ALL-POINTS TECHNOLOGY CORPORATION

COASTAL CONSISTENCY REVIEW

October 5, 2021

Barrett Outdoor Communications, Inc.
381 Highland Street
West Haven, CT 06516

Re: Proposed Telecommunications Facility
Dock Shopping Center
200 Main Street, Rear
Stratford, Connecticut

On behalf of Barrett Outdoor Communications ("Barrett"), All-Points Technology Corporation, P.C. ("APT") performed an evaluation to demonstrate that the proposed project meets the requirements of the Connecticut Coastal Management Act ("CCMA")[1] and is consistent with the CCMA and regulations adopted thereunder and adequately protective of the State's coastal resources and policies. This analysis was performed because the proposed project is located within the coastal boundary as defined in CGS Section 22a-94(b). The initial step in assuring consistency with the State's coastal policies for any use or activity subject to the CCMA is to determine the coastal resources on or near a proposed project which may be affected. The next step is to review the coastal use policies to determine if there are potential conflicts regarding the proposed use or activity under consideration.

Project Information

Barrett proposes to establish a wireless telecommunications facility on property at a storage yard at 200 East Main Street, Rear in Stratford, Connecticut (the "Property"). Barrett's proposed development ("Facility" or "Project") will consist of construction of a 125-foot tall monopole structure designed to accommodate multiple levels of antennas and associated equipment. The equipment would be located on an elevated steel platform adjacent to the tower abutting the Metro North Rail Corridor track fill embankment. Utilities supporting this installation would originate from the eastern side of the Property and travel underground through existing paved areas.

The proposed Facility would be located outside of the 100-year floodplain associated with the Housatonic River and will not impact the river's flood storage capacity.

[1] CGS Section 22a-90 through 22a-112

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
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Coastal Resources

An APT Wetland Scientist inspected the Property to field verify the locations of coastal resources on or adjacent to the Property with a particular focus on the proposed Facility location. Prior to the field inspection, the Connecticut Department of Energy and Environmental Protection ("DEEP") Coastal Resources Map[2] for Stratford was reviewed. The following coastal resources are located on or adjacent to the Property:

Coastal Resources	On Site	Adjacent to Property	Off Site but Potentially Affected by Project	Not Applicable
General Resources*	☒	☐	☐	☒
Beaches & Dunes	☐	☐	☐	☒
Bluffs & Escarpments	☐	☐	☐	☒
Coastal Hazard Area	☒	☐	☐	☐
Coastal Waters & Estuarine Embayments	☒	☐	☐	☐
Developed Shorefront	☒	☐	☐	☐
Freshwater Wetlands and Watercourses	☐	☐	☐	☒
Intertidal Flats	☒	☐	☐	☐
Islands	☐	☐	☐	☒
Rocky Shorefront	☐	☐	☐	☒
Shellfish Concentration Areas	☐	☐	☐	☒
Shorelands	☐	☐	☐	☒
Tidal Wetlands	☒	☐	☐	☐

* applicable to all proposed activities

One state-regulated tidal wetland associated with the Housatonic River was identified and delineated on and adjacent to the Property in proximity to the proposed Facility (identified as Wetland 1). Please refer to the enclosed Coastal Boundary and Coastal Resources Maps provided in the attached December 2, 2020 Coastal Resources Inspection report. Representative photographs of the Property and coastal resources are enclosed.

Wetland 1 includes a stormwater outfall and riprap armored channel, tidal wetland and intertidal mud flat that borders on the tidally influenced Housatonic River. The delineated boundaries to this coastal resource are characterized by steep fill slopes. Banks to the Housatonic River north and south of this tidal wetland area consist of armoring or developed waterfronts. Due to regular tidal flooding, vegetation is sparse along banks and within the mud flat, with scattered areas of tidal wetland vegetation dominated by saltwater cordgrass.

Wetland 1 is located ±316 feet east of the proposed Facility's compound and ±40 feet from the nearest point of the underground utility route. APT does not anticipate the proposed Facility would result in a likely adverse impact to nearby tidal wetlands or other coastal resources associated with the

[2] Connecticut Department of Environmental Protection (now known as Department of Energy & Environmental Protection), Coastal Area Management Program. *Coastal Resources, Essex Quadrangle*. 1979.

Housatonic River due to the distance from the Facility to the nearest resource area and the developed and disturbed nature of the Facility location and surrounding area. This determination is contingent upon erosion control measures being designed, installed and maintained in accordance with the DEEP 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.

According to the most current DEEP Natural Diversity Data Base ("NDDB") State and Federal Listed Species and Natural Communities Map for Stratford, the Property lies within an area identified as potential habitat for Endangered, Threatened or Special Concern Species. As the Property is entirely developed, the Project would be located within a previously developed area. Therefore, no impact to Endangered, Threatened or Special Concern Species is anticipated. Nonetheless, a Request for Natural Diversity Data Base State Listed Species Review was submitted to DEEP on September 15, 2020. DEEP NDDB responded on September 23, 2020 indicating that no negative impacts to State listed species (RCSA Sec. 26-306) are anticipated resulting from the proposed Project.

The proposed Project will not generate any significant additional stormwater beyond current conditions, as the Facility will be installed within an existing paved parking area and the only ground disturbance will be associated with the elevated steel platforms posts, chain-link fence posts, protective concrete bollards, and the foundation for the monopole.

Applicable Coastal Use and Activity Policies

Section 22a-92 of the CCMA identifies all statutory activities potentially applicable to a proposed activity. One of these activities applies to the proposed Project:

- ☒ **General Development**[3] [CGS Sections 22a-92(a)(1), (2) & (9)]
- ☐ Water-Dependent Uses [CGS Sections 22a-92(a)(3), 22a-92(b)(1)(A)]
- ☐ Ports and Harbors [CGS Section 22a-92(b)(1)(C)]
- ☐ Coastal Structures and Filling [CGS Section 22a-92(b)(1)(D)]
- ☐ Dredging and Navigation [CGS Sections 22a-92(c)(1)(C), 22a-92(c)(1)(D)]
- ☐ Boating [CGS Section 22a-92(b)(1)(G)]
- ☐ Fisheries [CGS Section 22a-92(c)(1)(I)]
- ☐ Coastal Recreation and Access [CGS Sections 22a-92(a)(6), 22a-92(c)(1)(J) & (K)]
- ☐ Sewer and Water Lines [CGS Section 22a-92(b)(1)(B)]
- ☐ Fuel, Chemicals and Hazardous Materials [CGS Sections 22a-92(b)(1)(C) & (E) & 22a-92(c)(1)(A)]
- ☐ Transportation [CGS Sections 22a-92(b)(10)(F), 22a-92(c)(1)(F), (G) & (H)]
- ☐ Solid Waste [CGS Section 22a-92(a)(2)]
- ☐ Dams, Dikes and Reservoirs [CGS Section 22a-92(a)(2)]
- ☐ Cultural Resources [CGS Section 22a-92(b)(J)]
- ☐ Open Space and Agricultural Lands [CGS Section 22a-92(a)(2)]

Consistency with Applicable Statutory Coastal Use and Activity Policies

A primary policy of the CCMA is to ensure that a proposed development proceeds in a responsible manner, balancing economic growth and avoiding disruption of coastal resources. The CCMA identifies eight potential adverse impacts to coastal resources. The proposed Project will not result in adverse impacts to coastal resources or be inconsistent with associated policies. This section provides an

[3] applicable to all proposed activities

explanation of how the proposed activity is consistent with the applicable statutory coastal resource policies and describes any mitigation necessary to offset adverse impacts.

Potential Resource Impacts	Applicable	Not Applicable
1. Characteristics & Functions of Resources - CGS Section 22a-93(15)(H)	☒	☐
2. Coastal Flooding - CGS Section 22a-93(15)(E)	☐	☒
3. Coastal Waters Circulation Patterns - CGS Section 22a-93(15)(B)	☐	☒
4. Drainage Patterns - CGS Section 22a-93(15)(D)	☐	☒
5. Patterns of Shoreline Erosion and Accretion - CGS Section 22a-93(15)(C)	☐	☒
6. Visual Quality - CGS Section 22a-93(15)(F)	☒	☐
7. Water Quality - CGS Section 22a-93(15)(A)	☐	☒
8. Wildlife, Finfish, Shellfish Habitat - CGS Section 22a-93(15)(G)	☐	☒

1) *Degrading tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments by significantly altering their natural characteristics or function.*

The proposed Facility will not alter or degrade the natural characteristics of any coastal resource area. The proposed Facility would be located within an existing developed area ±316 feet from the nearest coastal resource.

2) *Increasing the hazard of coastal flooding by significantly altering shoreline configurations or bathymetry, particularly within high velocity flood zones.*

The proposed Facility will not alter shoreline configurations or bathymetry and will not increase coastal flooding. The Facility is located outside of the 100-year flood hazard zone (Coastal Flood Hazard Area) and will not increase the hazard of coastal flooding.

3) *Degrading existing circulation patterns of coastal waters by impacting tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours.*

The proposed Facility is located in an existing developed area adjacent to both I-95 and the Metro North rail line. It is located outside of tidally influenced coastal water areas and as such will not impact current drainage or circulation patterns to tidally influenced areas.

4) *Degrading natural or existing drainage patterns by significantly altering groundwater flow and recharge and volume of runoff.*

Existing drainage patterns, groundwater flow and recharge and stormwater runoff will not be altered by the proposed Facility due to its location within an existing developed area. No significant impervious surfaces will be created beyond those that currently exist.

5) *Degrading natural erosion patterns by significantly altering littoral transport of sediments in terms of deposition or source reduction.*

The proposed Facility would not affect littoral transport of sediments (i.e., patterns of sand deposition) since the Facility location is not on a shoreline.

6) *Degrading visual quality by significantly altering the natural features of vistas and viewpoints.*

The proposed Facility includes the installation of ground equipment that is shielded to the north by the elevated Metro North rail line and to the south by the I-95 bridge of the Housatonic River. The proposed monopole is to be located adjacent to an existing bridge catenary (#862) associated with the rail line. This catenary is approximately 168.7 ft AMSL, approximately 31.4 ft. above the proposed top elevation of the monopole. Due to the existing elevated rail line bridge catenary structure located to the north and the existing I-95 bridge structure to the south, visual quality from any nearby coastal vistas or viewpoints would not be materially changed with the addition of the proposed Facility.

7) *Degrading water quality of coastal waters by introducing significant amounts of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity.*

The proposed Facility will not affect water quality in the Housatonic River or associated coastal resources. Since the proposed Facility is located within an existing developed area, no significant impervious surfaces would be created and as a result no significant stormwater runoff will be generated by the proposed Facility. Since minimal ground disturbance is associated with the proposed Project, no significant sedimentation will be generated by the proposed development that would impact coastal waters. Proper erosion control measures would be employed during construction to contain any exposed soils from generating sedimentation that could potentially impact nearby resources.

8) *Degrading or destroying essential wildlife, finfish or shellfish habitat by significantly altering the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significantly altering the natural components of the habitat.*

Since the proposed Facility would be located on an existing developed property, coastal wildlife, finfish or shellfish habitat would not be affected.

Impact to Future Water-Dependent Development Activities and Opportunities

"Adverse impacts on future water-dependent development opportunities" and "adverse impacts on future water-dependent development activities" include but are not limited to (A) locating a non-water-dependent use at a site that (i) is physically suited for a water-dependent use for which there is a reasonable demand or (ii) has been identified for a water-dependent use in the plan of development of the municipality or the zoning regulations; (B) replacement of a water dependent use with a non-water-dependent use; and (C) siting of a non-water-dependent use which would substantially reduce or inhibit existing public access to marine or tidal waters.[4]

Potential Impacts on Water Dependent Uses	Applicable	Not Applicable
Locating a non-water-dependent use on a site suited to or planned for a water-dependent use - CGS Section 22a-93(17)	☐	☒
Replacing an existing water-dependent use with a non-water-dependent use - CGS Section 22a-93(17)	☐	☒
Siting a non-water-dependent use which reduces or eliminates public access to marine or tidal waters - CGS Section 22a-93(17)	☐	☒

[4] CGS Section 22a-93(17)

The Property has direct access to the Housatonic River, other marine waters, or any associated coastal resources, and is therefore currently providing a water-dependent use. The location of the proposed Facility within the Property would not reduce, eliminate or in any way hinder public access to the Housatonic River or future water-dependent development activities or opportunities.

Conclusion

As detailed in this coastal consistency analysis, the activity proposed by Barrett is found to be consistent with all applicable policies in Section 22a-92 of the Connecticut Coastal Management Act and will not adversely impact coastal resources of the Town of Stratford.

Coastal Resources Inspection Report

COASTAL RESOURCES INSPECTION

October 5, 2021 **APT Project No.: CT560100**

Prepared For: Barrett Outdoor Communications, Inc.
381 Highland Street
West Haven, CT 06516

Site Name: The Dock Shopping Center

Site Address: 200 East Main Street, Rear, Stratford, Connecticut

Date(s) of Investigation: 7/8/2019

Field Conditions: **Weather:** partly cloudy**,** mid 70's
Soil Moisture: dry to moist

Wetland/Watercourse Delineation Methodology*:

☐Connecticut Inland Wetlands and Watercourses
☒Connecticut Tidal Wetlands
☐U.S. Army Corps of Engineers

The wetlands inspection was performed by†:

Matthew Gustafson, Registered Soil Scientist

Enclosures: Tidal Wetland Delineation Field Form
Tidal Wetland Inspection Map
Environmental Resources Map

This report is provided as a brief summary of findings from APT's wetland investigation of the referenced study area that consists of proposed development activities and areas generally within 200 feet.‡ If applicable, APT is available to provide a more comprehensive wetland impact analysis upon receipt of site plans depicting the proposed development activities and surveyed location of identified wetland and watercourse resources.

* *Wetlands and watercourses were delineated in accordance with applicable local, state and federal statutes, regulations and guidance.*

† *All established wetlands boundary lines are subject to change until officially adopted by local, state, or federal regulatory agencies.*

‡ *APT has relied upon the accuracy of information provided by Barrett Outdoor Communications, Inc. and its contractors regarding proposed lease area and access road/utility easement locations for identifying wetlands and watercourses within the study area.*

Attachments

- Tidal Wetland Delineation Field Form
- Tidal Wetland Inspection Map
- Environmental Resources Map

Tidal Wetland Delineation Field Form

Wetland I.D.:	Wetland 1	
Flag #'s:	WF 1-01 to 1-12	
Flag Location Method:	Site Sketch ☒	GPS (sub-meter) located ☒

TIDAL WETLAND HYDROLOGY:

Subtidal ☐	Regularly Flooded ☒	Irregularly Flooded ☐
Irregularly Flooded ☐		
Comments: Wetland 1 consists of the ordinary high tide line characterized by steep fill slopes and developed shorefront associated with the existing property development (drainage discharges to Wetland 1) and I-95 and Metro North Rail Corridor infrastructure.		

TIDAL WETLAND TYPE:

Coastal Salt Marsh ☐	Common Reed Marsh ☐	Scrub/Shrub/Emergent ☐
Brackish Marsh ☒	Other: None	
Distance from Project Area:	Compound: ±316 feet to the east; Utilities: ±40 feet to the east	
Comments: Delineated wetland boundary encompasses both tidal mud flats and areas of tidal wetland vegetation.		

TIDAL WATERCOURSE/ESTUARINE EMBAYMENT TYPE:

Perennial ☒	Intermittent ☐	Tidal ☒
Watercourse/Embayment Name: Housatonic River		
Distance from Project Area:	Compound: ±325 feet to the east; Utilities: ±50 feet to the east	
Comments: None		

SOILS:

Are field identified soils consistent with NRCS mapped soils?	Yes ☒	No ☐
If no, describe field identified soils		

DOMINANT PLANTS:

Common Reed (Phragmites australis)*	Saltwater Cordgrass (Spartina alterniflora)
Fox grape (Vitis labrusca)	

* denotes Connecticut Invasive Plants Council invasive species

Tidal Wetland Delineation Field Form (Cont.)

Coastal Resources	On Site	Adjacent to Property	Off Site but Potentially Affected by Project	Not Applicable
General Resources*	☒	☐	☐	☐
Beaches & Dunes	☐	☒	☐	☒
Bluffs & Escarpments	☐	☐	☐	☒
Coastal Hazard Area	☒	☐	☐	☐
Coastal Waters & Estuarine Embayments	☐	☐	☐	☒
Developed Shorefront	☒	☐	☒	☐
Freshwater Wetlands and Watercourses	☐	☐	☐	☒
Intertidal Flats	☒	☐	☐	☐
Islands	☐	☐	☐	☒
Rocky Shorefront	☐	☐	☐	☒
Shellfish Concentration Areas	☐	☐	☐	☒
Shorelands	☐	☐	☐	☒
Tidal Wetlands	☒	☐	☐	☐

* applicable to all proposed activities

GENERAL COMMENTS:

All-Points Technology Corp., P.C. ("APT") understands that Barrett Outdoor Communications, Inc. proposes to construct a wireless communications facility behind the Dock Shopping Center (retail shopping center and marina) and between the existing Metro North rail line and I-95 in the northeastern corner of ±4.37-acre subject parcel. The proposed facility would consist of a ±125-foot tall monopole and elevated wireless communications equipment platform with a ±4,650 limit of disturbance located within a paved and developed area adjacent to a paved parking lot. A tidal wetland and mud flat area associated with the Housatonic River, identified as Wetland 1, is located ±316 feet east of the proposed facility's compound and ±40 feet from the nearest point of the underground utility route.

Wetland 1 includes a stormwater outfall and riprap armored channel, tidal wetland and intertidal mud flat that border on the tidally influenced Housatonic River. The delineated boundaries to this coastal resource are characterized by steep fill slopes. Banks to the Housatonic River north and south of this tidal wetland area consist of armoring or developed waterfronts. Due to regular tidal flooding, vegetation is sparse along the banks and within the mud flat with scattered areas of tidal wetland vegetation dominated by saltwater cordgrass.

APT does not anticipate the proposed facility would result in a likely adverse impact to nearby tidal wetlands or other coastal resources associated with the Housatonic River due to the ±316-foot separation from the facility to the nearest resource area and considering the facility would be sited within a developed and disturbed area. This determination is contingent upon erosion control measures being designed, installed and maintained in accordance with the CTDEEP 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. No significant stormwater is anticipated to be generated since the facility would be located either on existing impervious paved surfaces or on an elevated steel platform over pavement or a rip rap armored side slope.

Wetland Inspection Map
Wireless Communications Facility
200 East Main Street Rear
Stratford, Connecticut

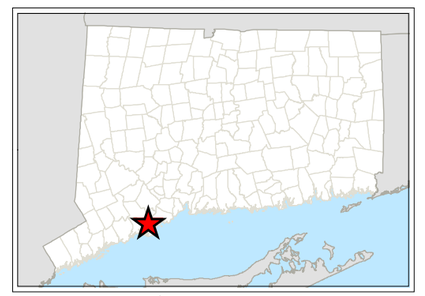
Legend

- Proposed Monopole
- Proposed Lease Area
- Proposed Utility Easement
- Site
- Approximate Parcel Boundary
- Delineated Wetland Boundary
- Approx. Wetland Boundary
- Wetland Flag
- Wetland Area
- Open Water (CTDEEP)

N
W E
S

80 40 0 80 Feet

1 in = 80 ft



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Map Sources:

Ortho Base Map: CT ECO 2019Aerial Imagery

Elevation contours derived from 2016 LiDAR data provided by CTECO

Wetlands field delineated by: Matthew Gustafson, Registered Soil Scientist, APT. Date: 07/08/19.

Map Date: November 2020

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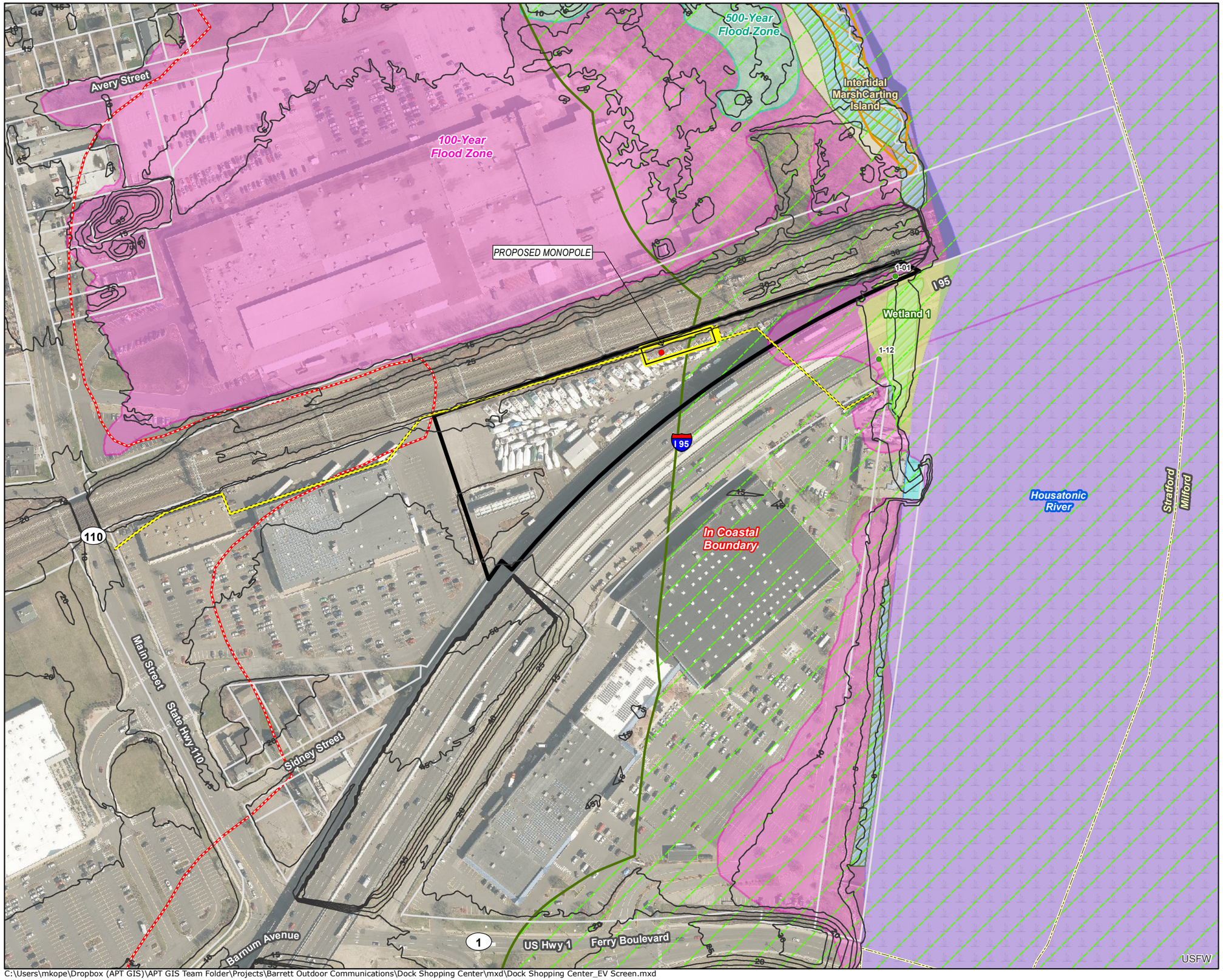
Environmental Resources
Wireless Communications Facility
200 East Main Street Rear
Stratford, Connecticut



Legend

- Proposed Monopole
- Proposed Lease Area
- Proposed Utility Easement
- Subject Property
- Approximate Parcel Boundary
- Municipal Boundary
- Natural Diversity Database Area (June 2021)
- Critical Habitat (CTDEEP, Oct 2019)
- CT NE Cottontail Focus Area*
- Public Water Supply Watershed*
- Delineated Wetland Boundary
- Wetland Flag
- Approx. Wetland Boundary
- CTDEEP Wetlands (not delineated)
- Tidal Wetland 1990 (CTDEEP)
- Tidal Wetland 1970 (CTDEEP)
- Coastal Boundary (CTDEEP)
- Open Water (CTDEEP)
- Prime Farmland Soils*
- Statewide Important Farmland Soils*

FEMA Flood Zones

- 100-Year Flood Zone
- 500-Year Flood Zone
- Floodway*

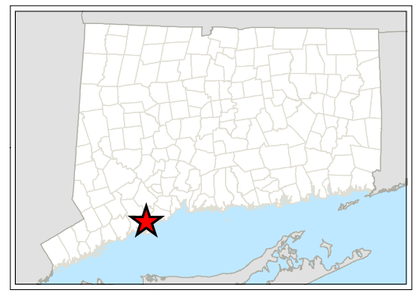
Aquifer Protection Area (APA, CTDEEP, Nov. 2020)*

- Final Adopted Aquifer Protection Area
- Final Aquifer Protection Area
- Preliminary Aquifer Protection Area

N

200 100 0 200 Feet

1 in = 200 ft



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Map Sources:

*Legend item not in mapped area

Ortho Base Map: CT ECO 2016 Aerial Imagery

Elevation contours derived from 2016 LiDAR data provided by CTECO

Digital FEMA data from FEMA's National Flood Hazard Layer (NFHL_09_20181207)

CTDEEP's data library (http://www.ct.gov/deep)
Data layers are maintained and updated by CTDEEP and represent the most recent publications.

Map Date: September 2021

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Photodocumentation

Photo 1: View of proposed tower and compound by boat and jersey barriers in right side of photo at pavement edge, looking west. I-95 Housatonic Bridge in left side of photo and Metro North railroad in far right side of photo.

Photo 2: View of proposed tower and compound (elevated compound along rip rap armored side slope) looking west.

Photo 3: View of Housatonic River and tidal wetlands and mud flat under I-95 bridge, looking southeast.

Photo 4: View of Housatonic River bank, mud flat and tidal wetlands under I-95 bridge, looking north.