



Vanasse Hangen Brustlin, Inc.

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**Memorandum**

To: Ms. Hollis M. Redding  
SBA Towers II LLC  
One Research Drive, Suite 200 C  
Westborough, MA 01581

Date: January 14, 2011

Project No.: 40999.30

From: Dean Gustafson  
Professional Soil Scientist

Re: Preliminary Wetland Impact Analysis  
Potential Alternate Site  
120 Old Black Point Road  
Niantic (East Lyme), Connecticut

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Vanasse Hangen Brustlin, Inc. (VHB) performed a site inspection on January 6, 2011 to investigate a potential alternate site to the 49 Brainerd Road project and provide a preliminary assessment of possible wetland impacts. VHB was provided with a Lease Exhibit (LE-1) from David Vivian of New Cingular Wireless PCS, LLC depicting the subject parcel and a proposed access drive and wireless telecommunications facility layout; a copy of LE-1 is enclosed.

The entirely wooded undeveloped property was found to contain three distinct wetland systems that were delineated by an unknown soil scientist on behalf of the property owner. A review of the wetland boundaries in proximity to the proposed locations of an access drive and wireless telecommunications facility were found to be substantially correct. A brief description of the wetland areas and anticipated impacts is provided below.

Starting from Old Black Point and heading east into the interior of the subject property, the three identified wetland areas are sequentially labeled as Wetlands 1, 2 and 3 for descriptive purposes. Refer to the enclosed Preliminary Wetland Impact Assessment figure along with photolog documentation depicting the wetland areas and proposed development locations. Wetland 1 consists of a small emergent and scrub/shrub wetland located immediately adjacent to the east side of Old Black Point Road. The wetland drains west towards the road and enters into a nearby catch basin that conveys flows through a culvert to the west into a tidal salt marsh located immediately adjacent to the west side of Old Black Point Road. This wetland is dominated by narrowleaf cattail (*Typha angustifolia*), common reed (*Phragmites australis*), soft rush (*Juncus effusus*), silky dogwood (*Cornus amomum*) and roundleaf greenbrier (*Smilax rotundifolia*). The proposed access drive will result in a direct impact of approximately 600 square feet to Wetland 1. Wetland 2 is a forested wetland system that flows to the north with dominant species including red maple (*Acer rubrum*), black gum (*Nyssa nigra*), common spicebush (*Lindera benzoin*), highbush blueberry (*Vaccinium corymbosum*), roundleaf greenbrier and cinnamon fern (*Osmunda cinnamomea*). The proposed access drive will result in a direct impact of approximately 2,300 square feet to Wetland 2. Wetland 3 is also a forested wetland system that flows to the north/northeast with dominant species including red maple, black gum, yellow birch (*Betula alleghaniensis*), black birch (*Betula lenta*), red oak (*Quercus*

*rubra*), highbush blueberry, mountain laurel (*Kalmia latifolia*), and cinnamon fern. The proposed access drive will result in a direct impact of approximately 2,600 square feet to Wetland 3. The lease exhibit depicts the access road traveling over an adjoining lot under separate ownership and avoiding direct impacts to Wetland 3. However, no easement agreement is in place so impact to Wetland 3 is included in this preliminary assessment. In addition to direct impacts, the proposed wireless telecommunications facility compound is shown within approximate 25 to 30 feet west of the boundary of Wetland 3 within a mature forested upland habitat. The facility location is dominated by a mature oak-dominant forest with average tree size ranging from 8 to 24 inches diameter at breast height (DBH) with tree heights approaching 80 to 90 feet tall. VHB understands that the location of the facility was dictated by the subject property owner who apparently has plans for future subdivision of the property. Although a function and value assessment of the impacted wetlands was not performed, the cumulative impacts to wetlands from the development of a wireless telecommunications facility at this property could result in a likely adverse impact to wetland resources.

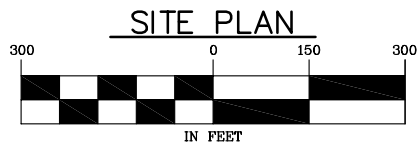
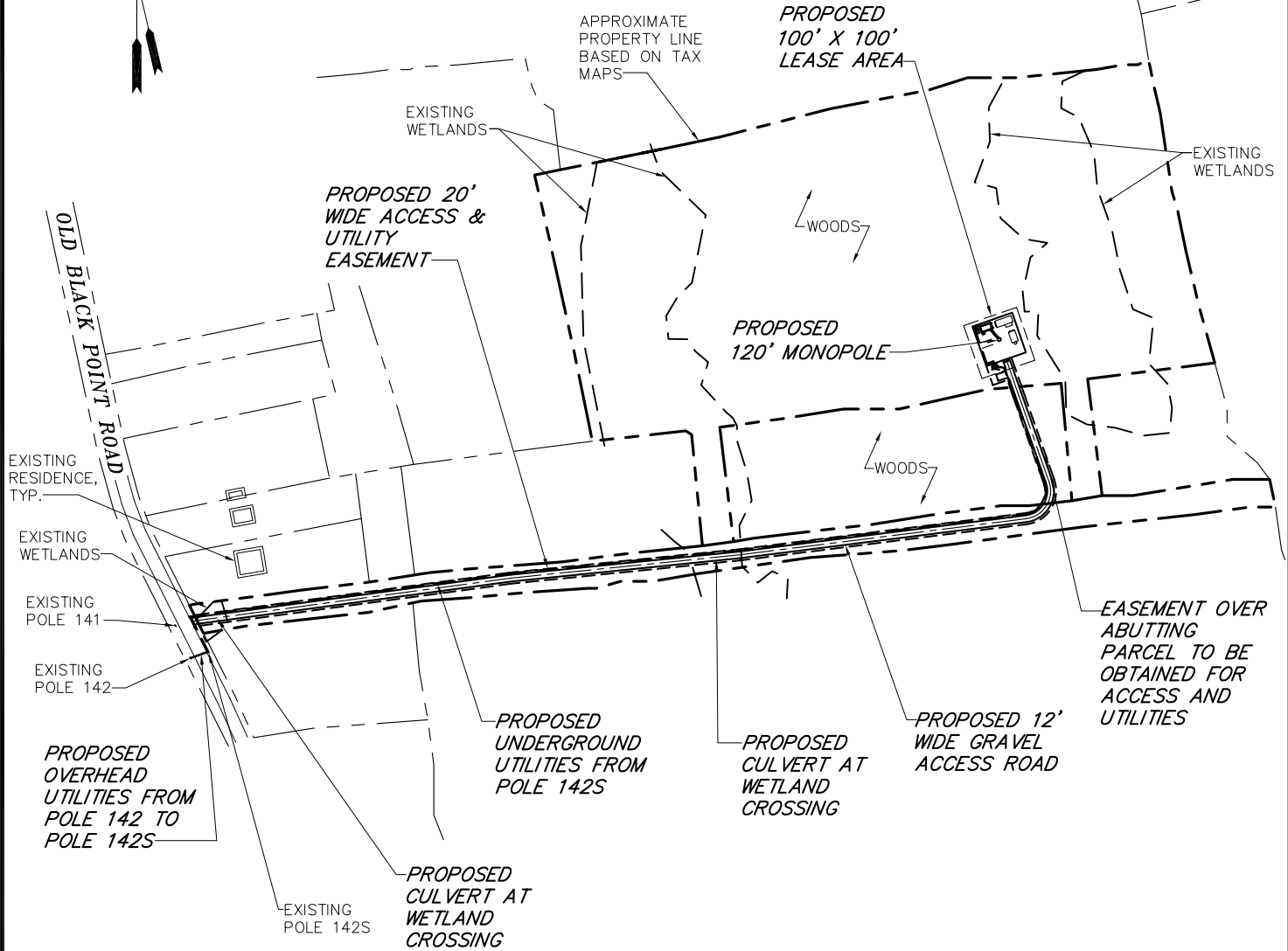
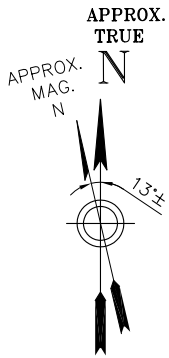
A preliminary assessment of National Environmental Policy Act (NEPA) compliance for such a facility with respect to wetland impacts is provided below. In order to determine if a proposed project results in a "significant environmental effect", for which an Environmental Assessment (EA) must be prepared under NEPA, a project is evaluated against the U.S. Army Corps of Engineers New England Division (Corps) minimal impact threshold criteria to "Waters of the U.S." (e.g., wetlands, waterways, etc.). Generally, if a project is determined to satisfy the requirements of a Category 1 project (minimal impact and eligible without screening by reviewing agencies) it is not considered to result in a significant environmental effect and a Finding of No Significant Impact (FONSI) could be issued for the NEPA listed category item 7 (wetland). In order to support this conclusion, a careful review of the Department of the Army Programmatic General Permit (PGP) State of Connecticut (effective May 31, 2006, expiration date May 31, 2011) criteria for Category 1 is necessary.

For the proposed wetland crossing improvements associated with this potential alternate site, the following key criteria are generally required in order to be eligible under Category 1 of the PGP.

*Less than 5,000 SF [square feet] of Inland Waters, Waterway and/or Wetland Fill and Secondary Impacts. Fill impacts include all temporary and permanent fill and excavation discharges resulting from a single and complete project, see #5 of General Requirements. Secondary impacts include but are not limited include to impacts to inland waters, waterways or wetlands drained, dredged, flooded, cleared or degraded resulting from a single and complete project. (See 40 CFR 230.11 (g) and (h))*

The proposed project would result in direct wetland impacts totaling 5,500 SF, exceeding the Corps' threshold of 5,000 SF. Therefore, such a development would not be considered eligible under Category 1 of the PGP and therefore a Finding of No Significant Impact for NEPA listed category item 7 could not be assessed. As a result, the project would be considered to result in a "significant environmental effect" with respect to wetland impacts, an EA would be required to be filed with the Federal Communications Commission and a permit application would be required to be filed with the Corps.

Enclosures



NOTE:  
 PROPOSED CINGULAR WIRELESS INSTALLATION SHOWN IS ONLY APPROXIMATE. EXACT LOCATIONS AND DETAILS WILL BE DETERMINED BY FINAL ENGINEERING DESIGN.

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 EAST LYME-GADA  
 120 OLD BLACK POINT ROAD  
 NIAN TIC, CT 06357  
 NEW LONDON COUNTY

CHA PROJ. NO. - 18301-1033

1 OF 3






REV 0

LE-1

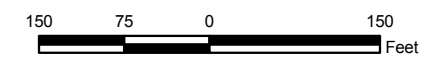


Preliminary Wetland Impact Assessment  
East Lyme-Gada  
Potential Alternate Site Location  
120 Old Black Point Road  
Niantic, Connecticut

**Legend**

-  Potential Alternate Facility Layout
-  Wetland Boundary
-  Property Line
-  Wetland Area
-  Existing Building

Base Map Source: ConnDOT 2004  
aerial photograph with 0.5-foot resolution.





**Vanasse Hangen Brustlin, Inc.**  
PHOTOLOG DOCUMENTATION  
Preliminary Wetland Impact Assessment  
120 Old Black Point Road, Niantic (East Lyme), CT  
January 6, 2011



Photo 1: Overview of Wetland 1, looking east across Old Black Point Road.



Photo 2: Overview of Wetland 1, looking west. Tidal salt marsh on west side of road.



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Photo 3: View of Wetland 2 at proposed crossing looking west.



Photo 4: View of Wetland 2 at proposed crossing, looking east.



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Photo 5: View of Wetland 3 at proposed crossing, north end, looking east.



Photo 6: View of proposed wireless telecommunications facility (double flagged tree), looking north.