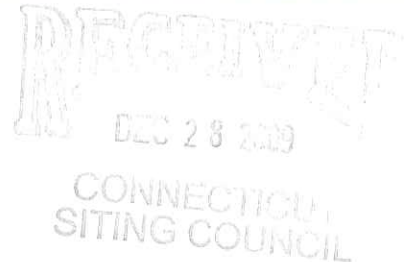


December 23, 2009

Mr. Keith Coppins
Phoenix Partnership, LLC
110 Washington Ave.
North Haven, CT 06473



**RE: FTP/North Haven
50 Devine Street, North Haven CT
Coastal Consistency Analysis – Site Plan Review**

Dear Mr. Coppins:

At your request, *Infinigy Engineering & Surveying (Infinigy)* has conducted a review of the Connecticut Coastal Management Act (CCMA) as outlined in the Connecticut General Statutes (CGS) sections 22a-90 through 22a-112. The CCMA requires “coastal site plan reviews” for the application listed below if the proposed activity or use is located landward of the mean high water mark:

- Site plans submitted to a zoning commission in accordance with CGS section 22a-109;
- Plans submitted to a planning commission for subdivision or resubdivision;
- Application for special exceptions or special permits submitted to a planning commission, zoning commission or zoning board of appeals;
- Application for variances submitted to a local zoning board of appeals; and
- Referrals of proposed municipal projects to a planning commission pursuant to CGS section 8-24 [CGS section 22a-105(b)]

As stated within the CCMA, the authority for coastal site plan review lies with the municipal board or commission responsible for the decision on the underlying application. Although the CT DEP exercises and oversight role in municipal coastal management activities (CGS section 22a-110), the proposed project application does not include a shoreline flood and erosion control structure or a change in the zoning map or regulations. As such, referral to the CT DEP is not required and the Coastal Site Plan Review process is completed by the governing municipality, in this case, the Connecticut Siting Council.

Project Information

The Subject Property for the proposed telecommunications facility, located at 50 Devine Street, is situated within an industrial/commercial area. The Subject Property consists of a ±6.0 acre parent parcel of land, specifically, the proposed 70-foot x 70-foot compound and surrounding lease area, zoned as General Industrial.

Phoenix Partnership, LLC (Phoenix Partnership) proposes to install a 120-foot monopole proximate to the eastern boundary of the Subject Property, adjacent to the eastern edge of existing pavement, in an area of known excavation and fill. The tower will be situated in the center of the 70-foot by 70-foot fenced equipment compound area. Access to the telecommunications facility will be from the existing paved parking areas. The proposed access and utility easement consists of a 15-foot wide access area and a 15-foot by 20-foot turn around area.

The proposed project is located within the Coastal Boundary zone as defined in CGS Section 22a-94(b). According to Mr. Harry Yamalis, an Environmental Analyst for CT Department of Environmental Protection, the lowest proposed project elevations are at 7-foot AMSL which is two (2) feet above the average high tide line established for this area. Therefore, based upon the existing elevations at the project site, the Project does not fall within the jurisdiction of the coastal permit program.

However, as stated within the CCMA and verified by Ms. Kristal Kallenberg of CT Department of Environmental Protection Coastal Site Plan Review section, coastal site plan review is required for projects located within the coastal boundary. Therefore, a coastal site plan review shall be completed by the Connecticut Siting Council during the review and approval of the Development and Management Plan.

Coastal Consistency Review Summary of Findings

As proposed, the Phoenix Partnership project will not result in adverse impacts to coastal resources as defined within the CCMA. The CCMA identifies eight (8) potential adverse impacts to coastal resources. Potential adverse impacts on each resource area, as identified within the CCMA are defined below as they are applicable to each project.

1. Water Quality

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 project will not affect water quality within the Quinnipiac River or associated wetlands located greater than 150-feet to the east of the Project Site. Since the proposed wireless telecommunications compound creates minimal impervious surface and is underlain by a gravel surface, no significant stormwater runoff will be generated by the proposed project.

2. Coastal Waters Circulation Patterns

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 project is located on a parcel that is currently developed and is located outside of tidally influenced coastal water areas and as such will not impact current drainage or circulation patterns.

3. Natural Erosion Patterns

Degrading natural erosion patterns by significantly alerting littoral transport of sediments in terms of deposition or source reduction.

The proposed project would not affect littoral transport of sediments since the facility location is not on a shoreline.

4. Natural or Existing Drainage Patterns

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

Existing drainage patterns, groundwater flow and recharge and stormwater runoff will not be significantly altered by the proposed facility due to its limited size and the existing improvements on the Subject Property.

5. Coastal Flooding

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

Although the proposed project is located within the 100-year floodplain, it will not significantly alter shoreline or bathymetry. Per the requirements of Connecticut Siting Council all equipment areas shall be raised a minimum of 2' above the existing ground elevation and supported by concrete piers. Concrete pads will not be utilized to minimize impervious surfaces.

6. Visual Quality

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

The proposed 120-foot monopole style telecommunication installation will not significantly alter vistas or viewpoints and does not result in significant visibility from coastal resource areas. Refer to Infinigy's Visual Resource Evaluation Report dated May 5, 2009, provided under separate cover.

7. Essential wildlife, finfish or shellfish habitat

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.

No essential wildlife, finfish or shellfish habitat exist on the Subject Property. The proposed facility location is immediately adjacent to a commercial building, a former light industrial use facility and active rail lines.

8. Tidal Wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments

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

The proposed project will not alter the natural characteristics of any coastal resource areas as none exist on the Subject Property.

Therefore, it is the opinion of *Infinigy* that the proposed project is consistent with all applicable coastal policies and standards as stated within the CCMA and there are no potential adverse impacts associated with the proposed project on coastal resources or future water dependent development activities.

Sincerely,


Infinigy Engineering and Surveying, PLLC

Deborah M Osterhoudt, P.G.
Project Manager

Attachments
Appendix A – Site Location Map
Appendix B – Coastal Boundary Map
Appendix C – Coastal Site Plan

APPENDIX A
SITE LOCATION MAP

File: M:\INFINICY SURVEY\FLORIDA_TWRS\226-003\NORTHAVEN\DWG\ENVIRON\SITE LOCATION.DWG Saved: 1/19/2009 2:33:29 PM Plotted: 1/19/2009 2:33:34 PM User: Mike Bourgeois



SOURCE: SITE SURVEY
QUADRANGLE: Hartford, Conn., N.Y., N.J., MASS.

Figure Number: ____
Project Number: 226-003
Scale: 1" = 20000'
Date: 01/19/2009

PROPERTY LOCATION MAP
PROPOSED CELLULAR TOWER
50 Devine Street
North Haven, CT
Project Sponsor: Florida Tower Partners

infinigy
engineering & surveying
11 Herbert Drive
Latham, New York 12110
(518) 690-0790

APPENDIX B
COASTAL BOUNDARY MAP

COASTAL MANAGEMENT AREAS MAP

CLIENT NAME:

Florida Tower Partners, LLC

SITE LOCATION:

50 Devine Street
North Haven, CT

PROJECT NAME:

FTP-North Haven

PROJECT NO.:

226-

Coastal Area



Coastal Area

Coastal Boundary



Coastal Boundary



APPENDIX C
COASTAL SITE PLAN