

21 B Street Burlington, MA 01803 Tel: (781) 273-2500 Fax: (781) 273-3311

January 21, 2008

Verizon Wireless c/o Ms. Rachel Mayo Robinson & Cole, LLP 280 Trumbull Street Hartford, CT 06103

Subject:

Section 7 USFW

Farmington North 2 / P#2000017850, L#119646

199 Town Farm Road, Farmington, Hartford County, Connecticut

EBI Project #61073006

Dear Ms. Mayo:

The following Project Site was evaluated with respect to possible federally-listed, threatened or endangered species in order to determine if the proposed telecommunications facility would result in a potential adverse effect to federally-listed species. This evaluation was performed in accordance with the direction and information provided by the United States Department of the Interior Fish and Wildlife Service (USFWS) in their January 7, 2008 letter. A copy of this correspondence is attached. Additionally, in EBI's earlier correspondence with the USFWS, dated September 10, 2007, a tree canopy height of 40' was identified, however the actual tree canopy height is 65'. EBI notes that this change in height does not affect the evaluation of the Project Site.

According to information provided by the USFWS in their January 7, 2008 letter and on their website (http://www.fws.gov/northeast/newenglandfieldoffice/endangeredspec-consultation.htm), four federally-listed threatened species have been identified within Hartford County, Connecticut: the Bald Eagle, Dwarf Wedge Mussel, Puritan Tiger Beetle, and the Sandplain Gerardia. The Bald Eagle was officially delisted in the lower 48 states from the list of endangered species and threatened wildlife. Further research on the remaining three species regarding their natural habitats identified the following information:

Dwarf Wedge Mussel: The preferred habitat for the Dwarf Wedge Mussel is a freshwater stream or river. This mollusk lives on the sand, firm muddy sand, firm clay, and gravel located at the bottom of moving freshwater with slow to moderate currents.

Puritan Tiger Beetle: The preferred habitat for the Puritan Tiger Beetle is the upper portion of a sandy beach associated with either fresh or salt water. Larvae of this species of insect thrive on large cliffs with minimal vegetation. The species has always been associated with the Connecticut River and the Chesapeake Bay, and is recently only found on sandy, narrow stretches of beach located next to cliffs.

Sandplain Gerardia: The Sandplain Gerardia only thrives in an area of dry, sandy, short grass plains, roadsides, or oak scrub openings. The species requires an open habitat, maintained by periodic disturbances to its environment. Currently, Connecticut only supports one small population, which is located in a cemetery.

Both the Dwarf Wedge Mussel and Puritan Tiger Beetle require a close proximity to water, whether it is the bottom of a stream or river (Dwarf Wedge Mussel) or the beach near a body of water (Puritan Tiger Beetle). The Project Site is located approximately 1,600 feet west of the Farmington River, which is not a known habitat for either species, and the local habitat would not adequately support either of these species. Therefore, it is unlikely that *Verizon Wireless'* proposed telecommunications project will impact either the Dwarf Wedge Mussel or the Puritan Tiger Beetle.

Based on the habitat requirements of the Sandplain Gerardia (dry, sandy, poor-nutrient soils, usually within ten miles of the coast) and EBI's visual observations made during a site inspection, it is unlikely that *Verizon Wireless'* proposed telecommunications project will impact the Sandplain Gerardia. Additionally, during a September 11, 2007

telephone conversation, Mr. Anthony Tur, Endangered Species Specialist with the USFWS, stated that he concurred with EBI's assessment that the Project Site would be an unsuitable habitat for the Sandplain Gerardia and was unaware of any other federally-listed threatened or endangered species that would be negatively impacted by the project.

Based on EBI's review of the natural habitats of the three Federally-listed threatened species identified in Hartford County and information provided by the USFWS, it does not appear that habitat at the Subject Property is suitable to support these species. Therefore, with consideration given to the fact that no suspected habitats for listed threatened or endangered species were identified at the Subject Property, *Verizon Wireless'* proposed project is not likely to affect Federally-listed threatened or endangered species.

Thank you for the opportunity to prepare this *Letter*, and assist you with this project. Please do not hesitate to contact us should you have any questions or if we may be of further assistance.

Respectfully Submitted,

Joanna Winkler Staff Scientist EBI Consulting

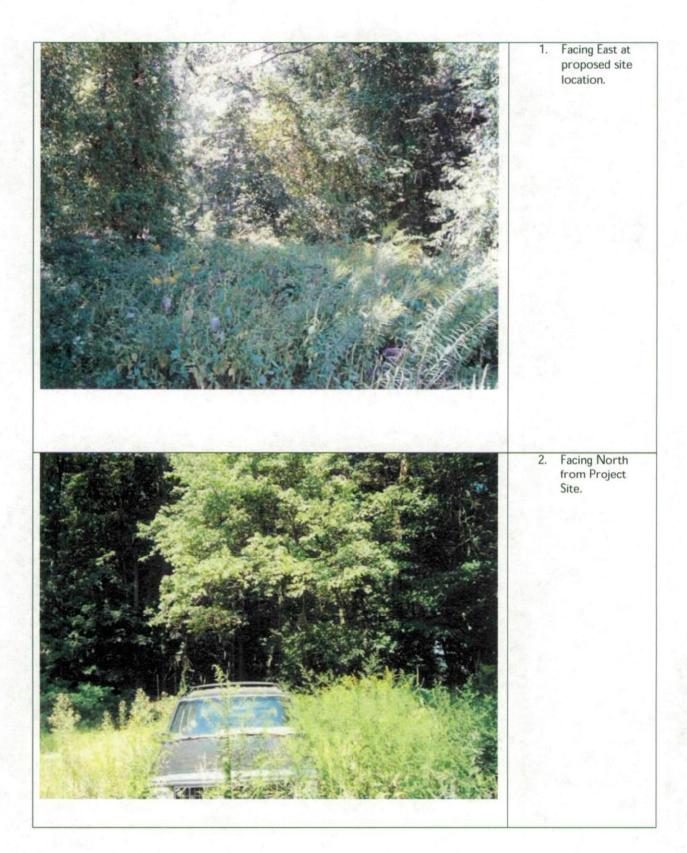
(781) 418-2335

jwinkler@ebiconsulting.com

Appendix A - Photographs

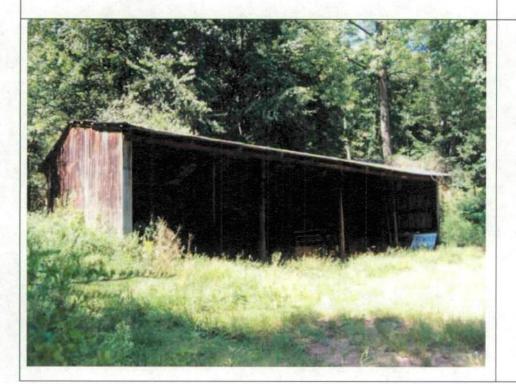
Appendix B - USFWS Correspondence

APPENDIX A PHOTOGRAPHS

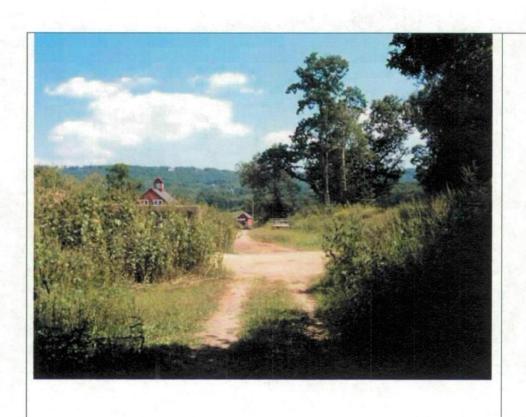




Facing South from Project Site.



4. Facing
Northwest from
Project Site,
toward
equipment shed.



5. Facing East along access to Town Farm Road.

APPENDIX B USFW CORRESPONDENCE



United States Department of the Interior



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

January 7, 2008

To Whom It May Concern:

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

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

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

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

Future Coordination with this Office Relative to New Telecommunication Facilities

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

- 1. If the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building, no further coordination with this office is necessary. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.
- 2. If the above criteria cannot be met, your review of the attached lists of threatened and endangered species locations within Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts may confirm that no federally-listed endangered or threatened species are known to occur in the town or county where the project is proposed.
- 3. If a listed species is present in the town or county where the project is proposed, further review of our enclosed lists of threatened and endangered species may allow you to conclude that suitable habitat for the species will not be affected. Based on past experiences, we anticipate that there will be few, if any, projects that are likely to impact piping plovers, roseate terms, bog turtles, Jesup's milk-vetch or other such species that are found on coastal beaches, riverine habitats or in wetlands because communication towers typically are not located in these habitats.

For projects that meet the above criteria, there is no need to contact this office for further project review. A copy of this letter should be retained in your file as the Service's determination that no listed species are present, or that listed species in the general area will not be affected. Due to the high workload associated with responding to many individual requests for threatened and endangered species information, we will no longer be providing response letters for activities that meet the above criteria. This correspondence and the enclosed species lists remain valid until January 1, 2009. Updated consultation letters and species list are available on our website:

(http://www.fws.gov/northeast/newenglandfieldoffice/EndangeredSpec=Consultation.htm)

Thank you for your cooperation, and please contact me at 603-223-2541 for further assistance.

Sincerely yours,

Outting P.7 -

Anthony P. Tur

Endangered Species Specialist New England Field Office

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES IN CONNECTICUT

There is no federally-designated Critical Habitat in Connecticut. The following are federallylisted species by county:

Common Name	Species	Status	County/General Distribution
Shortnose sturgeon ¹ Acipenser brevirostrum		Е	Atlantic coastal waters and Connecticut River
Indiana bat	Myotis sodalis	Е	New Haven/hibernaculum
Bald eagle	Haliaeetus leucocephalus	D ²	Nesting: Hartford, Litchfield, Middlesex, New Haven, New London, Tolland Wintering: entire state, major rivers
Piping plover	Charadrius melodus	Т	Nesting: Fairfield, Middlesex, New Haven, New London (coastal beaches only) Migratory: Atlantic Coast
Roseate tern	Sterna dougallii dougallii	Е	Nesting: New Haven (Faulkner Island) Migratory: Atlantic Coast
Bog turtle	Clemmys muhlenbergii	T	Fairfield, Litchfield
Dwarf wedgemussel	Alasmidonta heterodon	Е	Hartford (Connecticut River watershed)
Puritan tiger beetle	Cicindela puritana	Т	Hartford, Middlesex (Connecticut River floodplain)
Northeastern beach tiger beetle	Cicindela dorsalis dorsalis	Т	Coastal beaches/extirpated
Small whorled pogonia	Isotria medeoloides	Т	Litchfield, New Haven
Sandplain gerardia	Agalinus acuta	Е	Hartford
Chaffseed	Scwalbea americana	Е	New London/historic

Principal responsibility for this species is vested with the National Marine Fisheries Service.
 Delisted. Protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.



21 B Street Burlington, MA 01803 Tel: (781) 273-2500

Fax: (781) 273.3311

September 10, 2007

Mr. Michael Amaral U.S. Fish and Wildlife Service 70 Commercial St., #300 Concord, NH 03301-5031

Subject:

Request for Section 7 Review

Farmington North 2 / P#2000017850, L#119646

199 Town Farm Road, Farmington, Hartford County, CT 06032

N 41°45'27.99" W 72°49'47.75"

EBI Project #61073006

Dear Mr. Amaral:

EBI CONSULTING (EBI) is preparing an environmental review on behalf of Cellco Partnership d.b.a. Verizon Wireless for the project noted above (herein, the Subject Property) as part of its permit process and regulatory review by the Federal Communications Commission (FCC). The review is focused on compliance with the Section 7 of the Endangered Species Act and environmental concerns specified by the FCC in 47 CFR 1.1307.

The property is located in Farmington, CT 06032 at 199 Town Farm Road. Farmington is located in Hartford County, in central Connecticut. The current tenancy is agricultural use. Vicinity properties consist of singlefamily residences, cleared agricultural land, and undeveloped wooded land with an average canopy height of 40 feet above grade.

The proposed facility will be either a 110-foot monopole style tower or a 117-foot stealth tree style tower. Telecommunication support equipment will be placed in a proposed 12-foot by 30-foot equipment shelter to be located within a 60-foot by 60-foot fenced compound on a 100-foot by 100-foot leased area. A 12-foot wide access and utility easement will run from the west side of the compound then turn south and continue to Town Farm Road utilizing the existing gravel driveway.

Based on the information currently available to us, provided by the U.S. Fish and Wildlife Service dated March 9, 2007, the Subject Property has the potential to support one state federally listed species that has been identified for Hartford County, Connecticut. Bald Eagle nesting sites and the Sandplain gerardia have been identified within Hartford County. Based on the habitat required for the Sandplain gerardia (inhabits dry, sandy, poor-nutrient soils in sandplain and serpentine sites and most sites are within ten miles of the coast), it is unlikely that the project will impact the Sandplain gerardia.

Enclosed please find copies of a street map as well as a section of the 1985 Avon, CT and New Britain, CT topographic map that have the location of the proposed telecommunications installation highlighted. Additionally, photographs of the areas proposed to be occupied by Cellco Partnership d.b.a. Verizon Wireless and vicinity properties are attached to this letter.



APPENDIX A
FIGURES, DRAWINGS, AND MAPS



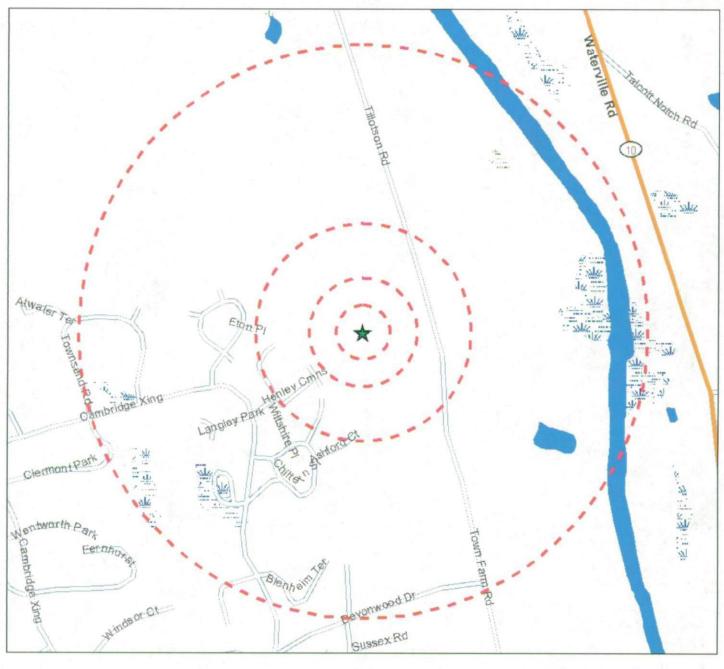
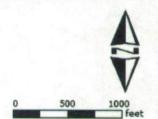


Figure 1 - Site Location Map

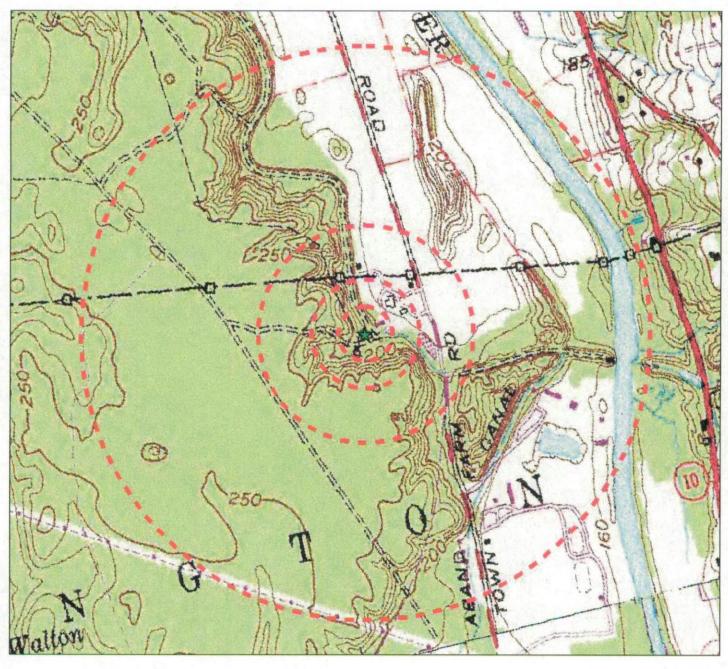
P#2000017850, L#119646/Farmington North 2 199 Town Farm Road Farmington, CT 06032

PN: 61073006



Source: Selected data from ESRI, EBI and NWI





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

USGS 24k Quad: Avon, CT 1985 and New Britain, CT 1985

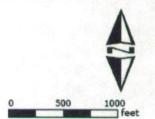
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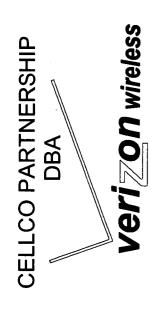
Source: Selected data from ESRI, EBI and USGS

Figure 2 - USGS Quad Location Map

P#2000017850, L#119646/Farmington North 2 199 Town Farm Road Farmington, CT 06032

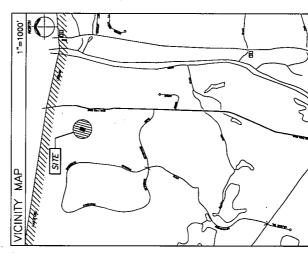






FARMINGTON NORTH 2

FARMINGTON, CONNECTICUT 06032 199 TOWN FARM ROAD





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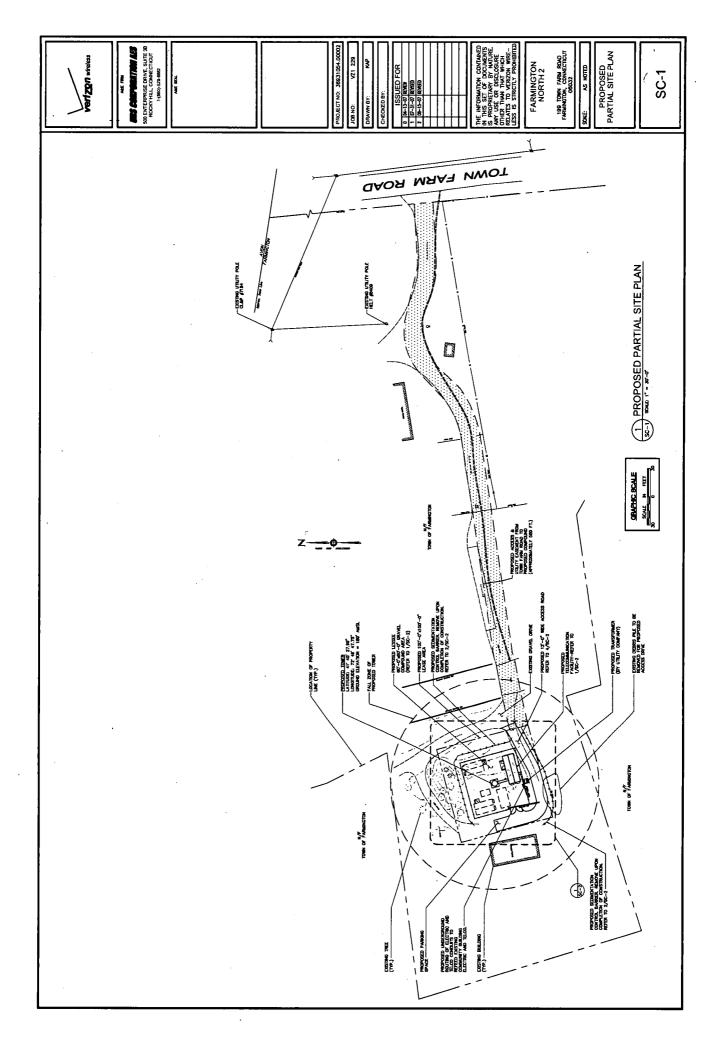
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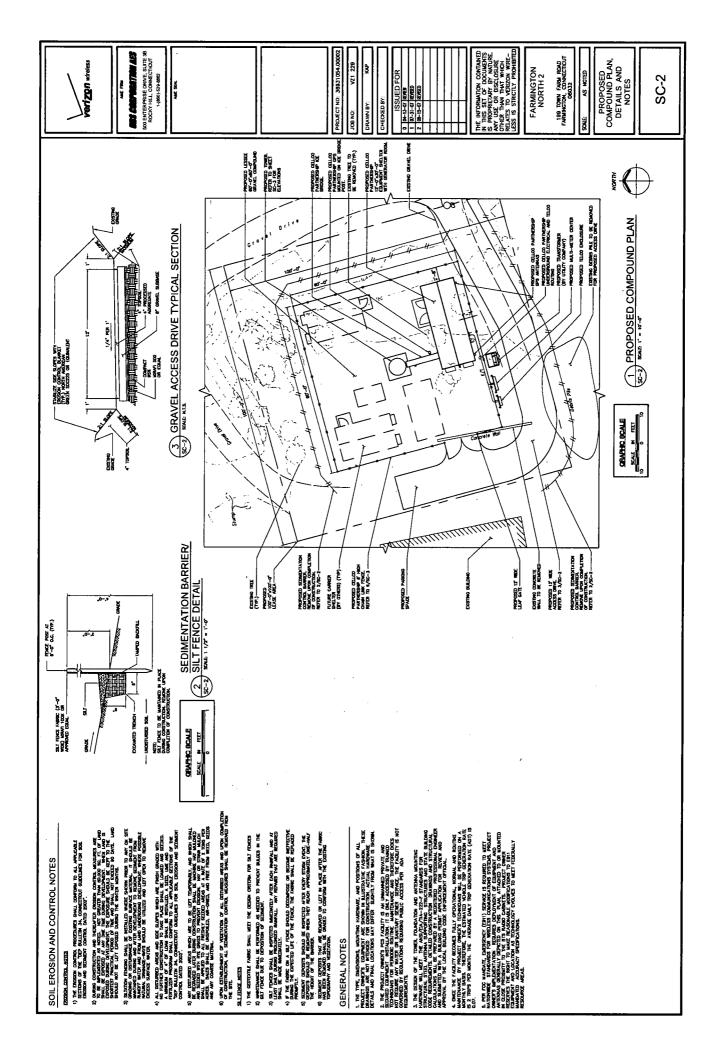
199 TOWN FARM ROAD FARMINGTON, CONNECTICUT 06032 FARMINGTON NORTH 2

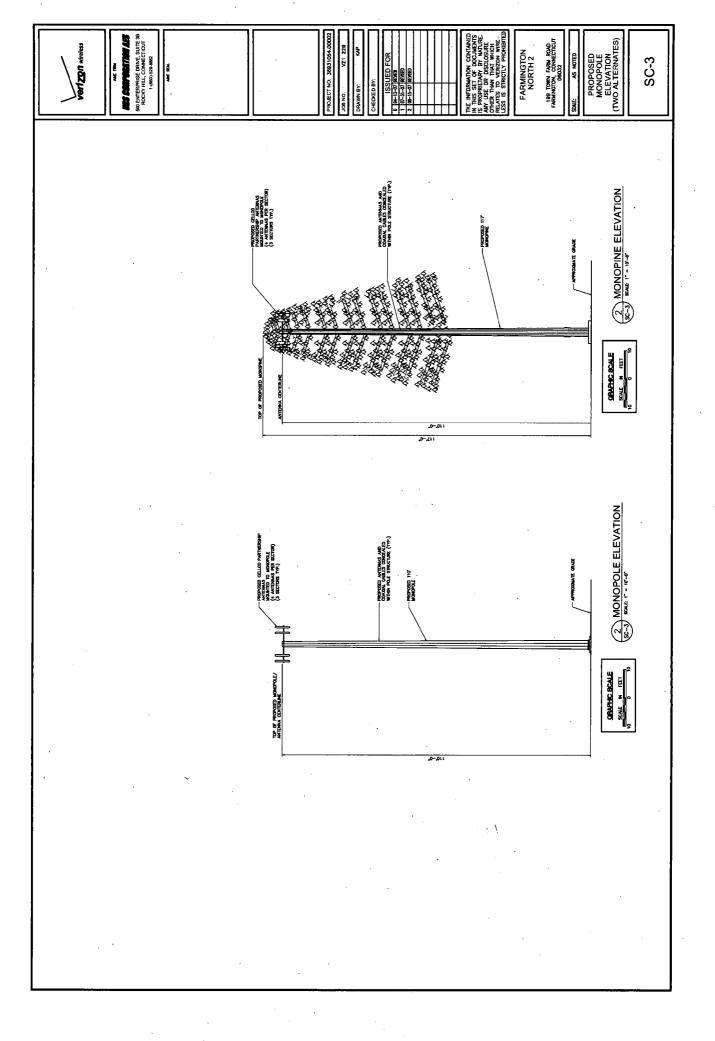
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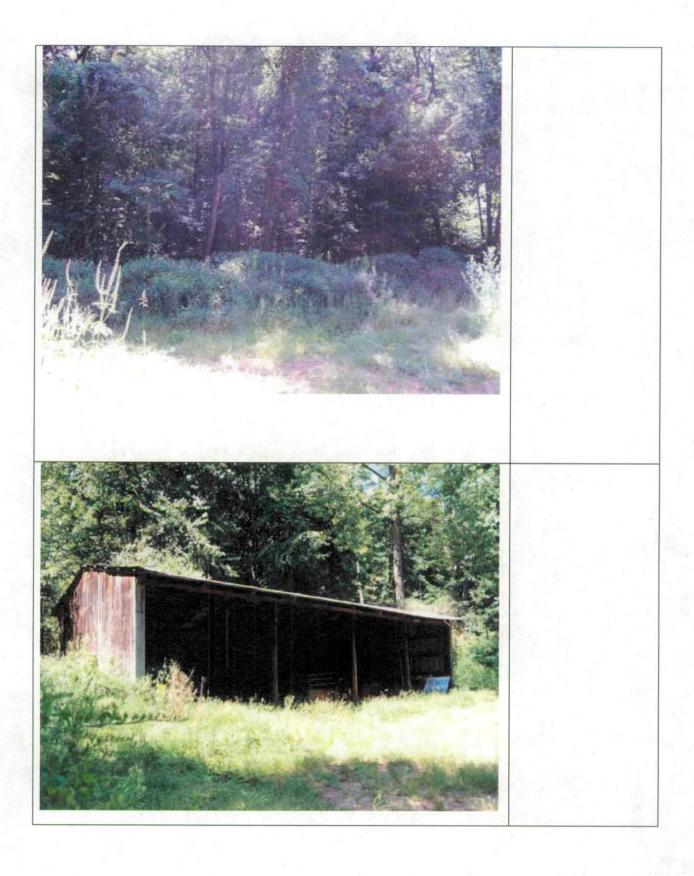


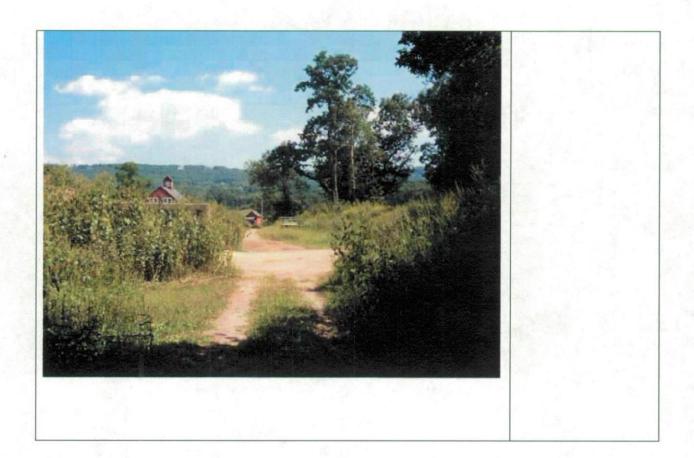




APPENDIX B PHOTOGRAPHS







EBI Consulting RECORD OF COMMUNICATION

JOB:61073006		
Contact Name: Mr. Anthony Tur	Date:	September 11, 2007
Contact Title: <u>Endangered Species Specialist</u>	Time:	12:38pm
Organization: <u>USFW New England Field Office</u>	Phone:	(603) 223-2541
EBI CONTACT: JOANNA WINKLER		
Mr. Anthony Tur from the New England USFW Field regarding a telecommunications site located at 199 To assessment of the Sandplain gerardia habitat at the site was delisted from the federal protected list of Endang writing a letter in response to my letter, and said "as f	own Farm Road in Fa e. He also said that ered Species list as c	rmington, CT. He concurred with my the Bald Eagle is no longer a concern, as it of August 8, 2007. He did not plan on
FOLLOW-UP ACTION REQUIRED:		
None needed		



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



October 1, 2007

Joanna Winkler EBI Consulting 21 B Street Burlington, MA 01803

> Re: Environmental Review for Town Farm Road, Farmington, CT

Dear Ms. Winkler:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided and listed above. According to our information, there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species at the site in question.

Natural Diversity Data Base information includes all information regarding critical biologic resources available to us at the time of the request. This information is a compilation of data collected over the years by the Environmental and Geographic Information Center's Geological and Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions regarding this information (424-3585). Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Kenneth J. Metzler

Ecologist/Environmental Analyst III

KJM/blm -





December 17, 2007

Historic Preservation & Museum Division

Ms. Maureen A. Taylor EBI Consulting 21 B Street Burlington, MA 01803

59 South Prospect Street Hartford, Connecticut 06106

(v) 860.566.3005 (f) 860.566.5078 ect: Telecommunications Facilities

199 Town Farm Road

Farmington, CT

EBI #61073006, P#2000017850, L#119646

Dear Ms. Taylor:

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

The State Historic Preservation Office concurs with Heritage Consultants LLC that no further archaeological investigations appear warranted with respect to the proposed undertaking. This office believes that the proposed undertaking will have <u>no effect</u> upon Connecticut's historic, architectural, and archaeological heritage.

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

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



Telecommunications Facilities 199 Town Farm Road Farmington, CT EBI #61073006, P#2000017850, L#119646 Page 2

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

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

Sincerely,

Karen Senich

Deputy State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA Ms. Catherine Labadia/HC



Connecticut Commission on Culture & Tourism

October 10, 2007

Historic Preservation & Museum Division

59 South Prospect Street

Hartford, Connecticut

Ms. Maureen A. Taylor **EBI** Consulting 21 B Street

Burlington, MA 01803

Subject: Telecommunications Facilities

199 Town Farm Road

Farmington, CT

EBI #61073006, P#2000017850, L#119646

(v) 860.566.3005 (f) 860.566.5078

06106

Dear Ms. Taylor:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the project area possesses moderate to high sensitivity for historic archaeological resources. Therefore, we recommend that a professional reconnaissance survey be undertaken to identify and evaluate archaeological resources which may exist within proposed project limits, including, equipment storage and associated work areas. All archaeological studies must be undertaken in accordance with our Environmental Review Primer for Connecticut's Archaeological Resources.

No ground disturbance or construction-related activities should be initiated until this office has had an opportunity to review and comment upon the recommended archaeological survey report.

We anticipate working with all interested parties in the expeditious furtherance of the proposed undertaking as well as in the professional management of Connecticut's archaeological heritage.

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

Sincerely,

Karen Senich

Deputy State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA Ms. Catherine Labadia/HC