by its shell (carapace) between the front and hind legs with both hands. Be sure to hold the turtle closer to their hind legs as they may reach over and bite if your hands are too close to the head. The turtle may hiss and should retract into its shell.

Who to contact: Please report any finds and relocation of Eastern Box Turtle immediately to **Dean Gustafson of All-Points Technology Corporation, P.C. at (860) 984-9515.**

ALL-POINTS TECHNOLOGY CORPORATION

USFWS COMPLIANCE REVIEW

October 9, 2013

AT&T Mobility
500 Enterprise Drive, Suite 3A
Rocky Hill, CT 06067

APT Project No.: CT1931090

Attn: Tim Burks

Re: Proposed AT&T Site CT2040
257 Perkins Road
Southbury, Connecticut

Dear Mr. Burks,

At your request, All-Points Technology Corporation, P.C. ("APT") performed an evaluation with respect to possible federally-listed, threatened or endangered species in order to determine if the proposed telecommunications facility at the referenced property would result in a potential adverse effect to federally-listed species.

Project Summary:
State: Connecticut
County: New Haven
host Property: 257 Perkins Road, Southbury, CT
Proposed Tower Latitude/Longitude Coordinates: N41°30'06.71" W73°18'00.75"
Proposed Tower Ground Elevation: ±575.2' AMSL
Size of host Property: ±3.038 acres
host Property Watershed: Shepaug River

This evaluation was performed in accordance with the January 7, 2013 policy statement of the United States Department of the Interior Fish and Wildlife Service ("USFWS") New England Field Office. A copy of the January 7, 2013 USFWS policy statement as well as the July 31, 2008 list of federally endangered and threatened species in Connecticut (most recent update) are enclosed for reference.

The federally-listed threatened bog turtle (*Clemmys muhlenbergii*) is known to occur in the Town of Southbury, Connecticut (refer to the enclosed listing) and as such the proposed development requires further analysis of potential affect to this rare species in accordance with the USFWS rare species review policy. A summary of this analysis is detailed below.

Bog Turtle Habitat Evaluation

Bog turtles occur in or near calcareous wet meadows and fens typically bordered by shrub and red-maple swamp wetland habitats.[1] Bog turtle habitat includes "*calcareous wet meadows, pastures, and fens, usually bordered by shrub and red-maple swamps… [that are] characterized by a continuous flow of water seeping through the saturated surface soil and [contain] an extremely diverse vegetational community*" and *"Bog Turtles inhabit small pockets of open-canopy habitat located within these diverse and dynamic wetland ecosystems."*[2] Therefore, key

[1] *Amphibians and Reptiles of Connecticut and Adjacent Regions.* Michael W. Klemens. 1993. Pgs. 176-184.
[2] *Bog Turtle (Clemmys muhlenbergii), Northern Population, Recovery Plan*. Michael Klemens. May 15, 2001.

considerations for determining appropriate bog turtle habitat include the presence of open-canopy type wetland habitats associated with perennial streams underlain by limestone derived soil/bedrock parent material.

Inspections of the host Property were conducted in June and September of 2013 by APT wetland scientists for the purposes of determining the presence of wetlands on or immediately adjacent to the host Property and identification of habitat that may be suitable for bog turtle. The investigations revealed that no wetlands or watercourses are located within the proposed AT&T development area or on the host Property. The nearest wetland or watercourse resource to the proposed AT&T development is associated with a relatively narrow forested hillside seep wetland and intermittent watercourse located on an adjoining residential parcel approximately 150 feet to the southwest. Please refer to the enclosed Wetland Inspection Map for the approximate location of the identified resource area. The host Property is dominated by an existing residence and associated maintained lawn and landscaping. Upland early successional forest and scrub/shrub habitat generally dominate along the north, west and south property boundaries, areas proposed for AT&T's development (e.g., access drive and tower compound). Dominant species in these areas consist of white ash (*Fraxinus americana*), black birch (*Betula lenta*), multiflora rose (*Rosa multiflora*)*, autumn olive (*Elaeagnus umbellata*)*, Asiatic bittersweet (*Celastrus orbiculatus*)*, hayscented fern (*Dennstaedtia punctilobula*) and mugwort (*Artemisia vulgaris*)*. Photographs of the current site conditions are enclosed.

Other wetland and watercourse resources located in proximity to the host Property include a relatively narrow forested wetland corridor associated with Turrill Brook. Turrill Brook is a small (3 to 5 foot wide) perennial stream that flows south near the west side of the existing driveway the serves the host Property's residence. Turrill Brook is a generally west, fast- to moderately fast-flowing tributary to the Shepaug River, located approximately one mile west of the proposed AT&T development. In addition, the National Wetland Inventory depicts three small wetland habitats in proximity to the host Property: a small pond feature ("PUBH" located ±0.4 mile to the northeast) and two small scrub-shrub wetland areas ("PSS1E" and "PSS1F" located ±0.2 mile to the southwest and southeast, respectively). Preferred habitat of bog turtle, which includes wet meadows and fens bordered by shrub and red-maple swamps and slow moving streams habitat type does not dominate these wetland areas.

According to the *Bedrock Geological Map of Connecticut* (Rogers, 1985), bedrock underlying the host Property and the immediate surrounding area (± 0.5 mile radius from proposed AT&T facility) is classified as the Rowe Schist formation, consisting of light gray to silvery, fine- to medium-grained schist. Bedrock in the surrounding area is classified as Ratlum Mountain Schist, consisting of gray, medium-grained schist and granofels. Exposed schist bedrock was field confirmed on the host Property along the east property boundary during ATP's investigations. In addition, soils field identified within and surrounding the AT&T facility and proposed access drive are classified as Hollis-Chatfield-Rock outcrop complex; Hollis consists of somewhat excessively drained shallow (10 to 20 inches to bedrock) glacial till soils and Chatfield consists of well drained moderately deep (20 to 40 inches to bedrock) glacial till soils. These glacial till soils are derived from non-calcareous crystalline parent material. Therefore, the appropriate bedrock/soil geology for bog turtle habitat is not supported by the host Property or surrounding area.

A request for rare species review by the Connecticut Department of Energy & Environmental Protect ("CTDEEP") Natural Diversity Data Base ("NDDB") resulted in issuance of a September 5, 2013 letter stating records for a State Species of Special Concern, eastern box turtle (*Terrapene carolina carolina*), exist in the vicinity of the host Property[3]; a copy of the letter is enclosed. The CTDEEP did not identify bog turtle as being in the vicinity of the site; bog turtle is classified as a State Endangered Species in addition to its Federally Threatened classification. AT&T has committed to implementing protective measures during construction as recommended by CTDEEP to avoid impacts to eastern box turtle.

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* plant is classified as invasive as determined by the Connecticut Invasive Plants Council in accordance with CGS 22a-381a through 22a-381d

3 NDDB review #201303212

Therefore, since the proposed AT&T development will not impact wetlands, no bog turtle habitat was identified on or proximate to the host Property, and CTDEEP did not identify bog turtle in the vicinity of the AT&T development, no further consultation with USFWS regarding this issue is required. Please note that in the unlikely event that bog turtle(s) were to enter the host Property, the eastern box turtle protective measures that will be implemented during construction of the proposed AT&T facility would be equally protective of bog turtles. A January 7, 2013 letter from the USFWS indicating that no further Endangered Species Act coordination is necessary is enclosed. This federally-listed rare species review follows the 2013 procedure and guidelines provided by the USFWS New England Field Office.[4]

Sincerely,

Dean Gustafson
Senior Environmental Scientist

Enclosures

[4] http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm, web site accessed September 27, 2013.

USFWS Policy Documents

- January 7, 2013 Telecommunications Policy Statement

- July 31, 2008 Inventory of Federally Listed Endangered and Threatened Species In Connecticut

United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087
http://www.fws.gov/newengland

January 7, 2013

To Whom It May Concern:

The U.S. Fish and Wildlife Service's (Service) New England Field Office has determined that individual project review for certain types of activities associated with communication towers **is not required.** These comments are submitted in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Due to the rapid expansion of the telecommunication industry, we are receiving a growing number of requests for review of **existing** and **new** telecommunication facilities in relation to the presence of federally-listed or proposed, threatened or endangered species, critical habitat, wilderness areas and/or wildlife preserves. We have evaluated our review process for proposed communications towers and believe that individual correspondence with this office is not required for the following types of actions relative to **existing** facilities:

1. the re-licensing of existing telecommunication facilities;
2. audits of existing facilities associated with acquisition;
3. routine maintenance of existing tower sites, such as painting, antenna or panel replacement, upgrading of existing equipment, etc.;
4. co-location of new antenna facilities on/in existing structures;
5. repair or replacement of existing towers and/or equipment, provided such activities do not significantly increase the existing tower mass and height, or require the addition of guy wires.

In order to obviate the need to contact this office in the future for individual environmental review for **existing** communication towers or antenna facilities, please note that we are not aware of any federally-listed, threatened or endangered species that are being adversely affected by any existing communication tower or antenna facility in the following states: Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts. Furthermore, we are not aware of any **existing** telecommunication towers in federally-designated critical habitats, wilderness areas or wildlife preserves. Therefore, no further consultation with this office relative to the impact of the above referenced activities on federally-listed species is required.

January 7, 2013

Future Coordination with this Office Relative to **New** Telecommunication Facilities

We have determined that proposed projects are not likely to adversely affect any federally-listed or proposed species when the following steps are taken to evaluate new telecommunication facilities:

1. If the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building, no further coordination with this office is necessary. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.

2. If the above criteria cannot be met, your review of our lists of threatened and endangered species locations within Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts may confirm that no federally-listed endangered or threatened species are known to occur in the town or county where the project is proposed.

3. If a listed species is present in the town or county where the project is proposed, further review of our lists of threatened and endangered species may allow you to conclude that suitable habitat for the species will not be affected. Based on past experiences, we anticipate that there will be few, if any, projects that are likely to impact piping plovers, roseate terns, bog turtles, Jesup's milk-vetch or other such species that are found on coastal beaches, riverine habitats or in wetlands because communication towers typically are not located in these habitats.

For projects that meet the above criteria, there is no need to contact this office for further project review. A copy of this letter should be retained in your file as the Service's determination that no listed species are present, or that listed species in the general area will not be affected. Due to the high workload associated with responding to many individual requests for threatened and endangered species information, we will no longer be providing response letters for activities that meet the above criteria. This correspondence and the species lists remain valid until January 1, 2014. Updated consultation letters and species lists are available on our website:

(http://www.fws.gov/newengland/EndangeredSpec-Consultation.htm)

Thank you for your cooperation, and please contact Mr. Brett Hillman of this office at 603-223-2541 if you need further assistance.

Sincerely yours,

Thomas R. Chapman
Supervisor
New England Field Office

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN CONNECTICUT

COUNTY	SPECIES	FEDERAL STATUS	GENERAL LOCATION/HABITAT	TOWNS
Fairfield	Piping Plover	Threatened	Coastal Beaches	Westport, Bridgeport and Stratford
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	Westport and Stratford
	Bog Turtle	Threatened	Wetlands	Ridgefield and Danbury.
Hartford	Dwarf wedgemussel	Endangered	Farmington and Podunk Rivers	South Windsor, East Granby, Simsbury, Avon and Bloomfield.
Litchfield	Small whorled Pogonia	Threatened	Forests with somewhat poorly drained soils and/or a seasonally high water table	Sharon.
	Bog Turtle	Threatened	Wetlands	Sharon and Salisbury.
Middlesex	Roseate Tern	Endangered	Coastal beaches, islands and the Atlantic Ocean	Westbrook
	Piping Plover	Threatened	Coastal Beaches	Clinton, Westbrook, Old Saybrook.
	Puritan Tiger Beetle	Threatened	Sandy beaches along the Connecticut River	Cromwell, Portland
New Haven	Bog Turtle	Threatened	Wetlands	Southbury
	Piping Plover	Threatened	Coastal Beaches	Milford, Madison and West Haven
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	Branford, Guilford and Madison
	Indiana Bat	Endangered	Mines, Caves	
New London	Piping Plover	Threatened	Coastal Beaches	Old Lyme, Waterford, Groton and Stonington.
	Roseate Tern	Endangered	Coastal beaches, Islands and the Atlantic Ocean	East Lyme, New London and Waterford.
	Small whorled Pogonia	Threatened	Forests with somewhat poorly drained soils and/or a seasonally high water table	Waterford
Tolland	None			

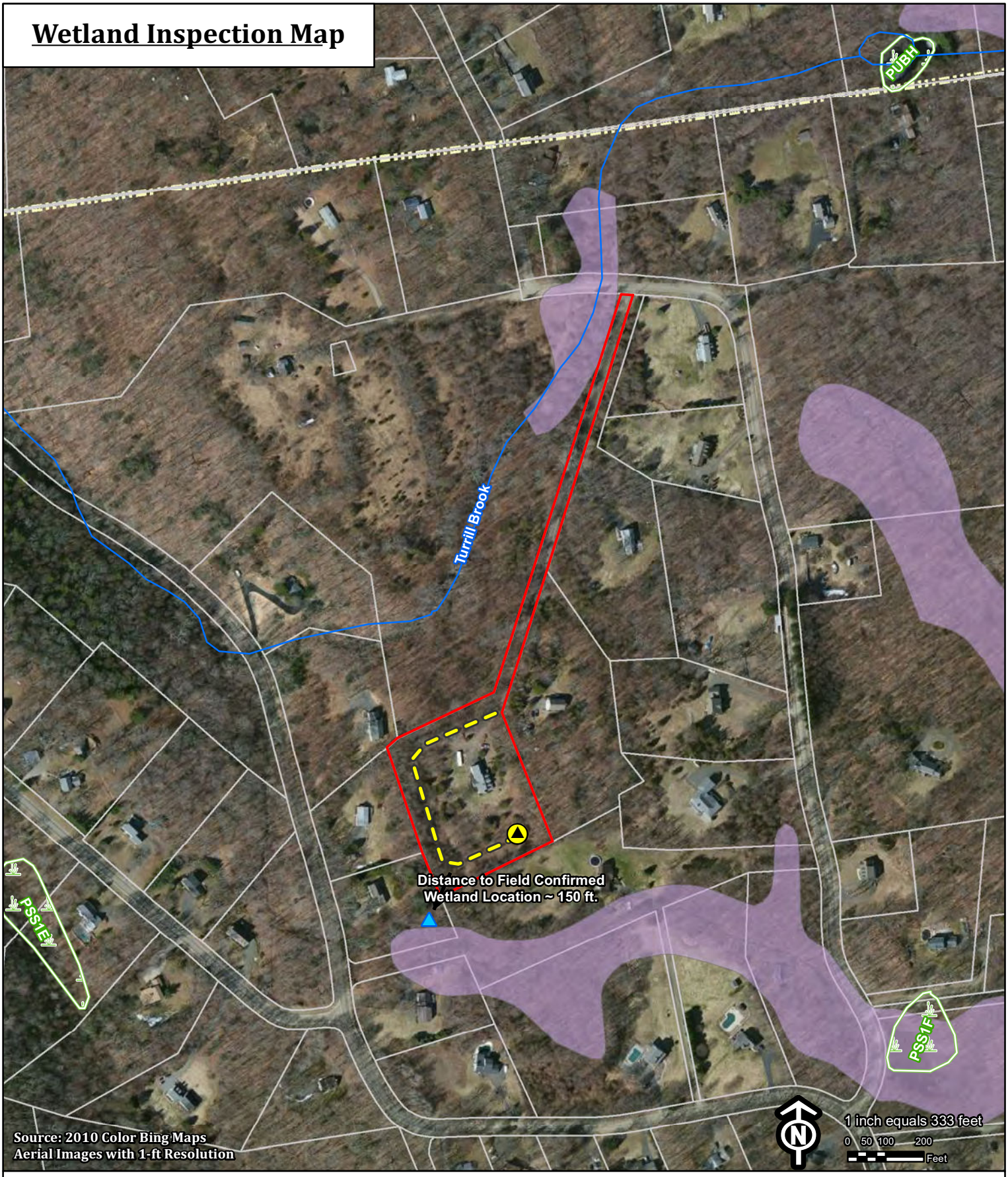
-Eastern cougar, gray wolf, Indiana bat, Seabeach amaranth and American burying beetle are considered extirpated in Connecticut.
-There is no federally-designated Critical Habitat in Connecticut.

7/31/2008

Attachments

- Wetland Investigation Map
- Photo Documentation
- September 5, 2013 CTDEEP NDDB Letter

Wetland Inspection Map



Legend

- Proposed Tower Location
- APT Field Confirmed Wetland Location
- Proposed Access Drive
- CT DEEP Watercourse
- CT DEEP Inland Wetland Soils
- NWI Wetland
- Subject Parcel
- CT Parcel

Proposed AT&T Wireless Communications Facility
257 Perkins Road
Southbury, Connecticut

Wednesday, October 09, 2013

at&t

ALL-POINTS TECHNOLOGY CORPORATION

Path: C:\All_Points_Tech\Projects\Client\AT&T\CT1931090_Southbury\GIS\Maps\Wetland_Insp_Map.mxd

Photo 1: View of existing gravel driveway to residence, looking south.

Photo 2: View of proposed start of gravel access drive to AT&T facility, looking west along north parcel boundary (just beyond right side of photo).

Photo 3: View of typical scrub-shrub/young forest habitat along western parcel boundary, looking west. Note mugwort dominating herbaceous layer.

Photo 4: View of residence and location of proposed AT&T facility in background behind house in forest area, looking southeast.

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

Bureau of Natural Resources
Wildlife Division
Natural History Survey – Natural Diversity Data Base

September 5, 2013

Mr. Dean Gustafson
All-Points Technology Corporation, P.C. (APT)
3 Saddlebrook Drive
Killingworth, CT 06419
dgustafson@allpointstech.com

Regarding: AT&T Southbury – Site No. CT2040 – 257 Perkins Road, Southbury - telecommunications tower – New Cingular Wireless
Natural Diversity Data Base 201303212

Dear Mr. Gustafson:

In response to your request for a Natural Diversity Data Base (NDDB) Review of State Listed Species for AT&T Southbury – Site No. CT2040, our records for this site indicate the following extant populations of species within the vicinity of the site:

Eastern box turtle (*Terrapene carolina Carolina*) Protection Status: Species of Special Concern

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. Eastern Box Turtles have been negatively impacted by the loss of suitable habitat. Some turtles may be killed directly by construction activities, but many more are lost when important habitat areas for shelter, feeding, hibernation, or nesting are destroyed. As remaining habitat is fragmented into smaller pieces, turtle populations can become small and isolated.

Recommendation: Precautions should be taken to protect Eastern box turtles. The following guidelines should be met:

- Silt fencing, as noted in your application, should be installed around the work area prior to activity;
- After silt fencing is installed and prior to work being conducted, a sweep of the work area should be conducted to look for turtles;

- Workers should be apprised of the possible presence of turtles, and provided a description of the species (http://www.ct.gov/dep/cwp/view.asp?a=2723&q=473472&depNav_GID=1655);
- Any turtles that are discovered should be moved, unharmed, to an area immediately outside of the fenced area, and position in the same direction that it was walking;
- Work conducted during early morning and evening hours should occur with special care not to harm basking or foraging individuals; and
- All silt fencing should be removed after work is completed and soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted.

The Natural Diversity Data Base includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. If the project is not implemented within 12 months, then another Natural Diversity Data Base review should be requested for up-to-date information.

Please be advised a more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the Department of Energy and Environmental Protection for the proposed site. Should state involvement occur in some other manner, specific restrictions or conditions relating to the species discussed above may apply.

Thank you for consulting the Natural Diversity Data Base. If you have further questions, I can be reached by email at Elaine.hinsch@ct.gov or by phone at (860) 424-3011.

Sincerely,

/s/
Elaine Hinsch
Program Specialist II
Wildlife Division

cc: DEEP Office of Planning and Program Development