CUDDY
+FEDER
LLP

445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
T 914 761 1300
F 914 761 5372
cuddyfeder.com

June 28, 2016

VIA EMAIL AND OVERNIGHT DELIVERY
Executive Director Melanie Bachman, Esq.
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: Petition No. 443B - New Cingular Wireless PCS LLC ("AT&T")
Amended Petition for Declaratory Ruling
1 River Road, Greenwich, Connecticut

Dear Executive Director Bachman:

On behalf of New Cingular Wireless PCS, LLC ("AT&T") please find enclosed an original and fifteen (15) copies of a supplemental submission to the pending request to amend Petition 443B consisting of a visibility analysis and a wetlands report.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Daniel M. Laub
Enclosures

cc: Peter Tesi, First Selectman Town of Greenwich
Katie Deluca, Director of Planning, Town of Greenwich
Michele Briggs, AT&T
Dan Bilezikian, SAI
Christopher B. Fisher, Esq.

CONNECTICUT SITING COUNCIL

AMENDED PETITION OF NEW CINGULAR WIRELESS PCS, LLC ("AT&T") TO THE CONNECTICUT SITING COUNCIL FOR A DECLARATORY RULING THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED FOR A PROPOSED TEMPORARY TOWER TO BE LOCATED AT 1 RIVER ROAD IN THE TOWN OF GREENWICH, CONNECTICUT	)	**PETITION NO. 443B** **JUNE 28, 2016**

SUPPLEMENTAL SUBMISSION TO
AMENDED PETITION FOR DECLARATORY RULING
PROPOSED TEMPORARY TOWER
1 RIVER ROAD IN GREENWICH

By submission of an amended petition dated May 11, 2016 ("Amended Petition") New Cingular Wireless PCS, LLC ("AT&T" or the "Petitioner") petitioned the Connecticut Siting Council ("Council") pursuant to Sections 16-50j-38 and 16-50j-39 of the Regulations of Connecticut State Agencies ("R.C.S.A.") for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required to install a temporary tower facility ("Temporary Facility") at 1 River Road in the Town of Greenwich, Connecticut (the "Site"). AT&T is licensed by the Federal Communications Commission ("FCC") to provide wireless services in this area of the State of Connecticut. As set forth more fully in the Amended Petition AT&T is coordinating with Eversource, the Department of Transportation and other parties to relocate an existing wireless facility on an electrical transmission tower to a different existing transmission tower at the same site adjacent to the Cos Cob train station off Shore Road. Approval of the proposed temporary tower will ensure continuity of service in this area of Greenwich during this transition.

Included as Attachment A is a Visibility Analysis prepared by All Points Technology ("APT") concluding that the Temporary Facility will not result in an adverse visual impact to the surrounding environment. The 94' AGL Temporary Facility will have a slender profile of just 2 feet in diameter at the base tapering to a mere 6 inches at the top where 3 panel antennas will be closely affixed to the tower at a centerline height of 89 feet as the demonstrated in the Visibility Analysis photosimulations. Year-round visibility will be limited to areas within 0.75 mile or less and except for immediately abutting properties most views will be limited to the upper portions of the tower mast. As shown in the Visibility Analysis, the context of these near-field views includes the large, 24,000 sq. ft. Greenwich Racquet Club building, an elevated portion of Interstate 95, motorboats, sailboats and different marina infrastructure including various docks and numerous vertical pylons.

The Visibility Analysis further demonstrates that the tower mast will be difficult to discern from a distance due to its overall minimal height and width. Distant views of the tower mast will also be obscured by trees or existing intervening infrastructure and buildings and often seen in context with transportation and communications infrastructure including telephone poles, transmission lines, the Cos Cob substation and the railroad. Importantly, the Temporary Facility is limited in duration and any visibility is by nature reversible and therefore does not represent an adverse visual effect for purposes of the Council's regulatory considerations in ruling on this Petition.

Tidal wetlands were delineated in close proximity to the proposed Temporary Tower site, which is located within a maintained lawn area. Included as Attachment B please find a Wetland Report prepared by APT along with a plan for sedimentation and erosion controls and tidal wetland protection measures that will be implemented by AT&T. As noted in the Wetland Report the proposed Temporary Tower will not result in direct impacts to tidal wetlands with the implementation of the planned protection measures.

Petitioner respectfully submits that the record demonstrates that the proposed temporary tower does not present a substantial adverse effects for purposes of Section 16-50p of the General Statutes.

Respectfully Submitted,

Daniel M. Laub
On behalf of the Petitioner AT&T
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601

cc: Town of Greenwich
Jessica Rincon, AT&T
Kelly Wade Bettuchi, AT&T
Dan Bilizekian, SAI

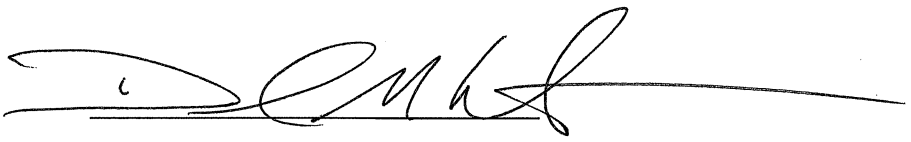
CERTIFICATE OF SERVICE

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

Hon. Peter Tesei
First Selectman, Town of Greenwich
101 Field Point Road
Greenwich, CT 06830

Katie Deluca
Director of Planning, Town of Greenwich
101 Field Point Road
Greenwich, CT 06830

Dated: June 28, 2016



ATTACHMENT A

VISIBILITY ANALYSIS

CT5006
COS COB RELO
TEMPORARY TOWER INSTALL
1 RIVER ROAD
GREENWICH, CT 06807

Prepared for:

SAI - AT&T
500 Enterprise Drive
Rocky Hill, CT 06078

Prepared by:

All-Points Technology Corporation, P.C.
3 Saddlebrook Drive
Killingworth, CT 06419

June 2016

Project Introduction

New Cingular Wireless PCS, LLC, d/b/a AT&T must relocate its existing wireless communications facility south of the Cos Cob Substation off Sound Shore Drive in Greenwich, Connecticut. Due to timing concerns associated with dismantling the existing Eversource Energy transmission structure on which AT&T operates its current facility, a temporary facility is required while a new, permanent location is secured. At the request of AT&T, All-Points Technology Corporation, P.C. ("APT") prepared this Visibility Analysis to evaluate the potential visual impacts associated with a proposed "Temporary Facility" nearby at One River Road in Greenwich (the "Host Property").

Site Description and Setting

The Host Property consists of a ±2.84-acre parcel currently occupied by two (2) commercial buildings located south of the Interstate 95 transportation corridor on a peninsula that extends into Cos Cob Harbor. The proposed Temporary Facility would be located on the south side of a 24,000+ square foot athletic field house (occupied by the Greenwich Racquet Club). The Temporary Facility would be at an approximate ground elevation of 11 feet Above Mean Sea Level ("AMSL") and would include a 94-foot tall ballast tower. The tower base would measure approximately two (2) feet in diameter and taper to less than six (6) inches at the top. A 14-foot by 14-foot steel ballast frame would be constructed at grade on gravel to support the tower. Supporting equipment would be placed adjacent to the base of the tower within a fence-enclosure. AT&T would mount three (3) panel antennas at a centerline height of 89 feet above ground level ("AGL"), such that the tops of the antennas would not extend above the top of the tower.

The Site vicinity is densely developed with residential areas north of Interstate 95 and commercial uses south of highway (including several marinas).

Methodology

A balloon float and field reconnaissance were conducted May 26, 2016 to evaluate the visibility associated with the proposed Temporary Facility and to obtain photographs for use in this report. The balloon float consisted of raising an approximately four-foot diameter, red helium-filled balloon tethered to a string height of 94 feet above ground level ("AGL") at the Site. Weather conditions were favorable for the in-field activities, with calm winds (less than 4 miles per hour) and mostly sunny skies. Once the balloon was secured, APT conducted a Study Area reconnaissance by driving along the local and State roads and other publicly accessible locations to document and inventory where the balloon could be seen above/through the tree canopy.

A total of 25 nearby locations were selected to depict existing conditions with the balloon aloft. At each photo location, the geographic coordinates of the camera's position were logged using global positioning system ("GPS") technology. Photographs were taken with a Canon EOS 6D digital camera body and Canon EF 24 to 105 millimeter ("mm") zoom lens, with the lens set to 50 mm to present a consistent field of view.

Three-dimensional computer models were developed for the proposed Temporary Facility from AutoCAD information. Photographic simulations were then generated to portray scaled renderings of the proposed installation. Using field data, site plan information and image editing software, the proposed Temporary Facility was scaled to the correct location and height, relative to the existing structure and surrounding area.

The table below summarizes characteristics of the photographs and simulations presented in the attachment to this report including a description of each location, view orientation, and the distance from where the photo was taken relative to the Site. A photolog map and copies of the existing conditions and photo-simulations are attached.

View	Location	Orientation	Distance to Site	View Characteristics
1	Buxton Lane	Southwest	±0.39 Mile	Year-round
2	Bayside Terrace	West	±0.37 Mile	Not Visible
3	Bayside Terrace	West	±0.26 Mile	Year-round
4	Chapel Lane	Northwest	±0.23 Mile	Year-round
5	Miltiades Avenue	Northwest	±0.29 Mile	Not Visible
6	Glen Avon Drive	Northwest	±0.44 Mile	Not Visible
7	Riverside Yacht Club	Northwest	±0.79 Mile	Year-round
8	Cos Cob Park	Northeast	±0.38 Mile	Year-round
9	Cos Cob Park	North	±0.29 Mile	Year-round
10	Cos Cob Park	North	±0.24 Mile	Year-round
11	Cos Cob Park	North	±0.30 Mile	Not Visible
12	Sound Shore Drive at Station Drive	Northeast	±0.26 Mile	Year-round
13	Mianus River Boat & Yacht Club	Northeast	±0.13 Mile	Year-round
14	Mianus River Boat & Yacht Club	Northeast	±0.10 Mile	Year-round
15	Host Property	Northwest	±158 Feet	Year-round
16	Station Drive	Northeast	±0.13 Mile	Year-round
17	Station Drive	Northeast	±469 Feet	Year-round
18	Strickland Road	Southeast	±0.10 Mile	Not Visible
19	Strickland Road	Southeast	±0.15 Mile	Year-round
20	Strickland Road	Southeast	±0.31 Mile	Not Visible
21	Relay Place	Southeast	±0.28 Mile	Year-round
22	River Road	Southwest	±0.10 Mile	Year-round
23	River Road	Southwest	±0.32 Mile	Not Visible
24	River Road	Southwest	±0.35 Mile	Year-round
25	Riverside Avenue	Southwest	±0.62 Mile	Not Visible

Photo-simulations of the Temporary Facility were prepared for the 16 locations where the balloon was visible and represent the approximate limits of visibility associated with the proposed installation. They are however static in nature and do not necessarily fairly characterize the prevailing views from all locations within a given area. The simulations provide a representation of the proposed Temporary Facility under similar settings as those encountered during the field reconnaissance. Views of the facility can change substantially throughout the seasons as well as the time of day, and are dependent on weather and other atmospheric conditions including but not necessarily limited to haze, fog, and clouds; the location, angle and intensity of the sun; light conditions, and the specific viewer location.

Conclusions

Areas from where the proposed Temporary Facility would be visible year-round are limited to locations within approximately 0.75 mile or less of the Site. Near-range views (within ±0.25 mile) would be achieved from locations in the immediate vicinity of the Site (north and west) and on the eastern shoreline of Cos Cob Harbor directly across from the Host Property. With the exception of those locations immediately abutting the Host Property, only the upper portion of the tower will be seen. More distant views would be limited to the top-most portion of the Temporary Facility and either be partially obscured by intervening infrastructure or may be achieved from locations primarily south and west of the Site, and south of the Interstate.

The tower design is a narrow pole with the antennas affixed close to the top of the mast. This design and relatively low height, combined with the existing infrastructure in the area, will serve to minimize the visual profile of the Temporary Facility. The majority of views towards the Site feature other more prominent existing structures.

Based on the results of this analysis, it is our opinion that the Temporary Facility would not result in an adverse visual impact to the surrounding environment.

ATTACHMENTS

PHOTO LOG

Legend

Site ○ Visible ● Not Visible

N W E S

1,000 500 0 1,000 Feet

1 inch = 1,000 feet

All-Points Technology Corporation

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	**BUXTON LANE**	**SOUTHWEST**	**+/- 0.39 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	**BUXTON LANE**	**SOUTHWEST**	**+/- 0.39 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	**BAYSIDE TERRACE**	**WEST**	**+/- 0.37 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	**BAYSIDE TERRACE**	**WEST**	**+/- 0.26 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	**BAYSIDE TERRACE**	**WEST**	**+/- 0.26 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	**CHAPEL LANE**	**NORTHWEST**	**+/- 0.23 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	**CHAPEL LANE**	**NORTHWEST**	**+/- 0.23 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	**MILTIADES AVENUE**	**NORTHWEST**	**+/- 0.29 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	**GLEN AVON DRIVE**	**NORTHWEST**	**+/- 0.44 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	**RIVERSIDE YACH CLUB**	**NORTHWEST**	**+/- 0.79 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	**RIVERSIDE YACH CLUB**	**NORTHWEST**	**+/- 0.79 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	**COS COB PARK**	**NORTHEAST**	**+/- 0.38 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	**COS COB PARK**	**NORTHEAST**	**+/- 0.38 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	**COS COB PARK**	**NORTH**	**+/- 0.29 MILE**	**YEAR ROUND**

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	**COS COB PARK**	**NORTH**	**+/- 0.29 MILE**	**YEAR ROUND**

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	**COS COB PARK**	**NORTH**	**+/- 0.24 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	**COS COB PARK**	**NORTH**	**+/- 0.24 MILE**	**YEAR ROUND**

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
11	**COS COB PARK**	**NORTH**	**+/- 0.30 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	**SOUND SHORE DRIVE AT STATION DRIVE**	**NORTHEAST**	**+/- 0.26 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	**SOUND SHORE DRIVE AT STATION DRIVE**	**NORTHEAST**	**+/- 0.26 MILE**	**YEAR ROUND**

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
13	**MIANUS RIVER BOAT & YACHT CLUB**	**NORTHEAST**	**+/- 0.13 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
13	**MIANUS RIVER BOAT & YACHT CLUB**	**NORTHEAST**	**+/- 0.13 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
14	**MIANUS RIVER BOAT & YACHT CLUB**	**NORTHEAST**	**+/- 0.10 MILE**	**YEAR ROUND**

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
14	**MIANUS RIVER BOAT & YACHT CLUB**	**NORTHEAST**	**+/- 0.10 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
15	**HOST PROPERTY**	**NORTHWEST**	**+/- 158 FEET**	**YEAR ROUND**

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
15	**HOST PROPERTY**	**NORTHWEST**	**+/- 158 FEET**	**YEAR ROUND**

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
16	**STATION DRIVE**	**NORTHEAST**	**+/- 0.13 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
16	**STATION DRIVE**	**NORTHEAST**	**+/- 0.13 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	**STATION DRIVE**	**NORTHEAST**	**+/-469 FEET**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	**STATION DRIVE**	**NORTHEAST**	**+/-469 FEET**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
18	**STRICKLAND ROAD**	**SOUTHEAST**	**+/- 0.10 MILE**	**NOT VISIBLE**

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
19	**STRICKLAND ROAD**	**SOUTHEAST**	**+/- 0.15 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
19	**STRICKLAND ROAD**	**SOUTHEAST**	**+/- 0.15 MILE**	**YEAR ROUND**

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
20	**STRICKLAND ROAD**	**SOUTHEAST**	**+/- 0.31 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
21	**RELAY PLACE**	**SOUTHEAST**	**+/- 0.28 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
21	**RELAY PLACE**	**SOUTHEAST**	**+/- 0.28 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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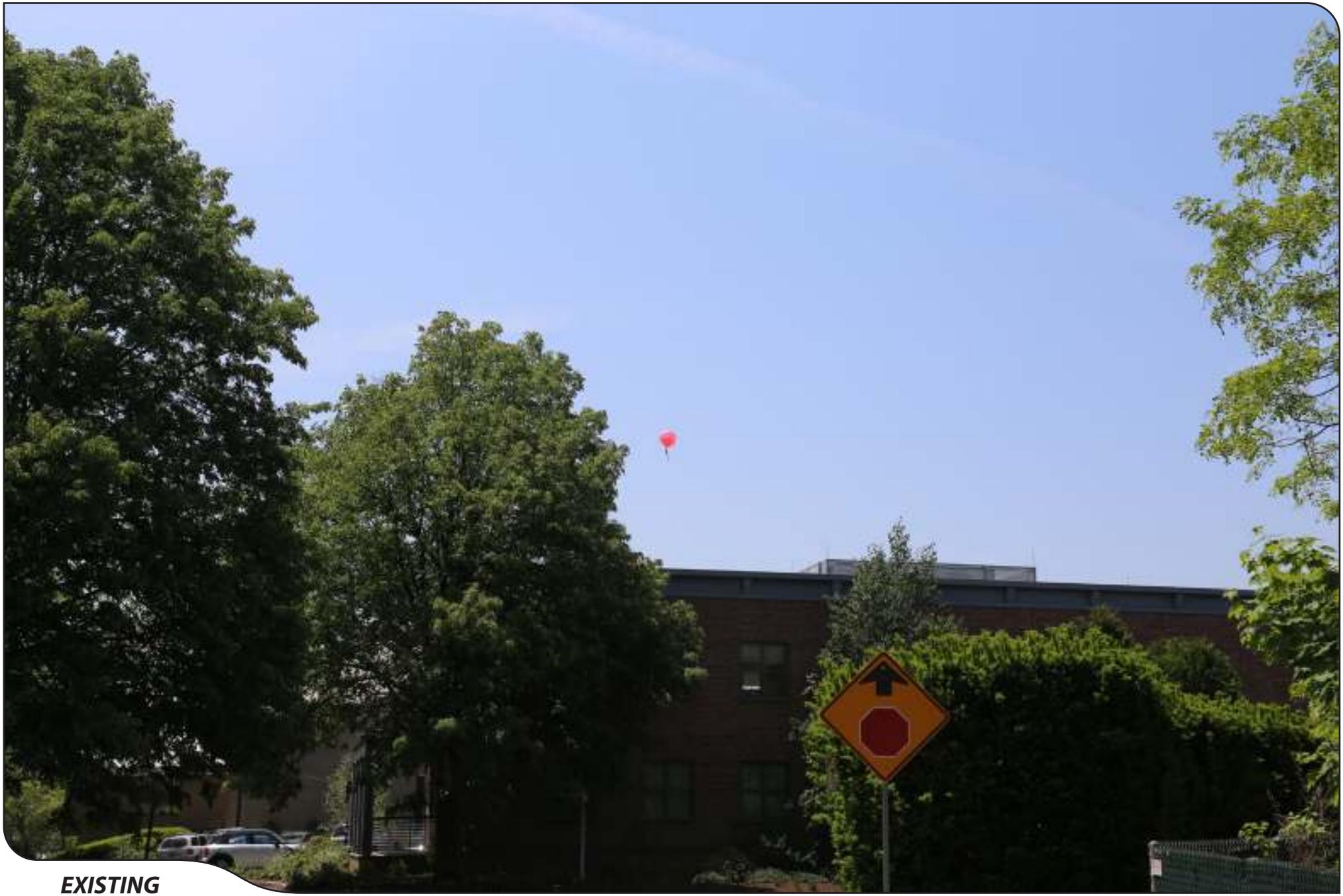

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
22	**RIVER ROAD**	**SOUTHWEST**	**+/- 0.10 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
22	**RIVER ROAD**	**SOUTHWEST**	**+/- 0.10 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

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EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
23	**RIVER ROAD**	**SOUTHWEST**	**+/- 0.32 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
24	**RIVER ROAD**	**SOUTHWEST**	**+/- 0.35 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
24	**RIVER ROAD**	**SOUTHWEST**	**+/- 0.35 MILE**	**YEAR ROUND**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
25	**RIVERSIDE AVENUE**	**SOUTHWEST**	**+/- 0.62 MILE**	**NOT VISIBLE**

ALL-POINTS TECHNOLOGY CORPORATION

at&t

ATTACHMENT B

WETLAND INSPECTION

June 19, 2016 **APT Project No.: CT1931420**

Prepared For: SAI-AT&T
500 Enterprise Drive, Suite 3A
Rocky Hill, CT 06067

AT&T Site Name: CT5006 Cos Cob Relo
Temporary Tower Install

Site Address: 1 River Road
Greenwich, Connecticut

Date(s) of Investigation: 6/9/2016

Field Conditions: **Weather:** sunny**,** mid 60'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†:

Dean Gustafson, Professional Soil Scientist

Enclosures: Wetland Delineation Field Form & Wetland Inspection 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 AT&T, SAI and its contractors regarding proposed lease area and access road/utility easement locations for identifying wetlands and watercourses within the study area.*

Attachments

- Wetland Delineation Field Form
- Wetland Inspection Map

Tidal Wetland Delineation Field Form

Wetland I.D.:	Wetland 1	
Flag #'s:	WF 1-01 to 1-20	
Flag Location Method:	Site Sketch ☒	GPS (sub-meter) located ☒

TIDAL WETLAND HYDROLOGY ☒

Subtidal ☐	Regularly Flooded ☒	Irregularly Flooded ☐
Irregularly Flooded ☐		
Comments: None		

TIDAL WETLAND TYPE:

Coastal Salt Marsh ☒	Common Reed Marsh ☐	Scrub/Shrub/Emergent ☐
Brackish Marsh ☐	Other: None	
Distance from Subject Property:	<10 feet to the south	
Comments: None		

TIDAL WATERCOURSE/ESTUARINE EMBAYMENT TYPE:

Perennial ☒	Intermittent ☐	Tidal ☒
Watercourse/Embayment Name: Mianus Pond		
Distance from Subject Property:	<10 feet to the south	
Comments: The north bank of Mianus Pond, an intertidal estuary waterbody, consists of armored developed shorefront interspersed with narrow tidal wetland vegetation and intertidal mud flats that contain shellfish (i.e., mussels, clams & oysters).		

SOILS:

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

DOMINANT PLANTS:

High-tide Bush (Iva frutescens)	Saltwater Cordgrass (Spartina alterniflora)

* 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	☐	☒	☐	☐

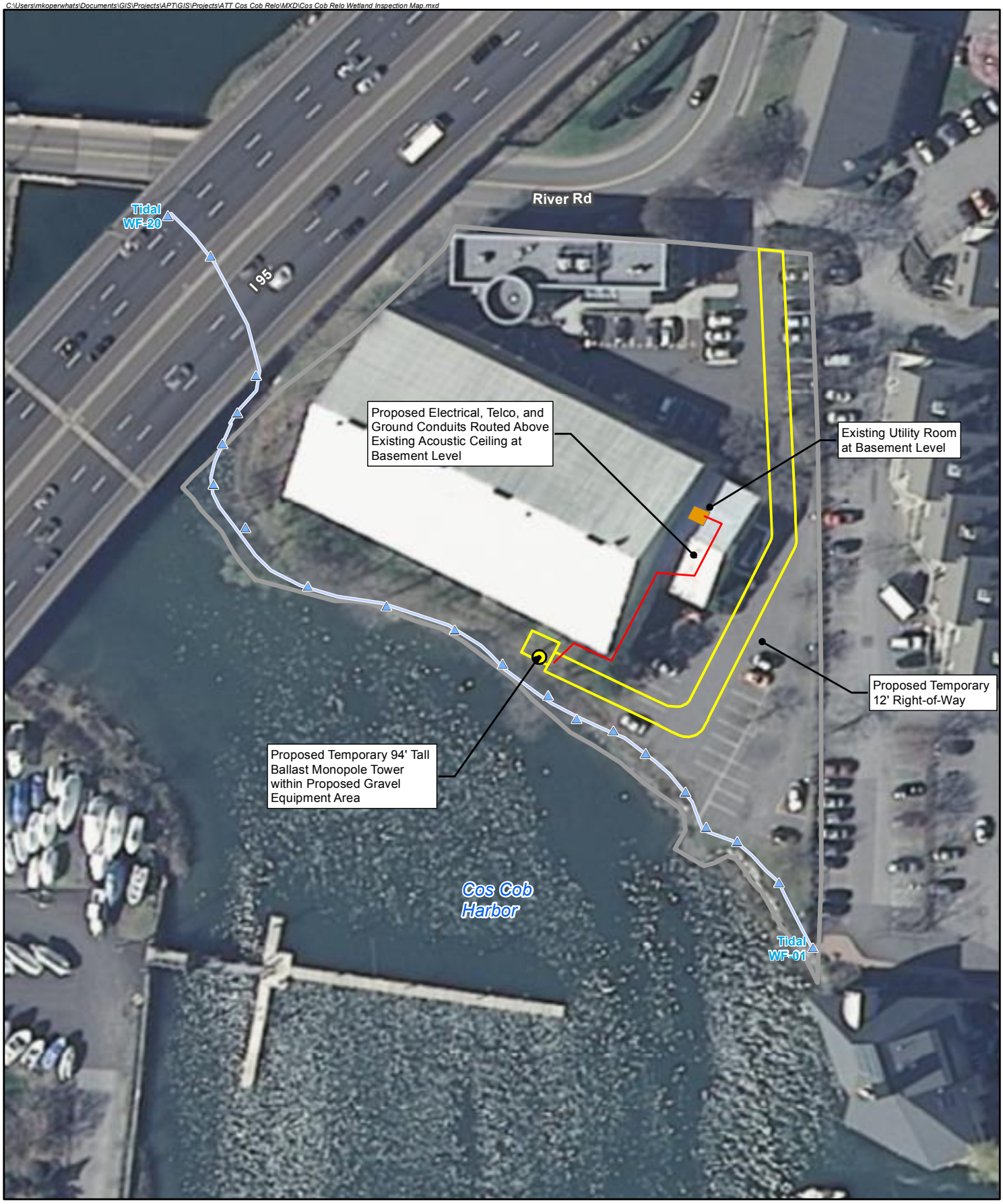
GENERAL COMMENTS:

The Cos Cob Relo Temporary Tower site is proposed adjacent to the Greenwich Racquet Club building, along the south side of the building adjacent to nearby Mianus Pond, a tidal estuary embayment, and associated coastal resources. Tidal wetlands were delineated in close proximity to the proposed Temporary Tower site, which is located within a maintained lawn area. The tidal wetland boundary is characterized by a distinct slope break and areas vegetated with hightide bush and saltwater cordgrass. In addition to the tidal wetland habitat, the Mianus Pond intertidal zone is characterized by developed shorefront (i.e., rock armoring), mudflats and shellfish beds. A coastal flood hazard zone encompasses the entire subject property, include the proposed Temporary Tower site, with a Zone AE (Elevation 13 feet, NAVD88).

The proposed project will not alter the natural characteristics of any coastal resource area, with the exception of the coastal flood hazard zone. The proposed Temporary Tower compound will not result in direct impact to tidal wetlands, although construction activities will be in close proximity to wetlands. No temporary impacts to the nearby tidal wetland area are anticipated provided: 1) sedimentation and erosion controls are properly designed, installed and maintained in accordance with the 2002 Connecticut Guidelines For Soil Erosion and Sediment Control; and, 2) a tidal wetland protection plan is implemented during construction. The tidal wetland protection program would consist of several components: use of appropriate sedimentation and erosion control measures to control and contain erosion; periodic inspection and maintenance of sedimentation and erosion controls; education of all contractors and sub-contractors prior to initiation of work on the environmentally sensitive nature of the site; protective measures; and, reporting.

Long term secondary impacts to nearby tidal wetlands possibly associated with the operation of the temporary tower are minimized by the following facts: the proposed temporary tower is located within a disturbed area associated with the developed footprint of the existing site improvements; the temporary tower will not result in the removal of mature shrubs or trees; it is unmanned and temporary; it will not create significant additional impervious surfaces; and, it creates minimal traffic. Therefore, it is APT's opinion that the proposed Temporary Tower will not result in a likely adverse impact to tidal wetlands.

C:\Users\mkoperwhats\Documents\GIS\Projects\APT\GIS\Projects\ATT Cos Cob Relo\MXD\Cos Cob Relo Wetland Inspection Map.mxd



Legend

- Proposed Monopole Tower
- Proposed Electrical, Telco, and Ground Conduit Route
- Existing Utility Room
- Proposed Facility Layout
- Subject Property
- Tidal Wetland Flag
- Tidal Wetland Line

N W E S

50 25 0 50 Feet

Wetland Inspection Map

Proposed Temporary Wireless Telecommunications Facility
Cos Cob Relo.
1 River Road
Greenwich, Connecticut

at&t

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Map Notes:
Base Map Source: 2012 Aerial Photograph (CTECO)
Map Scale: 1 inch = 75 feet
Map Date: June 2016

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TIDAL WETLAND PROTECTION PROGRAM

Portions of the proposed Project are located in close proximity to tidal wetlands and coastal resources. As a result, the following protective measures shall be followed to help avoid degradation of the nearby coastal waters, wetlands and resource areas.

It is of the utmost importance that the Contractor complies with the requirement for the installation of protective measures and the education of its employees and subcontractors performing work on the project site. These measures will also provide protection to a nearby coastal resources. This protection program shall be implemented regardless of time of year the construction activities occur. All-Points Technology Corporation, P.C. ("APT") will serve as the Environmental Monitor for this project to ensure that wetland protection measures are implemented properly. The Contractor shall contact Dean Gustafson, Senior Environmental Scientist at APT, at least 5 business days prior to the pre-construction meeting. Mr. Gustafson can be reached by telephone at (860) 663-1697 ext. 201 or via email at dgustafson@allpointstech.com.

The tidal wetland protection program consists of several components: use of appropriate erosion control measures to control and contain erosion while avoiding/minimizing wildlife entanglement; periodic inspection and maintenance of isolation structures and erosion control measures; education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting.

1. **Erosion and Sedimentation Controls**

    a. Plastic netting used in a variety of erosion control products (i.e., erosion control blankets, fiber rolls [wattles], reinforced silt fence) has been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. No permanent erosion control products or reinforced silt fence will be used on the project. Temporary Erosion control products will use either erosion control blankets and fiber rolls composed of processed fibers mechanically bound together to form a continuous matrix (net less) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.

    b. Installation of erosion control measures shall be performed by the Contractor prior to any earthwork. The Environmental Monitor will inspect the work zone area prior to and following barrier installation to ensure erosion controls are properly installed.

    c. In addition to required daily inspection by the Contractor, the fencing will be inspected for tears or breeches in the fabric following installation periodically by the Environmental Monitor throughout the course of the construction project.

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

    e. All silt fencing and other erosion control devices shall be removed within 30 days of completion of work and permanent stabilization of site soils. If fiber rolls/wattles, straw bales, compost filter socks or other natural material erosion control products are used, such devices will not be left in place to biodegrade and shall be promptly removed after soils are stable so as not to create a barrier or entanglement hazard to migrating wildlife. Seed from seeding of soils should not spread over fiber rolls/wattles/filter socks as it makes them harder to remove once soils are stabilized by vegetation.

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
☒ 3 SADDLEBROOK DRIVE · KILLINGWORTH, CT 06419 · PHONE 860-663-1697 · FAX 860-663-0935
☐ P.O. BOX 504 · 116 GRANDVIEW ROAD · CONWAY, NH 03818 · PHONE 603-496-5853 · FAX 603-447-2124

2. Contractor Education

a. Prior to work on site, the Contractor shall attend an environmental awareness training program at the pre-construction meeting with the Environmental Monitor. This orientation and educational session will consist of an introductory meeting with the Environmental Monitor to understand the environmentally sensitive nature of the development site and the need to follow these protective measures.

3. Petroleum Materials Storage and Spill Prevention

a. Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location in proximity to sensitive coastal resources.

b. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.

c. The following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.

i. Petroleum and Hazardous Materials Storage and Refueling

1. Refueling of vehicles or machinery shall occur a minimum of 100 feet from wetlands or watercourses and shall take place on an impervious pad with secondary containment designed to contain fuels.

2. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands or watercourses.

ii. Initial Spill Response Procedures

1. Stop operations and shut off equipment.

2. Remove any sources of spark or flame.

3. Contain the source of the spill.

4. Determine the approximate volume of the spill.

5. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.

6. Ensure that fellow workers are notified of the spill.

iii. Spill Clean Up & Containment

1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.

2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.

3. Isolate and eliminate the spill source.

4. Contact appropriate local, state and/or federal agencies, as necessary.

5. Contact a disposal company to properly dispose of contaminated materials.

iv. Reporting

1. Complete an incident report.

2. Submit a completed incident report to appropriate local, state and/or federal agencies, as necessary.

4. Herbicide and Pesticide Restrictions

a. The use of herbicides and pesticides at the proposed wireless telecommunications facility is strictly prohibited.

5. Reporting

a. Any incidents of sediment release into the nearby coastal waters or tidal wetlands will be reported to the Connecticut Siting Council.

b. Daily inspection reports will be completed by the Environmental Monitor and provided to AT&T and its contractor(s).

c. A summary report will be completed by the Environmental Monitor following the completion of construction activities and provided to AT&T and the Connecticut Siting Council.