USFWS REVIEW

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

September 20, 2006

Reference: See attached sheet for a list of projects covered by this letter

Brian Lever, Trevelyn Potter
Maureen Taylor, Christopher Baird
Linda Mackey, Jeff Redfield
Jessica Wellum, Joel Dukes
Mary Stadalnick, David Akerblom
EBI Consulting
Four A Street
Burlington, MA 01803

Ladies and Gentlemen:

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

Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

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

Sincerely yours,

Michael J. Amaral

Michael J. Amaral
Endangered Species Specialist
New England Field Office

Attachment

Project	Location	Project #
Antenna co-location	Worcester, MA	61063919
Tower	No. Attleboro, MA	61062594
Antenna co-location	Ashland, MA	61063691
Tower	Watertown, CT	61063915
Tower	Nashua, NH	61062464
Tower	Bridgewater, MA	61063035
Antenna co-location	Attleboro, MA	61063906
Tower	East Dummerston, VT	61063517
Tower	Vernon, VT	61061215
Tower	Bartlett, NH	61061820
Tower	Shaftsbury, VT	61063692
Tower	Gaylordsville, CT	61063807
Tower	Vernon, VT	61062186
Tower	Tewksbury, MA	61063705
Antenna co-location	Medway, MA	61064409
Tower	Springfield, MA	61062722
Tower	Winchester, MA	61063951
Tower	Carroll, NH	61061835
Tower	Brockton, MA	61064411

SHPO REVIEW

Connecticut Commission on Culture & Tourism

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

December 13, 2006

Mr. Stephen Forrest
EBI Consulting
Four A Street
Burlington, MA 01803

Subject: Telecommunications Facilities
700 Kent Road (South Kent Road)
Gaylordsville (New Milford), CT
EBI #61063807, 36930982

Dear Mr. Forest:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the Gaylordsville Monument (South Kent Road) possesses historic and architectural importance and appears eligible for the National Register of Historic Places. Therefore, we respectfully request that the following information be provided for further review:

- Professionally completed Connecticut architectural inventory form, including photographs/digital images and location map for the Gaylordsville Monument.

- Photosimulations of the proposed cell tower from the visual perspective of the Gaylordsville Monument.

- Submission of Heritage Consultants LLC's final archaeological reconnaissance survey report (two copies).

Upon submission of the requested material, the State Historic Preservation Office will provide substantive comments vis-a-vis the National Historic Preservation Act.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

cc: Mr. David George/HC

Transportation
Land Development
Environmental
Services

Vanasse Hangen Brustlin, Inc.

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

Memorandum

To: Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
27th Floor
Hartford, CT 06103-3597

Date: January 5, 2007

Project No.: 40862.19

From: Michael Koperwhats

Re: State Historic Preservation Office
Photographic Documentation
Proposed Verizon Wireless
Telecommunications Facility
700 Kent Road
New Milford, Connecticut

Verizon Wireless currently seeks approval from the Connecticut Siting Council (CSC) for a Certificate of Environmental Compatibility and Public Need to construct a telecommunications "Facility" to be located on property at 700 Kent Road in the Town of New Milford, Connecticut. The proposed Facility would include the installation of a 120-foot tall monopole with associated ground equipment located within a fenced enclosure at the base of tower structure. As part of the CSC application process, Verizon Wireless and their consultants have submitted various project information to the State Historic Preservation Office (SHPO) for review in order to identify potential impacts to any nearby historic resources. Following that review, the SHPO determined that the Gaylordsville Monument is located within the general vicinity of the proposed project and as such requested that Verizon Wireless prepare photographic simulations of the proposed Facility from the visual perspective of monument.

Vanasse Hangen Brustlin, Inc. (VHB) was retained by Verizon Wireless to conduct additional in-field reconnaissance in order to comply with the SHPO request. This memorandum is intended to briefly describe the methodologies utilized during the in-field activities and summarize the results.

On January 3, 2007, VHB, Inc. conducted a balloon float at the project site in order to determine if the proposed Facility would be visible from the Gaylordsville Monument and if so, provide photographic documentation and simulations illustrating the actual view of the monopole structure from the monument. The balloon float consisted of raising and maintaining a helium-filled weather balloon at the proposed project location at a height of 120 feet above ground level (AGL). During the balloon float, VHB staff conducted reconnaissance from the Gaylordsville Monument and immediate vicinity thereof and determined that views of the proposed Facility would not be achieved from this area. Potential views of the proposed Facility from the Gaylordsville Monument would be primarily obstructed by a stand of mature evergreen trees located adjacent to the monument. These trees stand approximately 65-75 feet tall and would provide year-round screening. The existing deciduous trees located on the host property adjacent to the proposed Facility would serve to provide secondary or additional screening during "leaf-on" conditions. The attached photographic documentation represents the view from the Gaylordsville Monument to the location where Verizon

plans to construct the proposed Facility. Also attached is our computer-based Viewshed Map which was originally included as part of our *Visual Resource Evaluation Report* prepared in August of 2006 in which the visibility of the proposed Facility was analyzed within an approximate two-mile radius surrounding the project area. The attached Viewshed Map depicts areas of year-round visibility along select portions of Route 7 and South Old Stone Road within the general vicinity of the proposed Facility, but, as shown on the map, such views do not extend to the area where the Gaylordsville Monument is located.

Photolog Documentation

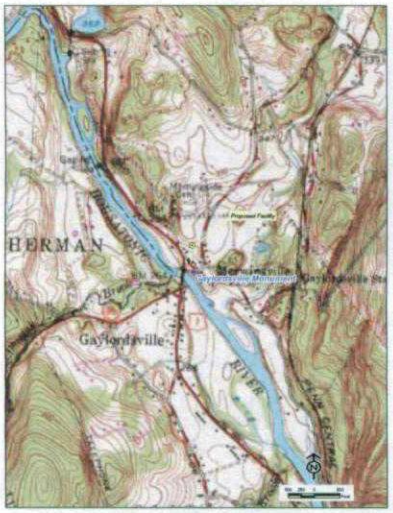
Town of
New Milford
Connecticut

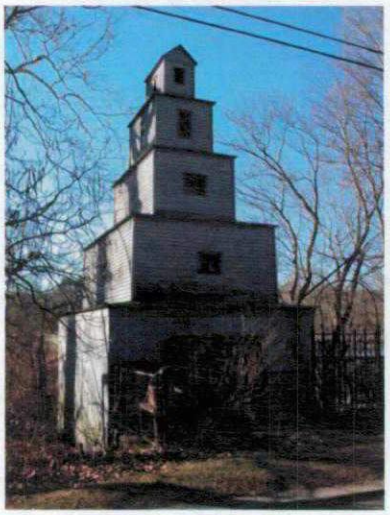
Vanasse Hangen Brustlin, Inc.

verizon

Photographic Documentation - State Historic Preservation Office

Town of
New Milford
Connecticut





GAYLORDSVILLE MONUMENT
SOUTH KENT ROAD
NEW MILFORD, CONNECTICUT

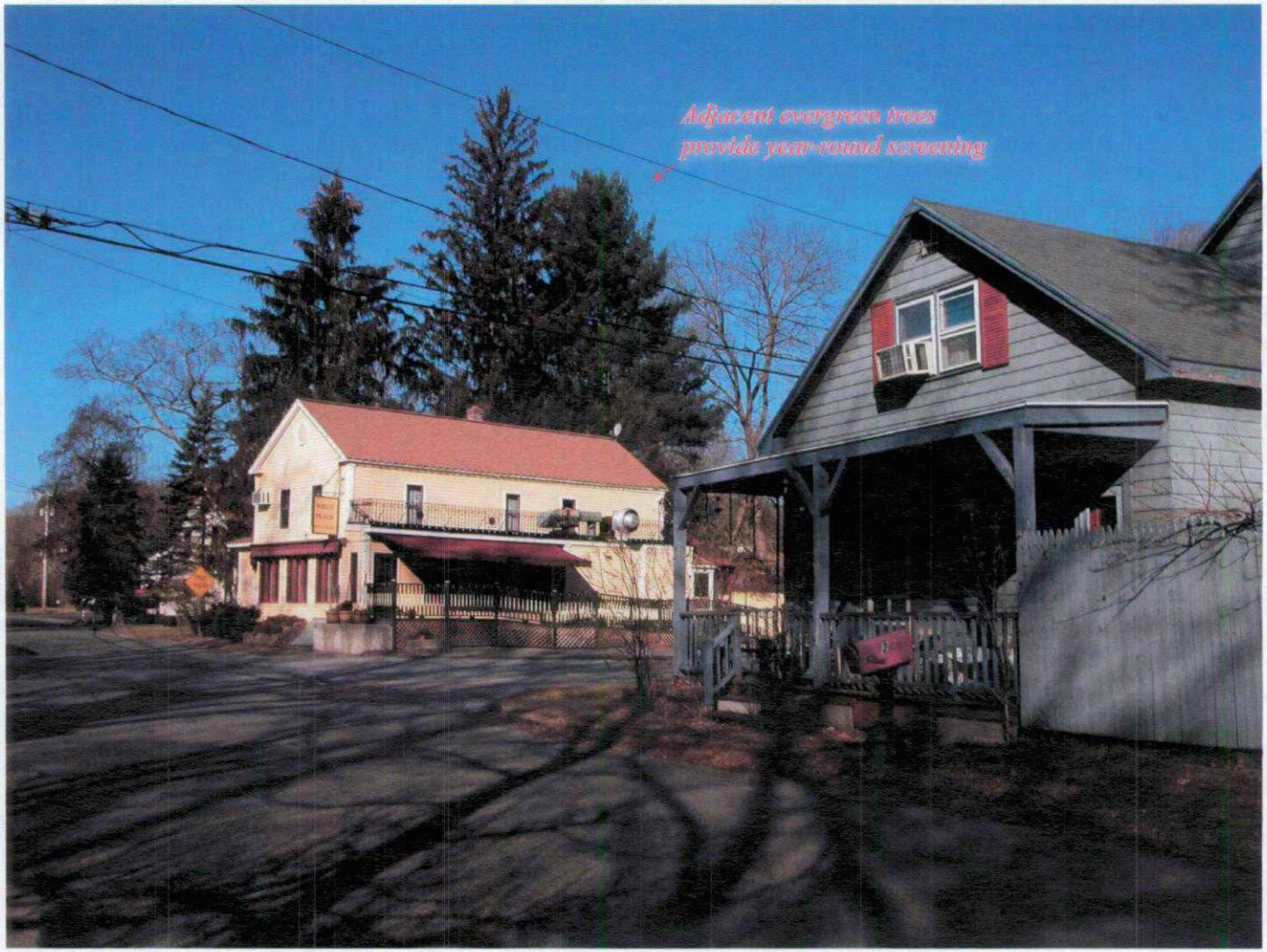
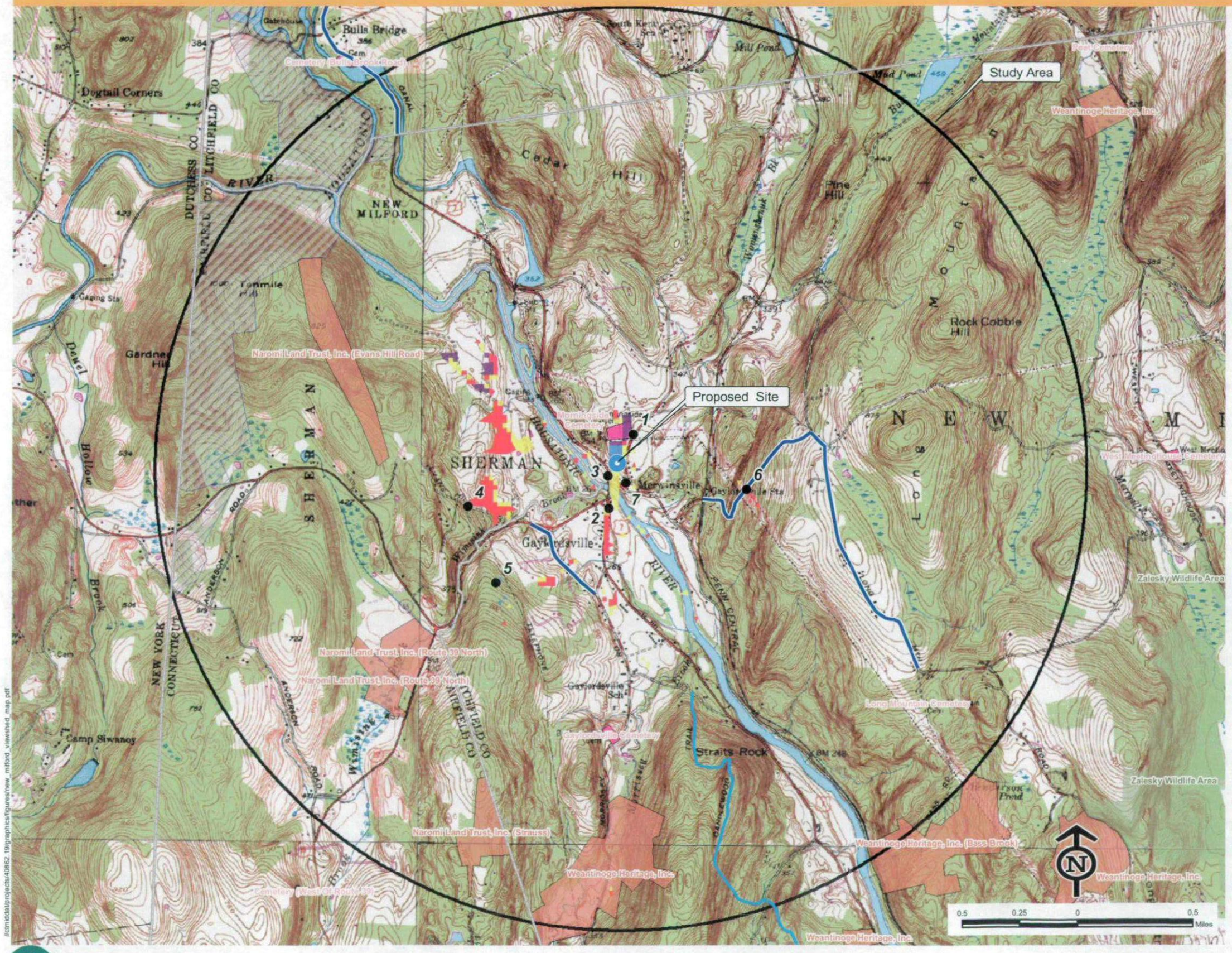


PHOTO TAKEN FROM RIVER ROAD AT GAYLORDSVILLE MONUMENT, LOOKING NORTHWEST
DISTANCE FROM THE PHOTOGRAPH LOCATION TO THE PROPOSED SITE IS 690 FEET +/-

Viewshed Map

Topography and Forest Cover as Constraints

Town of New Milford Connecticut



Proposed Verizon Wireless Telecommunications Facility
New Milford Northwest
700 Kent Road
New Milford, Connecticut

NOTE:
- Viewshed analysis conducted using ESRI's Spatial Analyst.
- Proposed Facility height is 120 feet.
- Existing tree canopy height estimated at 65 feet.

DATA SOURCES:
- 7.5 minute digital elevation model (DEM) with 30 meter resolution produced by the USGS, 1982
- Forest areas derived from 2004 digital orthophotos with 0.5-foot pixel resolution; digitized by VHB, 2006
- Base map comprised of Dover Plains, Kent, New Milford and Pawling USGS Quadrangle Maps
- Protected properties data layer provided CTDEP, 2003
- Scenic Roads layer derived from available State and Local listings.

Map Compiled August 2006

Legend

Proposed Monopole Location (Includes area of visibility approximately 500 feet around facility)

Photos - August 9, 2006
- Balloon visible above the trees
- Anticipated Seasonal Visibility (Approximately 12 Acres)

Approx. % of Tower Visible (Year-Round)
- Upper 25% to Tree Line View - 22 Acres
- 50% - 30 Acres
- 75%- 8 Acres
- Entire Facility Visible - 3 Acres

Total Year-Round Visibility Approximately 63 Acres

Protected Properties (Municipal)
- Cemetery
- Preservation
- Conservation
- Existing Preserved Open Space
- Recreation
- General Recreation
- School
- Uncategorized

Protected Properties (CT DEP)
- 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

- DEP Boat Launches
- Scenic Road (State and Local)
- Housatonic Range Trail (CT Blue Blaze)
- Town Line
- Protected Properties (Federal)

VHB Vanasse Hangen Brustlin, Inc.
Transportation | Land Development | Environmental Services

verizonwireless

f:\cm\data\projects\40862.19\graphics\figures\new_milford_viewshed_map.pdf

FINAL REPORT NOVEMBER 2006

PHASE I CULTURAL RESOURCES RECONNAISSANCE SURVEY OF THE PROPOSED NEW MILFORD NORTHWEST CELLULAR COMMUNICATIONS TOWER, GAYLORDSVILLE, CONNECTICUT

PREPARED FOR:

EBI CONSULTING, INC.
FOUR A STREET
BURLINGTON, MA 01803

HERITAGE CONSULTANTS, LLC
877 MAIN STREET
NEWINGTON, CONNECTICUT 06111

TABLE OF CONTENTS

LIST OF FIGURES

1.0 Introduction

This report summarizes the results of a Phase I cultural resources reconnaissance survey of a proposed cellular communications facility to be constructed behind an existing fire station on Kent Road in Gaylordsville, Connecticut. Heritage Consultants, LLC, completed the field investigation portion of this project, performed on behalf of EBI Consulting, Inc., in October of 2006. All work was conducted in accordance with the National Historic Preservation Act of 1966, as amended; the National Environmental Policy Act of 1969, as amended; and the *Environmental Review Primer for Connecticut's Archaeological Resources* (Poirier 1987). The remainder of this document presents a description of the Areas of Potential Effect, information used as project context, the methods for the current Phase I cultural resources reconnaissance survey, results of the investigation, and management recommendations for the project.

2.0 Project Description

As mentioned above, the proposed cellular communications facility will be located in Gaylordsville, Connecticut (Figure 1). The Areas of Potential Effect are situated at an approximate elevation of 121.2 m (400 ft) NGVD; they are bounded to the north by a residential lot with manicured lawn, to the east by an open field and South Kent Road, to the south by commercial development, and to the west by wooded areas. The Areas of Potential Effect consist of a proposed lease area measuring 30.3 x 30.3 m (100 x 100 ft) in size and a single 3.6 m wide (12 ft) proposed access road that will extend from South Kent Road to the proposed lease area; it will measure approximately 182 m (600 ft) in length (Figure 2). The proposed access road area consists of an open field, which is bound by South Kent Road to the east. The proposed lease area will house an equipment shelter, a 36.3 m (120 ft) monopole type tower, an ice bridge and posts, a transformer and utility cabinet, and protective bollards. All of these items will be enclosed within a chain link fence.

At the time of survey, the Areas of Potential Effect were characterized by mixed forest and open grassy areas (Figure 3 through 6). The Areas of Potential Effect associated with the proposed lease area were surveyed using visual reconnaissance and shovel testing in an effort to identify evidence of intact soil strata and cultural deposits. The proposed access road was also subjected to shovel testing, visual reconnaissance, and photo-documentation. Field methodologies employed during the current investigation consisted of pedestrian survey, mapping, photo-documentation, and subsurface testing. The details of the field methods, as well as the results of this field effort, are reviewed below.

3.0 Background Research

The current Phase I cultural resources reconnaissance survey was completed using a three-step approach. The first step consisted of historic research and records review that focused on the portion of Gaylordsville encompassing the Areas of Potential Effect. This was followed by a review of all previously recorded archeological sites situated within the vicinity of the project area in an effort to determine the archeological context of the region. Finally, this approach entailed the completion of the current Phase I cultural resources reconnaissance survey.

Background research included analysis of readily available historic maps and aerial imagery depicting the area encompassing proposed project area; an examination of the pertinent 1983 USGS 7.5' series topographic quadrangle; and a review of all archeological data maintained by the Connecticut State Historic Preservation Office and digital records archived by Heritage Consultants, LLC. The intent of this review was to identify all previously recorded cultural resources situated within and/or immediately adjacent to the Areas of Potential Effect. This information was used to develop the archeological context for assessing cultural resources that may be identified during survey.

4.0 Project Context: Previous Investigations, Natural & Prehistoric Settings, and Historic Overview

The following sections provide an overview of the region's natural and prehistoric settings, historic backdrop, and previous cultural resources investigations completed within the vicinity of the Areas of Potential Effect. These brief discussions are included in an effort to provide contextual information relative to the location of the Areas of Potential Effect, its natural characteristics, and its prehistoric and historic use and occupation. It concludes with an overview of the previous cultural resources investigations that have taken place in the area and a discussion of their results.

4.1 Natural Setting

The Areas of Potential Effect are situated within the Southwest Hills ecoregion of Connecticut. The Southwest Hills ecoregion region consists of an upland area lying within 25 miles of Long Island Sound. This area is characterized by "low, rolling to locally rugged hills of moderate elevation, broad areas of upland, and local areas of steep rugged topography" (Dowhan and Craig 1976). Elevations in this part of Connecticut range from 76.2 m (250 ft) to a maximum of nearly 304.8 m (1,000 ft) above sea level. The bedrock of the region is consists of sedimentary and igneous rocks; primarily of gneisses and schists created during the Paleozoic. Soils vary from glacial till in the uplands of the region, to sand, gravel, silt, and clay within the valleys and multiple upland locations. Vegetation located within the immediate vicinity of the Areas of Potential Effect consists of mixed forests and grasses. Finally, local fauna include rainbow trout, largemouth bass, sucker, rabbit, fox, raccoon, opossum, squirrel, white tailed deer, five-lined skink, the bog turtle, and a wide variety of terrestrial and aquatic bird species.

4.2 Prehistory of Connecticut

The earliest inhabitants of Connecticut, referred to as Paleo-Indians, probably arrived in the area after ca. 14,000 B.P. (Gramly and Funk 1990; Snow 1980). While there have been numerous finds of Paleo-Indian projectile points throughout Connecticut, only two sites, the Templeton Site (6-LF-21) and the Hidden Creek Site (72-163), have been studied in detail (Jones 1997; Moeller 1980). The Templeton Site (6-LF-21) is located in Washington, Connecticut on a terrace overlooking the Shepaug River. Carbon samples recovered during excavation of the site area produced a radiocarbon date of 10,190±300 B.P., for the occupation. In addition to a single large and two small fluted points, the Templeton Site produced gravers, drills, core fragments, scrapers, and channel flakes, indicating that the full range of lithic reduction took place within the site area (Moeller 1980). Moreover, use of both exotic and local raw materials was documented in the recovered lithic assemblage, suggesting that not only did the site's occupants spend some time in the area, but they also had access to distant lithic sources.

The only other Paleo-Indian site studied in detail is the Hidden Creek Site (72-163) (Jones 1997). Paleo-Indian artifacts recovered from this site include bifaces, side scrapers, a fluted preform, gravers, and end scrapers. While no direct date for the Paleo-Indian assemblage yet has been obtained, Jones (1997:76) argues that based on typological considerations the artifacts likely date from ca., 10,000 to 9,500 years ago. Further, based on the types and number of tools present, Jones (1997:77) has hypothesized that the Hidden Creek Site represents a short-term occupation. Excavation of both sites suggest that the Paleo-Indian settlement pattern consisted of a high degree of mobility, with groups moving regionally in search of seasonal food resources, as well as for high quality lithic materials.

The Archaic Period began by ca., 10,000 B.P. (Ritchie and Funk 1973; Snow 1980). Later, Griffin (1967) and Snow (1980) divided the Archaic Period into three subperiods: the Early Archaic (10,000 to 8,000 B.P.), Middle Archaic (8,000 to 6,000 B.P.), and Late Archaic (6,000 to 3,400 B.P.). To date, very few Early Archaic sites have been identified in southern New England. Like Paleo-Indian sites, Early Archaic sites tend to be very small and produce few artifacts, most of which are not diagnostic. Sites of this age are identified based on the recovery of a series of ill-defined bifurcate-based projectile points. These projectile points are identified by their characteristic bifurcated base, and they generally are made from

high quality lithics, though some quartz and quartzite specimens have been recovered. Current archeological evidence suggests that Early Archaic groups became more focused on locally available and smaller game species. Occupations of this time period are represented by camps that were moved periodically to take advantage of seasonal resources (McBride 1984).

By the onset of the Middle Archaic Period, increased numbers and types of sites are noted in the region (McBride 1984). The most well known Middle Archaic site in New England is the Neville Site (Dincauze 1976). Analysis of the Neville Site indicated that the Middle Archaic occupation dated from between ca., 7,700 and 6,000 years ago. These sites are associated with the recovery of Neville, Stark, and Merrimac projectile points. McBride (1984) noted that Middle Archaic sites in the lower Connecticut River Valley tend to be represented by moderate density artifact scatters representing a "diversity of site types, with both large-scale occupations and small special purpose present" (McBride 1984:96). Thus, based on the available archeological evidence, the Middle Archaic Period is characterized by continued increases in diversification of resources exploited, as well as by sophisticated changes in the settlement pattern to include different site types, including both base camps and task-specific sites (McBride 1984:96).

The Late Archaic Period in southern New England is divided into two major cultural traditions: the Laurentian and Narrow-Stemmed Traditions (Funk 1976 McBride 1984; Ritchie 1969a and b). Laurentian artifacts include ground stone axes, adzes, gouges, ulus (semi-lunar knives), pestles, atlatl weights and scrapers. The diagnostic projectile point forms of this time period include the Brewerton Eared-Notched, Brewerton Eared and Brewerton Side-Notched varieties (McBride 1984; Ritchie 1969a). Current archeological evidence suggests that Laurentian populations consisted of groups of mobile hunter-gatherers. While a few large Laurentian Tradition occupations have been identified and studied, they generally encompass less than 500 m^2 in area. These base camps reflect frequent movements by small groups of people in search of seasonally abundant resources. The overall settlement pattern of the Laurentian Tradition was dispersed in nature, with base camps located in a wide range of microenvironments, including riverine as well as upland zones (McBride 1984:252).

The latter portion of the Late Archaic is represented the Narrow-Stemmed Tradition. It is recognized by the presence of quartz and quartzite narrow stemmed projectile points, triangular quartz Squibnocket projectile points, and a bipolar lithic reduction strategy (McBride 1984). In general, the Narrow-Stemmed Tradition corresponds to when Late Archaic populations in southern New England began to "settle into" well-defined territories. Further, Narrow-Stemmed Tradition settlement patterns are marked by an increase in the types of sites utilized. That is, the Narrow-Stemmed Tradition witnessed the introduction of large base camps supported by small task-specific sites and temporary camps. The increased number of Narrow Stemmed Traditions temporary and task specific sites indicates frequent movements out of and back into base camps for the purpose of resource procurement; however, the base camps were relocated seasonally to position groups near frequently used, but dispersed, resources (McBride 1984:262).

The Terminal Archaic, which lasted from ca., 3,700 to 2,700 B.P., is represented by the Susquehanna Tradition (McBride 1984; Ritchie 1969b). The Susquehanna Tradition is based on the classification of several Broadspear projectile point types and associated artifacts. Temporally diagnostic projectile points of this tradition include the Snook Kill, Susquehanna Broad, Mansion Inn, and Orient Fishtail types (Lavin 1984; McBride 1984; Pfeiffer 1984). In addition, the material culture of the Terminal Archaic includes soapstone vessels, chipped and ground stone adzes, atlatl weights, drills, net sinkers, plummets and gorgets (Lavin 1984; McBride 1984; Ritchie 1969a and 1969b; Snow 1980). Susquehanna Tradition settlement patterns are centered around large base camps located in on terrace edges overlooking floodplains. Acting as support facilities for the large Terminal Archaic base camps were numerous task specific sites and temporary camps. Such sites were used as extraction points for the procurement of resources not found in the immediate vicinity of the base camps, and they generally were located adjacent to upland streams and wetlands (McBride 1984:282). Finally, there also are a large number of Terminal

Archaic cremation cemeteries with burials that have produced broadspear points and radiocarbon dates between 3,700 and 2,700 B.P. (Pfeiffer 1990). Among the grave goods are ritually "killed" (intentionally broken) steatite vessels, as well as ground stone and flaked stone tools (Snow 1980:240); however, this represents an important continuation of traditions from the Late Archaic and it should not be regarded as a cultural trait unique to the Susquehanna Tradition (Snow 1980:244).

Traditionally, the advent of the Woodland Period in southern New England has been associated with the introduction of pottery (Ritchie 1969a; McBride 1984). Like the Archaic Period, the Woodland Period has been commonly divided into three subperiods: Early, Middle, and Late Woodland. The Early Woodland period of the northeastern United States dates from ca., 2,700 to 2,000 B.P. In his study of the lower Connecticut River Valley, McBride (1984) described Early Woodland sites as "characterized by a quartz cobble lithic industry, narrow-stemmed points, an occasional Meadowood projectile point, thick, cord-marked ceramics, and perhaps human cremations" (McBride and Soulsby 1989:50). Early Woodland sites tend to be located in a variety of different ecozones; however, the largest settlements associated with this period were focused on floodplain, terrace, and lacustrine environments (McBride 1984:300), suggesting "population aggregations along major rivers, interior lakes, and wetlands" (McBride and Soulsby 1989:50). In sum, archeological evidence indicates that Early Woodland populations consisted a mobile hunter/gatherers that moved seasonally throughout a diversity of environmental zones in search of available plant and animal resources.

The Middle Woodland Period of southern New England prehistory is marked by an increase in the number of ceramic types and forms utilized (Lizee 1994a), as well as an increase in the amount of exotic lithic raw material used in stone tool manufacture (McBride 1984). In Connecticut, the Middle Woodland Period is represented archeologically by the use of narrow stemmed and Jack's Reef projectile points; increased amounts of exotic raw materials in recovered lithic assemblages, including chert, argillite, jasper, and hornfels; and conoidal ceramic vessels decorated with dentate stamping. Ceramic types indicative of the Middle Woodland period include Linear Dentate, Rocker Dentate, Windsor Cord Marked, Windsor Brushed, Windsor Plain, and Hollister Stamped (Lizee 1994a: 200). In terms of settlement patterns, the Middle Woodland period is characterized by the occupation of village sites by large co-residential groups. These sites were the principal place of occupation, and they were positioned in close proximity to major river valleys, tidal marshes, estuaries, and the nearby coastline, all of which would have supplied an abundance of plant and animal resources (McBride 1984:309). In addition to villages, numerous temporary and task-specific sites were utilized in the surrounding upland areas, as well as in closer ecozones such as wetlands, estuaries, and floodplains.

The Late Woodland period in southern New England dates from ca., 1,200 to 350 B.P., and it is characterized by the earliest evidence for the use of maize in the lower Connecticut River Valley (Bendremer 1993; Bendremer and Dewar 1993; Bendremer et al. 1991; George 1997; McBride 1984); an increase in the frequency of exchange of non-local lithics (Feder 1984; George and Tryon 1996; McBride 1984; Lavin 1984); increased variability in ceramic form, function, surface treatment, and decoration (Lavin 1980, 1986, 1987; Lizee 1994a, 1994b); and a continuation of a trend towards larger, more permanent settlements in riverine, estuarine, and coastal ecozones (Dincauze 1973, 1974; McBride 1984; Snow 1980). Late Woodland lithic assemblages typically contain up to 60 to 70 percent exotic lithics. Finished stone tools include Levanna and Madison projectile points; drills; side-, end-, and thumbnail scrapers; mortars and pestles; nutting stones; netsinkers; and celts, adzes, axes, and digging tools (McBride 1984; Snow 1980). In addition, ceramic assemblages recovered from Late Woodland sites include Windsor Fabric Impressed, Windsor Brushed, Windsor Cord Marked, Windsor Plain, Clearview Stamped, Sebonac Stamped, Selden Island, Hollister Plain, Hollister Stamped, and Shantok Cove Incised types (Lavin 1980; Lizee 1994a; Pope 1953; Rouse 1947; Salwen and Ottesen 1972; Smith 1947).
Finally, McBride (1984:323-329) characterized Late Woodland settlement patterns as more nucleated than the preceding Middle Woodland ones, with fewer, larger sites situated in estuarine and riverine

ecozones. Both river confluences and coastal zones were favored areas for the establishment of large village sites that contain numerous hearths, storage pits, refuse pits, ceramic production areas, house floors, and human and dog burials (Lavin 1988b; McBride 1984). McBride (1984:326) has argued that these sites certainly reflect multi-season use, and were perhaps occupied on a year-round basis (see also Bellantoni 1987). In addition to large village sites, McBride (1984:326) identified numerous temporary and task-specific sites in the uplands of the lower Connecticut River Valley and along the coastline. These sites likely were employed for the collection of resources such as plant, animal, and lithic raw materials. These sites tend to be very small, lack internal organizational structure, and usually contain a limited artifact assemblage and few cultural features, suggesting that they were occupied from only a few hours to perhaps overnight. Temporary camps, on the other hand reflect a longer stay than task-specific camps, perhaps on the order of a few days to a week, and they contain a more diverse artifact assemblage indicative of more on-site activities, as well as more features (McBride 1984:328-329). In sum, settlement patterns of the Late Woodland period are characterized by "1) aggregation in coastal/riverine areas; 2) increasing sedentism, and; 3) use of upland areas by small task groups of individuals organized for specific tasks" (McBride 1984:326).

In sum, the prehistory of Connecticut spans from ca., 12,000 to 350 B.P., and it is characterized by numerous changes in tool types, subsistence pattern, and land use strategies. For the majority of the prehistoric era, local Native American groups practiced a subsistence pattern based on a mixed economy of hunting and gathering wild plant and animal resources. It is not until the Late Woodland period that incontrovertible evidence for the use of maize horticulture as an important subsistence pursuit is available. Further, settlement patterns throughout the prehistoric era shifted from seasonal occupations of small co-residential groups to large aggregations of people in riverine, estuarine, and coastal ecozones. In terms of the region containing the proposed project parcel, a variety of prehistoric site types may be expected. These range from seasonal camps utilized by Archaic populations to temporary and task-specific sites of the Woodland era.

4.3 History of the Proposed Project Region

The Area of Potential Effect is located in the northwestern corner of the Town of New Milford, in an area historically known as the village of Gaylordsville or Merwinsville. Originally known as Weantenock (with various spellings), the area appears to have been purchased from the local Indians twice. The first purchase was in 1670, when, with the legislature's approval, three individuals bought an area that is said to have contained 26,000 acres of land on both sides of the Housatonic River (Orcutt 1882). The three purchasers were given the right to organize a settlement there, but the legislature also provided that "if the place be not planted in fower [four] years it shall return to the Court's dispose againe" (Connecticut Public Records, Vol. 1, Pg. 128). Apparently nothing was done, because in 1702 the legislature gave the proprietors of the coastal town of Milford the right to purchase lands for a new town in the same area. The deed itself, dated February 8, 1703, refers to a "draught" or map and describes a piece of land bounded on the east by Woodbury, on the south by Danbury, on the west by "the mountain" and on the north by a line drawn from a brook at the northwest corner eastward to an imaginary line extending from the Woodbury line. This northern line was subsequently a source of conflict between New Milford and the later-established town of Kent. The 1703 deed also reserved the Indians' planting field to themselves, but in 1705 one John Mitchell of Woodbury secured a purchase of this area, which he transferred to the town's inhabitants in 1714 (Orcutt 1882). Notwithstanding these sales, and as was not uncommon at a time when very few white colonists had moved into the area, most of the Indians remained in the vicinity for some time. In particular, they had a village near the falls in the Housatonic, a short distance south of the whites' new village; but in 1736 the majority moved northward, outside the bounds of New Milford (De Forest 1852).

In the meantime, the 109 proprietors of the new town began the settlement process, with house lots being laid out in the south-central part of town where the present town center is still located. The founder of

Gaylordsville, Ensign William Gaylord, first arrived in New Milford in 1712, the same year the town was formally incorporated. In 1725, he moved his family to his farm upriver at the place that would come to be named after him, where he accumulated hundreds of acres of land by the time of his death in 1753. His house was located on the west side of the Housatonic River, just below the present boundary with Sherman. The local cemetery, which can be seen in the 1859 historic map, was established in 1738 (Figure 7). Many of his sons and their descendants also settled in the area, as well as some other families, including that of Ezekiel Payne from 1755. In 1760, the New Milford Ecclesiastical Society established a separate school district covering the part of Gaylordsville that was on the west side of the river. In 1771, another district on the east side of the river was established and called Paynes district. Notwithstanding this, in 1794 the Ecclesiastical Society agreed that because a group of families from the area had been attending church in Paulings, New York, they could be excused from paying their church taxes. Peter Gaylord established a store on the east side of the river near the bridge, which continued under a succession of owners as late as 1882. A second store was located below it somewhat later. In 1827, Sylvanus Merwin built a store west of the river, but in 1843 he moved across the river to the railroad station, opening a hotel and restaurant, both very successful because he arranged with the railroad company for the trains to stop there. The restaurant operated from 1843 to 1877, and the hotel was still open in 1882 (Orcutt 1882). Town residents founded a library very early, in 1796. The First National Bank of New Milford was established in 1852 and the New Milford Savings Bank in 1858. A newspaper, *The Housatonic Ray*, was established in New Milford in 1872 and continued in publication for some time, in company with *The New Milford Gazette*, established 1877 (J.W. Lewis & Co. 1881).

The town's Congregational church, an essential feature of every colonial Connecticut town, was formally organized in 1716, but no meetinghouse was built until 1720. Diversity in religious observance began to appear after 1800. A Methodist Episcopal church was organized at the village of Lanesville in 1822, and another in 1833 in New Milford village; church buildings were constructed in 1826 at Northville, in 1828 at Laneville, and in 1850 at New Milford. Gaylordsville had its own Methodist Episcopal Church also, which was organized in 1824 and built a church building in 1826. Baptists congregations appeared at Northville in 1814, and in Gaylordsville about 1830. Quakers organized in 1831 and built a meetinghouse in 1842, though it is not clear where in town it was (J.W. Lewis & Co. 1881).

The changing name of the village appears to be related to the changes in the name of the post office located there. Peter Gaylord was the first postmaster, between 1826 and 1838, and during this time the office was probably called Gaylordsville. Sylvanus Merwin was appointed postmaster in 1838, and when he was reappointed in 1840 the office was renamed Ousatonic. Then Peter Gaylord became postmaster again in 1841, and the name changed to Gaylord's Bridge. Merwin was then postmaster between 1853 and 1861, during which time the post office was called Merwinsville (Orcutt 1882). This is the name that appears on the historic map of 1859 (Figure 8). Then in 1861 John Gaylord became postmaster, the name was changed to Gaylordsville, and though Merwin served as postmaster between 1867 and 1869, the name was not changed again; in 1869, the office went to Alexander H. Barlow, who had taken over one of the local stores (Orcutt 1882). In the 1874 historic map, the village is labeled Gaylordsville, although Merwin's name was attached to the railroad station (Figure 9). In more modern maps, this name competition has played out in various ways. In a 1931 map, the east side of the river is labeled Merwinsville, and the west side Gaylordsville (Figure 10). In a 1950 USGS topographic map, the same compromise was reached, but the railroad station on the east side of the river was nonetheless called the Gaylordsville Station (Figure 11). The most recent USGS topographic maps also retain this mix of names. Notwithstanding these formal designations, however, local usage apparently has the name Gaylordsville applied to both sides of the river (Gaylordsville Historical Society 2006).

New Milford was a very large town in area, and remains one despite contributing part of the territory of Washington in 1779 and all that of Bridgewater in 1856 (Barry 1985). In addition, its physical characteristics were well adapted to both farming and industry, with several large streams in addition to

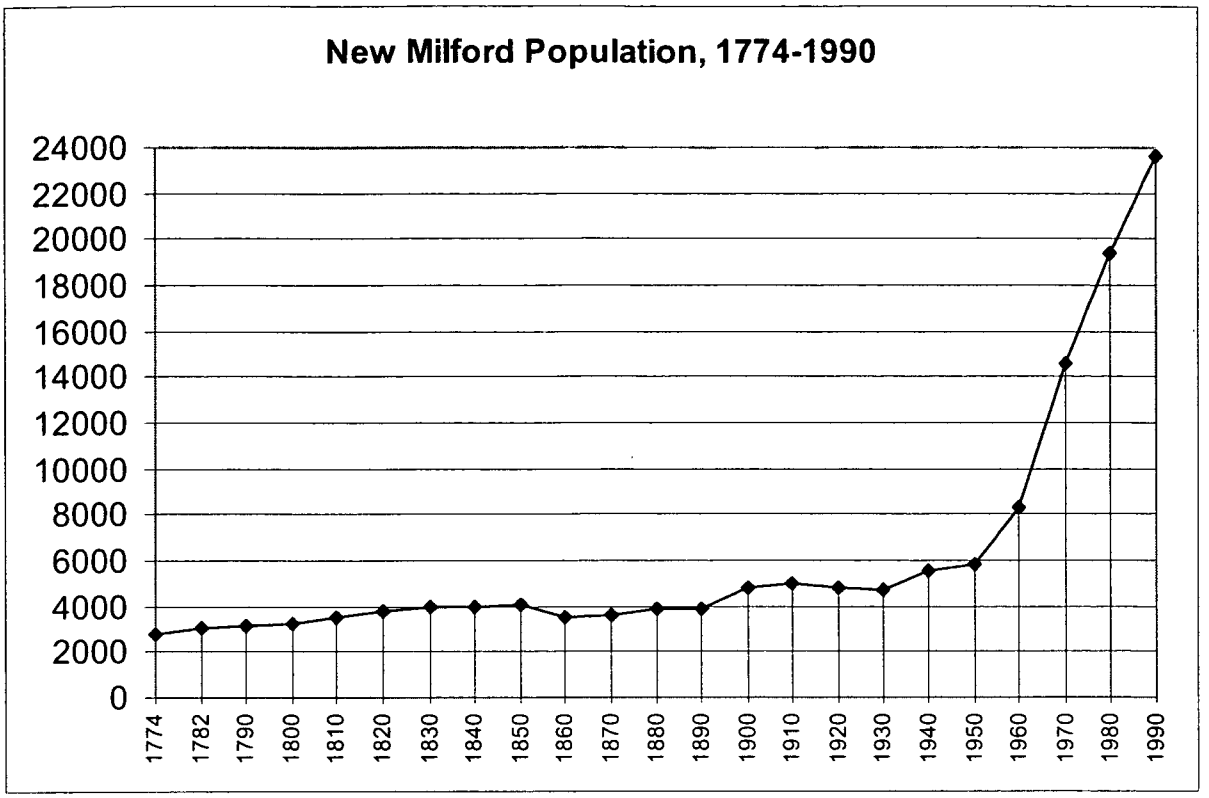
the Housatonic River, and substantial meadows as well as much soil that was good for growing grain and was used for that purpose in its agricultural days. In 1836 the town also had a granite quarry, several marble quarries, and some hat manufacturing in the Bridgewater section (which was still part of the town); the village of New Milford had five stores and some 60 houses. The population was sufficient to support no fewer than nine houses of worship: "2 Congregational, 2 Episcopal, 2 Baptist, 2 Methodist, and 1 for Friends or Quakers" (Barber 1836, 474). As can be seen from the chart below, New Milford's population had passed 2,000 by 1774, and approached 4,000 by 1830, though it did not pass that number until 1850. Even the separation of Bridgewater only brought the population down to about 3,500, and it had recovered by 1880 (see chart at end of this section; CT-DEP 1996). During the nineteenth century, New Milford farmers added tobacco cultivation to their repertoire, the first efforts being started in 1852. Others followed, so that warehouses were built in town in 1868 and 1869, and in 1880 handled some five thousand cases of tobacco (J.W. Lewis & Co. 1881). This tobacco was "a tough, strong-textured, dark green shade of tobacco. It was used as the so-called 'binder,' in the manufacture of cigars" (Peck 1991:117). After 1910, tobacco growing increased substantially for a time, before falling off again. Gaylordsville had two warehouses, one owned by Martin J. Hungerford and the other by James F. Morrissey (Peck 1991).

New Milford was the location of numerous business activities that provided employment for its large population. In the earliest days, grist mills, saw mills, and fulling mills provided essential services to the farmers. Streams also provided power for an assortment of activities ranging from cider mills to iron foundries, in addition to resource extraction activities such as lime kilns and charcoal-making. Between 1866 and 1893, there were at least two button manufactories in town, and in 1885 a hat shop opened in New Milford village. Other activities included paper mills, pottery, and plants making products such as paint and scouring powder; a small local gas company was active, a tomato-canning plant, and several creameries. Former town clerk Howard Peck's research indicated that in 1853, the town had four blacksmiths, three wagon shops, one wool factory, seven hat shops, two brick plants, two bark mills and tanneries, two lime kilns, one marble quarry, two paper mills, two shoe factories, two iron foundries and machine shops, one edge tool factory, and four cider brandy distilleries, in addition to saw mills and grist mills (Peck 1991). It appears that none of the industries in the town dominated the town's economy, and instead a diverse array of economic activities were founded and closed at various times over the years.

Some of this activity can be seen near the Area of Potential Effect in the 1859 map of the Gaylordsville section of New Milford, such as a furnace, a tannery, and the edge tool factory, as well as a store and Sylvanus Merwin's hotel (incorrectly labeled "Mervin" in the map). There were also the Methodist church, an educational "Academy," and to the south something labeled "Institute." The map suggests that at the time, the significant buildings near the Area of Potential Effect were houses across the road from it, with one tucked into the angle of two roads to the south. The nearest is labeled "WKF," with A. H. Canfield and Estate of Mervin the next closest; the grouping was flanked at either end by W. N. Canfield and B. E. Monroe (Figure 7). According to the 1850 census, this houses along this section of road was occupied by the families of William N. Canfield, merchant; Amos N. Benedict, Baptist Minister; John Gaylord, merchant; Peter Gaylord, Farmer, and William Evans, Tailor; Alanson N. Canfield, farmer; Ephriam Hubbell, brick mason; and Bennitt E. Monroe, joiner and carpenter (U.S. Census, 1850, Series: M432 Roll: 43 Page: 141). Alanson N. Canfield, though listed as a farmer here, also worked as a lumber dealer starting in 1856, and later moved to New Milford Village (Orcutt 1882). Not all of these individuals owned real estate according to the census; only Gaylord, Evans, Alanson Canfield, and Monroe. That might have changed between 1850 and the map year of 1859, but assuming the farmers lived near their farms, the Area of Potential Effect may have belonged to either Gaylord or Alanson Canfield. The 1860 census, though closer in time to the map's publication date, does not yield a grouping of names that is similar enough to those on the map.

In the 1874 map, the Gaylordsville area is depicted as much more crowded, but unfortunately the area around the Area of Potential Effect does not have as many labels as in the previous map. There is a W. Evans, a Post Office and Store, and a P. Gaylord, which is not sufficient information to establish the location in the census pages. Labeled businesses in and around the village are limited to a tannery and several stores. There are also several schools and a relocated M. E. Church (Figure 8; Beers 1874). A 1931 map of parts of Connecticut, including the New Milford, does not include any property owners in the vicinity of the Area of Potential Effect, although it does provide them elsewhere. The 1934 aerial photograph, however, makes it clear that the Area of Potential Effect was being used for agricultural purposes at that time, as was much of the area around it, though there may also have been a house or other structure close to the road (Figure 9). The 1952 aerial photograph also indicates that the Area of Potential Effect was a cleared field, though at that time much of the surrounding area had become reforested (Figure 10). In 1970, little had changed in the area except for the construction of a large building adjacent to the Area of Potential Effect; the rest of the area remained a thinly settled mix of agricultural fields and forest (Figure 11). The 1986 photograph depicts even more reforestation, except near the Area of Potential Effect, and possibly more residential development (Figure 12). By 2004, the area adjacent to the Area of Potential Effect had been further development, probably for commercial purposes, and a scattering of new houses on large lots can be seen in the vicinity (Figure 13). Gaylordsville, despite the presence of the railroad and the north-south road that followed the river from an early date, has remained a relatively quiet and out-of-the-way section of New Milford.

The town as a whole saw a slight decline in population between 1910 and 1930, but after 1930 it began to rise again (see chart at the end of this section; CT-DEP 1996). In 1932, the town's economic activities were described as "agriculture (tobacco a specialty), tobacco packing, manufacturing of wearing apparel, upholstery, lounges and chairs, lime burning, gold silver, and plated ware and bleaching and dyeing of fabrics" (Connecticut 1932, 292). After 1950, when widespread automobile ownership and suburbanization increased populations in most Connecticut towns, New Milford was not an exception; between 1950 and 1990 the population 5,799 to 23,629 (CT-DEP 1996). As of 2005, the population was 29,090, and is expected to continue rising at the rate of 1.2 percent for the next five years. In that year, 17.9 percent of jobs in town were in the manufacturing sector, 1.5 percent in agriculture, 8.1 percent in construction and mining, and the remaining 72.5 percent in various segments of the service sector. As of 2000, the vast majority of New Milford workers (5,236) lived in town, while an additional 3,121 commuted to Danbury (CERC 2006). The latter pattern indicates that the result of suburbanization in New Milford has been to allow businesses to flourish there, rather than transforming the town into a bedroom community. The continuing rise in population, however, may be related either to commuting patterns or to residence patterns; in either case, it suggests that further residential development in town can be expected in the future.



4.4 Previous Investigations

A review of data currently on file at the Connecticut State Historic Preservation Office, as well as the electronic site files maintained by Heritage Consultants, LLC, revealed that no formally submitted archaeological surveys have taken place within 0.8 km (0.5 mi) of the Areas of Potential Effect. However, this literature search did reveal that a total of six previously recorded archeological sites (96-130, 96-131, 96-132, 127-1.1, 127-1.2, 96-30) are situated within 0.8 km (0.5 mi) of the currently proposed project parcel (Figure 14). These sites are discussed briefly below.

Site 96-130, also known as the Gaylordsville Monument Site, was recorded by staff members of the American Indian Archaeological Institute (Figure 14). This site is located within UTM zone 18 at coordinates 626280E, 4611500N. The site area is represented by a twentieth century memorial monument associated with South Kent Road. The size of the monument has not been recorded on the submitted site form, and Site 96-130 was not assessed applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No recommendations concerning archaeological testing of the site area or additional historical documentation were made by the staff members of the American Indian Archaeological Institute on the submitted site form.

Site 96-131, also referred to as the Jacot Dairy House, was identified within UTM zone 18 at coordinates 626940E, 4611440N. This site was described on the submitted site form as a dairy house dating from the nineteenth century (Figure 14). This site was identified and recorded by field crew associated with the American Indian Archaeological Institute, and according to the submitted site form, Site 96-131 served a rural and industrial purpose. The size of the site area was not recorded on the site form, nor were the testing methods applied to locate the site. Site 96-131 also was not assessed applying the National

Register of Historic Places criteria for evaluation. No recommendations concerning archaeological testing of Site 96-131 were noted on the submitted site form.

Site 96-132, also known as the Jacot Pond, was described as an ice pond dating from the nineteenth and twentieth centuries. Located within UTM zone 18 at coordinates 625940E, 4611460N, the Jacot Ice Pond was noted by staff members of the American Indian Archaeological Institute as associated with the Jacot Dairy House. Site 96-132 was described as not currently being in use, and it was not assessed applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No recommendations were made concerning additional archaeological recordation of the site area on the submitted site form.

Site 127-1.1, also known as the Jacot Pasture I Site, was described as being a camp with an occupation spanning from the Middle/Late Archaic to Late Woodland Period of Connecticut prehistory (Figure 14). The American Indian Archaeological Institute field crew recorded sites 127-1.1 and 127-1.2 (discussed below). According to the submitted site form, Site 127-1.1 is situated within UTM zone 18 at coordinates 626000E, 4611660N. No additional information concerning the site was noted on the submitted site form. Site 127-1.1 was not assessed applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]); no recommendations concerning additional testing of the site area were made on the submitted site form.

Site 127-1.2, which is also named the Jacot Pasture I Site, is situated within UTM zone 18 at coordinates 626000E, 4611600N. This occupation was described as dating from the eighteenth and nineteenth centuries, though no particular site function was recorded on the official site form (Figure 14). The approximate area of the site has not been recorded, and Site 127-1.2 was not assessed applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional recommendations concerning testing of the site area were made on the submitted site form.

Finally, Site 96-30, also referred to as the Morningside Site, is described as a prehistoric camp of an unknown cultural affiliation. The location of the camp is situated within UTM zone 18, at coordinates 626440E, 4611900N. The specifics of the site have not been recorded on the site form. However, the site form does mention that an artifact typology and nomenclature book (Ritchie 1971) was used for comparative purposes. Site 96-30 was not assessed applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]); no recommendations concerning additional testing of the site area were made on the submitted site form.

5.0 Field Methods

Following the completion of the background research, the Areas of Potential Effect were subjected to a Phase I cultural resources reconnaissance survey utilizing pedestrian survey, subsurface testing, mapping, and photo-documentation. The sampling strategy was designed to provide thorough coverage of all portions of the Areas of Potential Effect, including the proposed lease area and associated access road. The pedestrian survey portion of this investigation included visual reconnaissance of all areas located within and immediately adjacent to the Areas of Potential Effect, as well as photo-documentation of the proposed project area and its immediate surroundings. The subsurface testing portion of this investigation involved the excavation of shovel tests throughout the proposed lease area. Shovel tests excavated in these areas were positioned in the four corners, as well as at the proposed monopole location. Shovel testing was also conducted along the route of the proposed access road at 15 m (49.2 ft) intervals.

During survey, each shovel test measured 50 cm (19.7 in) in diameter and each was excavated to a depth of 50 cmbs (19.7 inbs) or until sterile subsoil, glacial till, or immovable objects (e.g., boulders) were encountered. Each shovel test was excavated in 10 cm (3.9 in) arbitrary levels within natural strata, and the fill from each level was screened separately. All shovel test fill was screened through 0.635 cm (0.25 in) hardware cloth. Soil characteristics were recorded in the field using Munsell Soil Color Charts and standard

soils nomenclature. Finally, each shovel test was backfilled immediately upon completion of the archeological recordation process.

6.0 Curation

Following the completion and acceptance of the Final Report of Investigations, all project drawings, maps, photographs, and field notes will be curated with Dr. Nicholas Bellantoni, Office of Connecticut State Archaeology, Box U-1023, University of Connecticut, Storrs, Connecticut 06269.

7.0 Results of the Investigation and Management Recommendations

During survey, 7 of 8 (87.5 percent) planned shovel tests were excavated successfully throughout the Area of Potential Effect associated with the proposed lease area (Figure 2). A typical shovel test profile contained two strata and it extended to a depth of 50 cmbs (19.7 inbs). Stratum I, which extended from 0 to 30 cmbs (0 to 11.8 inbs), consisted of a layer of dark brown (10YR 3/3) loamy sand. Stratum II reached from 30 to 50 cmbs (11.8 to 19.7 inbs) and it was characterized as a deposit of yellowish brown (10YR 4/6) loamy sand mixed with gravel. No evidence of cultural features was identified within the excavated shovel tests, and no cultural material, either prehistoric or historic in origin, was recovered. Since no cultural material was identified during survey and no impacts to cultural resources are anticipated as a result of the planned construction, no additional fieldwork is recommended.

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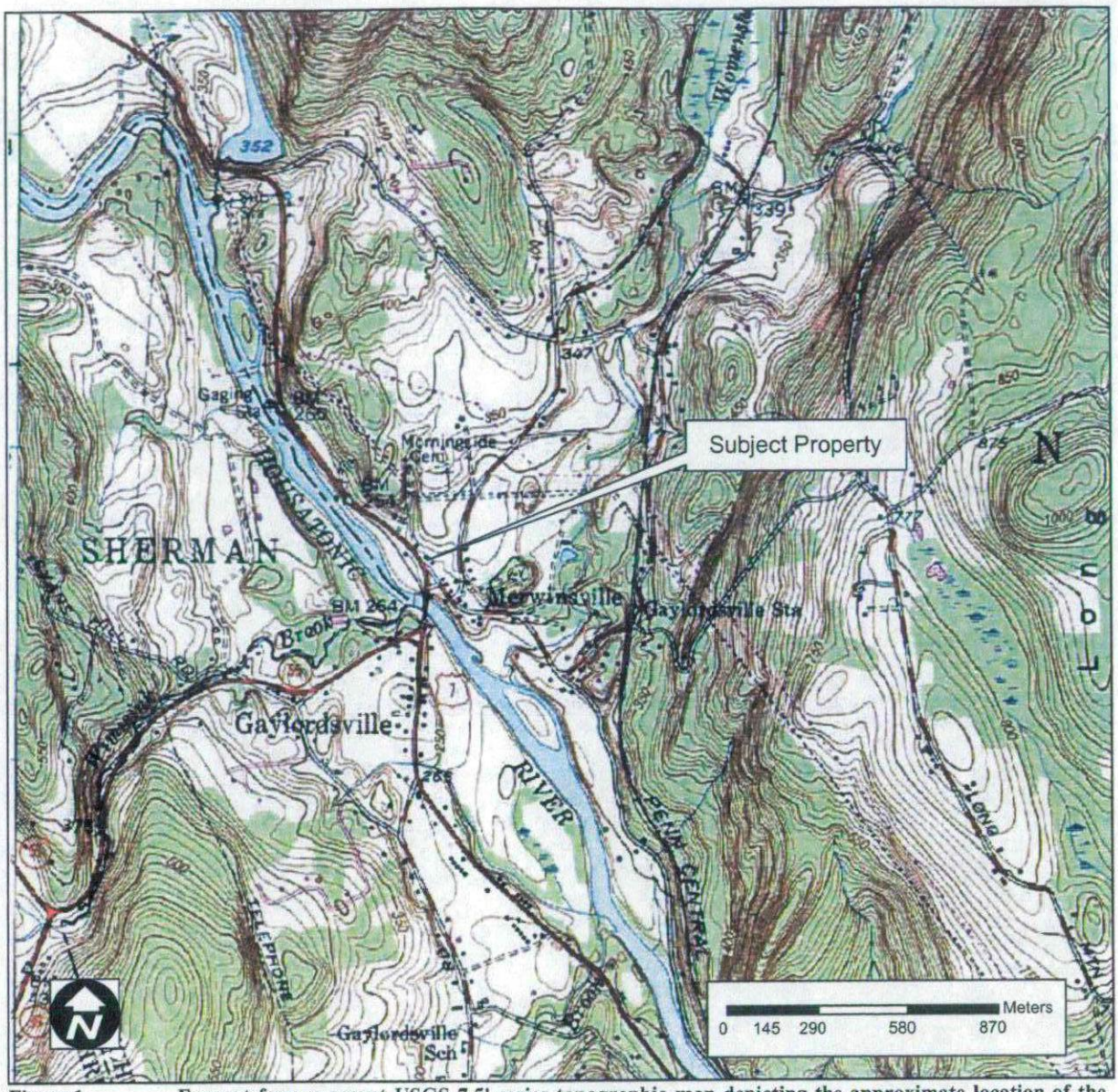


Figure 1. **Excerpt from a recent USGS 7.5' series topographic map depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

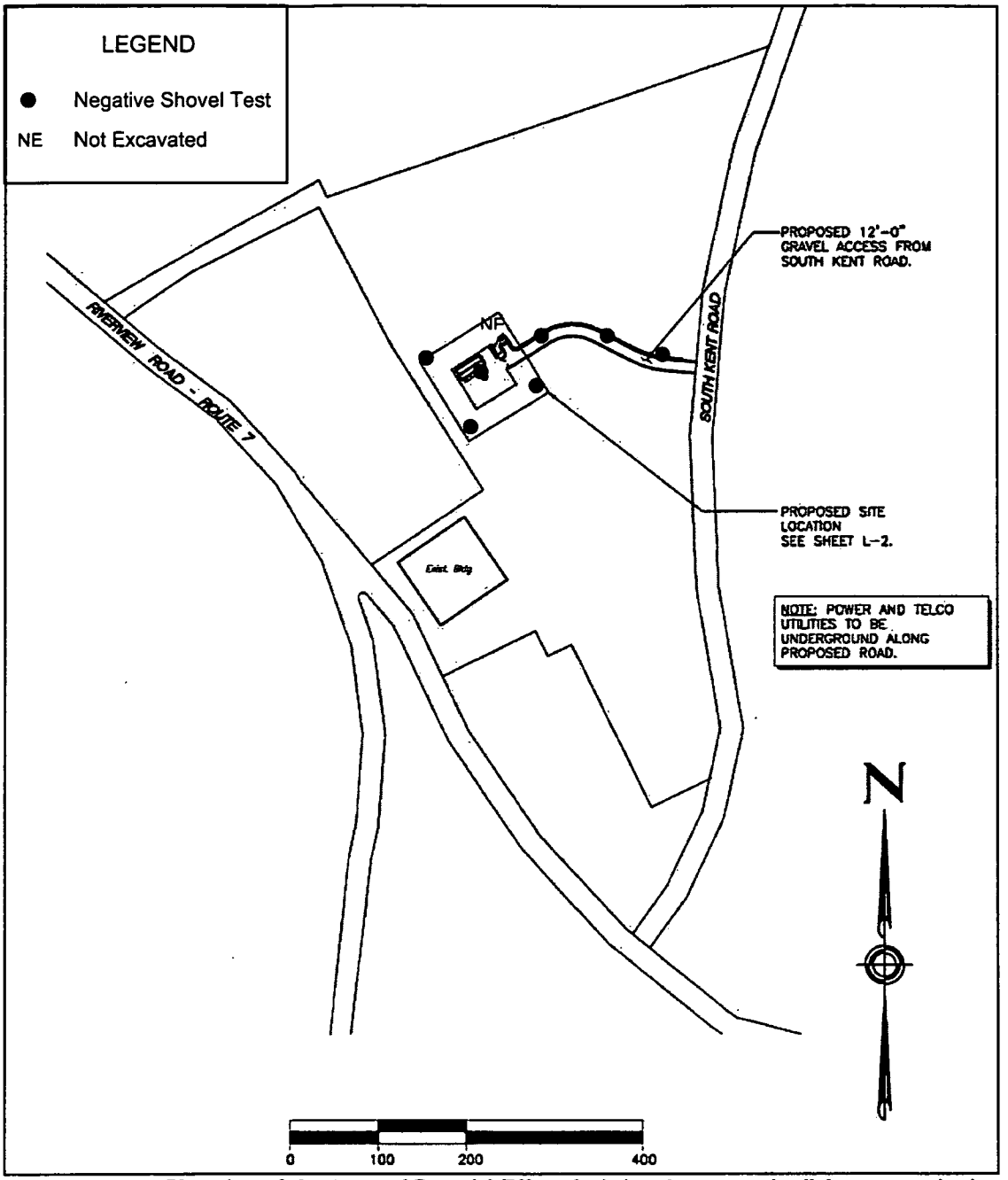


Figure 2. **Plan view of the Areas of Potential Effect, depicting the proposed cellular communication facility and the proposed access road.**

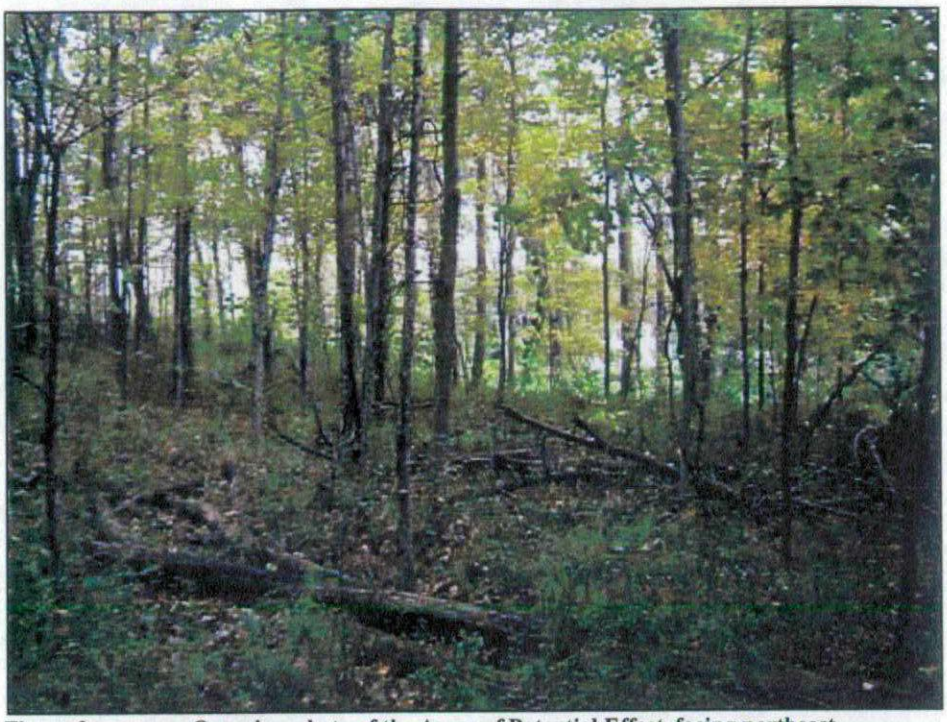


Figure 3. **Overview photo of the Areas of Potential Effect, facing northeast.**

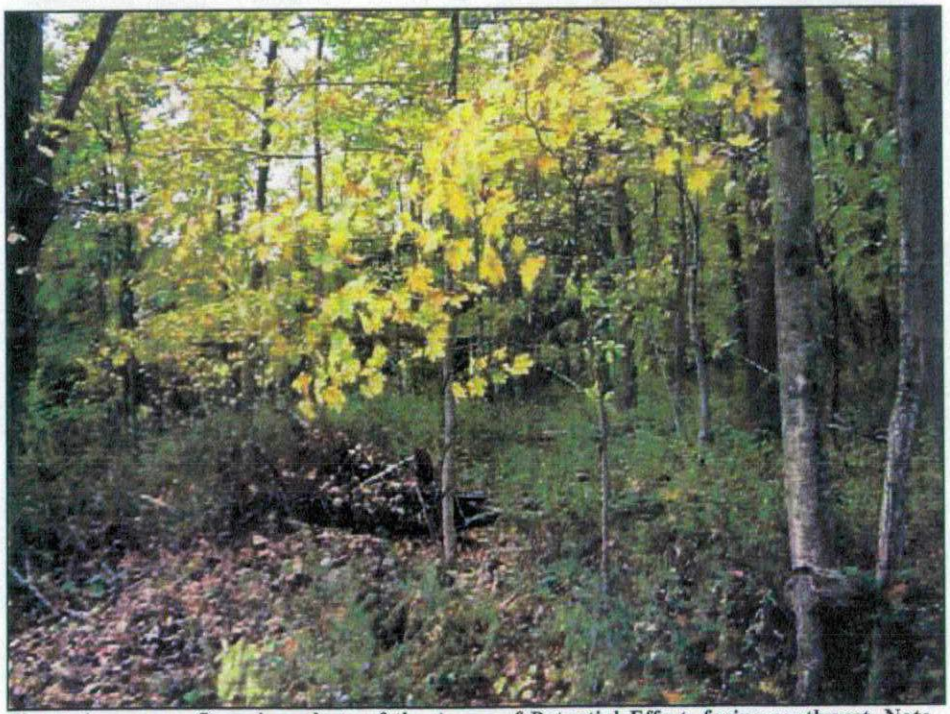


Figure 4. **Overview photo of the Areas of Potential Effect, facing southwest. Note the piles of deadfall.**

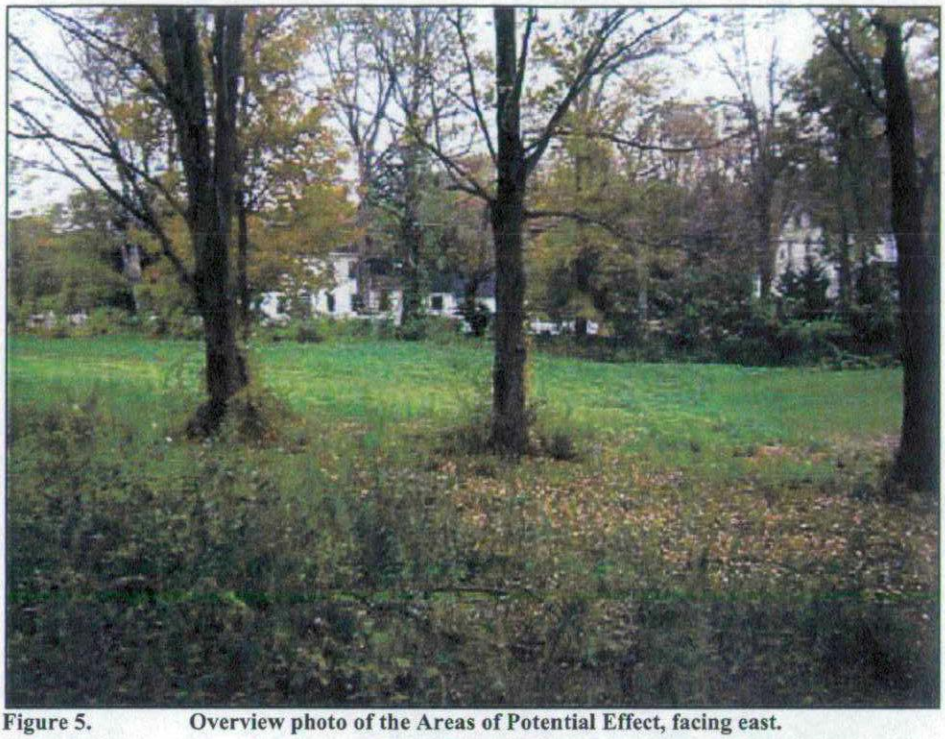


Figure 5. **Overview photo of the Areas of Potential Effect, facing east.**

Figure 6. **Overview photo of the Areas of Potential Effect, facing west.**

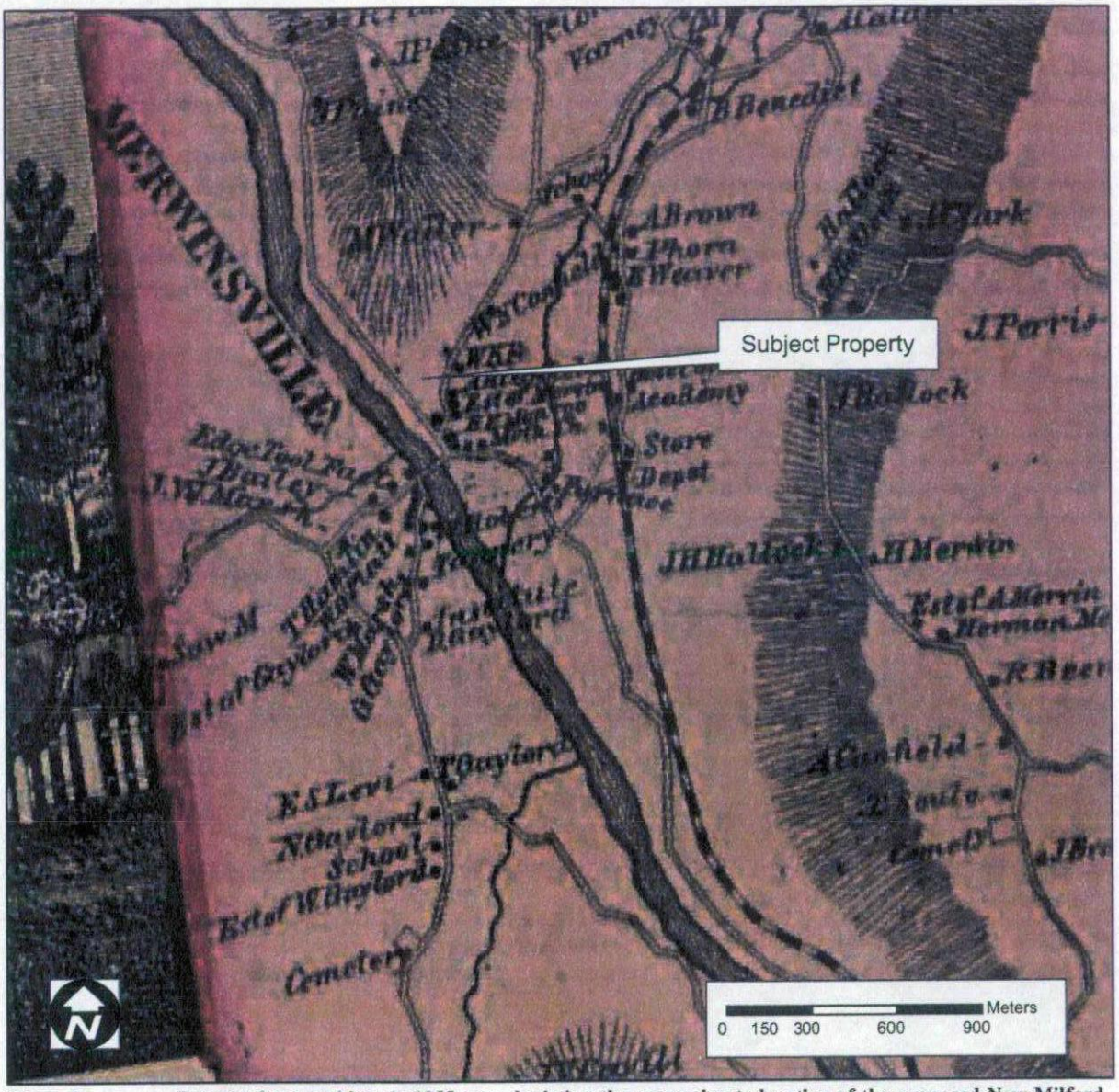


Figure 7. **Excerpt from an historic 1855 map depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

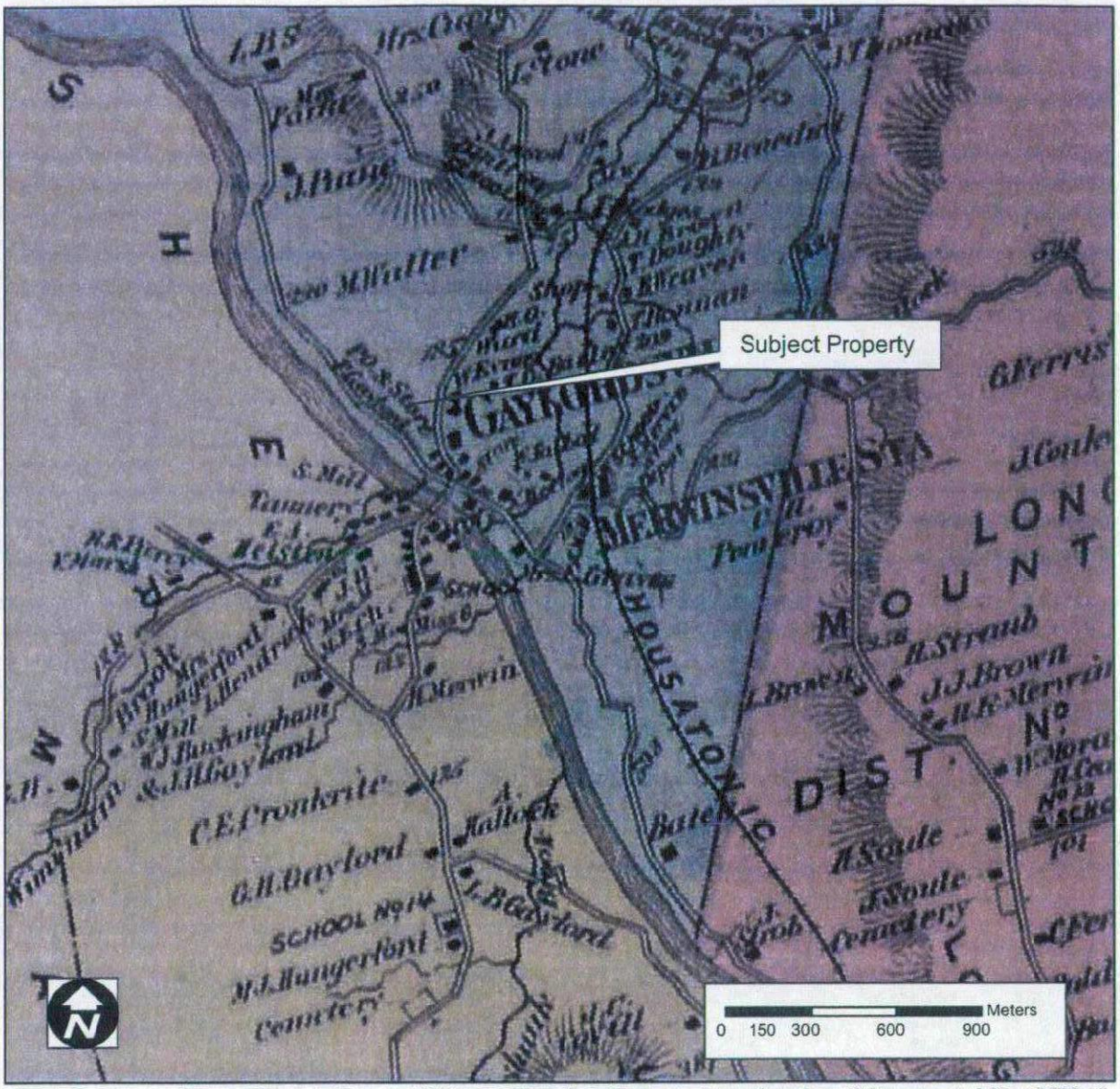


Figure 8. **Excerpt from an historic 1874 map depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

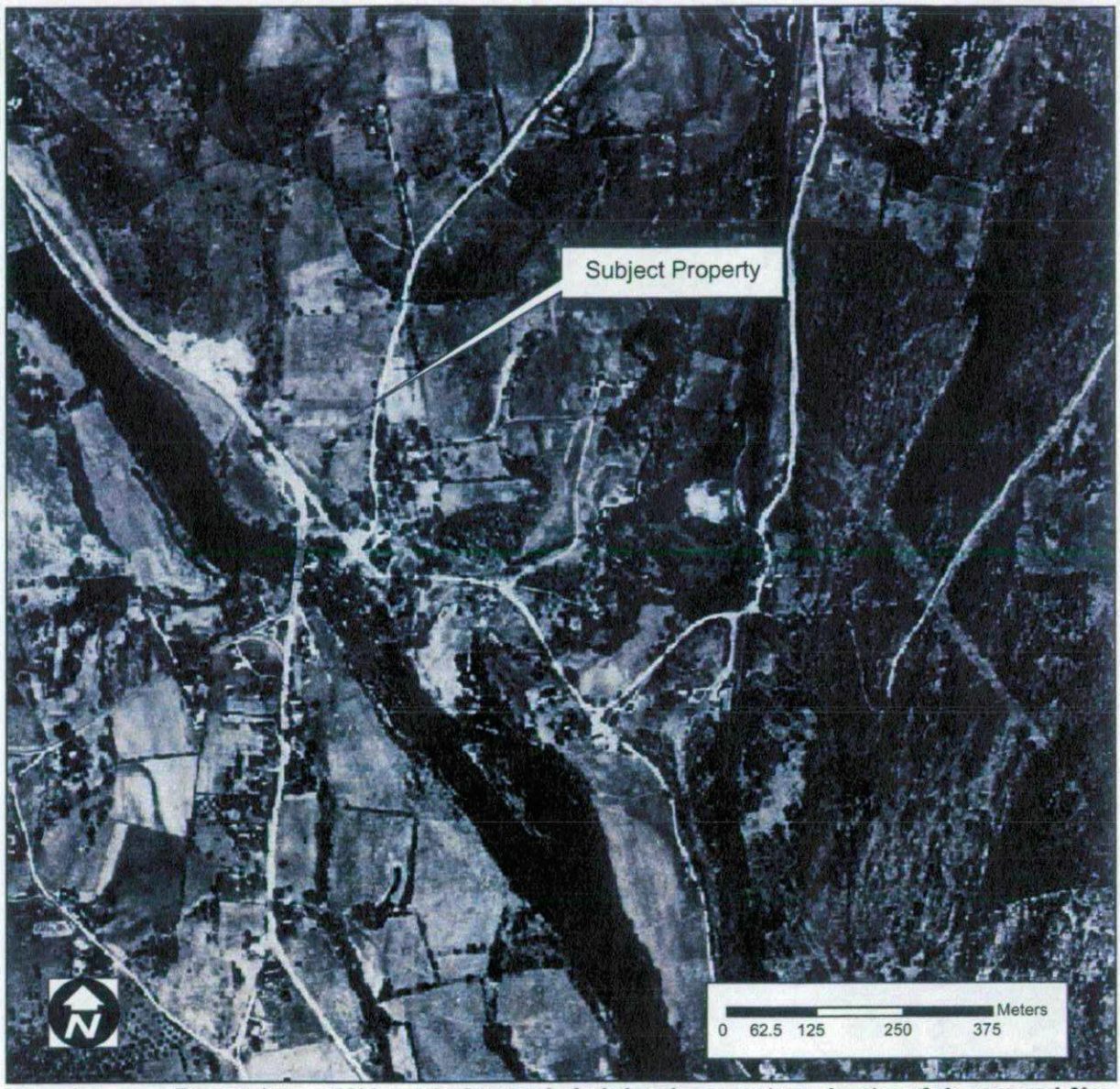


Figure 9. **Excerpt from a 1934 aerial photograph depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

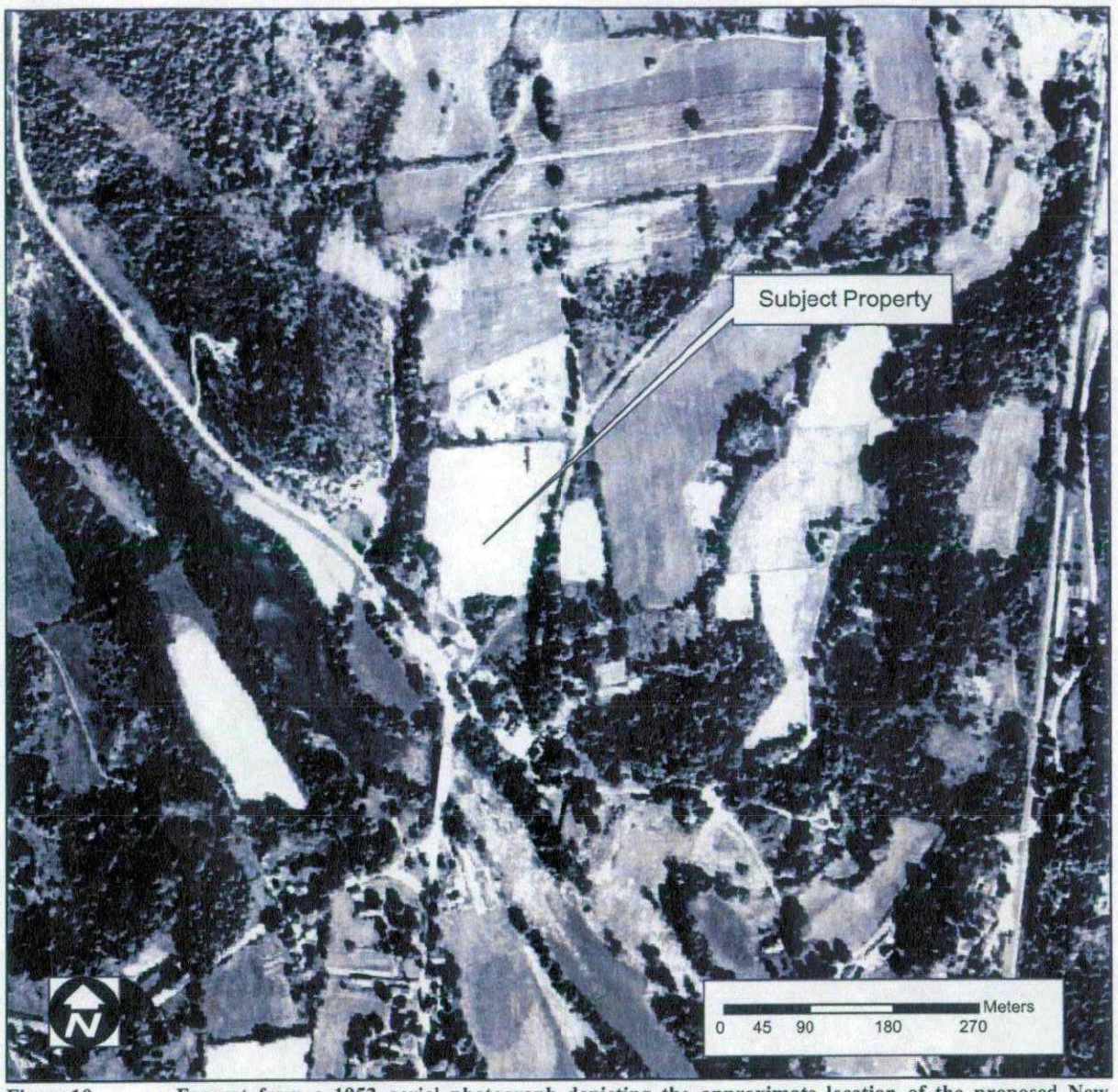


Figure 10. **Excerpt from a 1952 aerial photograph depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

Figure 11. **Excerpt from a 1970 aerial photograph depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

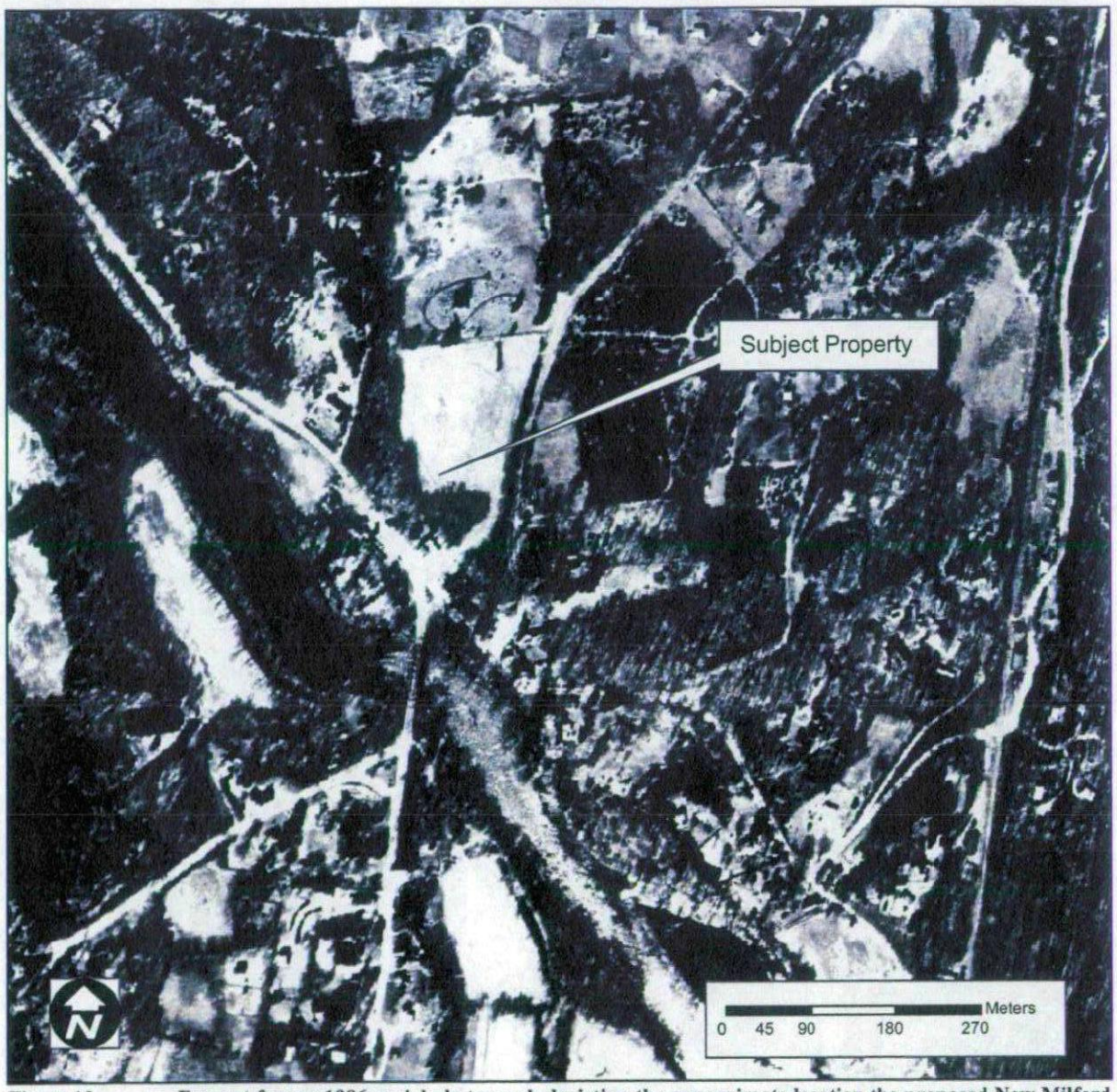


Figure 12. **Excerpt from a 1986 aerial photograph depicting the approximate location the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

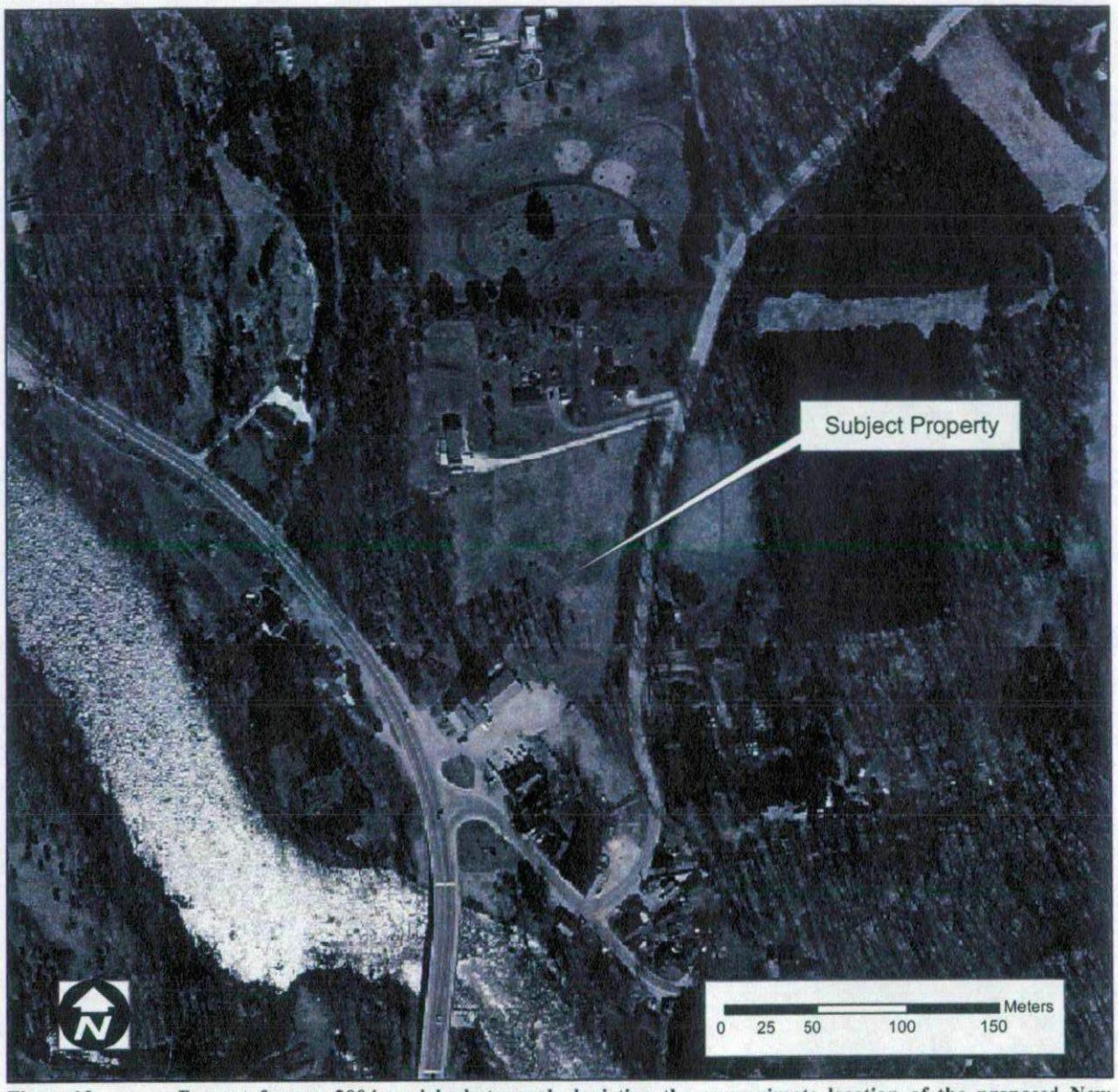


Figure 13. **Excerpt from a 2004 aerial photograph depicting the approximate location of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

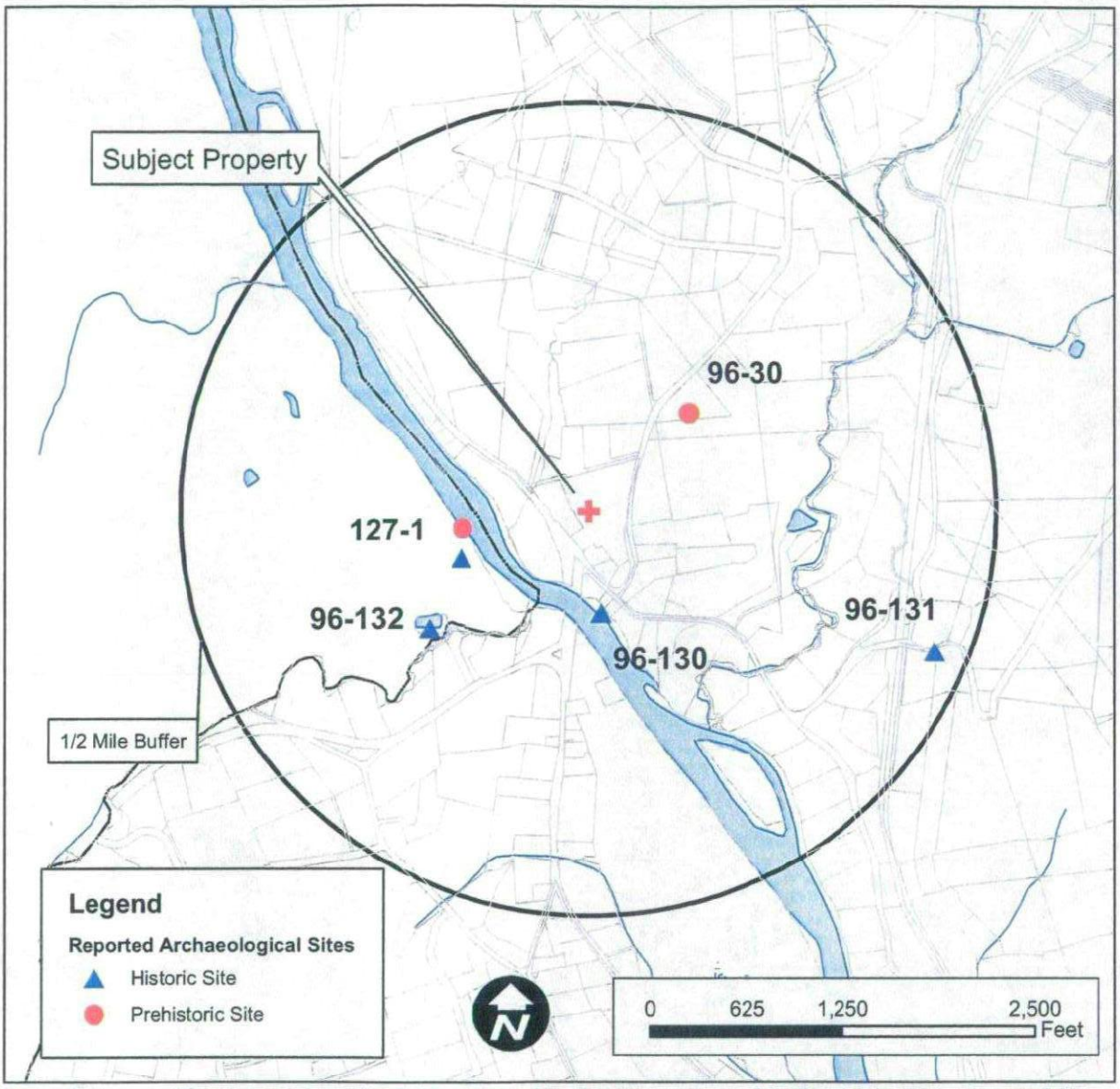


Figure 14. **Digital map of previously identified cultural resources situated in the vicinity of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.**

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

Attachment 10. Effects on Identified Properties

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

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

Historic Properties identified within the APE and the effect of the project on each property are outlined as follows.

Historic Property Name	Effect Determination	Reason for the Effect Determination
Merwinsville Hotel	No Effect	The tower will not be visible from the location of the Merwinsville Hotel due to separating distance and the heavily wooded nature of the area.

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

None performed to date.

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

No adverse effects are expected as a result of the proposed installation.

Attachment 11. Photographs

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

a. Photographs taken from the tower site showing views from the proposed location in all directions. The direction (*e.g.*, north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed tower.

b. Photographs of all listed and eligible properties within the Areas of Potential Effects.

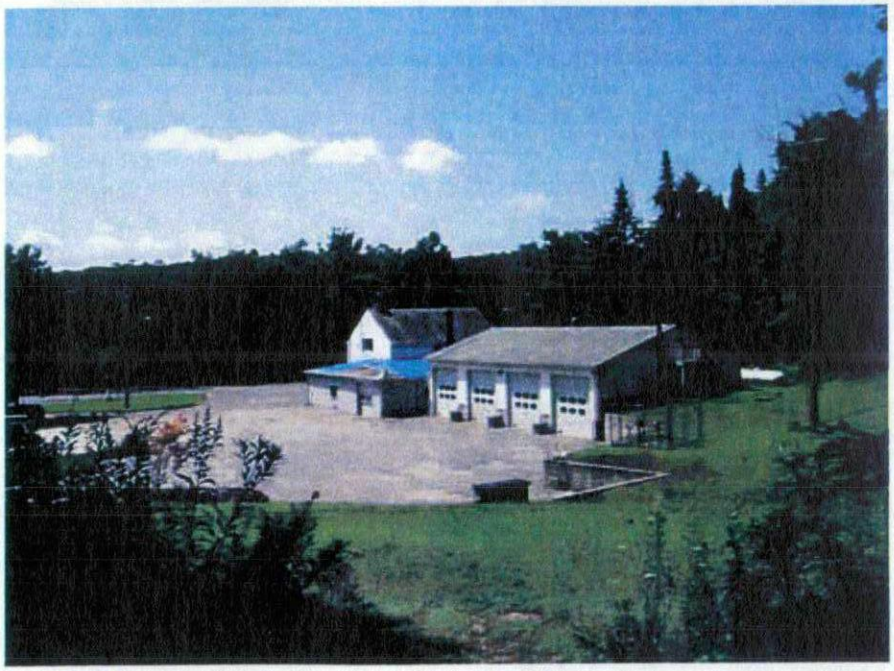
c. If any listed or eligible properties are visible from the proposed tower site, photographs looking at the tower site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included.

d. Aerial photos of the APE for visual effects, if available.

Please see the attached Photographs, which were taken by EBI Consulting staff on August 7, 2006, unless otherwise noted. A photograph location map is included in Attachment 12, Maps.

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

1. Existing fire station located at the Subject Property, reportedly constructed circa 1901.



2. View of the fire station building from the northeast. Note modern garage addition located to the rear of the original station building.

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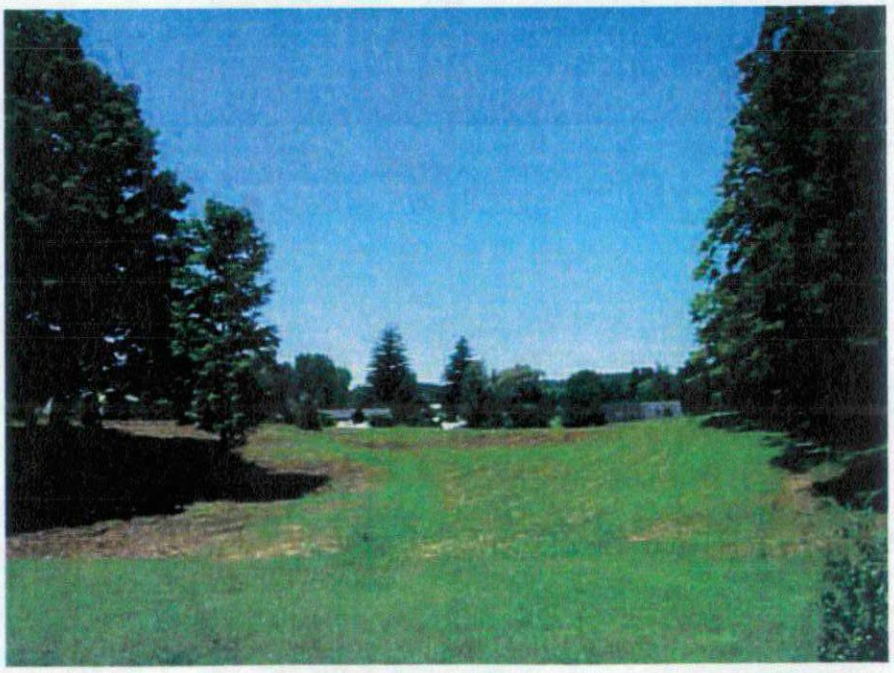
3060-1039
Estimated Time Per Response:
.5 to 10 hours

3. View of the proposed tower site located to the rear (northeast) of the existing buildings.



4. View north from the open area located adjacent to the proposed tower compound, facing a modern housing development.

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

5. Facing south from the Project Site area towards an adjacent restaurant.

6. View east from the Project Site area towards South Kent Road and an adjacent wooded area. The gravel access drive will extend through this location to South Kent Road.

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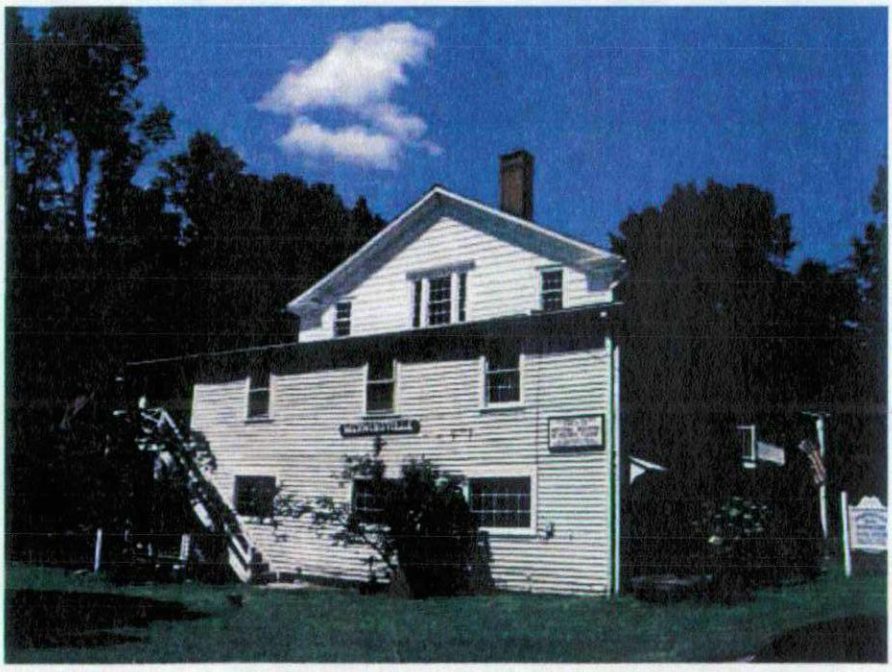
3060-1039
Estimated Time Per Response:
.5 to 10 hours

7. View west from the edge of the Project Site area facing the fire station. Note existing antenna tower.



8. View of the Merwinsville Hotel, located approximately 0.45 mile east/southeast of the Project Site.

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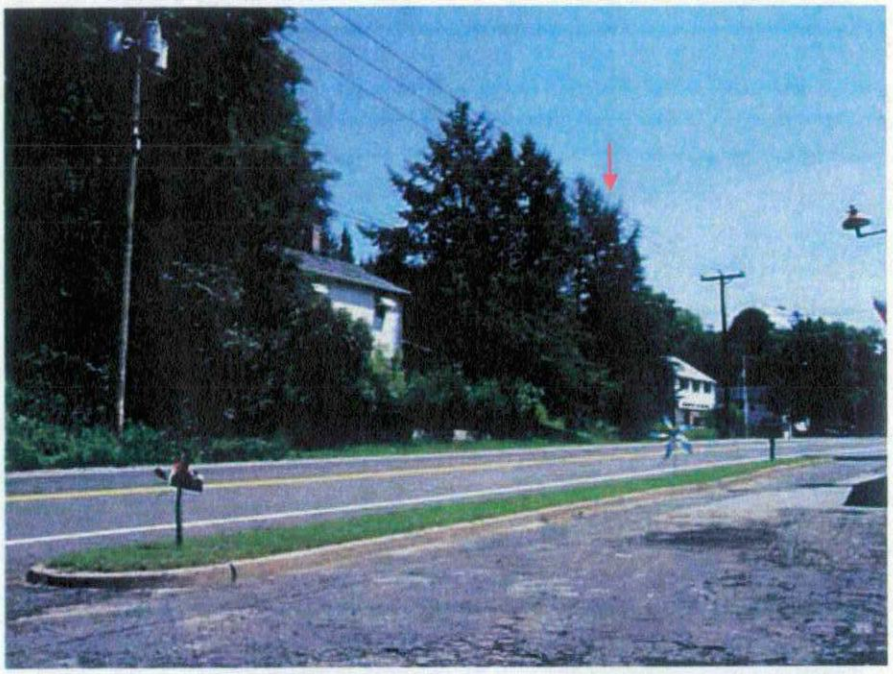
3060-1039
Estimated Time Per Response:
.5 to 10 hours

9. View towards the Subject Property from the Merwinsville Hotel, along Browns Forge Road. Due to existing vegetation the tower will not be visible from this location.

10. View of a property located to the northwest of the Subject Property along Route 7.

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



11. View of the Subject Property from Route 7 to the northwest. Visibility of the tower will be partially shielded by the existing trees.

12. Restaurant and house located adjacent to the Subject Property on the south.

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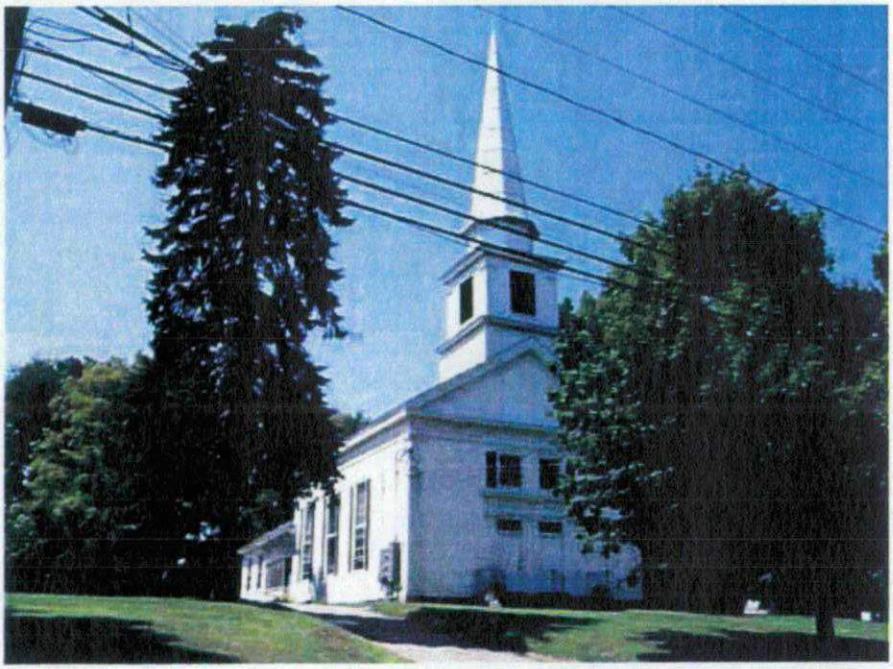
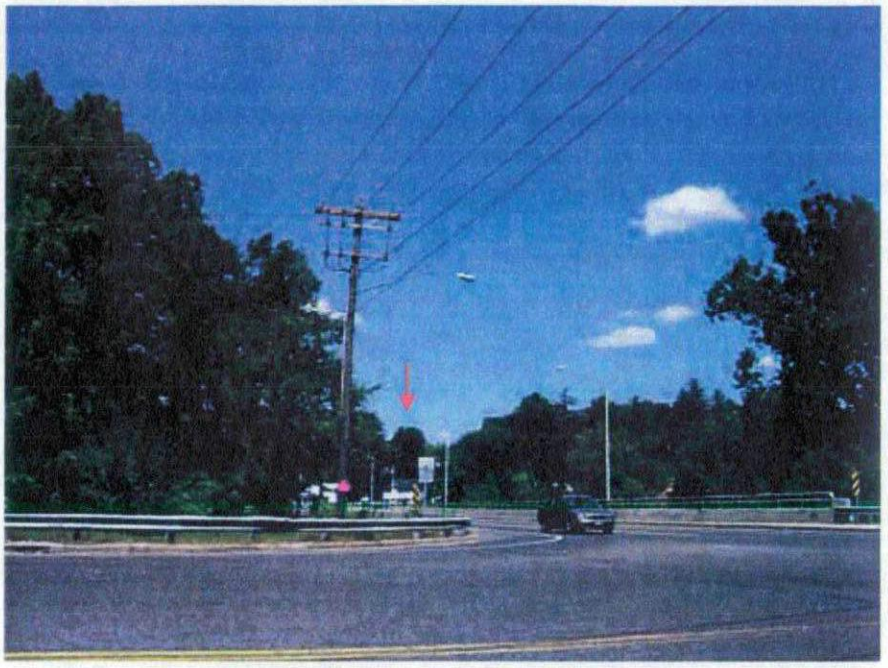
3060-1039
Estimated Time Per Response:
.5 to 10 hours

13. View facing towards the Subject Property from the cemetery located approx. 0.25 mile to the north.



14. New Milford United Methodist Church, located approx. 0.25 mile south of the Subject Property. This church currently supports telecommunications installations within the RF transparent steeple.

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



15. View of the Subject Property from the intersection of Route 7 and Route 55, approximately 0.25 mile to the south, near the location of the United Methodist Church.

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

Attachment 12. Maps

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

a. Identify the Areas of Potential Effects for both direct and visual effects. If a map is copied from the original, include a key with name of quad and date.

b. Show the location of the proposed tower site and any new access roads or other easements including excavations.

c. Show the locations of each property listed in Attachments 8 and 9.

d. Include keys for any symbols, colors, or other identifiers.

Attached maps include a Street Map and Topographic Map showing the location of the proposed Project Site (Figures 1 and 2). Also attached are a Photo-location Map, Historic Resources/Viewshed Maps, and detailed Site Plans/Lease Exhibits provided by the project proponent.

The APE for Direct Effects is identified on the attached Site Plans.
The APE for Visual Effects is identified on the attached Photo-location Map.
The location of the proposed collocation site and any related excavations are shown on the Site Plans/Lease Exhibits.
Historic Properties identified in Attachments 8 and 9 are identified on the Historic Resources Map.

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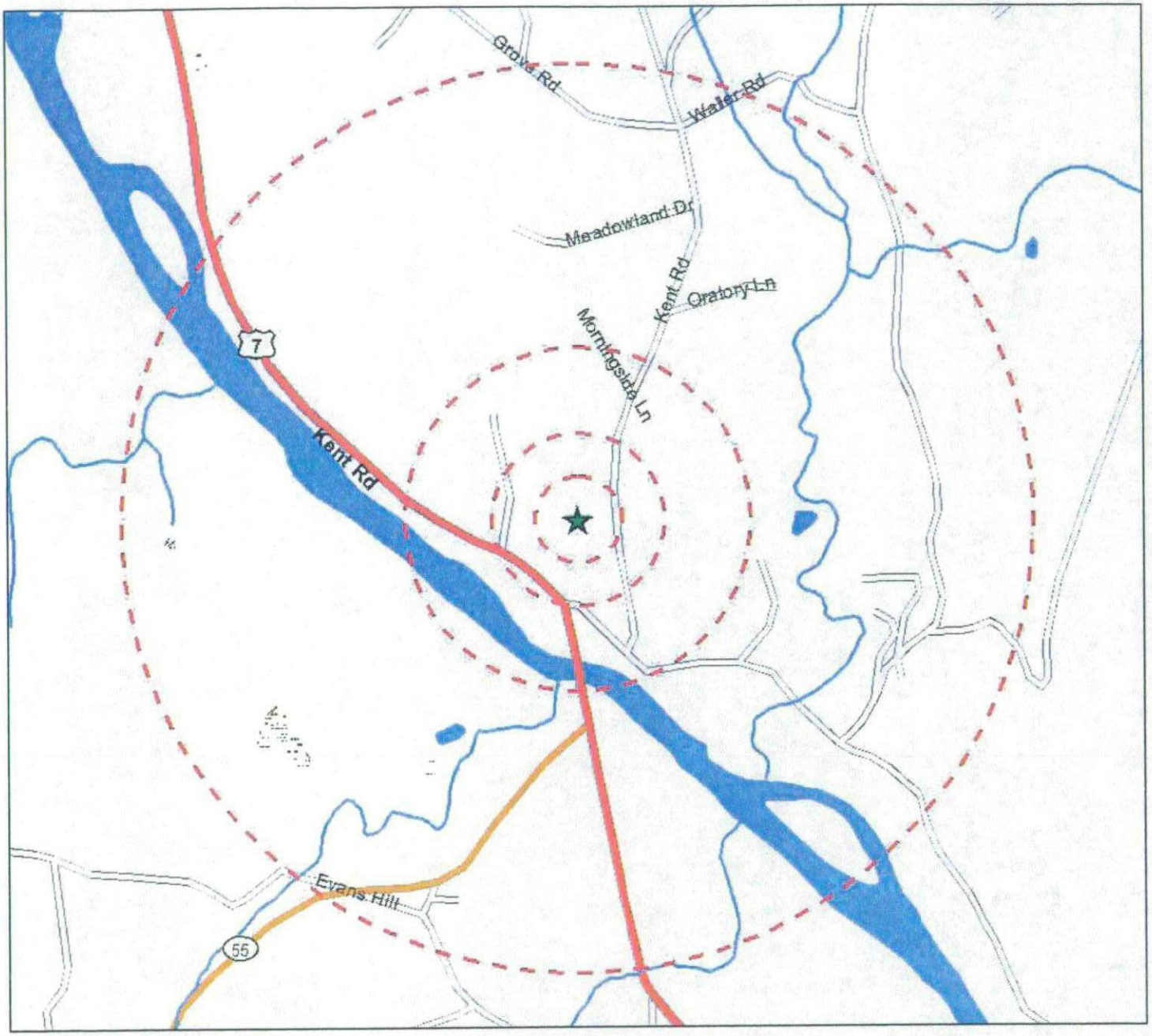
Creating Value for Your Business



Legend

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

Source: Selected data from ESRI, EBI and NWI

Figure 1 - Site Location Map

36930982/New Milford Northwest
700 Kent Road (South Kent Road)
Gaylordsville, CT 06755

PN: 61063807

N

0 500 1000 feet

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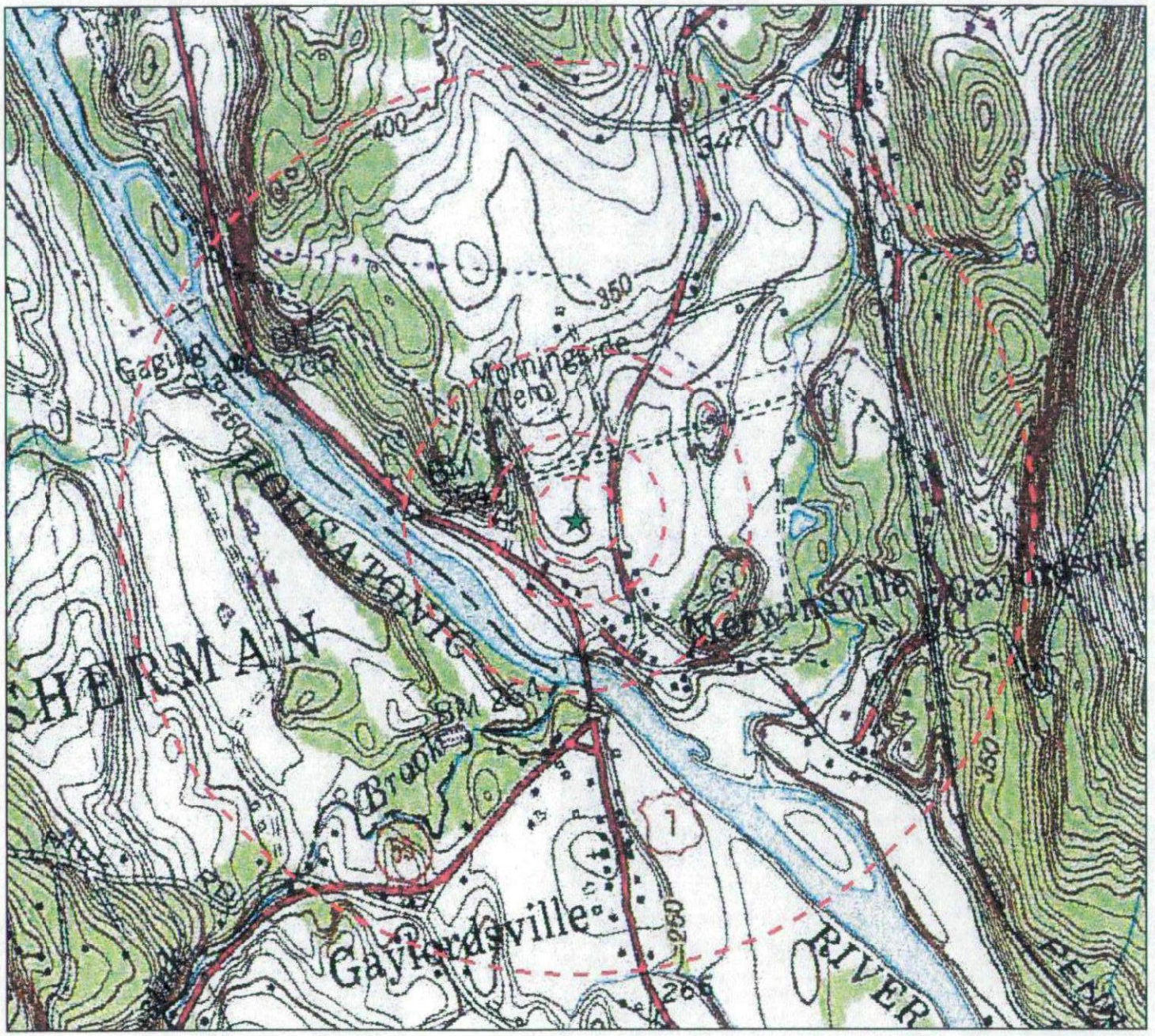

Legend

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

USGS 24k Quad: Kent, CT 1972

Source: Selected data from ESRI, EBI and USGS

Figure 2 - USGS Quad Location Map

36930982/New Milford Northwest
700 Kent Road (South Kent Road)
Gaylordsville, CT 06755

PN: 61063807

N

0 500 1000 feet

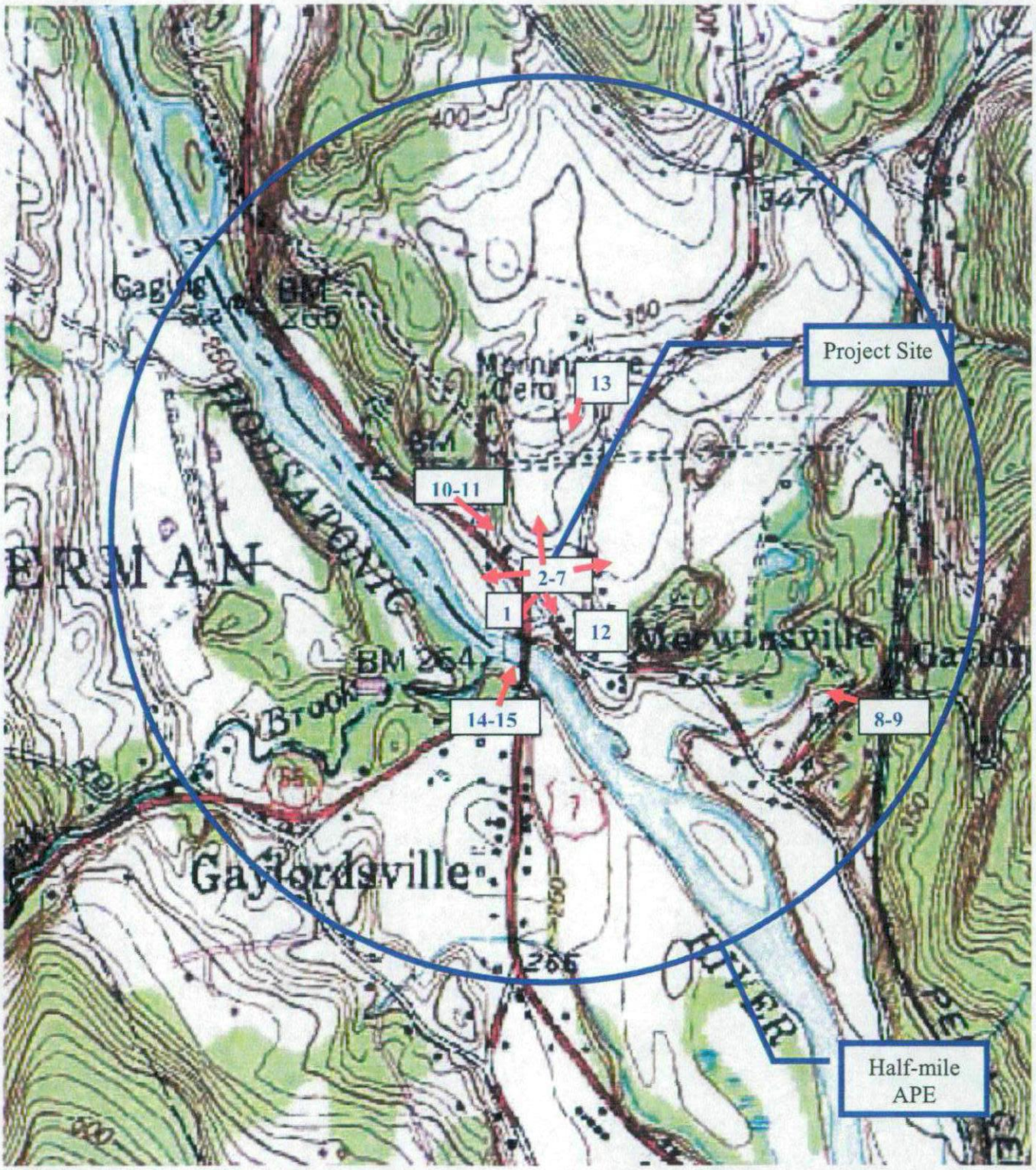

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Photo Location Map

36930982/ New Milford Northwest
700 Kent Road (South Kent Road)
Gaylordsville, CT 06755
With half-mile APE

N

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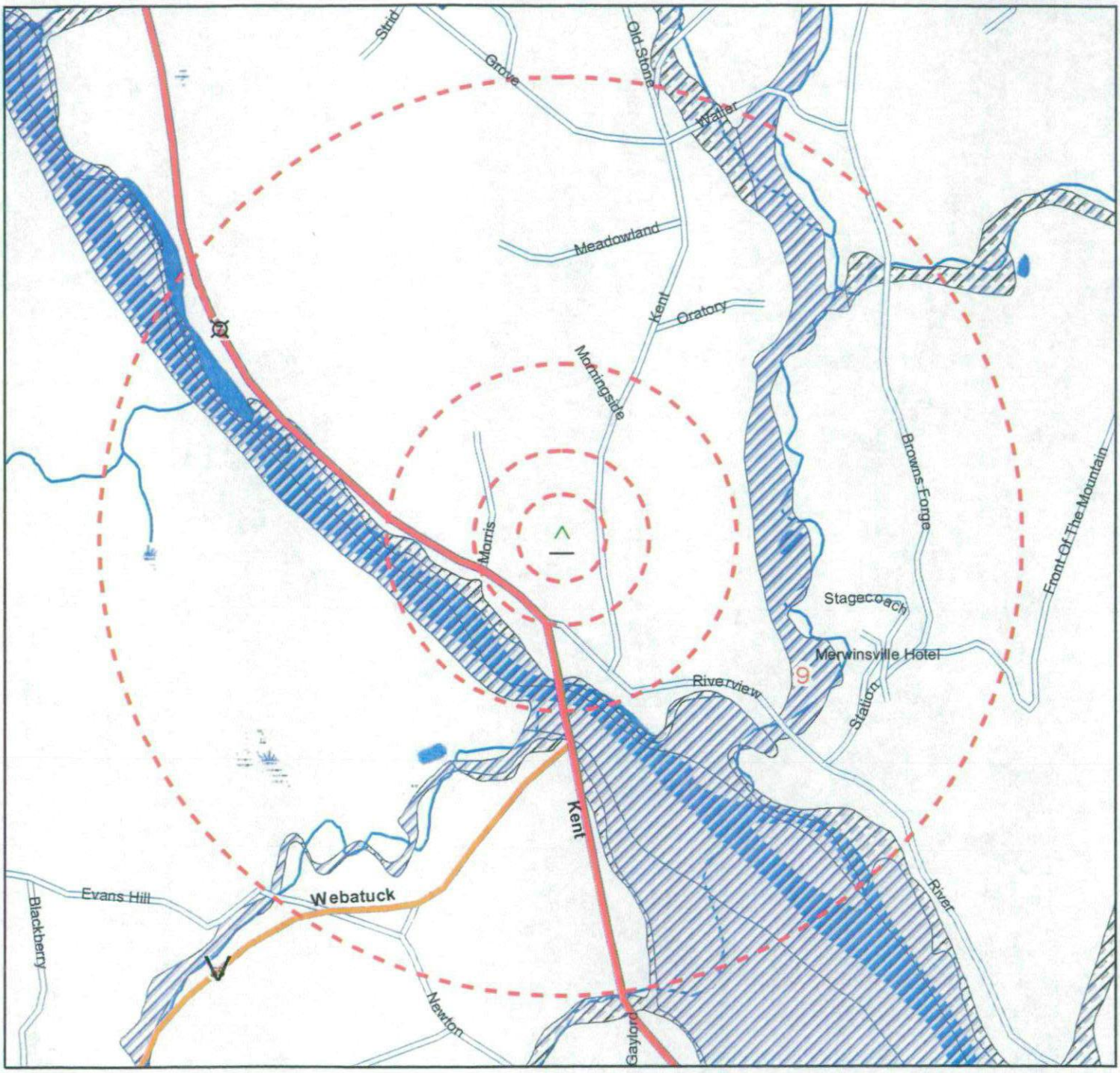

Project Site Site buffer at 250', 500', 1,000' and 1/2 mile

See associated Land Resources Legend page for additional map symbology definitions.

Source: Selected data from FEMA, NWI, ESRI and EBI.

Land Based and Historic Resources

NEW MILFORD NORTHWEST/36930982
700 KENT ROAD (SOUTH KENT ROAD)
GAYLORDSVILLE, CT 06755

A

0 200 400
Feet

PN: 61063807

National Datalayers Legend

- Project Site
- Site buffer at 250', 500', 1000', and 1/2 mile

Q3 Flood Zone

- A (-E, -H, -O) - 100-year inundation area.
- D - Area of possible flood hazard.
- VE - 100-year inundation area, with wave action.
- X500 - 500-year inundation area.
- Federally Owned Land
- National Register Historic Site
- National Register Historic District
- Stream or Creek
- Freshwater Forested/Shrub Wetland
- Freshwater Emergent Wetland
- Estuarine & Marine Wetland
- Unconsolidated Shore
- Freshwater Lake, Pond, or River
- Estuarine & Marine Deepwater
- Open Water

State Specific Legend

Washington State Datalayers

- Priority Fish Distribution
- Salmonid Stock Inventory
- Old Growth Area 1988
- Priority Habitat and Species
- WLRIS Lake

Massachusetts State Datalayers

- NHESP 2003 Certified Vernal Pool
- NHESP 2005 Estimated Habitats of Rare Wildlife
- NHESP 2005 Priority Habitats of Rare Species

California State Datalayers

- California Natural Diversity Point
- California Natural Diversity Area

Land-Based and Historic Resources Legend

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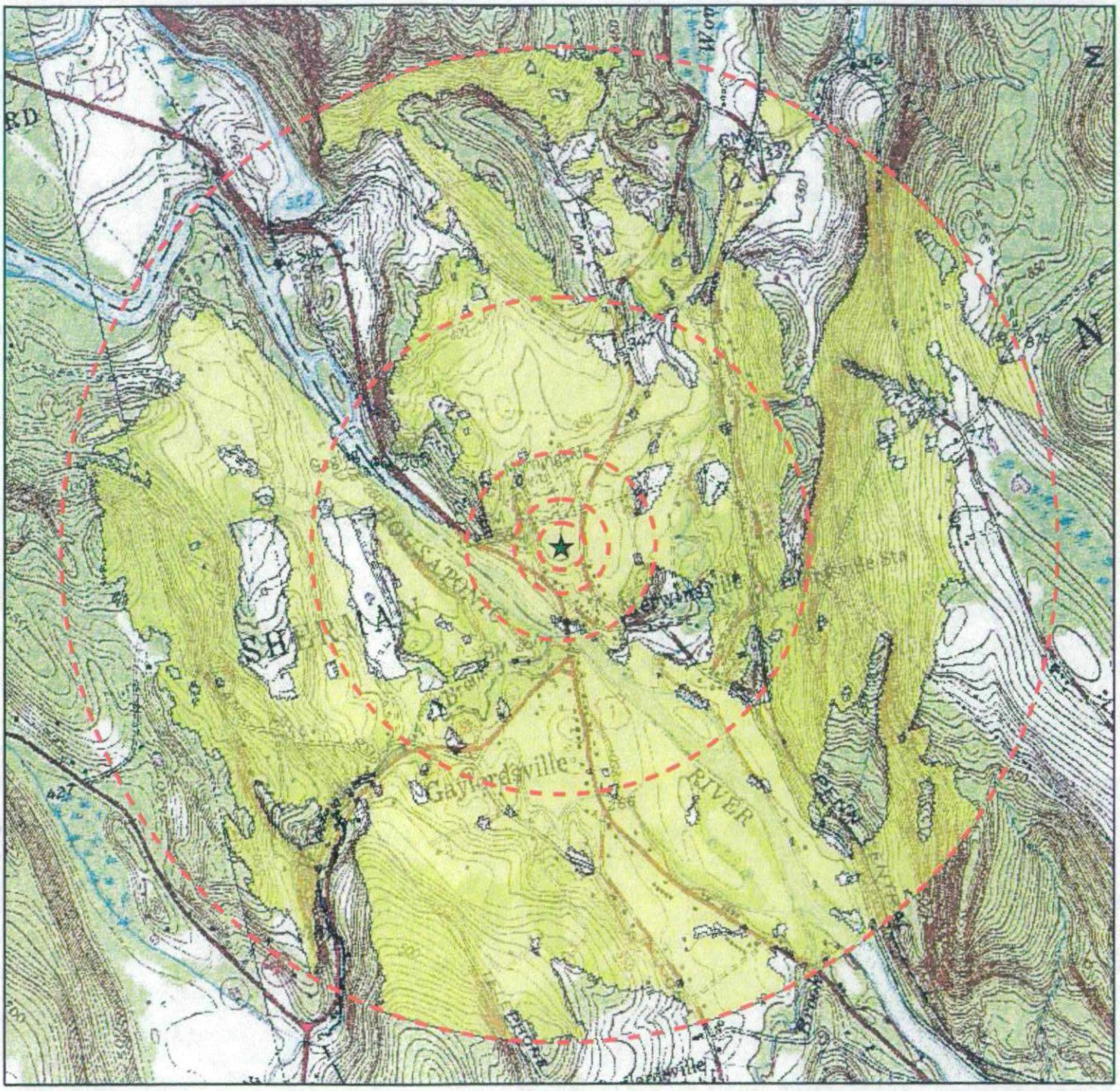


Legend

★ Project Site Site buffer at 250', 500', 1000', and 1/2 mile Area Visible from Project Site

Source: Selected data from USGS and EBI.

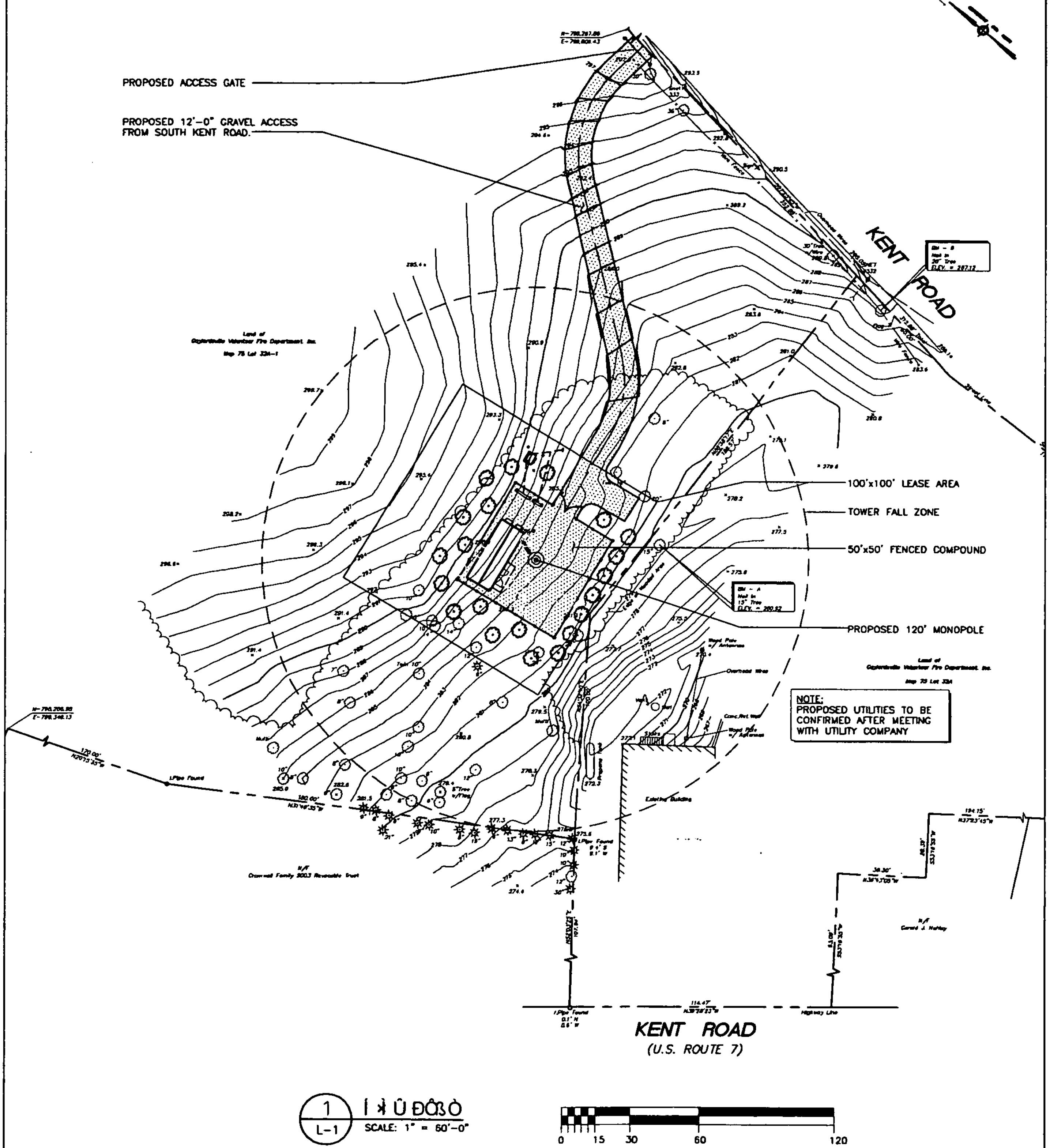
Viewshed Analysis Results Map

36930982/NEW MILFORD NORTHWEST
700 KENT ROAD (SOUTH KENT ROAD)
GAYLORDSVILLE, CT 06755

PN: 61063807

N

0 750 1,500 Feet



SITE ID NO:	36930982
Designed by:	DBP
Drawn by:	
Checked by:	
Approved by:	

URS CORPORATION AES

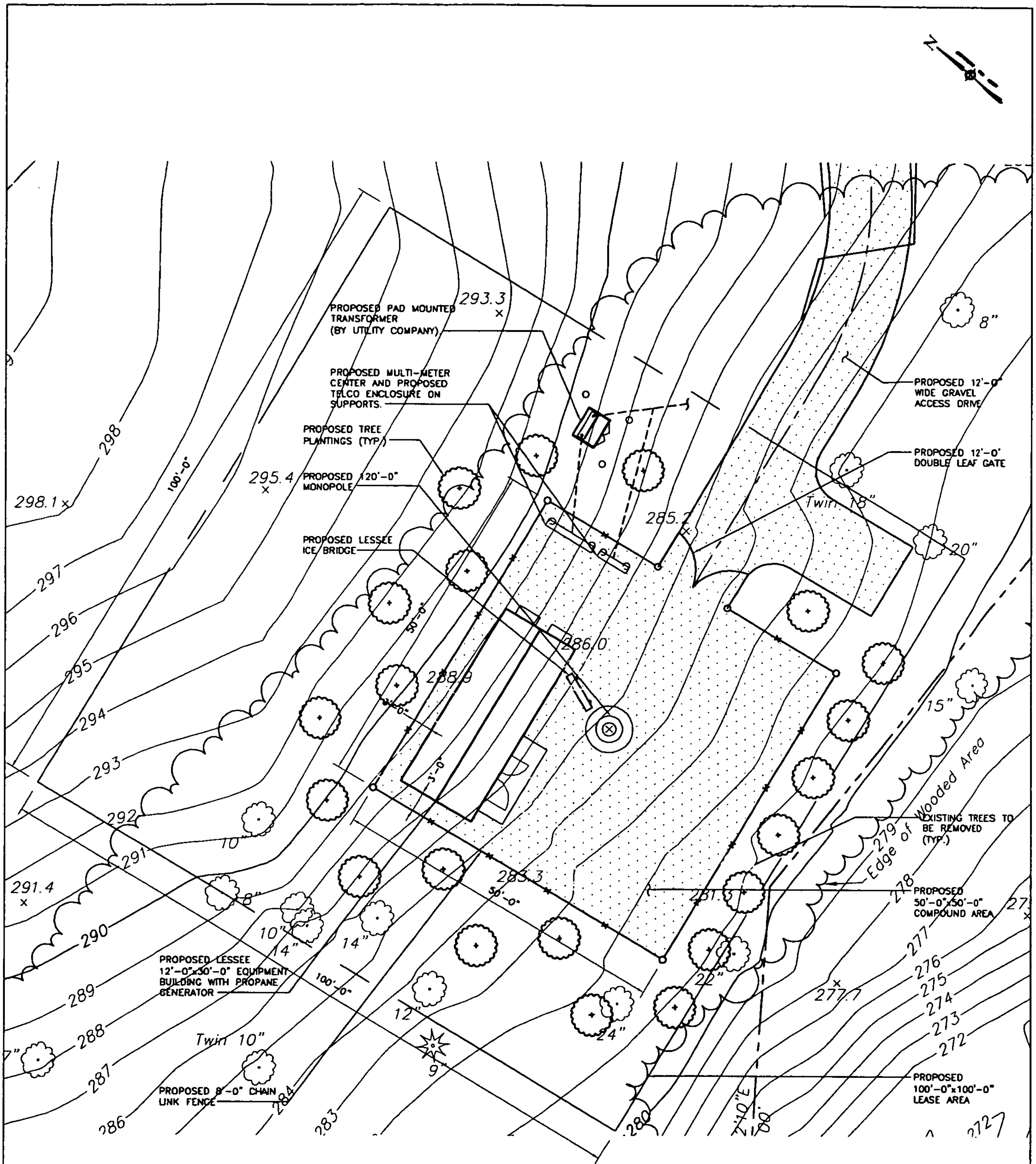
WIRELESS COMMUNICATIONS FACILITY

SITE ADDRESS:

REV.	DATE:	DESCRIPTION
2	08/25/06	REVISED
1	08/23/06	REVISED

Scale: AS NOTED | Date: 12-13-05

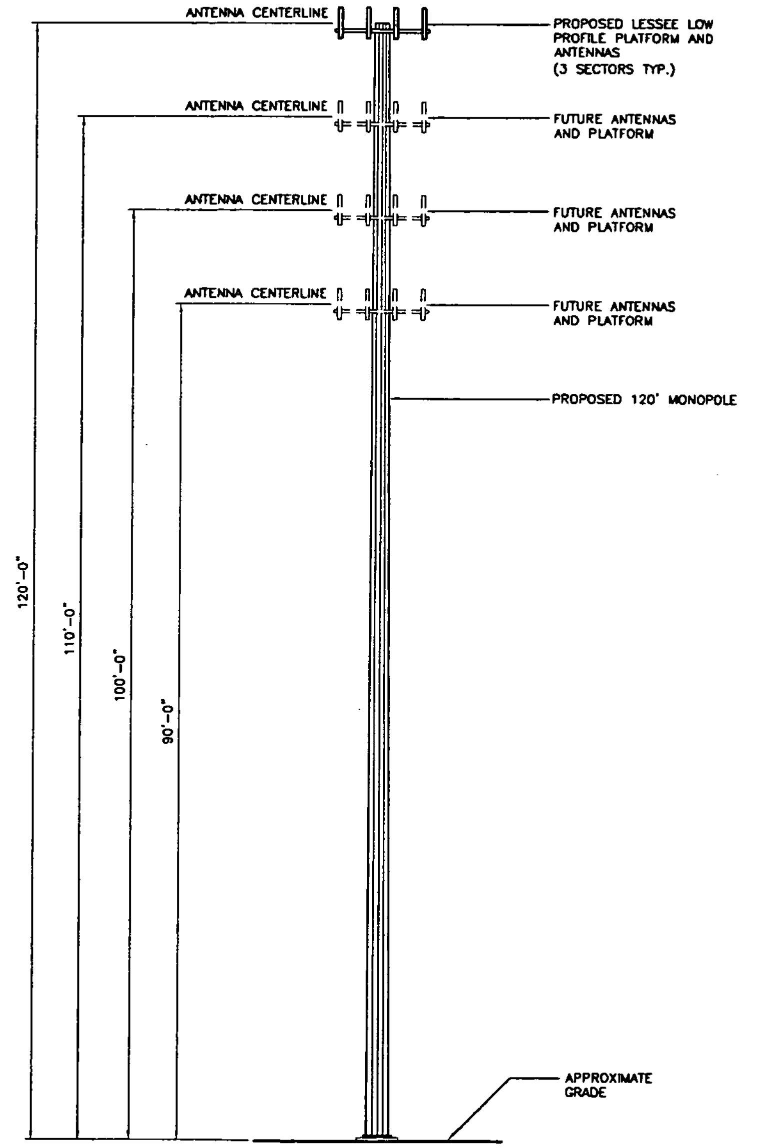
Job No.VZ1-164 | File No. L-1 | Dwg. 1 of 3



1 / L-2 — SCALE: 1" = 20'-0"

0 5 10 20 40

SITE ID NO: 36930982 Designed by: DBP Drawn by: Checked by: Approved by:	URS CORPORATION AES	WIRELESS COMMUNICATIONS FACILITY SITE ADDRESS:	08/25/06 REVISED 08/23/06 REVISED REV. DATE: DESCRIPTION Scale: AS NOTED Date: 12-13-05 Job No.VZ1-164 File No. L-2 Dwg. No. Dwg. 2 of 3



1 / L-3 Ì ÑÉ ÛÎ ÛÔÛÊßÌ ×ÑÒ

SCALE: 1" = 20'-0"

0 5 10 20 40

SITE ID NO: 36930982	**URS CORPORATION AES**	ÝÛĈÔÝÑ ÐßÎ Ì ÒÛÎ Ì Ø×Ð ÜÞß
Designed by: DBP	ëðð ÛÒÌ ÛÎ ÐÎ ×Í Û ÛÎ ×ÊÛ	ÊÛÎ ×ÆÑÒ É ×Î ÛÔÛÍ Í
Drawn by:	Ì ÑÝÕÇ Ø×ÔÔ ÝÑÒÒÛÝÌ ×ÝËÌ	WIRELESS COMMUNICATIONS FACILITY
Checked by:	Ìóèëðóéêì çêèèì	SITE ADDRESS: ÒÛÉ Ó×ÔÚÑÎ Ü ÒÑÎ Ì ØÉ ÛÍ Ì
Approved by:		éðð ÛÛÔÔ Ì ÑßÜ
		ÙßÇÔÑÎ Ü Í Ê×ÔÔÛÇ Ì ðêéèë

REV.	DATE:	DESCRIPTION
1	08/25/06	REVISED
0	08/23/06	REVISED

Dwg. No. Ôó

Scale: AS NOTED | Date: 12-13-05 | Job No.VZ1-164 | File No. L-3 | Dwg. 3 of 3

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

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

a. Footnotes may be in a form generally accepted in the preparer's profession so long as they identify the author, title, publisher, date of publication, and pages referenced for published materials. For archival materials/documents/letters, the citation should include author, date, title or description and the name of the archive or other agency holding the document.

b. A bibliography should be appended to each report listing the sources of information consulted in the preparation of the report. The bibliography may be in a form generally accepted in the preparer's profession.

References are appended.

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

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

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

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

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

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

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

References:

Connecticut Historical Commission National Register of Historic Places state listings by county http://www.chc.state.ct.us/NR-Litchfield.htm

Heritage Consultants, LLC of Newington, Connecticut. *Phase I Cultural Resources Reconnaissance Survey of the Proposed New Milford Northwest Cellular Communications Tower, Gaylordsville, Connecticut*

Heritage Consultants, LLC of Newington, Connecticut. *Preliminary Archaeological Assessment of the proposed New Milford Northwest cellular communications tower in Gaylordsville, Connecticut.*

Gaylordsville Fire Department. History. http://www.gvfd.com/History.html

National Register of Historic Places online research page http://www.cr.nps.gov/nr/research/nris.htm

Property Card provided by the town of New Milford, Connecticut

USGS Topographic Map, Kent, Connecticut 1972

Zoning drawings provided by Cellco Partnership d/b/a Verizon Wireless

Connecticut Commission on Culture & Tourism

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

December 13, 2006

Mr. Stephen Forrest
EBI Consulting
Four A Street
Burlington, MA 01803

Subject: Telecommunications Facilities
700 Kent Road (South Kent Road)
Gaylordsville (New Milford), CT
EBI #61063807, 36930982

Dear Mr. Forest:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the Gaylordsville Monument (South Kent Road) possesses historic and architectural importance and appears eligible for the National Register of Historic Places. Therefore, we respectfully request that the following information be provided for further review:

- Professionally completed Connecticut architectural inventory form, including photographs/digital images and location map for the Gaylordsville Monument.
- Photosimulations of the proposed cell tower from the visual perspective of the Gaylordsville Monument.
- Submission of Heritage Consultants LLC's final archaeological reconnaissance survey report (two copies).

Upon submission of the requested material, the State Historic Preservation Office will provide substantive comments vis-a-vis the National Historic Preservation Act.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

cc: Mr. David George/HC

HISTORIC RESOURCES INVENTORY
BUILDING AND STRUCTURES
HIST-6 REV. 01/06

STATE OF CONNECTICUT
COMMISSION ON CULTURE AND TOURISM
59 South Prospect Street, Hartford, Connecticut 06106
(860) 566-3005

FOR OFFICE USE ONLY

Town No. | Site No.
UTM
QUAD:
DISTRICT ☐ S ☐ NR | IF NR, SPECIFY ☐ Actual ☐ Potential

1. BUILDING NAME (Common) | (Historic)

2. TOWN/CITY | VILLAGE | COUNTY

3. STREET AND NUMBER (and/or location)

4. OWNER(S) ☐ Public ☐ Private

5. USE (Present) | (Historic)

6. ACCESSIBILITY TO PUBLIC: | EXTERIOR VISIBLE FROM PUBLIC ROAD ☐ Yes ☐ No | Interior accessible ☐ Yes ☐ No | IF YES, EXPLAIN

7. STYLE OF BUILDING | DATE OF CONSTRUCTION

8. MATERIAL(S) (Indicate use or location when appropriate)
☐ Clapboard ☐ Asbestos Siding ☐ Brick ☐ Other (Specify) _____
☐ Wood Shingle ☐ Asphalt Siding ☐ Fieldstone
☐ Board & Batten ☐ Stucco ☐ Cobblestone
☐ Aluminum Siding ☐ Concrete Type: _____ ☐ Cut Stone Type: _____

9. STRUCTURAL SYSTEM
☐ Wood frame ☐ Post and beam ☐ Balloon
☐ Load bearing masonry ☐ Structural iron or steel
☐ Other (Specify) _____

10. ROOF (Type)
☐ Gable ☐ Flat ☐ Mansard ☐ Monitor ☐ sawtooth
☐ Gambrel ☐ Shed ☐ Hip ☐ Round ☐ Other (Specify) _____
(Material)
☐ Wood Shingle ☐ Roll Asphalt ☐ Tin ☐ Slate
☐ Asphalt Shingle ☐ Built up ☐ Tile ☐ Other (Specify) _____

11. NUMBER OF STORIES | APPROXIMATE DIMENSIONS

12. CONDITION (Structural) ☐ Excellent ☐ Good ☐ Fair ☐ Deteriorated | (Exterior) ☐ Excellent ☐ Good ☐ Fair ☐ Deteriorated

13. INTEGRITY (Location) ☐ On original site ☐ Moved | WHEN? | (Alterations) ☐ Yes ☐ No | IF YES, EXPLAIN

14. RELATED OUTBUILDINGS OR LANDSCAPE FEATURES
☐ Barn ☐ Shed ☐ Garage ☐ Other landscape features or buildings (Specify)
☐ Carriage House ☐ Shop ☐ Garden

15. SURROUNDING ENVIRONMENT
☐ Open land ☐ Woodland ☐ Residential ☐ Scattered buildings visible from site
☐ Commercial ☐ Industrial ☐ Rural ☐ High building density

16. INTERRELATIONSHIP OF BUILDING AND SURROUNDINGS

(over)

17. OTHER NOTABLE FEATURES OF BUILDING OR SITE (Interior and/or exterior)

18. ARCHITECT	BUILDER

19. HISTORICAL OR ARCHITECTURAL IMPORTANCE

PHOTOGRAPHER	DATE
VIEW	NEGATIVE ON FILE
NAME	DATE

ORGANIZATION

ADDRESS

20. SUBSEQUENT FIELD EVALUATIONS

21. THREATS TO BUILDING OR SITE

☐ None known ☐ Highways ☐ Vandalism ☐ Developers ☐ Other _____
☐ Renewal ☐ Private ☐ Deterioration ☐ Zoning ☐ Explanation _____

EBI
CONSULTING
www.ebiconsulting.com

Four A Street
Burlington, MA 01803
Tel: 7812732500
Fax: 781.273.3311

January 24, 2007

Mr. Paul Loether
Connecticut Historical Commission
Amos Bull House
59 South Prospect Street
Hartford, CT 06106

Subject: **Request for Section 106 Review**
36930982/New Milford Northwest, 700 Kent Road (South Kent Road), Gaylordsville, CT 06755
EBI Project Number: 61063807

On December 5, 2006, EBI submitted a Form 620 package to your office. In correspondence dated December 18, 2006, the Connecticut Historic Preservation Office stated that the Gaylordsville Monument (South Kent Road) possesses historic and architectural importance and appears eligible for the National Register of Historic Places. Your office requested the following: professionally completed Connecticut architectural inventory form, including photographs, digital images and location map for the Gaylordsville Monument, photosimulations of the proposed cell tower from the visual perspective of the Gaylordsville Monument, and submission of Heritage Consultants LLC's final archaeological reconnaissance survey report (two copies).

Per the attached memorandum from Vanasse Hangen Brustlin, Inc. of Middletown, Connecticut, the proposed installation will not be visible from the perspective of the Gaylordsville Monument, due to the presence of a stand of approximately 65-75 foot tall mature evergreen trees. Per a telephone conversation with Mr. David Poirier of your office, EBI is submitting this documentation in lieu of a completed inventory form and photosimulations.

Attached also please find two copies of the Heritage Consultants LLC Phase I Cultural Resources Reconnaissance Survey.

On behalf of *Verizon Wireless*, I would appreciate your comments on this proposed telecommunications installation in a letter to my attention at our Regional office address noted above.

Sincerely,

Ms. Trevelyn Potter
Environmental Scientist

Attachment A – Previous Correspondence
Attachment B – VHB Memorandum
Attachment C – Archaeology Report

Connecticut Commission on Culture & Tourism

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

January 29, 2007

Ms. Trevelyn Potter
EBI Consulting
Four A Street
Burlington, MA 01803

Subject: Telecommunications Facilities
700 Kent Road (South Kent Road
Gaylordsville (New Milford), CT
EBI #61063807, 36930982

Dear Ms. Potter:

The State Historic Preservation Office has reviewed the reconnaissance survey prepared by Heritage Consultants LLC concerning the above-named project. In the opinion of the State Historic Preservation Office, the archival and archaeological methodologies employed by Heritage Consultants LLC are consistent with our *Environmental Review Primer for Connecticut's Archaeological Resources.*

The State Historic Preservation Office concurs with Heritage Consultants LLC that no further archaeological investigations appear warranted with respect to the proposed undertaking. In addition, this office has reviewed supplemental information provided by EBI Consulting concerning the Gaylordsville Monument. Based upon this material, we believe that the proposed undertaking will have no effect upon Connecticut's historic, architectural and archaeological heritage.

This office recommends that Heritage Consultants LLC consult with the Office of State Archaeology at the University of Connecticut (Storrs) concerning the professional transferal of all field notes, photographs, and artifactual materials generated by the archaeological investigations.

The State Historic Preservation Office appreciates the cooperation of all interested parties concerning the professional management of Connecticut's archaeological resources.

This comment updates and supersedes all previous correspondence regarding the proposed project.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA
Mr. David George/HC

Connecticut Commission on Culture & Tourism

January 29, 2007

Historic Preservation
& Museum Division

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Hartford, Connecticut
06106

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EBI Consulting
Four A Street
Burlington, MA 01803

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Gaylordsville (New Milford), CT
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For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA
Mr. David George/HC

DEP REVIEW

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FRANKLIN WILDLIFE MANAGEMENT AREA
391 ROUTE 32
NORTH FRANKLIN, CT 06254
TELEPHONE: (860) 642-7239

November 27, 2006

Ms. Trevelyn Potter
EBI Consulting
4 A Street
Burlington, MA 01803

re: telecommunication tower, 700 Kent Rd., New Milford

Dear Ms. Potter:

Your request was forwarded to me on 11/15/06 from Dawn McKay of the Department of Environmental Protection's (DEP) Natural Diversity Data Base. Their records indicate that the state endangered Northern Metalmark butterfly (*Calephelis borealis*) have been documented in this area. This butterfly is associated with the plant *Senecio obovatus* and any activities which affect this plant will affect the butterfly.

The Wildlife Division recommends that an invertebrate biologist familiar with the habitat requirements of this species conduct surveys. A report summarizing the results of such surveys should include habitat descriptions, invertebrate species list and a statement/resume giving the invertebrate biologist' qualifications. The DEP doesn't maintain a list of qualified invertebrate biologists. A DEP Wildlife Division permit may be required by the invertebrate biologist to conduct survey work, you should ask if your invertebrate biologist has one. The results of this investigation can be forwarded to the Wildlife Division and, after evaluation, recommendations for additional surveys, if any, will be made.

The Wildlife Division has not made an on-site inspection of the project area nor been provided with details or a timetable of the work to be done. Again, 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. Consultation with the Wildlife Division should not be substituted for site-specific surveys that may be required for environmental assessments. If you have any additional questions, please feel free to contact me at 860-642-7964. Thank you for the opportunity to comment.

Sincerely,

Julie Victoria
Wildlife Biologist
Franklin Swamp Wildlife Management Area
391 Route 32
N. Franklin, CT 06254

cc: NDDB – 14908

ENVIRONMENTAL PLANNING SERVICES

March 28, 2007

Ms. Julie Victoria
CT DEP
Franklin Wildlife Management Area
Franklin, Connecticut 06

RE: Verizon Wireless Telecommunicaitons Facility
700 Kent Road
New Milford, CT

Dear Ms. Victoria:

We had a conversation earlier this winter regarding your November 27, 2006 letter requesting a biological survey on the referenced site. You had requested an assessment of the potential for the site to support Northern metalmark (*Calephelis borealis*to). Since my client has time constraints, and the butterfly does not emerge for some time, I proposed a botanical survey to determine the presence or absence of Roundleaf Ragwort *(Packera obovata)*, with which it is closely associated, and you agreed. On March 26, 2007, EPS botanist James Cowen conducted a survey of the wooded area which is the proposed location of the telecommunications tower at the site. The site is surrounded by fields, buildings, and the adjacent parcel (mostly wooded) to the north was recently brushed hogged.

The wooded area is a small woodlot with a tree layer consisting mostly of Sugar Maple *(Acer saccharum)* with oaks also present *(Quercus spp.)*; and an evergreen hedgerow of spruce *(Abies sp.)* and White Pine *(Pimus strobus)*. In the under story, moderately dense Japanese Barberry *(Berberis thunbergii)* is dominant with Asiatic Bittersweet *(Celastrus orbiculatus)*, both invasive non-native species. In the emerging herb layer, another invasive is common, Garlic Mustard *(Alliaria petiolata)*. Rough-stemmed Goldenrod *(Solidago rugosa)* rosettes were observed. However, no rosettes of Roundleaf Ragwort (*Packera obovata,* syn. *Senecio obovatus)* were observed. Leaf litter was relatively dense. The extensive presence of invasive species and the small size of the woodlot render this woodlot of low ecological integrity.

Based on his survey, Mr. Cowen concluded that it is highly unlikely that this area could support Roundleaf Ragwort *(Packera obovata)* and therefore we believe that there is no habitat for the state-listed Northern metalmark (*Calephelis borealis*to) on the subject property. I have attached photographs documenting site conditions at the time of the field survey, as well as Mr. Cowen's credentials, in case you are not aware of them. Please don't hesitate to call if we can provide further assistance in this matter.

89 BELKNAP ROAD, WEST HARTFORD, CONNECTICUT 06117
PHONE 860-236-1578 FAX

Yours truly,

Michael S. Klein
Principal

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FRANKLIN WILDLIFE MANAGEMENT AREA
391 ROUTE 32
NORTH FRANKLIN, CT 06254
TELEPHONE: (860) 642-7239

April 27, 2007

Ms. Nicole Dentamaro
Vanasse Hangen Brustlin, Inc.
64 Tuttle Place
Middletown, CT 06457-1847

re: telecommunication tower, 700 Kent Rd., New Milford

Dear Ms. Dentamaro:

The Wildlife Division received a letter and photos from Environmental Planning Services regarding the vegetation at 700 Kent Road. A botanist from this company surveyed for the host plants of the state endangered Northern Metalmark butterfly (*Calephelis borealis*), namely *Senecio obovatus*, in that project area. According to the document, "Mr. Cowen concluded that it is highly unlikely that this area could support Roundleaf Ragwort and therefore we believe that there is no habitat for the state-listed Northern Metalmark on the subject property."

With this information, the Wildlife Division concurs with this assessment.

If the Wildlife Division can assist you further, please feel free to contact me (860-642-7239). Thank you for the opportunity to comment.

Sincerely,

Julie Victoria
Wildlife Biologist
Franklin Swamp Wildlife Management Area
391 Route 32
N. Franklin, CT 06254

cc: NDDB – (14908), 14925