



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

October 25, 2013

Dean Gustafson
All-Points Technology Corporation
3 Saddlebrook Drive
Killingworth, CT 06419

Re: Northeast Towers, 199 Brickyard Road in Farmington, Connecticut

Mr. Gustafson:

Materials pertaining to the above project were forwarded to me for review by the DEEP Natural Diversity Database (NDDDB). Their records indicate that many state-listed sand barren-obligate plant and invertebrate species occur at this site.

Per the materials submitted for review, construction of the telecommunications tower will be within an existing graveled lot therefore it is unlikely that this project will impact the remaining sand barren habitat that exists on-site.

Natural Diversity Database information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Database 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 Database as it becomes available.

This is a preliminary site review and is not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the DEEP for the proposed site. Please be advised that should state permits be required or should state involvement occur in some other fashion, specific restrictions or conditions relating to the species discussed above may apply. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division should be requested and species-specific surveys may be required. If the proposed project has not been initiated within one year of this Wildlife Division review, you should contact the NDDDB for an updated review.

If you have any additional questions, please feel free to contact me at Laura.Saucier@ct.gov, please reference the NDDDB number at the bottom of this letter when you e-mail or write.

Sincerely,

A handwritten signature in cursive script that reads "Laura Saucier".

Laura Saucier
Wildlife Technician

NDDDB 201303813



Sand Barren Habitat Survey Report

October 23, 2014

**Tower Holdings, LLC
199 Brickyard Road
Farmington, Connecticut 06032
Attn: Chuck Ruegulbuto**

APT Project No.: CT323100

**Re: Sand Barren Habitat Survey
Proposed Northeast Towers Facility
199 Brickyard Road
Farmington, Connecticut**

Dear Mr. Regulbuto,

At your request, and on behalf of Tower Holdings, LLC, All-Points Technology Corporation, P.C. ("APT") is providing this report to determine if sand barren habitat exists on the referenced subject property. In August of 2013, a Request for Natural Diversity Data Base State Listed Species Review Form was formally submitted to the CTDEEP for an evaluation regarding possible state-listed, threatened, endangered or special concern species located in proximity to a proposed Northeast Towers' tower training facility at 199 Brickyard Road in Farmington, Connecticut. NDDDB staff responded in an October 25, 2013 letter that "Their records indicate many state-listed sand barren-obligate plant and invertebrate species occur at this site." However, per review of the materials submitted by APT specifying the entirety of the construction activities being located within an existing graveled lot, NDDDB staff concluded that "it is unlikely that this project will impact the remaining sand barren habitat that exists on-site." A copy of the CTDEEP NDDDB correspondence is enclosed.

Tower Holdings, LLC proposes to construct a 180-foot tall self-supporting lattice tower training facility in the eastern portion of the storage yard. The facility will include the construction of an 8-foot high chain link fence surrounding a 60-foot by 60-foot gravel compound that will house equipment shelters and diesel-fired generators ("Facility"). A 20-foot wide gravel access drive and utility easement will generally follow along an existing access on the north side of the subject property. Please refer to the enclosed 2012 Aerial Photograph map for the approximate location of the Facility.

In response to the NDDDB letter, Matthew Gustafson and Dean Gustafson of APT conducted a habitat survey of the proposed Facility compound area, access road, and adjoining areas on the subject property ("Study Area") to determine if sand barren habitat exists within the proposed development areas. A summary of the findings of this habitat survey is provided below.

Sand Barren Critical Habitat Survey

The general habitat of the subject property is characterized as developed areas consisting of gravel surfaces maintained as a storage yard, associated industrial office/garage building, and paved parking areas completely enclosed within a chain link fence. The surrounding land use consists of a storage facility to the south, a narrow forested block with interior recreational trail across Brickyard road to the west, and active

compost and sand and gravel operations to the north and east. Photographs of the subject property and the adjoining compost and sand and gravel operations are provided in the attached Photo Documentation.

CTDEEP Critical Habitat mapping records depict an area associated with the current compost and sand and gravel operations location as the Brickyard Road Sand Barren Critical Habitat. A Critical Habitat Map is enclosed depicting this nearby area and the subject property; no critical habitat is shown to occur on the subject property. The current use of this identified Critical Habitat sand barren area is dominated by the storage and processing of large ±300-foot long windrows of compost apparently from leaf waste. The eastern extent of this Critical Habitat sand barren area consists of exposed sand and gravel deposits associated with an active sand and gravel operation. Due to the active composting and sand and gravel operations and associated high level of soil disruption, these areas are anticipated to provide limited habitat for sand barren obligate plant or invertebrate species. The composting operation was developed in circa 2011. A review of a 2009 aerial photograph, attached, reveals this area originally consisted of scattered open sand, sparse grassland and scrub habitats prior to its development as a composting operation. These habitat cover type areas appear to relate to DEEP's mapping of this area as Critical Habitat, which was based on DEEP's review of a 2004 black and white ortho photo. Connecticut's Critical Habitats mapping is the result of a project which took place from 2007-2009, to create habitat maps to be used in land use planning and natural resource protection. Therefore, it appears that the majority of the Brickyard Road Sand Barren Critical Habitat has been eliminated (refer to the 2012 aerial photograph) by the off-site composting and sand and gravel operations. The change in land use is not reflected in Connecticut's Critical Habitat mapping since the off-site development occurred subsequent to the state's mapping project.

Periphery areas to the composting and sand and gravel operations consist of some disturbed exposed sand, open field, scrub/shrub, and edge forest habitat generally dominated by invasive species including common mugwort (*Artemis vulgaris*), Asiatic bittersweet (*Celastrus orbiculatus*), and autumn olive (*Elaeagnus umbellata*). While some of these periphery areas may possess adequate habitat to support sand barren obligate plant and invertebrate species, these areas occur outside the subject property's chain link fence.

Construction activities associated with the proposed Facility would be within existing developed areas and separated from the adjoining property to the north and east by an existing chain-link fence. No impacts to the Brickyard Road Critical Habitat sand barren areas, which appear to no longer exist, are anticipated provided sedimentation and erosion controls are designed, installed and maintained during construction in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*. As a result, no impact to sand barren habitat or associated State Listed species would occur as a result of the development or operation of the proposed Facility.

If you have any questions regarding the above-referenced information, please feel free to contact by telephone at (860) 663-1697 ext. 201 or via email at dgustafson@allpointstech.com.

Sincerely,

All-Points Technology Corporation, P.C.



Dean Gustafson
Senior Environmental Scientist

Attachments

Attachments

- CT DEP NDDB Letter dated October 25, 2013
- 2012 Aerial Photograph
- Critical Habitat Map
- Photo Documentation
- 2009 Aerial Photograph



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Sincerely,

Laura Saucier
Wildlife Technician

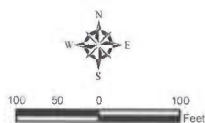
NDDDB 201303813



Legend

-  Proposed Tower Location
-  Proposed Underground Utilities
-  Proposed Site Layout
-  Subject Property

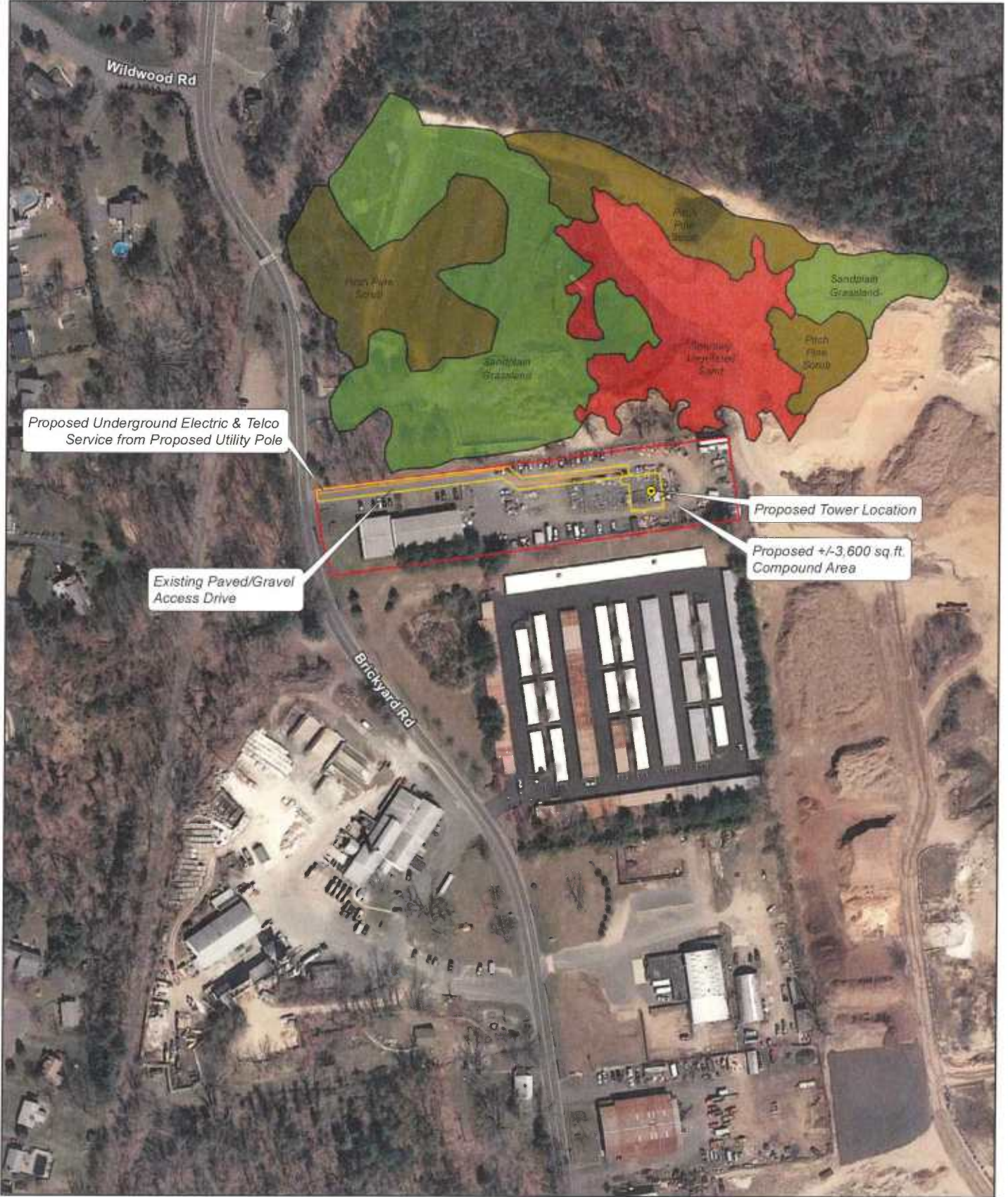
Map Notes:
 Base Map Source: 2012 Aerial Photograph (CTECO)
 Map Scale: 1 inch = 225 feet
 Map Date: October 2014



2012 Aerial Photograph

Proposed Wireless
 Telecommunications Facility
 Farmington
 199 Brickyard Road
 Farmington, Connecticut 06032





Legend

- Proposed Tower Location
- Proposed Underground Utilities
- Proposed Site Layout
- Subject Property
- CTDEEP Critical Habitat**
- Sand Barren Common Sub-Types:**
- Pitch Pine Scrub
- Sandplain Grassland
- Sparsely Vegetated Sand

Map Notes:
 Base Map Source: 2012 Aerial Photograph (CTECO)
 CTDEEP Critical Habitat Data Source: CT 2004 Black and White Ortho Photo
 Map Scale: 1 inch = 225 feet
 Map Date: October 2014



Critical Habitat Map

Proposed Wireless
 Telecommunications Facility
 Farmington
 199 Brickyard Road
 Farmington, Connecticut 06032





Photo 1: View of entrance to Northeast Tower's property, looking east across Brickyard Road. Northeast Tower's office/garage building in right side of photo.



Photo 2: View of paved parking and access along north side of building, looking east.



Photo 3: View of storage yard, looking east.



Photo 4: View of proposed wireless communications facility in storage yard, looking west..



Photo 5: View of composting operation north of the subject property, looking north.



Photo 6: View of sand and gravel operation east of the subject property, looking northeast.



Proposed Underground Electric & Telco Service from Proposed Utility Pole

Existing Paved/Gravel Access Drive

Proposed Tower Location

Proposed +/-3,600 sq.ft. Compound Area

Legend

-  Proposed Tower Location
-  Proposed Underground Utilities
-  Proposed Site Layout
-  Subject Property

2009 Aerial Photograph

Proposed Wireless
 Telecommunications Facility
 Farmington
 199 Brickyard Road
 Farmington, Connecticut 06032

Map Notes:

Base Map Source: 2009 color orthophotography for the Capitol Region of Connecticut (CTECO) Photo
 Map Scale: 1 inch = 225 feet
 Map Date: October 2014

