Transportation Land Development Environmental Services



54 Tuttle Place Middletown, Connecticut 06457 860 632-1500 FAX 860 632-7879

Memorandum

To: Mr. Scott Chasse

Date: April 2, 2010

All-Points Technology Corp., P.C.

3 Saddlebrook Drive Killingworth, CT 06419

Project No.: 40505.08

From: Dean Gustafson

Professional Soil Scientist

Re: Alternatives Analysis

T-Mobile Site No. CTNL803

"Self-storage Site"

232 Shore Road (Route 156) Old Lyme, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) has reviewed alternate locations on the Self-storage Site with respect to potential impact to nearby wetland resources and provides the following assessment. The two alternatives reviewed include reorientation and movement to the north of the Proposed Location in the northwest corner of the subject property and a new alternate location in the northeast corner of the Site. A Wetland Resources Map depicting CTDEP GIS wetland and watercourse layers and the two Facility locations evaluated is attached for reference. In addition, Site Plans prepared by All-Points Technology Corp., P.C., dated 3/15/10, depicting the alternative layouts are enclosed.

Proposed Location Revision

The proposed Facility location in the northwest corner of the subject property is located approximately 24 feet east of a large forested wetland system, referred to as Wetland 2 in VHB's Wetlands Delineation Report (May 15, 2009). An alternative layout is proposed that would shift the 40-foot by 60-foot compound approximately 20 feet north of the original proposed location to the north property boundary. This shift northward would result in expanding the setback to the nearest wetlands to 38 feet and result in less overall impact to wetland buffer habitat. The revised location would also result in the compound immediately abutting existing development to the north (railroad tracks) and to the east (self-storage facility), further minimizing disturbance to the undeveloped upland forested buffer to nearby wetlands. The proposed shift of the compound to the north will result in the removal of two large black oaks (33 and 22 inch diameter at breast height). These two trees were evaluated by a certified forester with VHB and found to be in declining health with recommendations for removal. A copy of this tree assessment is attached.

In addition to incorporating mitigation recommendations contained in VHB's Wetland Compliance memorandum (May 26, 2009), VHB recommends that a row of native shrubs (i.e., serviceberry, black chokecherry, gray dogwood, and nannyberry) be planted along the west and south sides of the proposed compound in the disturbed area between with the compound's fence and limit of work line defined by erosion and sedimentation controls. This buffer enhancement planting of native shrubs would provide food, shelter and nesting habitat for a variety of small animals, in particular several avian species, which would enhance the wildlife habitat value of the buffer between the proposed Facility and nearby wetland system. We believe that no likely adverse impact to wetlands would occur as a result of T-Mobile revising its compound location. The evaluation is based on the existing surrounding disturbance, the small area of proposed development, the unmanned nature of

the development and mitigation measures taken to minimize disturbance during and following construction (e.g., erosion and sedimentation controls and buffer enhancement planting).

Northeast Corner Alternative

A proposed telecommunications compound in the northeast corner of the subject property was evaluated from a wetland impact standpoint. No wetlands were identified in the northeast corner of the property. Wetlands identified along the east property boundary turn to the northeast off the property near the gated entrance to the self-storage (fenced) facility; this wetland is identified as Wetland 1 in VHB's Wetlands Delineation Report (May 15, 2009). Based on a remote field review of the off-site wetlands from the subject property, the wetland boundary appears to be approximately 40 to 50 feet east of the subject property's east boundary. As indicated in testimony from the February 4, 2010 Connecticut Siting Council hearing on Docket No. 391, from a comparative standpoint, Wetland 1 provides less overall function and value when compared to Wetland 2. This evaluation of the two wetlands is based in part on the size of the wetland systems, the diversity of vegetative wetland communities, hydrology and level of disturbance and development within and surrounding the wetlands. Based on this evaluation, no likely adverse impact to wetlands would occur as a result of T-Mobile shifting its Facility to the northeast corner of the subject property.

Enclosures



ALL-POINTS TECHNOLOGY CORPORATION, P.C. 3 SADDLEBROOK DRIVE KILLINGWORTH CT 06419 PHONE: (860)-663-1697 FAX: (860)-663-0935 www.allpointstech.com

APT FILING NUMBER: CT-255T-330

ALTERNATE LAYOUT

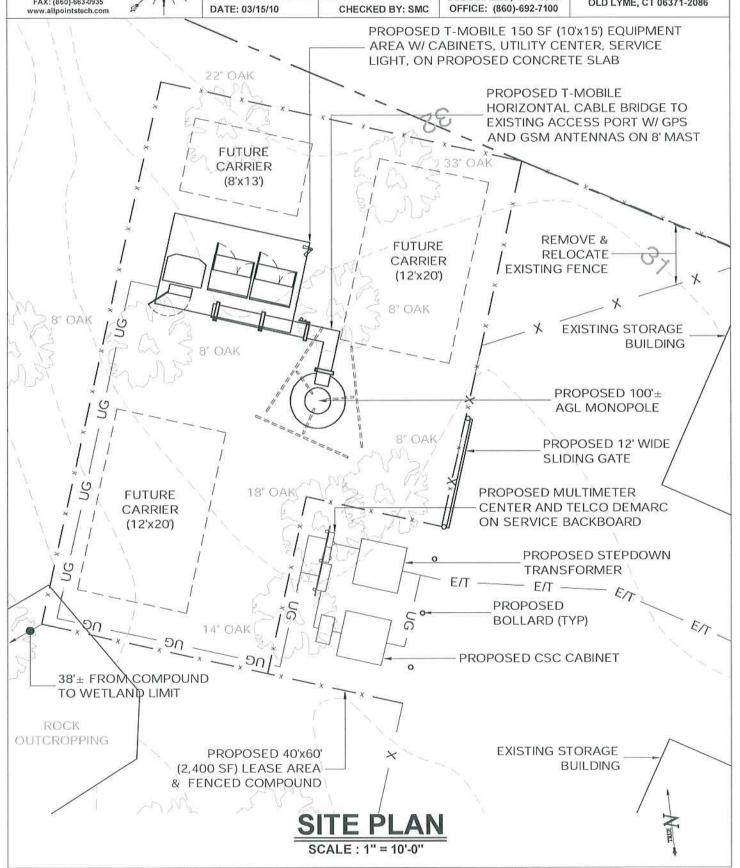
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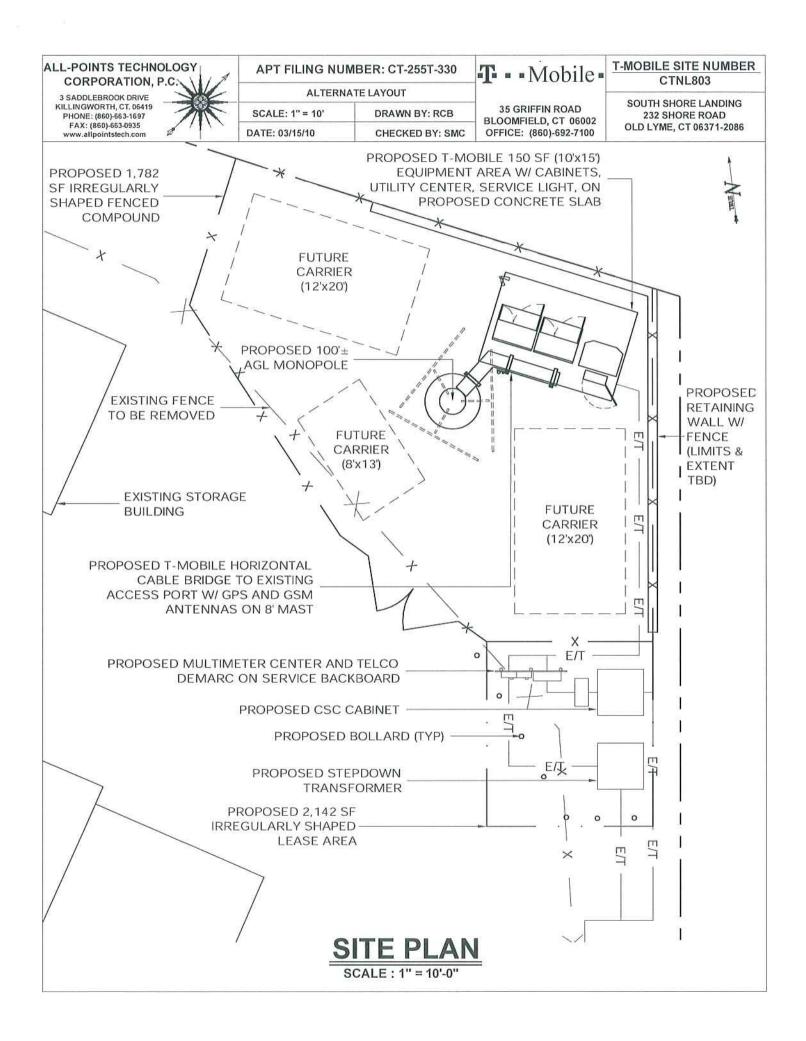
DRAWN BY: RCB

T - Mobile -

35 GRIFFIN ROAD BLOOMFIELD, CT 06002 T-MOBILE SITE NUMBER CTNL803

> SOUTH SHORE LANDING 232 SHORE ROAD OLD LYME, CT 06371-2086





Transportation Land Development Environmental Services



54 Tuttle Place Middletown, Connecticut 06457 860 632-1500 FAX 860 632-7879

Memorandum

To: Mr. Scott Chasse

Date: March 1, 2010

All-Points Technology Corp., P.C.

3 Saddlebrook Drive Killingworth, CT 06419

Project No.: 40505.08

From: Matthew Davison

CT Certified Forester #193 Registered Soil Scientist Re: Tree Assessment

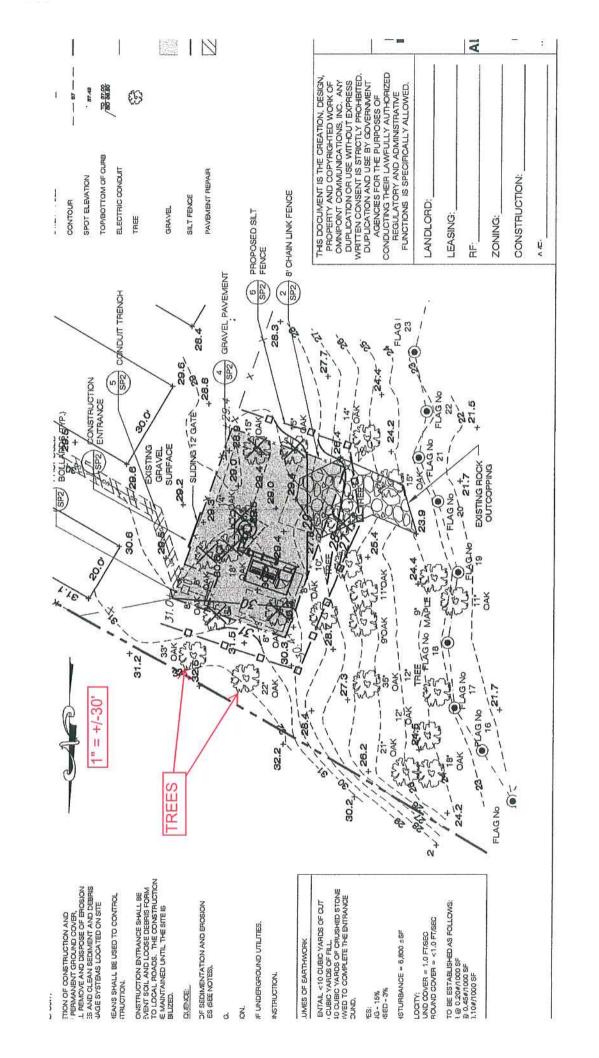
T-Mobile Site No. CTNL803 South Shore Landing 232 Shore Road (Route 156) Old Lyme, Connecticut

Vanasse Hangen Brustlin, Inc. (VHB) has completed an on-site investigation to identify potential health concerns of two trees located approximately 15-20 feet north-northeast of the proposed telecommunications facility in the northwest corner of the property at 232 Shore Road in Old Lyme, Connecticut. Please see the attached portion of a compound map which identifies the location of each tree in relation to the proposed compound.

33" Black Oak: This tree displays evidence of root damage which appears as symptoms including basal decay (swollen buttress), a crack or seam (a portion of which is weeping) on the lower main stem extending above the soil line and dead limbs in the tree canopy and abundant epicormic branching. Refer to Photos 1 and 2 in the attached Photolog Documentation. Epicormic branches arise from adventitious or dormant buds on the main stem and limbs in response to stress or damage to the cambium. These symptoms are more pronounced on the north (rail line) side where soil disturbance and compaction appear to have occurred. The disturbance observed along the north side of the referenced tree is related to ongoing rail maintenance activities. This tree is relatively stable and would not likely be considered an imminent safety hazard; however removal is recommended due to its proximity to the rail line and the proposed development to the south which will contribute to the existing stress. Additionally, black oaks are shorter lived and generally less vigorous tree species than red or white oak. This tree is in a mature state and will continue to decline in health irrespective of additional disturbance in proximity, further supporting the recommendation for removal.

22" Black Oak: This tree displays evidence of root damage which appears as symptoms including a seam (which is void of bark) on the lower main stem extending from the base approximately 8 feet above the soil line, numerous dead limbs in the tree canopy and abundant epicormic branching. Refer to Photos 3 and 4 in the attached Photolog Documentation. These symptoms are more pronounced on the north (rail line) side where soil disturbance and compaction appear to have occurred. This tree is leaning towards the rail line with multiple dead limbs extending towards the rail line. Removal of this tree is strongly recommended due to its condition and proximity to the rail line regardless of the proposed development to the south.

Enclosures



Vanasse Hangen Brustlin, Inc. PHOTOLOG DOCUMENTATION

Proposed T-Mobile Facility, 232 Shore Road, Old Lyme, CT Tree Analysis

September 4, 2009

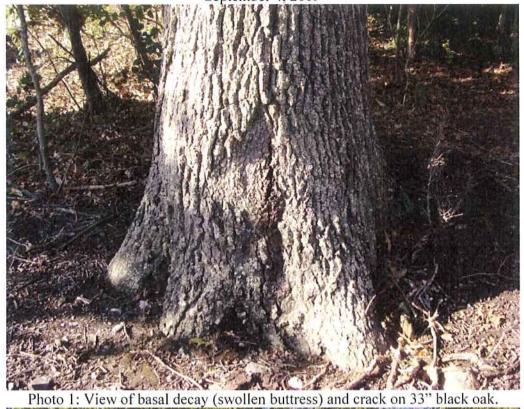




Photo 2: View of epicormic branches and dead limbs on 33" black oak.

Vanasse Hangen Brustlin, Inc. PHOTOLOG DOCUMENTATION

Proposed T-Mobile Facility, 232 Shore Road, Old Lyme, CT Tree Analysis September 4, 2009



Photo 3: View of seam extending from base to 8± feet high on 22" black oak.



Photo 4: View of epicormic branches and dead limbs on 22" black oak.