



**TECHNICAL REPORT
TO THE
TOWN OF STRATFORD AND THE CITY OF MILFORD**

BARRETT OUTDOOR COMMUNICATIONS, INC.

**PROPOSED MONOPOLE
TELECOMMUNICATIONS
FACILITY**

**200 EAST MAIN STREET REAR
STRATFORD, CONNECTICUT**

*Barrett Outdoor Communications, Inc.
381 Highland Street
West Haven, CT 06512*

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Introduction

Barrett Outdoor Communications, Inc., a stock corporation organized under the laws of the State of Connecticut (“Barrett”), hereby submits this Technical Report to the Town of Stratford (“Stratford”) and the City of Milford (“Milford”).

Barrett proposes to relocate an approximate sixty-five foot wireless telecommunications facility (“Relocated Facility”) at 28 Sidney Street, Stratford (“Existing Location”) to an approximate 4.37 acre parcel commonly known as 200 East Main Street, Rear, Stratford, Connecticut, 06614, and owned by UB Railside, LLC (“Property” or “Site”). The relocation is required because of the location and height of buildings associated with the ongoing redevelopment, which includes a self-storage facility and two nationally recognized restaurants. The Relocated Facility would consist of a 135 foot monopole, designed to accommodate a future extension of twenty feet. A lightning rod would be attached to the top, one omni-directional whip antenna would be base mounted at 140 feet above grade level (“AGL”), with platforms for wireless communication provider antenna arrays at centerlines of approximately 131, 119, 109 and 99 feet AGL. Related equipment would be located nearby on a raised equipment platform adjacent to the monopole.

The antenna arrays would belong to the following: (1) Barrett at the top of the monopole; (2) Cellco Partnership *d.b.a.* Verizon Wireless (“Verizon”) at 119 feet AGL; and (3) T-Mobile Northeast LLC, a subsidiary of T-Mobile USA Inc. *d.b.a.* T-Mobile (“T-Mobile”) at 109 feet AGL. Each of the wireless carriers would provide the antennas and the equipment related to the operation of its antenna array. The Relocated Facility would also provide suitable space for additional wireless carriers at 131 and 90 feet AGL, and municipal emergency services equipment, as necessary, which would promote Connecticut’s policy of collocation pursuant to General Statutes § 16-50aa. The Relocated Facility, if approved, would provide necessary wireless communications service as described in Section One, *infra*.

The purpose of this Technical Report is to provide Stratford and Milford with information concerning the Facility. Section One addresses the need for the Relocated Facility. Section Two details the site selection process. Section Three describes the design for the Relocated Facility and the environmental effects, if any, associated with the proposed Relocated Facility.

Please direct any correspondence and/or communications regarding this Technical Report to the attorneys for Barrett as follows:

Updike, Kelly & Spellacy, P.C.
8 Frontage Road
East Haven, CT 06512
(203) 786-8317
Attention: Jesse A. Langer, Esq.

SECTION 1

Site Justification

The Relocated Facility will replace an existing telecommunications facility located at the Existing Location and utilized by Verizon and T-Mobile. The Existing Location is part of an overall redevelopment plan for an area between the Housatonic River and Main Street generally known as the Dock Shopping Center. The existing telecommunications facility is slated for removal in furtherance of the redevelopment plan. The proposed replacement facility is necessary to maintain the existing coverage, including Emergency 911 service, associated with Verizon and T-Mobile's wireless networks in the areas proximate to the site. Additionally, the Relocated Facility would also accommodate two additional wireless carriers, Barrett's communications system, and municipal emergency communications equipment.

SECTION 2

Site Search Process and Selection

The Existing Location has served as the location of a wireless telecommunications facility for more than twenty years. A redevelopment of the immediate area precipitated the need to relocate the Facility elsewhere in the vicinity of the Existing Location. Barrett intends to relocate the Relocated Facility to the Property because it achieves the existing coverage and capacity objectives of Verizon and T-Mobile.

The Relocated Facility, proposed a short distance (approximately 0.25 miles) from the Existing Location, meets the site selection process typically undertaken by carriers licensed by the Federal Communications Commission ("FCC"). Generally, carriers licensed by the FCC investigate prospective sites in an area based upon the needs of their wireless network and infrastructure. A carrier chooses a target area central to the area in which it has identified coverage and/or capacity needs after extensive research of that particular area. The area targeted is the geographical location where the installation of a site would likely address the identified coverage or capacity need based on general radio frequency engineering and system design standards. The goal is to locate sites that will remedy coverage or capacity issues, cause the least environmental impact and avoid the unnecessary proliferation of towers.

As a general matter, site acquisition personnel study the area in and near the search area to determine whether any suitable structures exist. If a structure of appropriate height and structural capabilities cannot be found, then site acquisition personnel focus on industrial and commercial areas, or other areas that comport to local zoning ordinances that have appropriate environmental and land use characteristics. The list of potential locations is limited by the willingness of property owners to make their properties available for a telecommunications facility. Radio frequency engineers study potentially suitable and available locations to determine whether those locations will meet the technical requirements for a telecommunications facility. The list of possible alternative sites may be further narrowed by potential environmental effects and benefits. The

weight given to relevant factors varies for each search, depending on the nature of the area and the availability of potential sites.

There are no existing suitable structures in the area of Stratford or Milford that was the subject of this site search. The nearest towers and suitable structures are already in use by Verizon and T-Mobile. Moreover, any other existing towers are too far from the target area to provide sufficient coverage specifically to the target area. The Map and List of Facilities within a Four Mile Radius are appended hereto as Attachment 1.

In addition to the fact that the Existing Location, a short distance away, has hosted a wireless telecommunications facility for more than twenty years, the Site meets the above mentioned site selection criteria for several reasons. The Property is located in a retail commercial district designated as "CA" and developed with a retail shopping center. The Property is also located proximate to Interstate I-95 and the associated bridge apparatus over the Housatonic River. The Metro North rail corridor, and the associated bridge catenary structure, is immediately to the north, passing east to west. There are no wetlands, coastal resources, or other environmental concerns.

SECTION 3

General Facility Description

The Relocated Facility is proposed in the northern portion of the Property, an approximately 4.37 acre parcel, consisting of one lot and located at 200 East Main Street, Rear in Stratford. A site plan of the Relocated Facility is appended hereto as Attachment 2. The Property is developed and currently hosts a retail shopping center to the west and south of the proposed Facility. The Metro North Railroad runs east/west to the north of the Site. The Housatonic River is located to the east.

The Relocated Facility would consist of a 4,210 square foot telecommunications easement area and compound. The compound would include an elevated equipment platform. A 135 foot monopole, with a lightning rod on top, would be designed to accommodate a twenty foot extension. The monopole would host the following wireless antenna arrays: (1) a future wireless carrier at a centerline of approximately 131 feet AGL; (2) Verizon at a centerline of 119 feet AGL; and (3) T-Mobile at a centerline of 109 feet AGL. Barrett would install an omnidirectional whip antenna off the top of the monopole.

Related equipment cabinets would be placed on the elevated equipment platform nearby within the leased area. The compound would be surrounded by an eight foot chain link fence with anti-climb mesh. Access to the proposed tower would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer. The Facility would also include a liquid propane fueled emergency standby power generator and two 1,000 gallon liquid propane tanks on concrete pads located at the eastern end of the compound.

Site Evaluation Report

I. LOCATION

- A. COORDINATES: 41° 12' 14.93" ± N
73° 06' 47.91" ± W
- B. GROUND ELEVATION: 12.3' ± AMSL
- C. USGS MAP: USGS 7.5 Quadrangle Map, Milford
- D. SITE ADDRESS: 200 East Main Street, Rear
Stratford, CT 06614
- E. ZONING WITHIN ¼ MILE OF SITE: The abutting areas to the north of the proposed Site are zoned Light Industrial District ("MA") and Coastal Boundary. The abutting areas to the south are zoned Retail Commercial District ("CA") and Coastal Boundary. The abutting areas to the west are zoned CA, MA and Coastal Boundary. The abutting areas to the east include the Housatonic River and Milford.

II. DESCRIPTION

- A. SITE SIZE: 4,210 square foot telecommunications easement and compound. The elevated platform within the compound would be 1,489 square feet with a provision for two future equipment bays of approximately 236 square feet each.
- B. TOWER TYPE/HEIGHT: 135 foot monopole, with the highest appurtenances of an omnidirectional whip antenna and lightning rod; the monopole would be designed to accommodate a twenty foot extension.
- C. SITE TOPOGRAPHY AND SURFACE: The Site is a developed retail shopping center. The Site slopes slightly north to south.
- D. SURROUNDING TERRAIN, VEGETATION, WETLANDS, OR WATER: The Relocated Facility is proposed in the northern portion of the Property, an approximately 4.37 acre parcel, consisting of one lot and located at 200 East Main Street, Rear in Stratford. The Property is developed and currently hosts a retail shopping center to the west and south of the proposed Relocated Facility. The Metro North Railroad runs east/west to the north of the Site. The Housatonic River is located to the east. The hightide line of the Housatonic River is approximately 473 feet to the east of the proposed monopole and approximately 317 feet from the proposed utility easement for the Relocated Facility.

- E. LAND USE WITHIN ¼ MILE OF SITE: The land to the north is used for the Metro North Railroad. A retail shopping center is located to the south and west. The land to the east is the Housatonic River followed by Milford.
- F. LOCATION OF SCHOOLS AND COMMERCIAL DAYCARES NEAR SITE: There are no schools or commercial daycare centers located within 250 feet of the Site.

III. FACILITIES

- A. POWER COMPANY: United Illuminating
- B. POWER PROXIMITY TO SITE: The existing utility pole is located approximately 430 feet from the Site.
- C. TELEPHONE COMPANY: Frontier Communications
- D. PHONE SERVICE PROXIMITY: The existing telco pole is approximately 1,450 feet from the Site.
- E. VEHICLE ACCESS TO SITE: Access to the proposed Relocated Facility would be across an existing bituminous driveway and parking lot.
- F. OBSTRUCTION: The high tide line of the Housatonic River is located approximately 473 feet to the east of the proposed monopole and approximately 317 feet to the east of the proposed utility easement. The 100 year floodplain crosses the Property to the east of the proposed raised equipment platform.
- G. CLEARING AND FILL REQUIRED: The total area of disturbance would be 14,000 square feet. The Site improvements would entail approximately 430 cubic yards of cut for utility trenching and 95 cubic yards of excavation for the construction of the raised equipment platform and monopole. Barrett would not have to remove any trees.

IV. LEGAL

- A. PURCHASE [] LEASE [X]
- B. OWNER: UB Railside, LLC
- C. ADDRESS: 321 Railroad Avenue, Greenwich, CT, 06830
- D. DEED ON RECORD AT: Volume 2565, Page 0108

Facilities and Equipment Specification
(TOWER & EQUIPMENT)

I. TOWER SPECIFICATIONS

- A. MANUFACTURER: TBD
- B. TYPE: Monopole
- C. HEIGHT: 135'
- D. DIMENSIONS: TBD.

II. TOWER LOADING

- A. VERIZON AND T-MOBILE
 - 1. MODEL: TBD
 - 2. DIMENSIONS: TBD
 - 3. ANTENNAS: TBD
 - 4. HEIGHT: centerline of 119 and 109 feet AGL, respectively (Barrett would include a whip antenna on a mount at approximately 140 feet AGL)
 - 5. TRANSMISSION LINES: TBD
- B. FUTURE CARRIERS – two additional carriers and emergency services as needed.

III. ENGINEERING ANALYSIS AND CERTIFICATION

All work shall be in accordance with the 2015 International Building Code as modified by the 2018 Connecticut State Building Code, including the TIA/EIA-222 Revisions G and H “structural standards for steel antenna towers and supporting structures,” 2018 Connecticut State Fire Prevention Code, 2017 National Electrical Code and local codes. The foundation design will be based on soil conditions at the site.

Environmental Assessment Statement

I. PHYSICAL IMPACT

A. WATER FLOW AND QUALITY

The construction, operation and maintenance of the Facility would not affect water quality or result in a disturbance of or any impact to any wetlands and watercourses, including coastal resources. The nearest wetland area or watercourse is a wetland area is +/- 316 feet to the east of proposed compound and +/- 40 feet from the nearest point of the proposed underground utility route. That wetland resource is identified as a stormwater outfall and riprap armored channel, tidal wetland and intertidal mud flat that borders on the tidally influenced Housatonic River. The proposed Relocated Facility would likely not result in an adverse impact to nearby tidal wetlands or other coastal resources associated with the Housatonic River because of the distance from the Relocated Facility to the nearest resource area and because of the existing developed and disturbed nature of the Site and surrounding area. Additionally, the Site is not located within a 100 year flood zone. A copy of the Coastal Consistency Review is appended hereto as Attachment 3. Barrett would implement Best Management Practices during construction to control storm water and erosion. *See* Site Plan at Attachment 2, *infra*.

B. AIR QUALITY

Under ordinary operating conditions, the equipment used at the Relocated Facility would emit no air pollutants of any kind.

C. LAND

Although the proposed Relocated Facility would require some grading, the Site and adjacent areas are already developed. *See* the Site Evaluation Report, *supra*. The Relocated Facility would not require the removal of any trees. The remainder of the Property would remain unchanged by the construction and operation of the Site.

D. NOISE

The Relocated Facility equipment after construction would not emit any noise other than the installed heating, air conditioning and ventilation systems. In the event of a power outage, the wireless carriers would install a backup generator. There would also be a propane powered backup generator on site. Some noise is anticipated during construction, which is expected to take approximately ten weeks.

E. POWER DENSITY

The Facility would satisfy the FCC's standards.

F. VISIBILITY

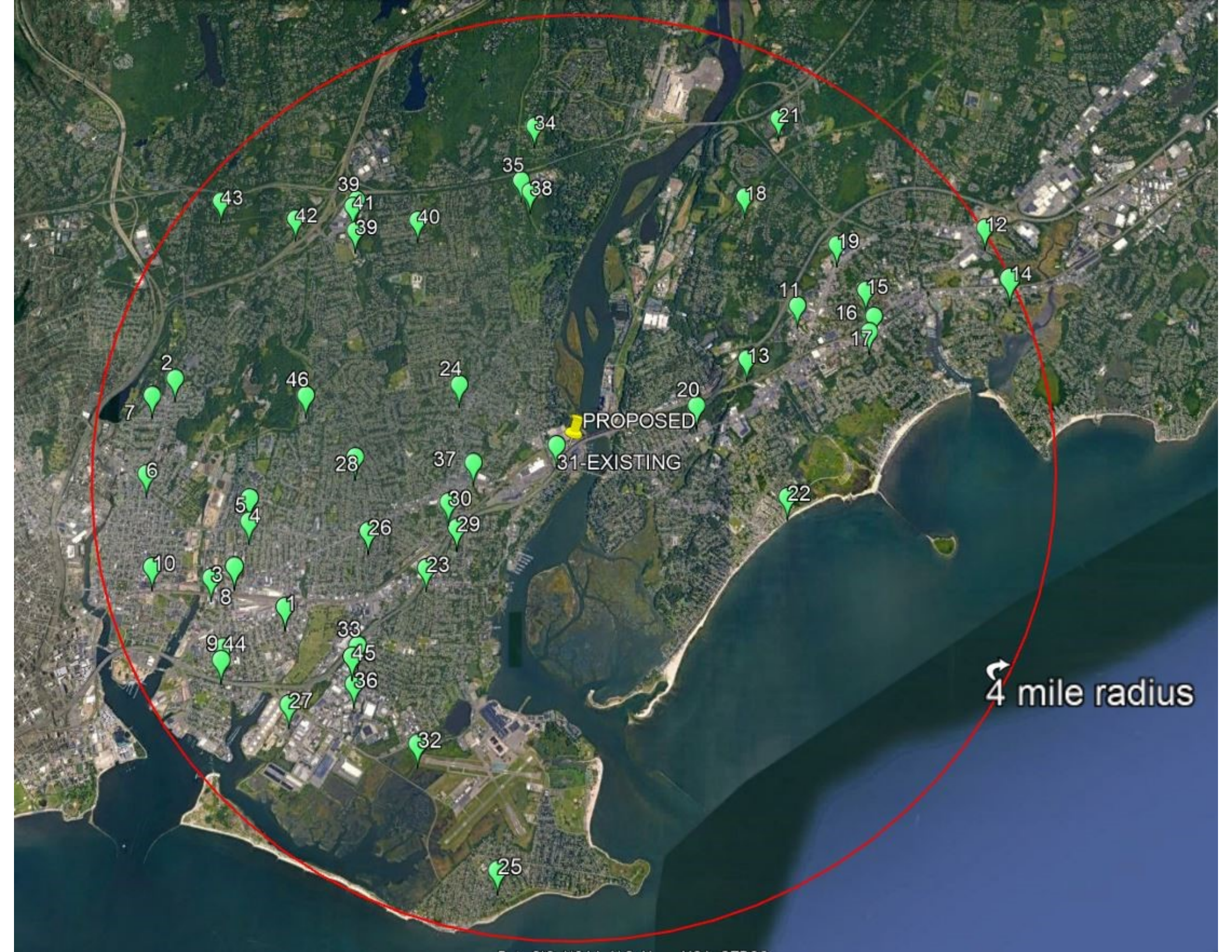
According to preliminary viewshed mapping, approximately 15 percent of the 8,042 acre study area (two mile radius) would have year-round views of portions of the Relocated Facility. Most of this area occurs over the Housatonic River and adjoining tidal marsh. An additional 148 acres may experience some seasonal views during leaf-off conditions. There are no single family residences within 1,000 feet of the equipment platform. The cumulative predicted visibility is approximately 17 percent of the study area. Beyond the Housatonic River and surrounding shoreline, there would be some year round visibility along Interstate 95 within one-half to three-quarters of mile of the Relocated Facility. There would be some predicted seasonal views from certain commercial and residential areas to the north and west of the Site, and on the western shore of the Housatonic River. These predicted views also include the existing infrastructure associated with commercial development, the catenaries associated with the Metro North Rail Line, the Interstate 95 corridor (and bridge), as well as electric transmission structures that are substantially taller than the proposed Facility. A copy of the Preliminary Visibility Assessment is appended hereto as Attachment 4.

II. SCENIC, NATURAL, HISTORIC & RECREATIONAL VALUES

Barrett has retained All Points Technology Corporation, P.C. (“All-Points”) to evaluate the Relocated Facility in accordance with the FCC’s regulations implementing the National Environmental Policy Act of 1969 (“NEPA”). All-Points concluded that the Relocated Facility would not have an adverse effect on any natural resource included in the thorough NEPA screening. A copy of the NEPA Summary Report is appended hereto as Attachment 5. All-Points also consulted with the Connecticut State Historic Preservation Office (“SHPO”) concerning sites listed on or eligible for listing on the National Register of Historic Places. The SHPO determined that the Facility would have no adverse effect on such sites. A copy of the SHPO Determination Letter is appended hereto as Attachment 6. Additionally, the location of the proposed Relocated Facility would not reduce, eliminate or in any way hinder public access to the Housatonic River or future water-dependent development activities or opportunities.

ATTACHMENT 1

Map and List of Facilities within A Four Mile Radius



PROPOSED

31-EXISTING

4 mile radius

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- 31-EXISTING
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Map #	Town	Address	Latdd	Longdd	Tower Type	carrier_1	carrier_2	carrier_3
1	Bridgeport	1069 Connecticut Ave	41.183611	-73.158056	monopole	Sprint @ 126'	T-Mobile @ 120'	AT&T 100'
2	Bridgeport	120 Huntington Tpke	41.211389	-73.177222	rooftop	ATT @ 100'	Verizon @ 182'	
3	Bridgeport	1491 Central Avenue (Tower II Apts)	41.187467	-73.168831	rooftop	Sprint @ 108'	T-Mobile @ 85'	
4	Bridgeport	1575 Boston Avenue (501-563 N. Ridgefield Ave)	41.193803	-73.164511	rooftop	Sprint @48'		
5	Bridgeport	1596 Boston Avenue	41.192989	-73.1645	steeple	T-Mobile @ 66'		
6	Bridgeport	1759 East Main Street	41.198736	-73.180533		T-Mobile @ 45'		
7	Bridgeport	1875 Noble Ave	41.210308	-73.181117	flagpole	T-Mobile @ 107, 117'	Sprint @ 96'	
8	Bridgeport	267 Grant Street	41.189722	-73.166389	rooftop	Verizon @ 144'	Sprint @ 140'	
9	Bridgeport	470 Newfield Avenue	41.175	-73.167083	billboard	T-Mobile @ 10'		
10	Bridgeport	803 East Washington Ave.	41.186942	-73.1789	rooftop	T-Mobile @ 77'		
11	Milford	10 Bona Street	41.220089	-73.077389	monopole	ATTT @ 133'	Verizon @ 93'	
12	Milford	1052 Boston Post Road	41.233111	-73.0455	s-flagpole	Verizon @ 82.5/76.5'	T-Mobile @ 72'	ATT @ 47'
13	Milford	111 SchoolHouse Road	41.212817	-73.0849	monopole	ATT @ 125'	Verizon @ 105'	T-Mobile @ 100'
14	Milford	160 Wampus Lane	41.225117	-73.042342	monopole	Nextel @ 120'	T-Mobile @ 105'	
15	Milford	200 High Street (Laurelton Hall)	41.222858	-73.066044	smokestack	Verizon @ 66.9'		
16	Milford	27 Golden Hill Street	41.218961	-73.065081	rooftop	T-Mobile @ 42'		
17	Milford	300 Seaside Avenue	41.2164	-73.065403	rooftop	Sprint @ 55'		
18	Milford	423 Oronoque Rd	41.237842	-73.086111	monopole	Verizon @ 100'	ATT @ 84'	
19	Milford	434 Boston Post Rd	41.228556	-73.070139	self-supporting lattice	ATT @ 140'	T-Mobile @ 110'	
20	Milford	438 Bridgeport Ave	41.206561	-73.093372	monopole	ATT @ 100'/73'	Sprint @ 80' & 90'	
21	Milford	528-530 Wheelers Farms Rd	41.248403	-73.079056	monopole	T-Mobile @ 110'	Verizon @ 110'	ATT @ 95'
22	Milford	85 Viscount Drive	41.199194	-73.078806	rooftop	Sprint @ 85'	T-Mobile @ 70'	
23	Stratford	100 Lupes Drive	41.188381	-73.136347	billboard	T-Mobile @ 49'		
24	Stratford	131 Huntington Road	41.208797	-73.131978	steeple	T-Mobile @ 59'		
25	Stratford	179 Prospect Drive	41.155011	-73.123442	steeple	T-Mobile @ 66'		
26	Stratford	1825 Barnum Ave (1-253 Burrirt Ave)	41.193297	-73.144919	rooftop	T-Mobile @ 57'	ATT @ 43'	Sprint @ 43 & 55'
27	Stratford	225 Lordship Blvd.	41.171611	-73.156472	rooftop	Sprint @ 72'		
28	Stratford	23 Stonybrook Road	41.203278	-73.148625	monopole	ATT @ 110' and 120'	T-Mobile @ 87' and 97'	Verizon @ 77'
29	Stratford	2399 Main Street	41.193264	-73.131256	rooftop	Sprint @ 98'	Verizon @ 57'	
30	Stratford	2725 Main Street	41.197614	-73.132431	cupola	ATT @ 89'	Sprint @ 80'	
31	Stratford	52 Sidney Street (Existing site)	41.201389	-73.116111	billboard	Verizon @ 67.9'	T-Mobile @ 60'	
32	Stratford	611 Access Road	41.168206	-73.136339	rooftop	T-Mobile @ 54'		
33	Stratford	623-627 Honeyspot Rd.	41.176875	-73.146022	monopole	ATT @ 90'	Verizon @ 80'	Sprint @ 72'
34	Stratford	630 James Farm Road	41.245333	-73.12	self-supporting lattice	Verizon @ 98'		
35	Stratford	670 Chapel Street	41.237925	-73.122389	power mount	ATT @123'	T-Mobile @ 107'	
36	Stratford	727 Honeyspot Road	41.1754	-73.146994	rooftop	T-Mobile @ 56'		
37	Stratford	900 Longbrook Avenue	41.201714	-73.128875	guyed lattice	T-Mobile @ 47'		
38	Stratford	Chapel Street (CL&P # 280)	41.236453	-73.122047	power mount	Sprint @ 87'		
39	Stratford	Hawley Lane (CL&P # 830)	41.233022	-73.149592	power mount	Nextel @ 101'		
40	Stratford	Huntington Avenue	41.233189	-73.139772	power mount	T-Mobile @ 88'		
41	Trumbull	180 Hawley Lane	41.235583	-73.149778	rooftop	ATT @ 56'	Verizon @ 55.1'	Sprint @ 54'
42	Trumbull	2891 Nichols Avenue	41.232858	-73.159333	power mount	ATT @ 100'		
43	Trumbull	48 Quail Trail	41.232684	-73.172253	power mount	T-Mobile @ 105'		
44	Bridgeport	568 Newfield Ave	41.1766	-73.1669	rooftop	T-Mobile		
45	Stratford	727 Honeyspot Rd	41.1754	-73.147	rooftop flagpole	T-Mobile		
46	Stratford	3191 Broadbridge Ave	41.2072	-73.1563	rooftop	T-Mobile		

ATTACHMENT 2

Site Plan



BARRETT OUTDOOR COMMUNICATIONS, INC.

"DOCK SHOPPING CENTER" WIRELESS COMMUNICATIONS FACILITY 200 EAST MAIN ST. REAR STRATFORD, CT 06614

ALL-POINTS
TECHNOLOGY CORPORATION
567 VAUXHALL STREET EXTENSION - SUITE 311
WATERFORD, CT 06385 PHONE: (860)-663-1697
WWW.ALLPOINTSTECH.COM FAX: (860)-663-0935

BARRETT OUTDOOR COMMUNICATIONS, INC.

381 HIGHLAND STREET
WEST HAVEN, CT 06516
OFFICE: (203) 932-4601

PERMITTING DOCUMENTS

NO	DATE	REVISION
8	11/12/20	FOR FILING: JRM
9	03/24/21	REVISED FOR FILING: JRM

OWNER UB RAILSIDE LLC
ADDRESS: 200 EAST MAIN ST. REAR
STRATFORD, CT 06614

"DOCK SHOPPING CENTER"

SITE 200 EAST MAIN ST. REAR
ADDRESS: STRATFORD, CT 06614

APT FILING NUMBER: CT560100

DRAWN BY: JM **CHECKED BY:** JRM

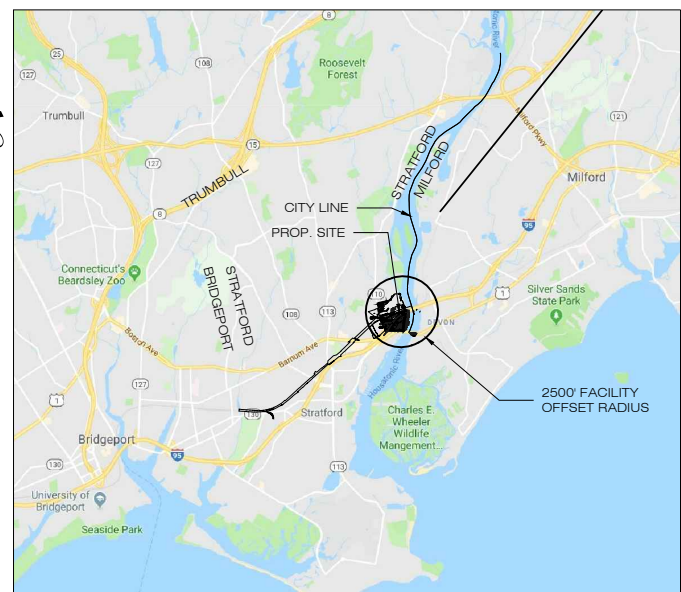
DATE: 04/05/19

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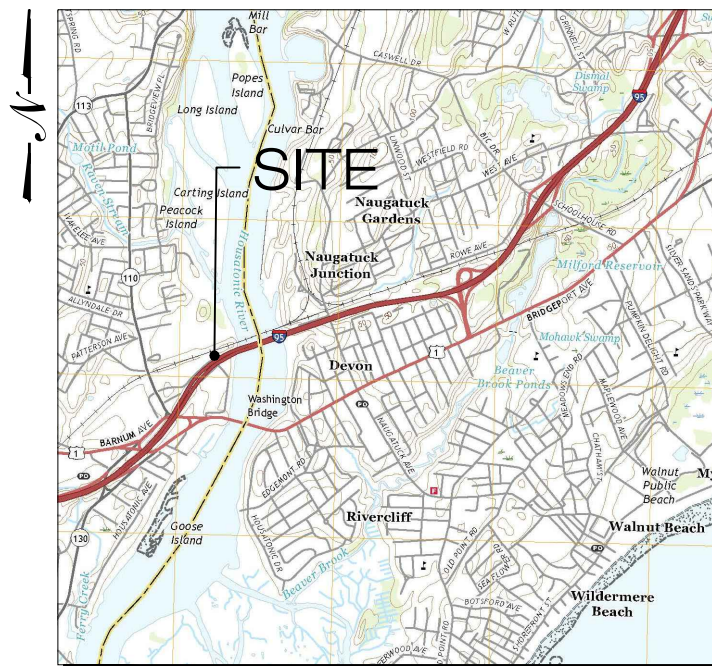
TITLE SHEET & INDEX

SHEET NUMBER:

T-1



MUNICIPAL NOTIFICATION LIMIT MAP
SCALE: 1" = 4000'-0"



VICINITY MAP
SCALE: 1" = 2,000'

DRAWING INDEX

- T-1 TITLE SHEET & INDEX
- A1 TELECOMMUNICATIONS EASEMENT MAP (1 OF 2)
- A2 TELECOMMUNICATIONS EASEMENT MAP (2 OF 2)
- R-1 ABUTTERS MAP
- SP-1 SITE PLAN
- C-1 PARTIAL SITE PLAN & ELEVATION
- C-2 SECTION

SITE INFORMATION

SITE NAME: "DOCK SHOPPING CENTER"
SITE ADDRESS: 200 EAST MAIN ST. REAR,
STRATFORD, CT 06614

SITE TYPE/DESCRIPTION: INSTALL 135'± AGL MONOPOLE
AND ELEVATED WIRELESS COMMUNICATIONS
EQUIPMENT PLATFORM WITHIN 4,650'± SF
LEASE AREA

PROPERTY OWNER: UB RAILSIDE LLC
321 RAILROAD AVE.
GREENWICH, CT 06830

APPLICANT: BARRETT OUTDOOR COMMUNICATIONS, INC.
381 HIGHLAND STREET
WEST HAVEN, CT 06516

LEGAL/REGULATORY COUNSEL: JESSE A. LANGER
UPDIKE, KELLY & SPELLACY, P.C.
8 FRONTAGE ROAD
EAST HAVEN, CT 06512
(203) 786-8317

ENGINEERING CONTACT: ALL-POINTS TECHNOLOGY CORP., P.C.
567 VAUXHALL STREET EXTENSION - SUITE 311
WATERFORD, CT 06385
860 663-1697

LATITUDE: N41°12'14.93" (N41.20413889) (NAD 83)
LONGITUDE: W73°06'47.91" (-73.11333333) (NAD 83)
ELEVATION: 12.3'± AMSL

MAP: 60
BLOCK: 11
LOT: 1/7

ZONING DISTRICT: CA (RETAIL COMMERCIAL DISTRICT)
COASTAL BOUNDARY
(CMA; C.G.S. 22a-113)

COORDINATES & GROUND
ELEVATION INDICATED HEREIN
WERE ESTABLISHED FROM AN
FAA 1-A SURVEY CERTIFICATION,
AS PREPARED BY CODESPOTI &
ASSOCIATES, P.C., DATED
AUGUST 18, 2020.

PERMITTING DOCUMENTS

NO	DATE	REVISION
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9	03/24/21	REVISED FOR FILING: JRM

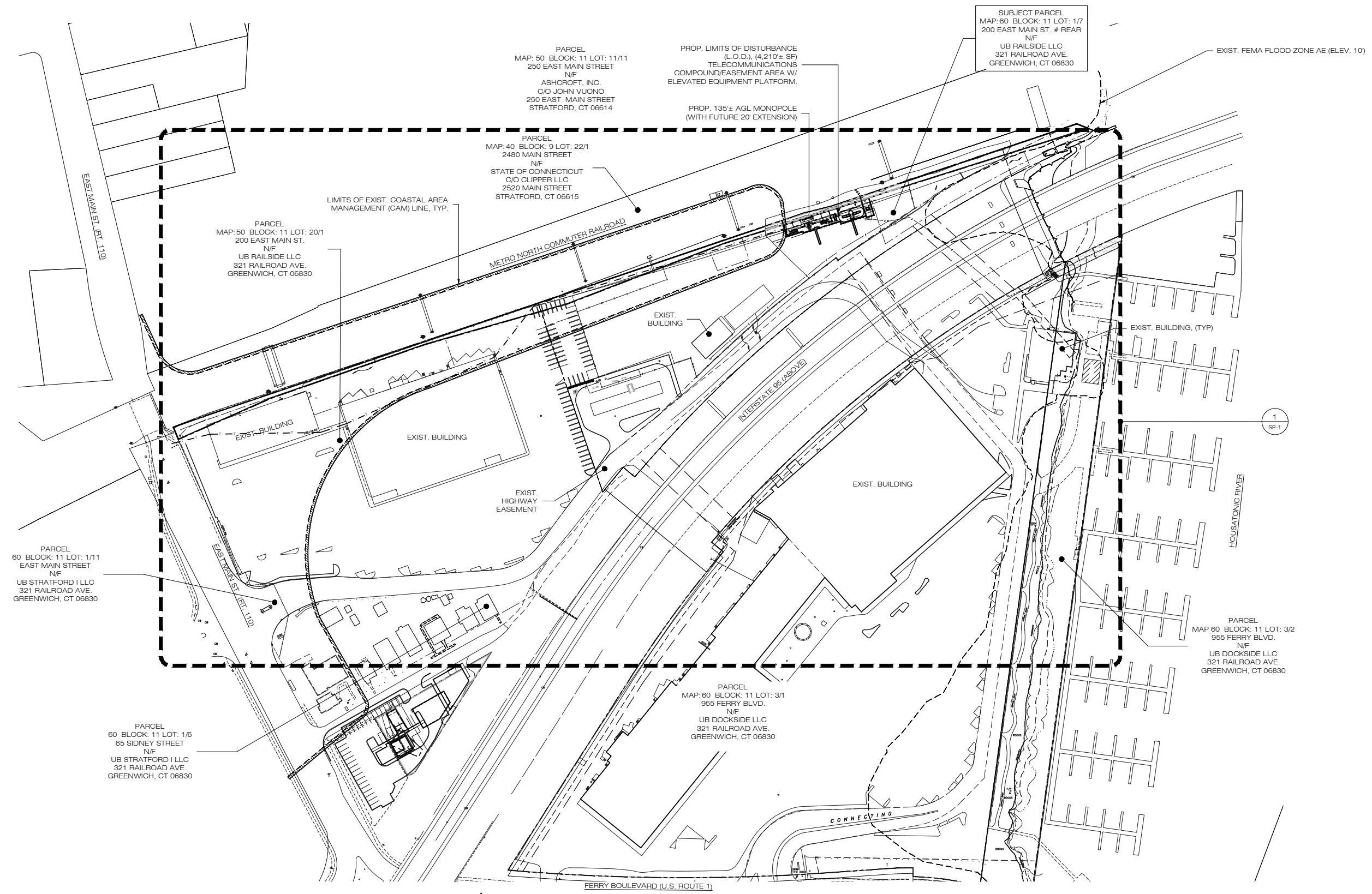
OWNER UB RAILSIDE LLC
ADDRESS: 200 EAST MAIN ST. REAR
STRATFORD, CT 06614

"DOCK SHOPPING CENTER"

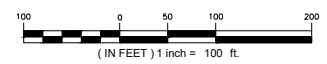
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DRAWN BY: JM **CHECKED BY:** JRM
DATE: 04/05/19

SHEET TITLE:
ABUTTERS MAP

SHEET NUMBER:
R-1



1 ABUTTERS MAP
R-1 SCALE: 1" = 100'-0"



PERMITTING DOCUMENTS

NO	DATE	REVISION
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9	03/24/21	REVISED FOR FILING: JRM

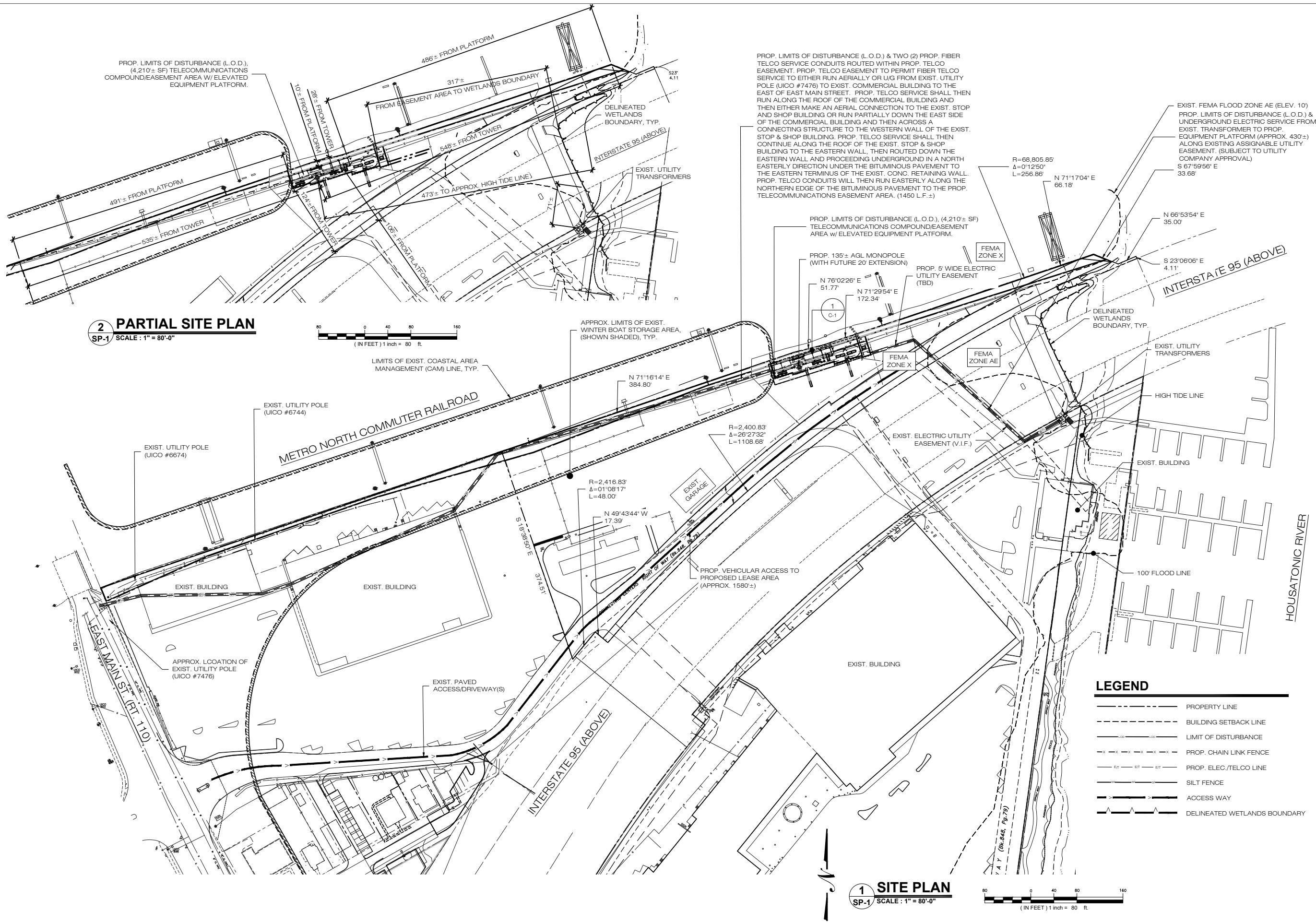
OWNER UB RAILSIDE LLC
ADDRESS: 200 EAST MAIN ST. REAR STRATFORD, CT 06614

"DOCK SHOPPING CENTER"

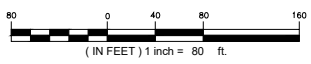
SITE 200 EAST MAIN ST. REAR
ADDRESS: STRATFORD, CT 06614
APT FILING NUMBER: CT560100
DRAWN BY: JM **CHECKED BY:** JRM
DATE: 04/05/19

SHEET TITLE:
SITE PLAN & PARTIAL SITE PLAN

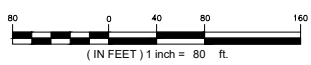
SHEET NUMBER:
SP-1



2 PARTIAL SITE PLAN
 SP-1 SCALE: 1" = 80'-0"



1 SITE PLAN
 SP-1 SCALE: 1" = 80'-0"



LEGEND

	PROPERTY LINE
	BUILDING SETBACK LINE
	LIMIT OF DISTURBANCE
	PROP. CHAIN LINK FENCE
	PROP. ELEC./TELECO LINE
	SILT FENCE
	ACCESS WAY
	DELIMITED WETLANDS BOUNDARY

PROP. LIMITS OF DISTURBANCE (L.O.D.) & TWO (2) PROP. FIBER TELCO SERVICE CONDUITS ROUTED WITHIN PROP. TELCO EASEMENT. PROP. TELCO EASEMENT TO PERMIT FIBER TELCO SERVICE TO EITHER RUN AERIALLY OR U/G FROM EXIST. UTILITY POLE (UICO #7476) TO EXIST. COMMERCIAL BUILDING TO THE EAST OF EAST MAIN STREET. PROP. TELCO SERVICE SHALL THEN RUN ALONG THE ROOF OF THE COMMERCIAL BUILDING AND THEN EITHER MAKE AN AERIAL CONNECTION TO THE EXIST. STOP AND SHOP BUILDING OR RUN PARTIALLY DOWN THE EAST SIDE OF THE COMMERCIAL BUILDING AND THEN ACROSS A CONNECTING STRUCTURE TO THE WESTERN WALL OF THE EXIST. STOP & SHOP BUILDING. PROP. TELCO SERVICE SHALL THEN CONTINUE ALONG THE ROOF OF THE EXIST. STOP & SHOP BUILDING TO THE EASTERN WALL, THEN ROUTED DOWN THE EASTERN WALL AND PROCEEDING UNDERGROUND IN A NORTH EASTERLY DIRECTION UNDER THE BITUMINOUS PAVEMENT TO THE EASTERN TERMINUS OF THE EXIST. CONC. RETAINING WALL. PROP. TELCO CONDUITS WILL THEN RUN EASTERLY ALONG THE NORTHERN EDGE OF THE BITUMINOUS PAVEMENT TO THE PROP. TELECOMMUNICATIONS EASEMENT AREA. (1450 L.F.±)

PROP. LIMITS OF DISTURBANCE (L.O.D.), (4,210± SF) TELECOMMUNICATIONS COMPOUND/EASEMENT AREA w/ ELEVATED EQUIPMENT PLATFORM.

PROP. 135± AGL MONOPOLE (WITH FUTURE 20' EXTENSION)

PROP. 5' WIDE ELECTRIC UTILITY EASEMENT (TBD)

EXIST. ELECTRIC UTILITY EASEMENT (V.I.F.)

PROP. VEHICULAR ACCESS TO PROPOSED LEASE AREA (APPROX. 1580±)

EXIST. FEMA FLOOD ZONE AE (ELEV. 10') PROP. LIMITS OF DISTURBANCE (L.O.D.) & UNDERGROUND ELECTRIC SERVICE FROM EXIST. TRANSFORMER TO PROP. EQUIPMENT PLATFORM (APPROX. 430±) ALONG EXISTING ASSIGNABLE UTILITY EASEMENT. (SUBJECT TO UTILITY COMPANY APPROVAL)
 S 67°59'56" E 33.68'

N 66°53'54" E 35.00'

S 23°06'06" E 4.11'

N 71°17'04" E 66.18'

N 76°02'26" E 51.77'

N 71°29'54" E 172.34'

APPROX. LIMITS OF EXIST. WINTER BOAT STORAGE AREA, (SHOWN SHADED), TYP.

LIMITS OF EXIST. COASTAL AREA MANAGEMENT (CAM) LINE, TYP.

EXIST. UTILITY POLE (UICO #6744)

EXIST. UTILITY POLE (UICO #6674)

R=2,416.83'
 Δ=01°08'17"
 L=48.00'

N 49°43'44" W 17.39'

R=2,400.83'
 Δ=26°27'32"
 L=1108.68'

R=68,805.85'
 Δ=0°12'50"
 L=256.86'

N 71°17'04" E 66.18'

N 76°02'26" E 51.77'

N 71°29'54" E 172.34'

N 71°16'14" E 384.80'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

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S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

S 18°36'50" E 37.45'

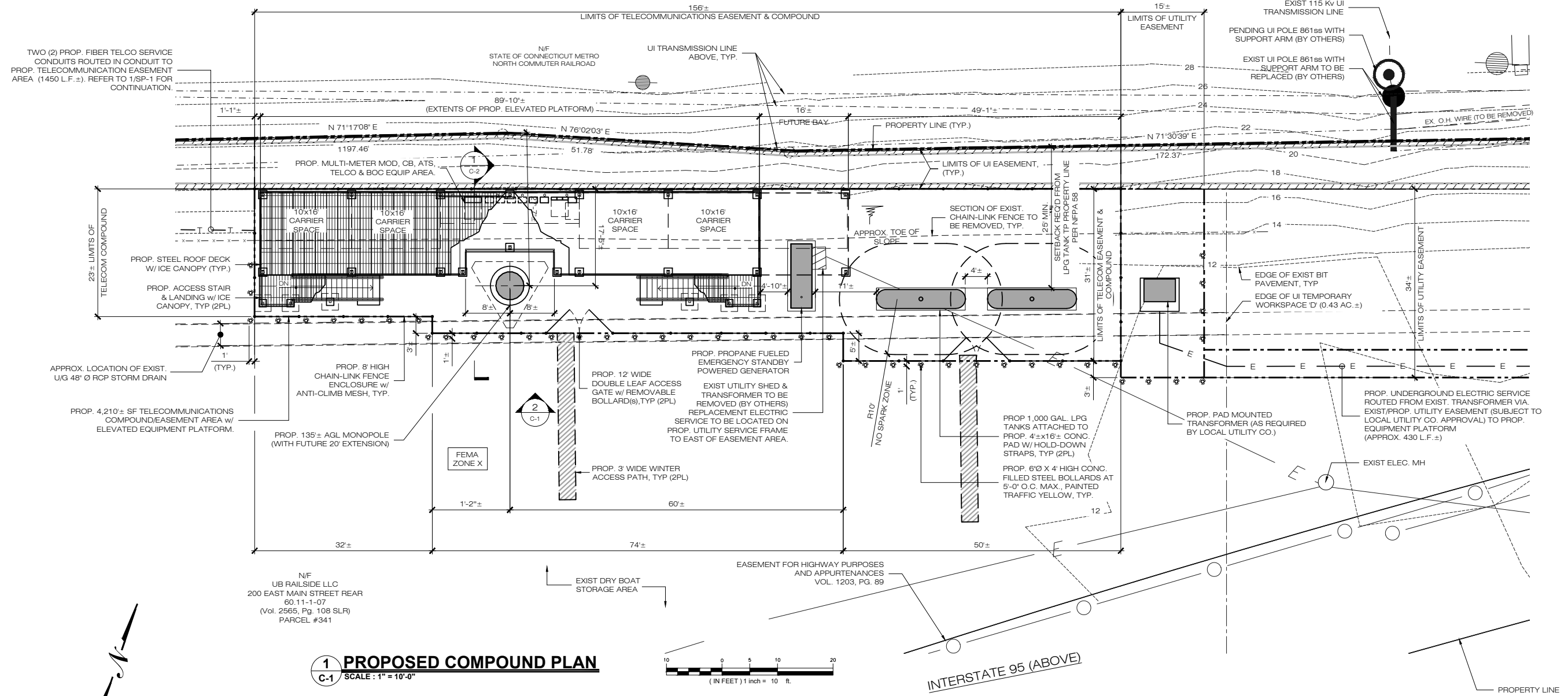
S 18°36'50" E 37.45'

PERMITTING DOCUMENTS		
NO	DATE	REVISION
8	11/12/20	FOR FILING: JRM
9	03/24/21	REVISED FOR FILING: JRM

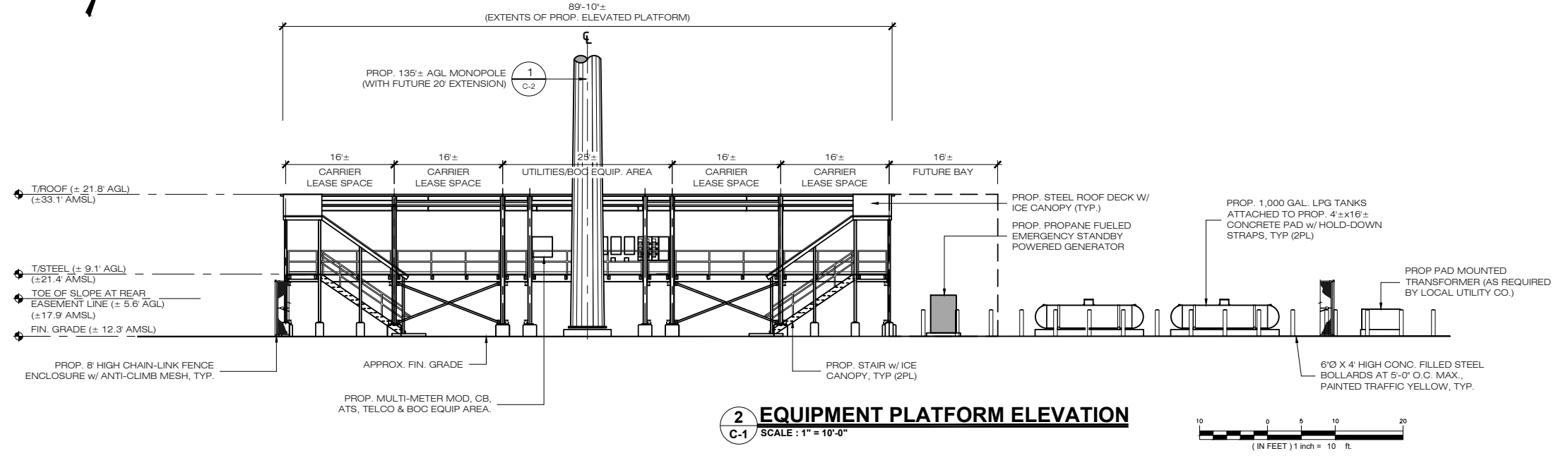
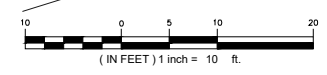
OWNER UB RAILSIDE LLC
ADDRESS: 200 EAST MAIN ST. REAR STRATFORD, CT 06614

"DOCK SHOPPING CENTER"	
SITE ADDRESS:	200 EAST MAIN ST. REAR STRATFORD, CT 06614
APT FILING NUMBER:	CT560100
DRAWN BY:	JM
CHECKED BY:	JRM
DATE:	04/05/19

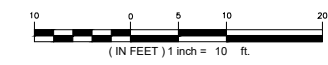
SHEET TITLE:	
PROPOSED COMPOUND PLAN	
SHEET NUMBER:	C-1



1 PROPOSED COMPOUND PLAN
 SCALE: 1" = 10'-0"



2 EQUIPMENT PLATFORM ELEVATION
 SCALE: 1" = 10'-0"



SITE AREAS & VOLUMES OF EARTHWORK

SITWORK ENTAILS APPROXIMATELY NET 95 CUBIC YARDS OF EXCAVATION TO BE REMOVED FROM THE SITE. THE UTILITY TRENCH FROM THE DEMARCS TO THE COMPOUND WILL EXCAVATE APPROXIMATELY 430 CUBIC YARDS OF MATERIAL THAT WILL BE USED TO BACKFILL THE TRENCH.

TOTAL AREA OF DISTURBANCE = 14,000± SF

NOTE:
 NO TREES WILL NEED TO BE REMOVED IN CONSTRUCTION OF THE FACILITY.

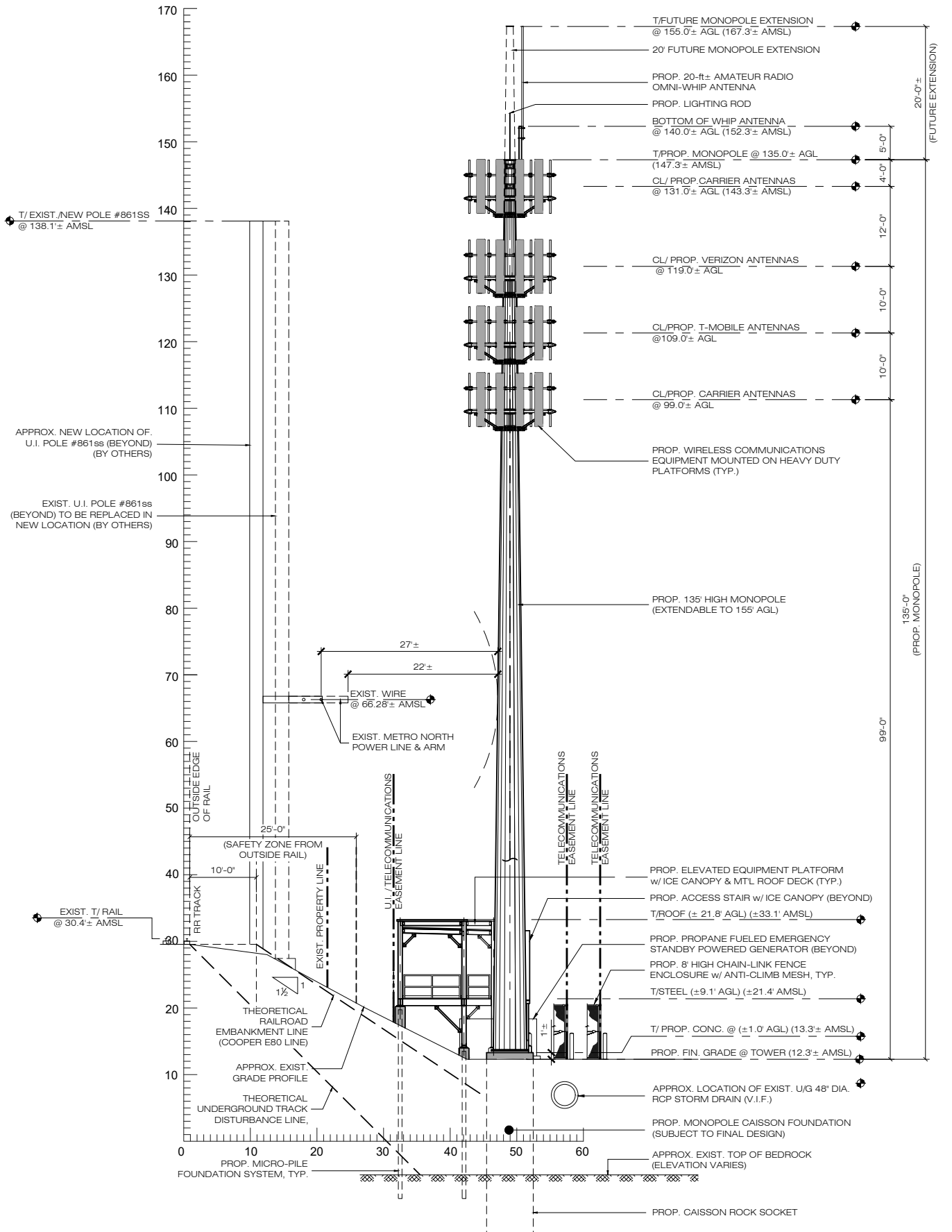
PERMITTING DOCUMENTS		
NO	DATE	REVISION
8	11/12/20	FOR FILING: JRM
9	03/24/21	REVISED FOR FILING: JRM

OWNER UB RAILSIDE LLC
ADDRESS: 200 EAST MAIN ST. REAR
STRATFORD, CT 06614

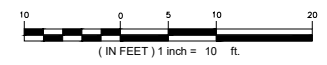
"DOCK SHOPPING CENTER"
SITE 200 EAST MAIN ST. REAR
ADDRESS: STRATFORD, CT 06614
APT FILING NUMBER: CT560100
DRAWN BY: JM CHECKED BY: JRM
DATE: 04/05/19

SHEET TITLE:
SECTION

SHEET NUMBER:
C-2



SECTION W/ METRO NORTH SAFETY PROFILE THRU PROP. TELECOMMUNICATIONS COMPOUND
SCALE: 1" = 10'-0"



ATTACHMENT 3
Coastal Consistency Review



COASTAL CONSISTENCY REVIEW

December 2, 2020

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 135-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. An LPG-fueled back-up generator and two 1,000-gallon LPG tanks will be installed on a concrete pad in the eastern end of the compound. Underground utilities supporting this installation would originate from the eastern side of the Property 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.

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

¹ CGS Section 22a-90 through 22a-112

Resources Map² 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*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Beaches & Dunes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bluffs & Escarpments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Coastal Hazard Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Waters & Estuarine Embayments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Developed Shorefront	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Freshwater Wetlands and Watercourses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Intertidal Flats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Islands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rocky Shorefront	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shellfish Concentration Areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shorelands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tidal Wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* 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 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

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

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 July 13, 2019. DEEP NDDDB responded on August 15, 2019 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 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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Coastal Flooding - CGS Section 22a-93(15)(E)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Coastal Waters Circulation Patterns - CGS Section 22a-93(15)(B)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Drainage Patterns - CGS Section 22a-93(15)(D)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

³ applicable to all proposed activities

5. Patterns of Shoreline Erosion and Accretion - CGS Section 22a-93(15)(C)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Visual Quality - CGS Section 22a-93(15)(F)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Water Quality - CGS Section 22a-93(15)(A)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Wildlife, Finfish, Shellfish Habitat - CGS Section 22a-93(15)(G)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 21.4 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)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Replacing an existing water-dependent use with a non-water-dependent use - CGS Section 22a-93(17)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Siting a non-water-dependent use which reduces or eliminates public access to marine or tidal waters - CGS Section 22a-93(17)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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.

⁴ CGS Section 22a-93(17)

Coastal Resources Inspection Report



COASTAL RESOURCES INSPECTION

December 2, 2020

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 <input checked="" type="checkbox"/>	GPS (sub-meter) located <input checked="" type="checkbox"/>

TIDAL WETLAND HYDROLOGY:

Subtidal <input type="checkbox"/>	Regularly Flooded <input checked="" type="checkbox"/>	Irregularly Flooded <input type="checkbox"/>
Irregularly Flooded <input type="checkbox"/>		
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 <input type="checkbox"/>	Common Reed Marsh <input type="checkbox"/>	Scrub/Shrub/Emergent <input type="checkbox"/>
Brackish Marsh <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	Intermittent <input type="checkbox"/>	Tidal <input checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If no, describe field identified soils		

DOMINANT PLANTS:

Common Reed (<i>Phragmites australis</i>)*	Saltwater Cordgrass (<i>Spartina alterniflora</i>)
Fox grape (<i>Vitis labrusca</i>)	

* 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*	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Beaches & Dunes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bluffs & Escarpments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Coastal Hazard Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Waters & Estuarine Embayments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Developed Shorefront	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Freshwater Wetlands and Watercourses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Intertidal Flats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Islands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rocky Shorefront	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shellfish Concentration Areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shorelands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tidal Wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* 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 ±135-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.

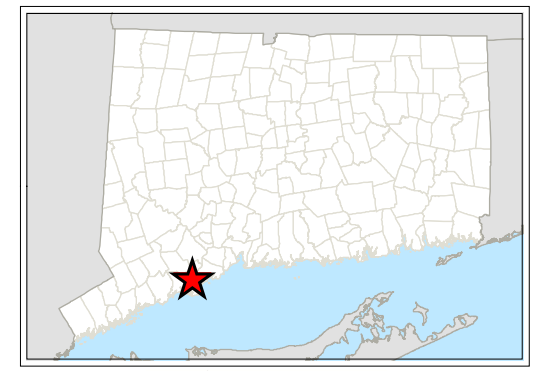
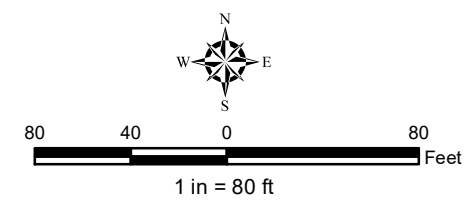
Wetland 1 includes a stormwater outfall and riprap armored channel, tidal wetland and intertidal mud flat that border on the tidally influenced Housatonic River. The delineated boundaries to this coastal resource are characterized by steep fill slopes. Banks to the Housatonic River north and south of 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)



Map Sources:

Ortho Base Map: CT ECO 2019 Aerial Imagery

Elevation contours derived from 2016 LiDAR data provided by CTECO

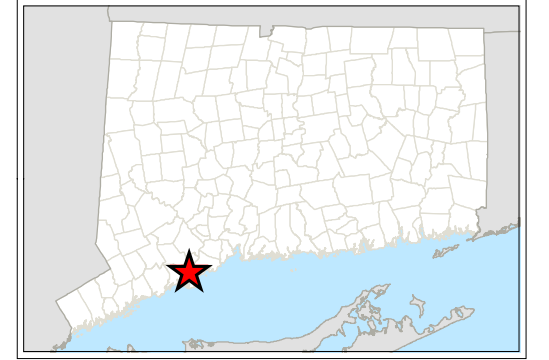
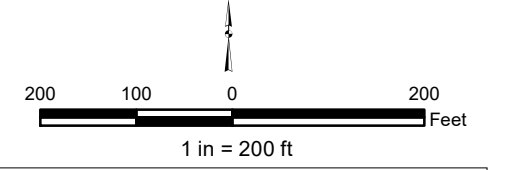
Wetlands field delineated by: Matthew Gustafson, Registered Soil Scientist, APT.
Date: 07/08/19.

Map Date: November 2020

**Environmental Resources
Wireless Communications Facility
210 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 2020)
- Critical Habitat (CTDEEP, July 2009)
- 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, Aug. 2019)***
- Final Adopted Aquifer Protection Area
- Final Aquifer Protection Area
- Preliminary Aquifer Protection Area



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: November 2020



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.

ATTACHMENT 4
Preliminary Visibility Assessment



PRELIMINARY VISUAL ASSESSMENT

Date: November 12, 2020

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

From: Brian Gaudet

Re: Proposed Telecommunications Facility
200 East Main Street Rear
Stratford, Connecticut

Barrett Outdoor Communications, Inc. ("Barrett") has identified a proposed location for development of a wireless telecommunications facility at 200 East Main Street Rear, Stratford, Connecticut (the "Host Property"). The proposed facility would include a 135-foot tall steel monopole and supporting equipment within a $\pm 4,650$ -square foot fenced compound (the "Facility") located in the north central portion of the Host Property. The proposed Facility is planned as a replacement for a billboard with wireless telecommunications facilities on a nearby property, which is being demolished as part of continuing redevelopment of the Host Property and adjacent properties owned by an affiliate of the Host Property owner.

The Host Property is located east of East Main Street, north of I-95, south of the Metro North rail line and west of the Housatonic River. It is a cleared, primarily undeveloped parcel with a small building and is currently used for boat storage. Commercial development and the auto and rail transportation corridors dominate the surrounding area.

At the request of Barrett, All-Points Technology Corporation, P.C. ("APT") has prepared initial viewshed mapping to provide a preliminary evaluation of the visibility associated with the proposed Facility. To conduct this assessment, a predictive computer model was developed specifically for this project using ESRI's ArcMap Geographic Information System ("GIS")¹ software and available GIS data. The predictive model provides an initial estimate of potential visibility throughout a pre-defined "Study Area", in this case a two-mile radius surrounding the proposed Facility location.

The predictive model incorporates project and Study Area-specific data, including the Facility location, its ground elevation and the proposed Facility height, as well as the surrounding topography, existing vegetation, and structures (the primary features that can block direct lines of sight). The Study Area extends into the neighboring municipality of Milford to the east. I-95 bisects the Study Area in an east-west direction. The Housatonic River bisects the Study Area in a north-south direction.

¹ ArcMap is a Geographic Information System desktop application developed by the Environmental Systems Research Institute for creating maps, performing spatial analysis, and managing geographic data.

A digital surface model ("DSM"), capturing both the natural and built features on the Earth's surface, was generated for the extent of the Study Area utilizing State of Connecticut 2016 LiDAR² LAS³ data points. LiDAR is a remote-sensing technology that develops elevation data by measuring the time it takes for laser light to return from the surface to the instrument's sensors. The varying reflectivity of objects also means that the "returns" can be classified based on the characteristics of the reflected light, normally into categories such as "bare earth," "vegetation," "road," or "building". Derived from the 2016 LiDAR data, the LAS datasets contain the corresponding elevation point data and return classification values. The Study Area DSM incorporates the first return LAS dataset values that are associated with the highest feature in the landscape, typically a treetop, top of a building, and/or the highest point of other tall structures.

Once the DSM was generated, ESRI's Viewshed Tool was utilized to identify locations within the Study Area where the proposed Facility may be visible. ESRI's Viewshed Tool predicts visibility by identifying those cells⁴ within the DSM that can be seen from an observer location. Cells where visibility was indicated were extracted and converted from a raster dataset to a polygon feature which was then overlaid onto an aerial photograph and topographic base map. Since the DSM includes the highest relative feature in the landscape, isolated "visible" cells are often indicated within heavily forested areas (e.g., from the top of the highest tree) or on building rooftops during the initial processing. It is recognized that these areas do not represent typical viewer locations and overstate visibility. As such, the resulting polygon feature is further refined by extracting those areas. The viewshed results are also cross-checked against the most current aerial photographs to assess whether significant changes (a new housing development, for example) have occurred since the time the LiDAR-based LAS datasets were captured.

The results of the preliminary analysis are intended to provide a representation of those areas where portions of the Facility may potentially be visible to the human eye without the aid of magnification, based on a viewer eye-height of five (5) feet above the ground and the combination of intervening topography, trees and other vegetation, and structures. However, the Facility may not necessarily be visible from all locations within those areas identified by the predictive model, which has limitations. For instance, it is important to note that the computer model cannot account for mass density, tree diameters and branching variability of trees, or the degradation of views that occurs with distance. As a result, some areas depicted on the viewshed maps as theoretically offering potential visibility of the Facility may be over-predicted because the quality of those views is not sufficient for the human eye to recognize the Facility or discriminate it from other surrounding or intervening objects.

Visibility also varies seasonally with increased, albeit obstructed, views occurring during "leaf-off" conditions. Beyond the density of woodlands found within the given Study Area, each individual tree has its own unique trunk, pole timber and branching pattern characteristics that provide varying degrees of screening in leafless conditions which cannot be adequately modeled. Thus, modeling for seasonal variations of visibility generally over-predicts the viewshed in "leaf-off" conditions, even when incorporating conservative constraints into the model (i.e., assuming each tree is simply a vertical pole of varying width, depending upon species, with no distinct branching pattern). Therefore, seasonal visibility is evaluated in the final visibility assessment once field verification activities are completed.

² Light Detection and Ranging.

³ An LAS file is an industry-standard binary format for storing airborne LiDAR data.

⁴ Each DSM cell size is 1 square meter.

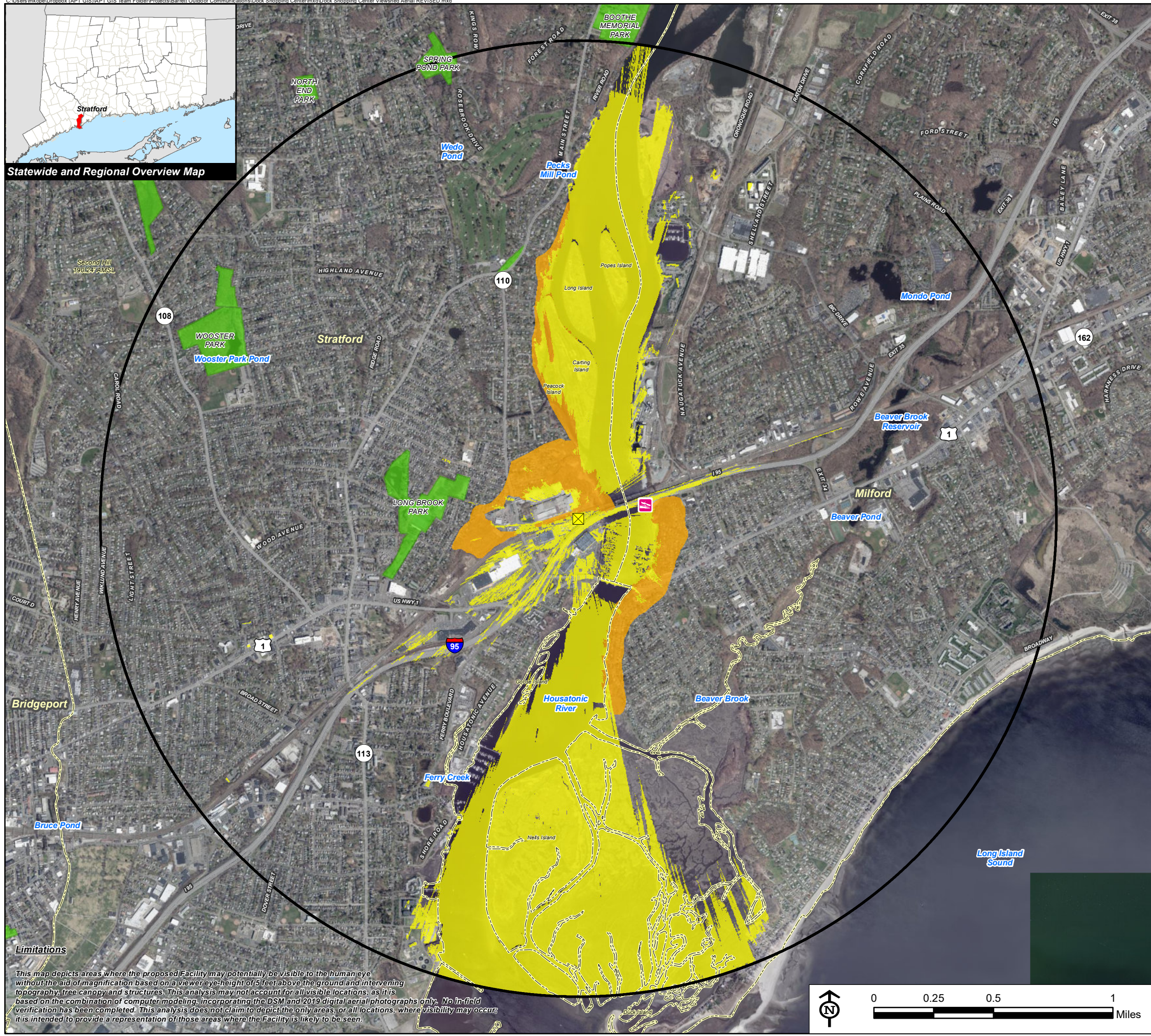
The preliminary viewshed mapping results indicate that predicted year-round visibility associated with the proposed Facility could include up to approximately 1,241 acres (94 percent of this area occurs over the Housatonic River and adjoining tidal marsh). An additional ± 148 acres may experience seasonal views, when leaves are off the deciduous trees. Cumulatively, the predicted visibility represents approximately 17.3 percent of the 8,042-acre Study Area. Beyond the Housatonic River and surrounding shoreline and marshes, year-round visibility would extend along I-95 within ± 0.5 to ± 0.75 mile of the Facility. Areas of seasonal visibility are predicted within the commercial development and residential area to the north and west of the site, and on the western shore of the Housatonic River up to ± 0.4 mile east of the Facility and ± 0.8 mile south of the Facility. Additional seasonal visibility is predicted to extend in limited areas at distances of up to 1.25 mile to the north.

The maps provided as attachments offer a preliminary basis for understanding the extent of visibility that may occur throughout the Study Area, but they do not address the character of those potential views. In addition to the infrastructures associated with commercial development and the railroad and I-95 corridors, the area immediately surrounding the Host Property includes electric transmission structures substantially taller than the proposed Facility. Note also that the results of the computer model have not been field verified. Our experience is that the computer model's sensitivity typically results in the initial mapping being over-predictive of the Facility's viewshed.

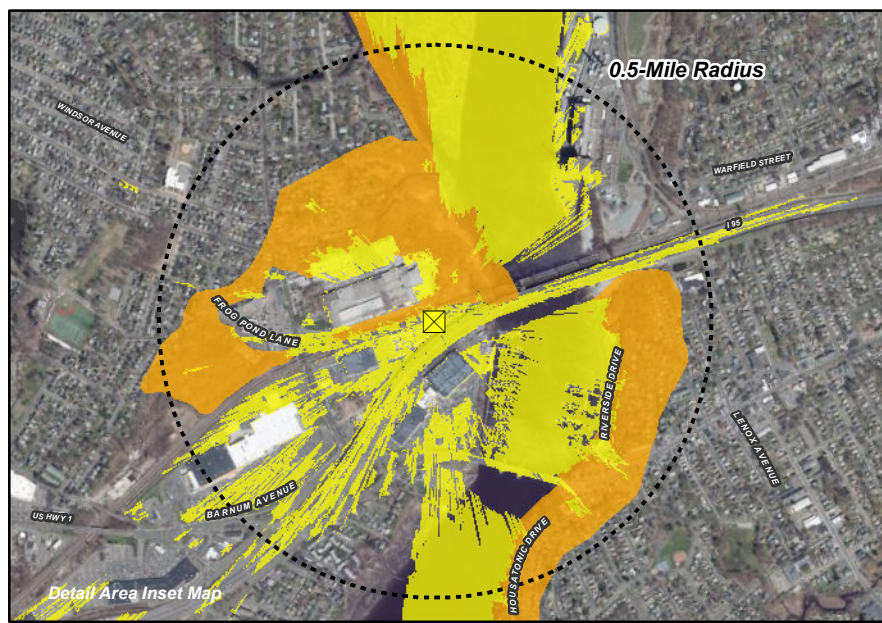
These initial results will be field-verified via a crane test⁵ to supplement and fine tune the results of the preliminary computer modeling. APT will inventory and photo-document areas where the crane can be seen (as well as locations where it is not visible) and prepare photographic simulations from several vantage points to depict scaled renderings of the proposed Facility. This information will be presented in Barrett's submission to the Connecticut Siting Council.

⁵ A brightly colored weather balloon or flag will be affixed to the boom arm at the proposed height of the Facility.

Attachments



Statewide and Regional Overview Map



Preliminary Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
 Dock Shopping Center
 200 East Main Street Rear
 Stratford, Connecticut

Proposed facility height is 135 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Base Map Source: 2019 Aerial Photograph (CTECO)
 Map Date: October 2020

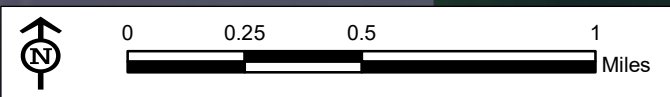
Legend

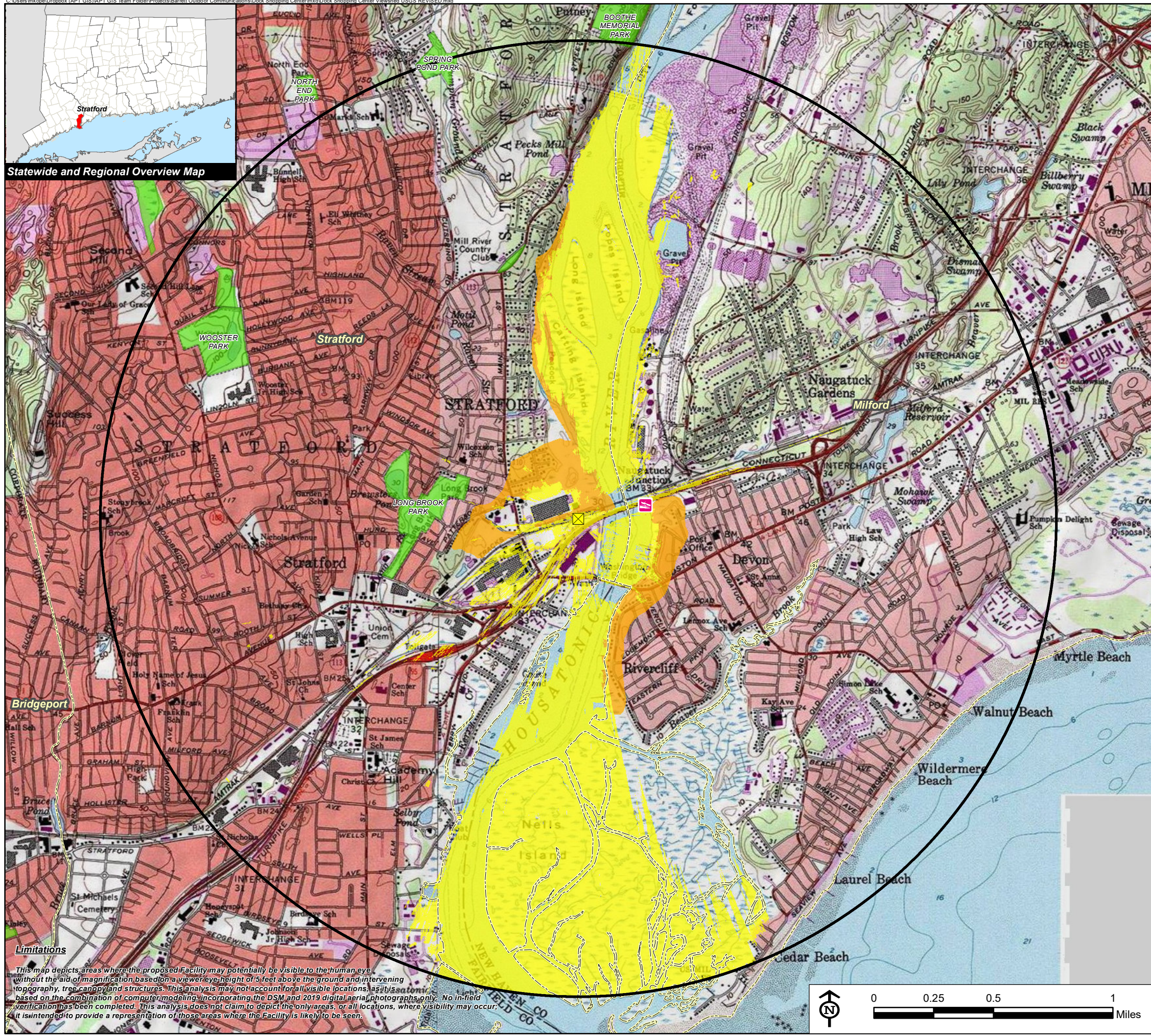
Proposed Site	Protected Open Space Property - Federal
Study Area (2-Mile Radius)	Protected Open Space Property - Land Trust
Predicted Year-Round Visibility (1,241 Acres; +/- 1,168 occurs over open water on the Housatonic River and associated tidal marsh areas)	Protected Open Space Property - Municipal
Areas of Potential Seasonal Visibility (148 Acres)	Protected Open Space Property - Private
Municipal Boundary	Protected Open Space Property - State
Trail	images\Ortho_2019_tiled
Scenic Highway	RGB
DEEP Boat Launches	Red: Band_1
Municipal and Private Open Space Property	Green: Band_2
State Forest/Park	Blue: Band_3

Data Sources:
Physical Geography / Background Data
 A digital surface model (DSM) was created from the State of Connecticut 2016 LIDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.
 Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)
Dedicated Open Space & Recreation Areas
 Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007); Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)
 Connecticut Forest & Parks Association, Connecticut Walk Books East & West

Other
 CTDOT Scenic Strips (based on Department of Transportation data)
Notes
 **Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.

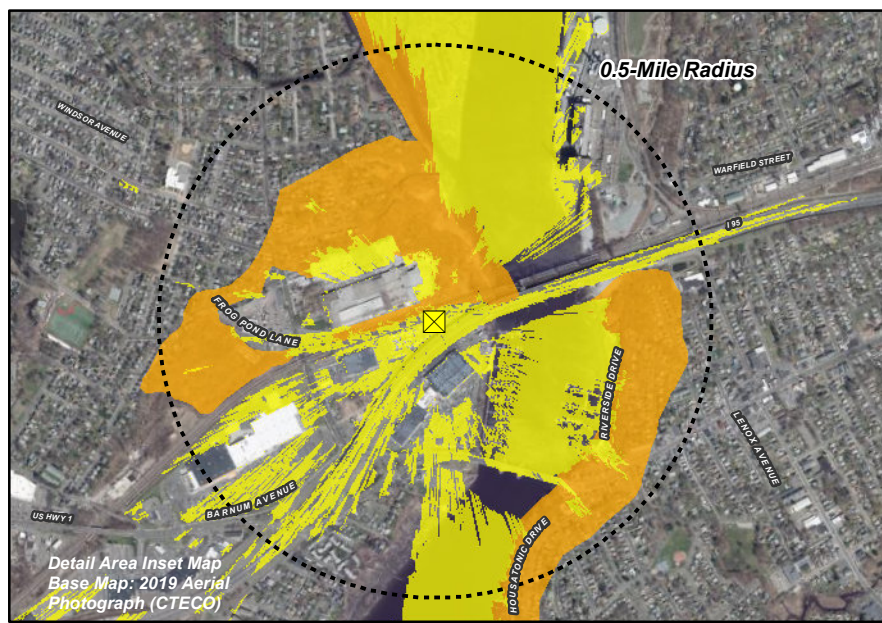
Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating the DSM and 2019 digital aerial photographs only. No in-field verification has been completed. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.





Statewide and Regional Overview Map

Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating the DSM and 2019 digital aerial photographs only. No in-field verification has been completed. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.



Preliminary Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
 Dock Shopping Center
 200 East Main Street Rear
 Stratford, Connecticut

Proposed facility height is 135 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Base Map Source: USGS 7.5 Minute Topographic Quadrangle Map, Bridgeport, CT (1984) and Milford, CT (1984)
 Map Date: October 2020

Legend

- Proposed Site
- Study Area (2-Mile Radius)
- Predicted Year-Round Visibility (1,241 Acres; +/- 1,168 occurs over open water on the Housatonic River and associated tidal marsh areas)
- Areas of Potential Seasonal Visibility (148 Acres)
- Municipal Boundary
- Trail
- Scenic Highway
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park
- Protected Open Space Property**
- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

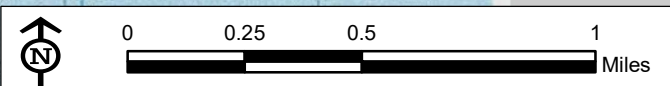
Physical Geography / Background Data
 A digital surface model (DSM) was created from the State of Connecticut 2016 LIDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas
 Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)
 Connecticut Forest & Parks Association, Connecticut Walk Books East & West

Other
 CTDOT Scenic Strips (based on Department of Transportation data)

Notes
 **Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.



ATTACHMENT 5
NEPA Summary

NEPA COMPLIANCE REVIEW

**200 East Main Street, Rear
Stratford, Fairfield County, CT 06614**

December 14, 2020



Prepared for:

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

Prepared by:

**All-Points Technology Corporation, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385**

NEPA Review Summary

Site Name:	"Dock Shopping Center"	
Site Type:	New wireless communications facility	
Site Address:	200 East Main Street, Rear, Stratford, Fairfield County, CT 06614	
Latitude / Longitude (NAD83):	N 41° 12' 14.93" / W 73° 06' 47.91"	
TCNS Number:	218459	
<i>FCC NEPA Category</i>	<i>Source</i>	<i>Findings</i>
Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management	No Effect
Designated Wildlife Preserve	National Park Service, US Forest Service, Bureau of Land Management	No Effect
Threatened or Endangered Species or Designated Critical Habitats	US Fish & Wildlife Service (USFWS) and Connecticut Department of Energy & Environmental Protection (DEEP) Natural Diversity Database (NDDB)	No Effect
Archeological and Historic Resources	State Historic Preservation Office (SHPO) file review and consultation, archaeological assessment, public notices and local government involvement	No Adverse Effect
Indian Religious Site	Indian Reservations in the Continental United States, Bureau of Indian Affairs Map, and consultation with federally recognized tribes via FCC's Tower Construction Notification System (TCNS)	No Effect
100-year Floodplain	Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM)	No Effect
Wetlands & Surface Waterways Features	Wetland Investigation, Natural Resources Conservation Service (NRCS) Soil Survey and USFWS National Wetland Inventory mapping	No Effect
High Intensity White Lights in Residential Neighborhood	TOWAIR Determination Results	No Effect
Environmental Assessment (EA)	Findings for the above FCC NEPA Categories and sources	Not Required

1.0 INTRODUCTION

1.1 PURPOSE

As a licensing agency, the Federal Communications Commission ("FCC") complies with the National Environmental Policy Act ("NEPA") by requiring its licensees to review their proposed actions for environmental consequences. The FCC rules for implementing NEPA are found in Title 47 of the Code of Federal Regulations (CFR), Part 1, Subpart I, rule sections 1.1301 to 1.1319. If a licensee's proposed action falls within one of the categories of rule sections 1.1301 to 1.1319, the licensee is required to consider the potential environmental effects from its construction of antenna facilities or structures, and disclose those effects in an environmental assessment ("EA") that is filed with the Commission for review.

Additionally, Section 106 of the National Historic Preservation Act of 1966 requires licensees to assess the effect of their proposed action on historic properties as outlined in regulations issued by the Advisory Council on Historic Properties at 36 CFR Part 800, as well as the Nationwide Programmatic Agreement ("NPA") for the Collocation of Wireless Antennas (47 CFR Part 1, See Attachments) and the NPA Regarding the Section 106 National Historic Preservation Act Review Process (47 CFR Part 1, See Attachments).

1.2 SCOPE OF WORK

At the request of Barrett Outdoor Communications, Inc. ("Barrett"), All-Points Technology Corporation, P.C. ("APT") has completed its review of environmental resource information outlined in 47 CFR Part 1, Subpart I, rule sections 1.1301 to 1.1319. The review includes the evaluation of the wireless telecommunication facility project impacts to the FCC NEPA categories outlined in this report using the sources referenced herein. Impacts from radiofrequency radiation are evaluated by the tower owner and/or applicant and are not part of this scope of work.

If the project undertaking results in an adverse effect finding under any of the FCC NEPA categories reviewed, those effects must be disclosed in the form on an EA and filed with the FCC for further review of potential environmental impacts.

This NEPA report documents the reviews completed. The term "Site" will be used herein to reference the location of the proposed undertaking.

2.0 SITE LOCATION AND PROJECT DESCRIPTION

2.1 SITE LOCATION

The Site is located at 200 East Main Street, Rear in Stratford, Connecticut. It is an approximately 4.37-acre parcel located east of East Main Street (CT Rt. 110) used as a dry storage facility for boats. The Site contains an asphalt-paved lot developed with a single, metal-frame building erected in 2011. The property is enclosed with a tall, chain-link fence with entrances located at the east and west ends of the parcel.

The Site is bounded to the north by the Metro North rail line, the east by the Housatonic River, to the south by I-95 and to the west by commercial development. The surrounding area is a mix of commercial and residential development.

A USGS Site Location Map is presented in the Attachments.

2.2 PROJECT DESCRIPTION – PROPOSED UNDERTAKING

Barrett is proposing to construct a new monopole at 200 East Main Street, Rear, Stratford, CT. The proposed tower will be $\pm 135'$ in height, with the top of whip antennas extending to $\pm 155'$ above ground level. The tower will be designed to accommodate four wireless service providers and allow for a future 20' extension. Related equipment cabinets will be installed on a raised platform adjacent to the monopole. A propane-fueled emergency standby generator and two propane tanks will be located on concrete pads at ground level.

Site Plans are included in the Attachments.

3.0 FCC NEPA REVIEW CATEGORIES

APT reviewed the following FCC NEPA categories to determine whether the proposed undertaking has the potential to cause an adverse effect on these resources.

3.1 DESIGNATED WILDERNESS AREAS

Will the facility be located in an officially designated wilderness area? **No**

The proposed facility is not located in an officially designated wilderness area.

Source: Review of Wilderness Areas of the United States mapping, <https://wilderness.net/visit-wilderness/maps.php>. (See Attachments.)

3.2 DESIGNATED WILDLIFE PRESERVES

Will the facility be located in an officially designated wildlife preserve? **No**

The proposed facility is not located in an officially designated wildlife preserve.

Source: Review of U.S. Fish & Wildlife Service National Wildlife Refuge System Map, <https://www.fws.gov/refuges/maps/index.html>. (See Attachments.)

3.3 THREATENED OR ENDANGERED SPECIES OR DESIGNATED CRITICAL HABITATS

Will the facility affect listed or proposed threatened or endangered species or designated critical habitats? **No**

APT consulted with the United States Fish and Wildlife Service ("USFWS") and reviewed the Connecticut Department of Energy & Environmental Protection ("DEEP") Wildlife Division Natural Diversity Data Base ("NDDB") to determine if rare, threatened or endangered species or designated critical habitat may be present in the project area.

One federally-listed¹ threatened species is documented in the Site vicinity: *Myotis septentrionalis* (NLEB; northern long-eared bat). Northern long-eared bat's range encompasses the entire State of Connecticut. As a result of this preliminary finding, APT performed an evaluation to determine if the proposed undertaking would result in a likely adverse effect to NLEB.

The proposed Facility would be located within a paved parking and storage area and rip rap armored side slope that contains minimal vegetation and would not require tree clearing (trees provide potential NLEB habitat). A review of the Connecticut Department of Energy & Environmental Protection ("DEEP") Wildlife Division Natural Diversity Data Base ("NDDB") NLEB habitat map revealed that the proposed Facility is not within 150 feet of a known occupied NLEB maternity roost tree and is not within 0.25 mile of a known NLEB hibernaculum. The nearest NLEB habitat resource to the proposed Facility is located ±20.2 miles to the east in North Branford.

¹ Listing under the federal Endangered Species Act

In a letter dated September 23, 2020, DEEP determined that negative impacts to State-listed species are not anticipated from the proposed activities at the Site.

Based on the information provided, the proposed undertaking is not likely to adversely affect any potential threatened or endangered species or designated critical habitats.

Source: Review of publicly available data, consultation with the USFWS and the DEEP NDDDB. (See Attachments.)

3.4 *ARCHAEOLOGICAL AND HISTORIC RESOURCES*

Will the facility affect districts, sites, buildings, structures or objects significant in American history, architecture, archaeology, engineering or culture that are listed, or are eligible for listing, in the National Register of Historic Places? **No Adverse Effects**

In a letter dated November 19, 2020, the SHPO determined that the proposed undertaking will have no adverse effects to sites listed on or eligible for listing on the National Register of Historic Places, with the following conditions:

1. The antennas, wires, mounts, and associated equipment will be designed and installed to be as non-visible as possible, and
2. if not in use for six consecutive months, the generator and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period.

Source: Review of SHPO files, archaeological investigation, public involvement, and Local Government and SHPO consultation. (See Attachments.)

3.5 *INDIAN RELIGIOUS SITES*

Will the facility affect Indian religious sites? **No**

The Site is not located on an American Indian federal reservation trust land. It was determined through tribal consultation via FCC's Tower Construction Notification System (TCNS) that the proposed undertaking is unlikely to affect Indian religious sites.

In the unlikely event that tribal artifacts or human remains are encountered during construction activities, the appropriate SHPO, tribes, and other consulting parties are to be contacted.

Source: Indian Reservations in the Continental United States, Bureau of Indian Affairs Map, archeological assessment, and consultation with federally recognized tribes using the FCC TCNS. (See Attachments.)

3.6 *FLOODPLAINS*

Will the facility be located in a 100-year floodplain? **No**

The facility is located outside of a 100-year flood hazard, as identified on the Flood Insurance Rate Map (FIRM) for the Site.

Source: Site observations and Federal Emergency Management Agency (FEMA) FIRM, Panel 09001C0453G, effective July 8, 2013. (See Attachments.)

3.7 *WETLANDS & SURFACE WATERWAYS FEATURES*

Will construction of the facility involve a significant change in surface features (e.g. wetland fill, water diversion, or deforestation)? **No**

The proposed facility will be located ±316-foot from the nearest resource area and within a developed and disturbed area. Therefore, the facility would not result in a likely adverse impact to nearby tidal wetlands or other coastal resources associated with the Housatonic River.

Source: U.S. Geological Survey (USGS) 7.5-Minute Series Topographic Quadrangle, Natural Resources Conservation Service (NRCS) Soil Survey, CTDEEP's data library (<http://www.ct.gov/deep>) of state wetland mapping, and Wetland Inspection Report by APT, dated October 21, 2020. (See Attachments.)

3.8 *HIGH INTENSITY WHITE LIGHTS IN RESIDENTIAL NEIGHBORHOOD*

Will the facility be equipped with high intensity white lights which are to be located in residential neighborhoods? **No**

No lighting is required for the tower.

Source: FAA Determination 9/3/2020. (See Attachments.)

4.0 *CONCLUSIONS*

APT completed this review in conformance with the FCC rules and regulations for implementing NEPA, 47 CFR 1.1301 to 1.1319. Based on the information obtained in connection with this review, the proposed undertaking does not require preparation and filing of an EA.

ATTACHMENT 6
SHPO Determination Letter



November 19, 2020

Mr. Brian Gaudet
Project Manager
All Points Technology Corp
567 Vauxhall Street Extension, Suite 311
Waterford, CT 06320

Subject: Proposed Wireless Telecommunications Facility
200 East Main Street, Rear
Stratford, CT
Barrett Outdoor Communications, Inc.
ENV-21-0254

Dear Mr. Gaudet:

The State Historic Preservation Office (SHPO) has reviewed the information submitted by All Points Technology Corp. (All Points) dated October 8, 2020. The proposed activities are subject to review by this office pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations. SHPO understands that the proposed undertaking includes the installation of a 135 foot tall monopole, with panel antennas proposed to be mounted at 110, 120, and 130 feet, respectively, the upper most rising to a maximum height of 135 feet above ground level (AGL). The monopole is also proposed to be topped with a 20 foot tall whip antenna. Support equipment is proposed to be located on a new, 14 foot wide by 182 foot long steel equipment platform, sited north of the proposed monopole.

Two previously identified archaeological sites are located within 0.5 miles of the project area; however, they will not be impacted by the undertaking. Two properties listed or determined eligible for listing on the National Register of Historic Places (NR) are located within 0.5 miles of the project area: the Housatonic River Railroad Bridge (NR# 87000842) and the Washington Bridge (NR# 04001093); however, they will not be adversely impacted by the undertaking. A review of topographical maps, historic aerial photos, and soil profiles of the area indicate that the project area has been substantially disturbed in the past by grading, cutting, smoothing, and filling, and therefore is unlikely to contain intact archaeological deposits.

The SHPO concurs with All Point's determination that the proposed undertaking will have no adverse effect to sites listed on or eligible for listing on the National Register of Historic Places, with the following conditions:

State Historic Preservation Office

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Department of Economic and
Community Development

State Historic Preservation Office

1. The antennas, wires, mounts, and associated equipment will be designed and installed to be as non-visible as possible, and
2. if not in use for six consecutive months, the generator and equipment shall be removed by the telecommunications facility owner. This removal shall occur within 90 days of the end of such six-month period.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive, flowing style.

Jonathan Kinney
Deputy State Historic Preservation Officer

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