



Vanasse Hangen Brustlin, Inc.

May 1, 2007

Ref: 40999.19

Mr. Keith Coppins
Optasite Towers LLC
One Research Drive, Suite 200C
Westborough, MA 01581

Re: NEPA Compliance Documentation
Proposed Optasite Facility CT-999-0075 – Middle Turnpike
640 Hilliard Street
Manchester, CT

Dear Mr. Coppins:

Vanasse Hangen Brustlin, Inc. (VHB) has been retained by Optasite Towers LLC (Optasite), to review environmental resource information outlined in 47 CFR Ch.1 § 1.1307 sections (a) and (b) for environmental consequences pursuant to the Federal Communications Commission ("FCC or Commission") requirements. Optasite is proposing to construct a new wireless telecommunications facility on the eastern portion of an industrial property located at 640 Hilliard Street in Manchester, Connecticut (the "host property"; Optasite Site ID # 999-0075 – Middle Turnpike). Optasite plans to construct a ±150-foot tall monopole (to be painted brown), attach carrier antennae onto the monopole, and install future associated ground equipment at the base of the monopole situated within a proposed ±30-foot by ±70-foot chain-link fenced enclosed compound area. The proposed compound area will be located southeast of a large industrial building, historically occupied by E.E. Hilliard Woolen Mill, which occupies the west portion of the host property. The proposed access/utilities easement will extend in a southerly direction off of Hilliard Street along the eastern property boundary. Specifically, VHB reviewed source information outlined below to determine if the proposed facility will be located in an environmentally sensitive area.

National Environmental Policy Act (NEPA) Requirements

As a licensing agency, the FCC complies with NEPA by requiring its licensees to review their proposed actions for environmental consequences. Rules implementing NEPA are found at Title 47 of the Code of Federal Regulations (CFR), Part 1, Subpart I, rule sections 1.1301 to 1.1319.

Section 1.1305 of these rules, state that the Commission "has found no common pattern which would enable it to specify" any particular Commission action as a "major action" under NEPA. Thus, section 1.1306 of the Rules "categorically excluded from environmental processing" all Commission actions except for those specifically identified in section 1.1307. If a licensee's proposed action falls within one of the categories of 1.1307, section 1.1308(a) requires the licensee to consider the potential environmental effects from its construction of antenna facilities or structures, and disclose those effects in an environmental assessment (EA) which is filed with the Commission for review.

54 Tuttle Place
Middletown, Connecticut 06457-1847
860.632.1500 ■ FAX 860.632.7879
email: info@vhb.com
www.vhb.com

VHB has reviewed the following source information for identification, location, and impacts to environmentally sensitive areas:

1. **Officially designated wilderness areas** - State of Connecticut, Department of Environmental Protection (CTDEP) Geographic Information System (GIS) data layers, CTDEP Natural Resources Center and Natural Diversity Data Base (NDDDB), and United States Department of Interior – Fish and Wildlife Service (USF&WS), New England Field Office. See attached NEPA screen map prepared by VHB, CTDEP letter and VHB memo in response to CTDEP comments, and USF&WS letter.
2. **Officially designated wildlife preserve** – CTDEP GIS data layers, CTDEP Natural Resources Center and NDDDB, and USF&WS, New England Field Office. See attached NEPA screen map, CTDEP letter and VHB memo in response to CTDEP comments, and USF&WS letter.
3. **Threatened or Endangered Species or designated critical habitats** – CTDEP GIS data, CTDEP's Natural Resources Center and NDDDB, and USF&WS, New England Field Office. See attached NEPA screen map, CTDEP letter and VHB memo in response to CTDEP comments, and USF&WS letter.
4. **National Register of Historic Places** – State of Connecticut Commission on Cultural & Tourism, Historic Preservation & Museum Division, State Historic Preservation Officer (SHPO); National Register and Reported Archeological Sites Connecticut Geographic Information System data layer provided by Heritage Consultants, LLC; and public notice. As part of the public notice requirement, VHB submitted notification of the proposed project to the Town of Manchester's municipal offices (to the attention of Scott Shanley, General Manager) and Manchester Historical Commission on February 19, 2007, and published a legal notice in the Journal Inquirer on February 20, 2007. See attached NEPA screen map prepared by VHB, SHPO letter, and public notice documents.
5. **Indian Religious Sites** - State of Connecticut, Connecticut Commission on Cultural & Tourism, Historic Preservation & Museum Division SHPO, National Register and Reported Archeological Sites Connecticut Geographic Information System data layer provided by Heritage Consultants, LLC, and all interested Native American Tribes (NAT) and/or Native Hawaiian Organizations (NHO) identified on FCC's online Tower Construction Notification System (TCNS). The proposed project was posted on FCC's TCNS website on November 21, 2006. As identified via TCNS, VHB consulted with the Mashantucket Pequot Tribe and the Narragansett Indian Tribe. See attached SHPO letter and letters from these Tribes. The proposed project area is not located on an American Indian federal reservation trust land; thus, consultation with the United States Department of Interior Bureau of Indian Affairs (BIA) is not necessary. Please note that in the unlikely event that tribal artifacts or human remains are encountered during construction activities, excavation is required to be halted immediately and the appropriate NATs and SHPO are to be contacted as pursuant to Title 47 CFR Sec. 1.1312 of the Commission's rules.
6. **Flood Plain** – Flood Insurance Rate Maps (FIRM) by Federal Emergency Management Agency (FEMA) Federal Insurance Administration, Office of Risk Assessment 50 C Street, SW Washington, DC 20472; CTDEP GIS data layer. See attached NEPA screen map prepared by VHB.



Mr. Keith Coppins
Optasite Towers LLC
Page 3

7. **Significant change in surface features** – Based on field observations and information provided by Optasite and its contractors, the proposed activity by Optasite does not appear to involve a significant change in surface features or result in wetland fill, deforestation or water diversion. See attached Wetlands Delineation Report prepared by VHB dated May 1, 2007.
8. **High Intensity white lights located in residential neighborhoods** – N/A; VHB was not provided with lighting information (i.e. FAA form) for this facility. VHB understands that no lighting is required for this facility.

Based on the information currently available, VHB has found that the proposed facility does not fall under any of the listed categories of Section 1.1307 under the NPA. The NEPA checklist and NEPA screen map, which outlines the location of the site and the location of the environmental resources, and agency correspondence are attached to this letter.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.



Nicole Dentamaro
Environmental/GIS Analyst

Attachments



Site Contact Name: Mr. Keith Coppins	Site type (choose one): <input checked="" type="checkbox"/> Raw land <input type="checkbox"/> Tower colo* <input type="checkbox"/> Other colo*	Site Cascade ID: CT-999-0075	Site Name & Address: Middle Turnpike 640 Hilliard Street Manchester, CT
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NEPA Land Use Screening Checklist

FCC NEPA Category	Consulting Agency to Contact	SSEO Document Reference	Check appropriate box(es) below		
			No Adverse Impact	Potential Adverse Impact	CNPA Applies Exempt From Review*
1. Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management (BLM), CTDEP GIS data layers and CTDEP Natural Resources Center and Natural Diversity Data Base (NDDDB), and United States Department of Interior – Fish and Wildlife Service (USF&WS), New England Field Office	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Designated Wildlife Preserves	National Park Service, US Forest Service, BLM, CTDEP GIS data layers and Natural Resources Center and NDDDB, and USF&WS, New England Field Office	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Threatened or Endangered Species & Critical Habitats	CTDEP GIS data layers and Natural Resources Center and NDDDB, and USF&WS, New England Field Office	Section 3.4.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Historic Places	State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO); Public Notice	Section 3.4.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Indian Religious Sites	SHPO, Tower Construction Notification System (TCNS) website –Native American Tribes (NATs), and/or Native Hawaiian Organizations (NHOs), Bureau of Indian Affairs (BIA)	Section 3.4.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Floodplain	Federal Emergency Management Agency (FEMA)	Section 3.4.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Wetlands & Surface Waterways	US Army Corps of Engineers (ACOE)	Section 3.4.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. High Intensity White Lights in Residential Neighborhoods	Lighting information, if applicable, to be provide by client via FAA form or other relevant lighting documentation	Section 3.4.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

***Based on the Collocation Nationwide Programmatic Agreement (CNPA), the proposed collocation project is exempt from review of the FCC NEPA Category.*

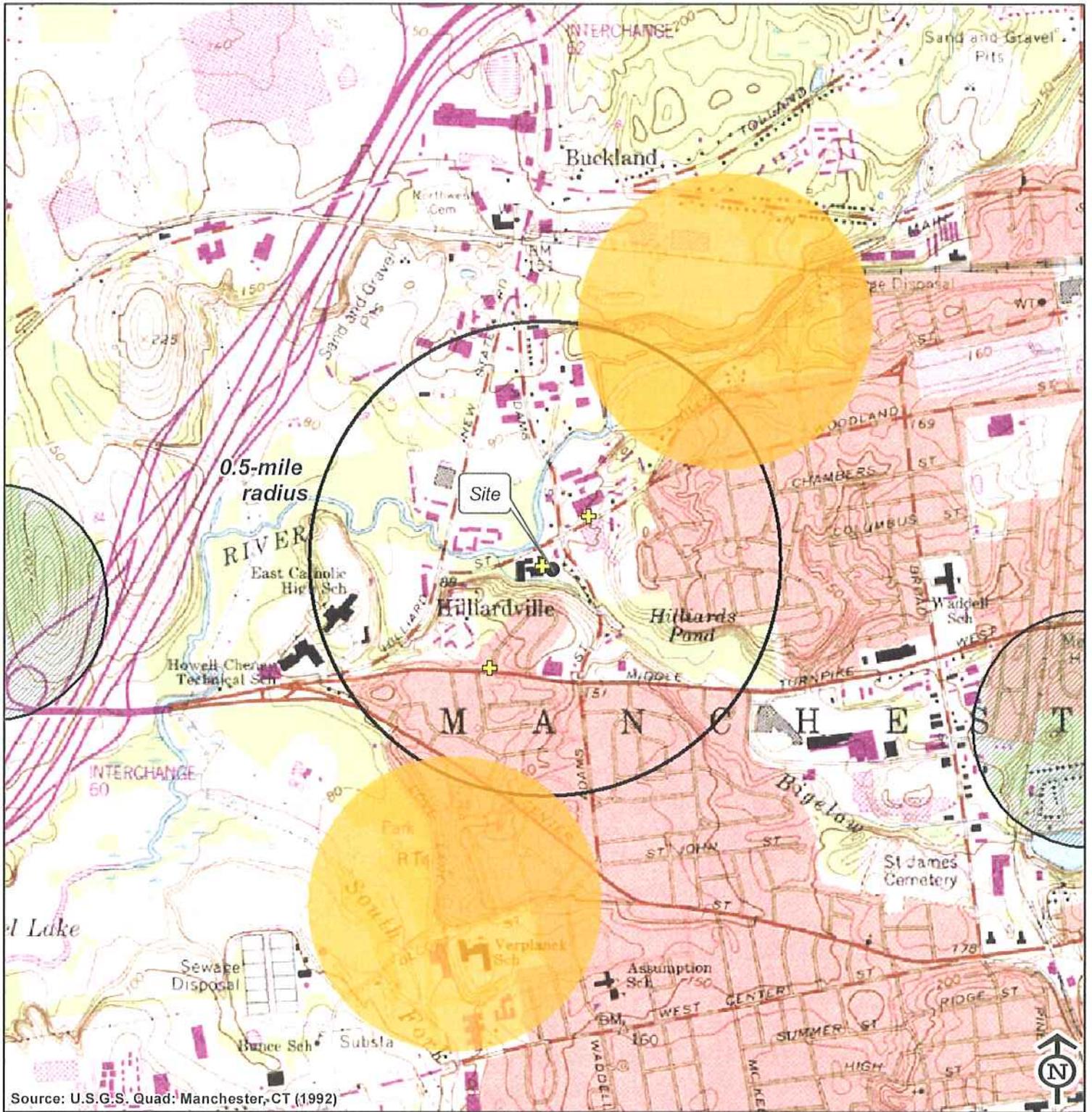
Prepared By: Nicole Dentamaro
(print name): Nicole Dentamaro

Company: Vanasse Hangen Brustlin, Inc.
Date: May 1, 2007

The undersigned has reviewed and approved this Checklist prior to commencement of site construction.

By: _____
Site Development Manager or Director

Date: _____



Source: U.S.G.S. Quad: Manchester, CT (1992)

- Site with 0.5 mile radius
- Natural Diversity Database Threatened and Endangered Species (updated December 2005, buffered)
- National Register Eligible Historic Sites
- National Register Historic Sites
- National Register Historic Districts
- Reported Archaeological Sites (buffered)
- Open Water
- Wetlands
- Floodplains**
- 100 Year Floodplain
- 500 Year Floodplain
- Floodway
- Protected Properties (CT DEP; 2002)**
- State Forest
- State Park
- DEP Owned Waterbody
- State Park Scenic Reserve
- Historic Preserve
- Natural Area Preserve
- Fish Hatchery
- Flood Control
- Other
- State Park Trail
- Water Access
- Wildlife Area
- Wildlife Sanctuary
- Protected Properties (Federal; 2002)



Vanasse Hangen Brustlin, Inc.

NEPA Screen Map
Proposed Optasite Facility
CT-999-0075 - Middle Turnpike
Lat: 41 47 05.00 Long: 72 33 04.00
640 Hilliard Street
Manchester, Connecticut

May 1, 2007



April 16, 2007

Vanasse Hangen Brustlin, Inc.

Ref: 40999.19

Ms. Julia Victoria, Wildlife Biologist
Franklin Wildlife Management Area
391 Route 32
North Franklin, CT 06254.

Re: NDDDB - 14995
Proposed Optasite Facility
640 Hilliard Street
Manchester, CT
Optasite ID #999-0075

Dear Ms. Victoria:

Vanasse Hangen Brustlin, Inc. (VHB) is in receipt of your recent letter dated April 12, 2007 regarding your review of the above referenced wireless telecommunications facility project (a copy of your letter is attached). The Department of Environmental Protection (DEP) Natural Diversity Database (NDDDB) records indicate that there are historic records of a state endangered species, the Barn Owl (*Tyto alba*), in the vicinity of the project site. VHB understands that barn owl habitat includes open grassy fields, old fields, and wet meadows. The project area exists entirely of gravel driveway/parking areas associated with the mill building and is immediately adjacent to a gasoline service station at the corner of Tolland Street and Adams Street. Existing condition photographs and Site Plans are attached. The proposed project will not occur within barn owl habitat (grassy fields, old fields, and wet meadows) as such habitat does not exist on or adjacent to the subject property. Therefore, the proposed project will not impact habitat of this state endangered species and no further investigation is recommended.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dean Gustafson", is written over a horizontal line.

Dean Gustafson
Senior Environmental Scientist

Enclosures

54 Tuttle Place
Middletown, Connecticut 06457-1847
860.632.1500 ■ FAX 860.632.7879
email: info@vhb.com
www.vhb.com



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FRANKLIN WILDLIFE MANAGEMENT AREA

391 ROUTE 32

NORTH FRANKLIN, CT 06254

TELEPHONE: (860) 642-7239



April 12, 2007

Ms. Nicole Dentamaro
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457-1847

re: proposed Optasite Facility, 640 Hilliard Street, Manchester

Dear Ms. Dentamaro:

Your request was forwarded to me on 4/4/07 from Dawn McKay of the Department of Environmental Protection (DEP) Natural Diversity Data Base. Their records indicate that there are historic records of a state endangered species, the Barn Owl (*Tyto alba*) in the vicinity of this project site.

Barn owls occur in low numbers in Connecticut because their habitat which is grasslands and farmlands are declining. Their main food source, meadow voles, mice and shrews, occur in open areas such as grassy fields, old fields and wet meadows. Any activities that decrease the open areas or destroy natural nesting sites in hollow trees will eliminate barn owls from an area. However, many habitat enhancements can be made to keep or encourage barn owls to nest in the vicinity. These activities range from erecting artificial nest structures, improving natural nests or increasing natural nest site availability. Barn owls nest from March through July.

Please be advised that the Wildlife Division has not made a field inspection of the project nor have we seen detailed plans or timetables for work to be done. The location of work is described as an industrial property and a former woolen mill, however, past practices at a site do not preclude the existence of wildlife. If this work will be conducted in any barn owl habitat (grassy fields, old fields and wet meadows), the Wildlife Division recommends that an ornithologist familiar with the habitat requirements of this species conduct surveys. The Division recommends that surveys for barn owls be conducted during their nesting season March – July. A report summarizing the results of such surveys should include habitat descriptions, bird species list and a statement/resume giving the ornithologist's qualifications. The Wildlife Division does not maintain a list of ornithologists in the state. The results of this investigation can be forwarded to the Wildlife Division and, after evaluation, recommendations for additional surveys, if any, will be made.

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 DEP Wildlife Division should be requested. Consultation with the Wildlife Division should not be substituted for site-specific surveys that may be required for environmental assessments. If you have any additional questions, please feel free to contact me. Thank you for the opportunity to comment.

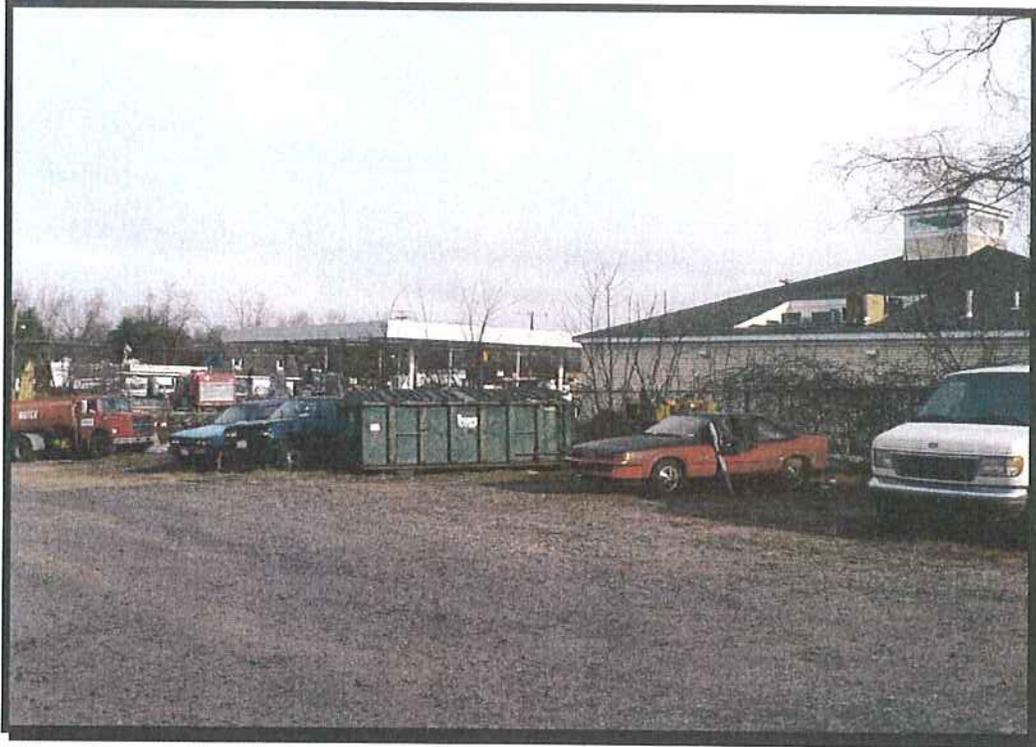
Sincerely,

Julie Victoria
Wildlife Biologist
Franklin Wildlife Management Area
391 Route 32
N. Franklin, CT 06254

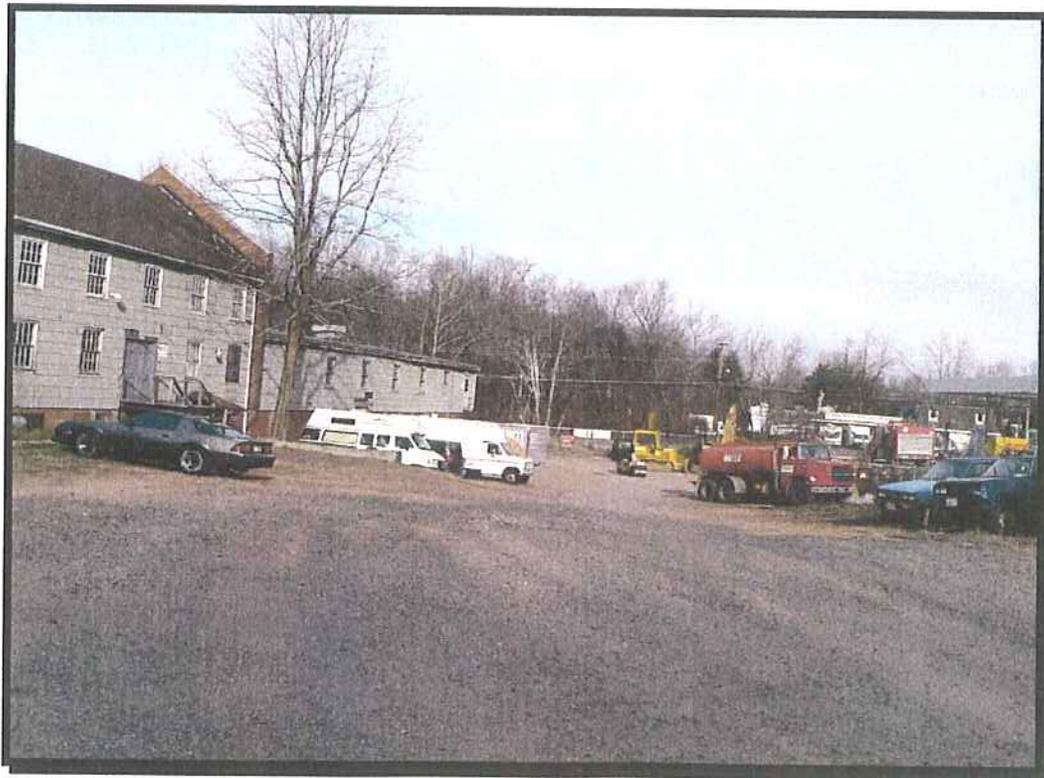
cc: NDDB – 14995



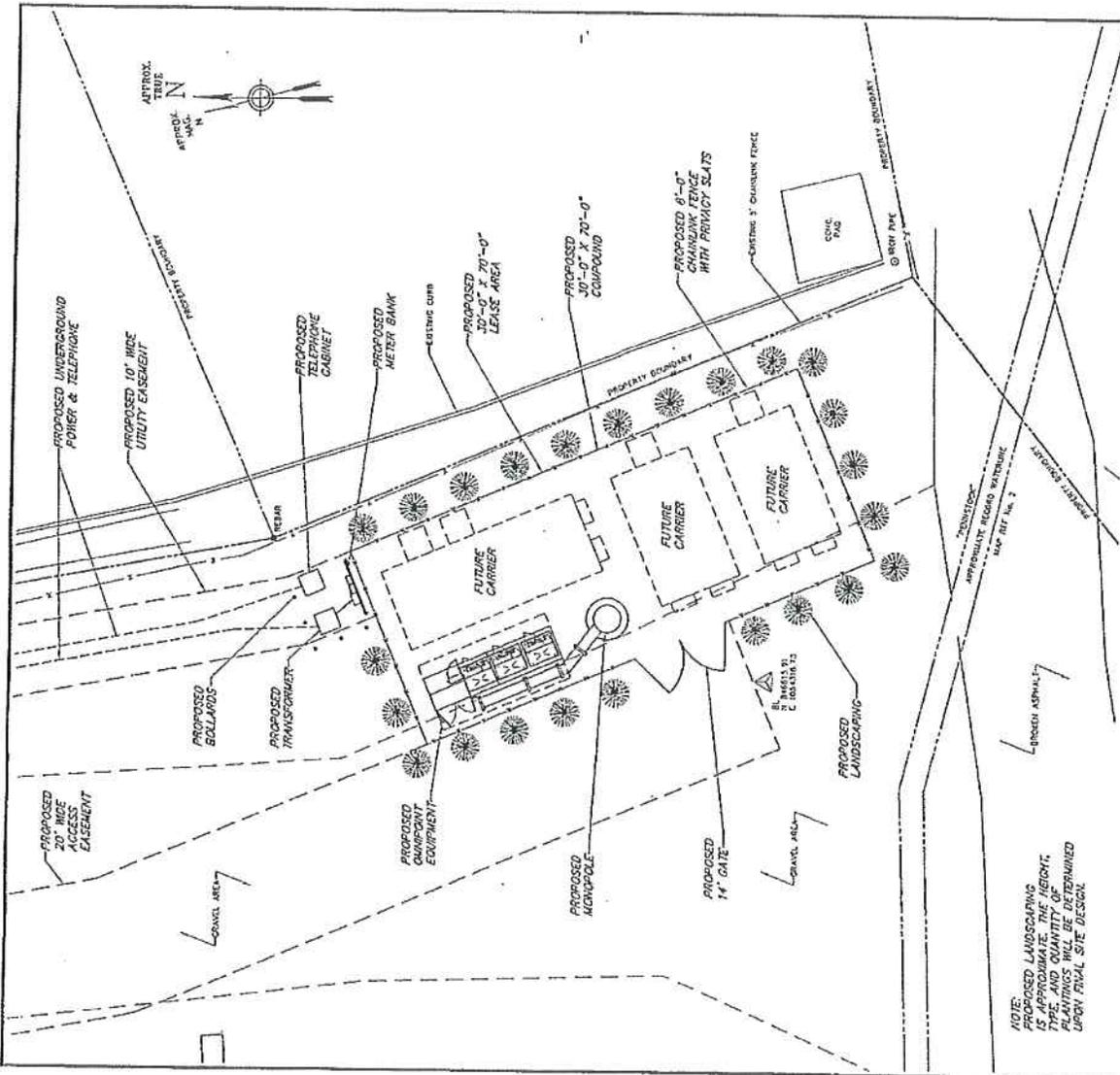
Vanasse Hangen Brustlin, Inc.
PHOTOLOG DOCUMENTATION
999-0075 – Middle Turnpike
640 Hilliard Road
Manchester, CT



Looking northeast at proposed compound/lease area.



Looking north at proposed access/utilities easement (towards Hilliard Street).

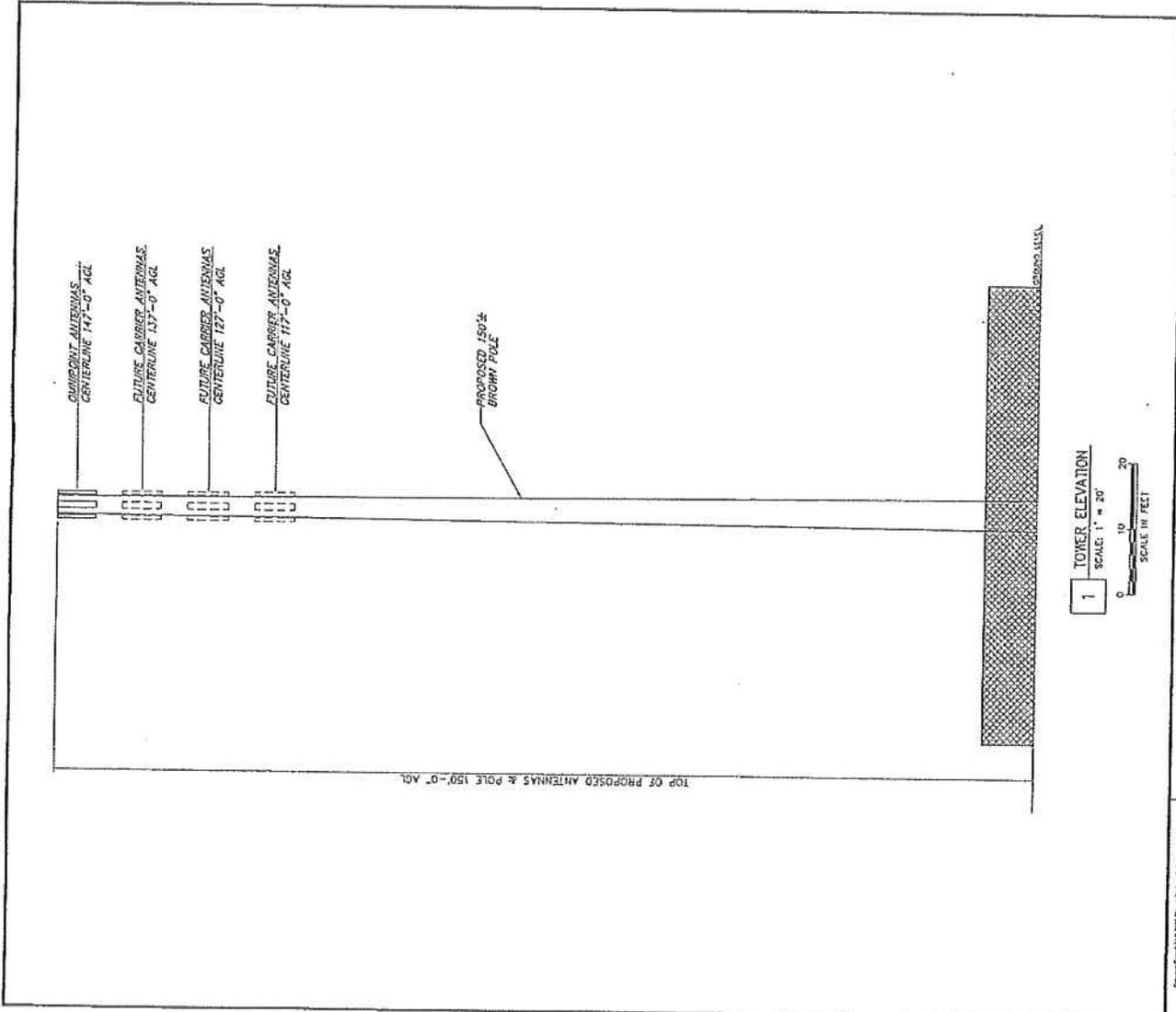


1 COMPOUND PLAN
 SCALE: 1" = 20'
 0 10 20
 SCALE IN FEET

NOTE:
 PROPOSED LANDSCAPING
 IS SHOWN FOR REFERENCE ONLY.
 TYPE, AND QUANTITY OF
 PLANTINGS WILL BE DETERMINED
 UPON FINAL SITE DESIGN.

BASELINE NOTES:
 1. BASELINE INFORMATION OBTAINED FROM A SURVEY PERFORMED BY CLOUGH HARBOR &
 ASSOCIATES LLP IN DECEMBER 2006.

<p>SHEET TITLE: COMPOUND PLAN</p>	<p>SITE ID: CT-999-0075</p>	<p>CH Optasite <small>OPTASITE, INC. 1 RESEARCH CENTER DRIVE, SUITE 200C WESTBOROUGH, MA 01581</small></p>
<p>DATE: 01/08/07</p>	<p>SITE NAME: MIDDLE TURNPIKE</p>	<p>1000 MARKET STREET, SUITE 111 WESTBOROUGH, MA 01581 TEL: 978-366-1000 WWW.OPTASITE.COM</p>
<p>REVISION: 1</p>	<p>SITE ADDRESS: 640 HILLIARD STREET MANCHESTER, CT 06042</p>	<p>CH PROJECT NO. - 13363-1011 11/23/06 11:02:21 AM 11/23/06 11:02:21 AM 11/23/06 11:02:21 AM 11/23/06 11:02:21 AM</p>



1 TOWER ELEVATION
 SCALE: 1" = 20'
 SCALE IN FEET

SHEET TITLE: TOWER ELEVATION	SITE ID: CT-999-0075 SITE NAME: MIDDLE TURNPIKE SITE ADDRESS: 640 HILLIARD STREET MANCHESTER, CT 06042 HARTFORD COUNTY
DATE: 01/05/07	REVISION: 0
 <p>1 PRES. OPTASITE, INC. 100C NEWBOROUGH, VA 22957</p>	
 <p>CHIA PART. NO. = 13330-1012</p>	

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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 3, 2007

Reference:	<u>Project</u>	<u>Location</u>
	Tower	Vernon, CT
	Tower	Manchester, CT

Nicole Dentamaro
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457-1847

Dear Ms. Dentamaro:

This responds to your recent correspondence requesting information on the presence of federally-listed and/or proposed endangered or threatened species in relation to the proposed activity(ies) referenced above.

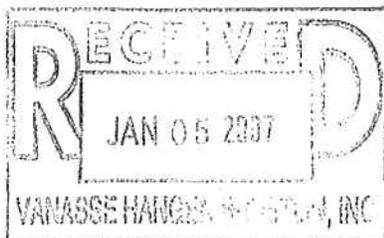
Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

Thank you for your coordination. Please contact us at 603-223-2541 if we can be of further assistance.

Sincerely yours,

Anthony P. Tur
Endangered Species Specialist
New England Field Office





Vanasse Hangen Brustlin, Inc.

February 19, 2007

Ms. Mary Dunne
Manchester Historical Society
106 Hartford Road
Manchester, CT 06040

To comply with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, Optasite Towers, LLC (Optasite) has retained Vanasse Hangen Brustlin, Inc. (VHB) to evaluate proposed tower facilities for any adverse effect it may have on historic properties. As part of this evaluation, and in conformance with the Nationwide Programmatic Agreement (NPA) for review of effects on historic properties for proposed undertakings, VHB is submitting this tower construction notification to the Town of Manchester municipal offices and Manchester Historical Society.

Optasite is proposing to install a new wireless telecommunication facility, consisting of a ±150-foot tall monopole (to be painted brown), antenna, and associated ground equipment to be developed on industrial property (former E.E. Hilliard Woolen Company) located at 640 Hilliard Street in Manchester, Connecticut. This facility will provide improved wireless coverage to areas of Manchester.

The purpose of this letter is to notify the Town of Manchester that public notice of this proposed facility will be published in the Journal Inquirer on February 20, 2007 and to invite comments regarding any potential effects that the proposed facility may have upon historic properties from relevant individuals or groups that you may be aware of.

Parties interested in submitting comments regarding any potential effects of the proposed facility on historic properties may do so by sending them to Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, CT, 06457, to the attention of Nicole Dentamaro. Questions about this proposed project may be submitted via mail to the above address, emailed to ndentamaro@vhb.com, or by calling (860) 632-1500 ext. 2317.

VHB will be accepting comments and/or questions within 30 days of the date of this publication. Therefore, all comments or questions regarding this matter should be postmarked/submitted by no later than March 22, 2007.

54 Tuttle Place
Middletown, Connecticut 06457-1847
860.632.1500 ■ FAX 860.632.7879
email: info@vhb.com
www.vhb.com



Vanasse Hangen Brustlin, Inc.

February 19, 2007

Mr. Scott Shanley, General Manager
Town of Manchester
41 Center Street
Manchester, CT 06040

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Journal Inquirer

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rights to recover on such claim.

Annette T. Tarascio, Clerk
The fiduciary is:

Autumn L. Keith c/o
Michael F. Dowley, Esq.
Law Offices of

Michael F. Dowley
116 Washington Street
Middletown, CT 06457

Journal Inquirer
February 20, 2007

rights to recover on such claim.

Annette T. Tarascio, Clerk
The fiduciary is:

Autumn L. Keith c/o
Michael F. Dowley, Esq.
Law Offices of

Michael F. Dowley
116 Washington Street
Middletown, CT 06457

Journal Inquirer
February 20, 2007

PUBLIC NOTICE

PUBLIC NOTICE
TOWN OF TOLLAND INLAND WETLANDS COMMISSION

Following a Public Hearing held on February 15, 2007, the Inland Wetlands Commission approved proposed amendments to the Inland Wetlands and Watercourses Regulations. These amendments shall take effect on Tuesday, February 20, 2007. A copy of these regulations are on file in the Town Clerk's and Development Group Offices
Stan Tetrault, Secretary

Journal Inquirer
February 20, 2007

PUBLIC NOTICE

Optasite Towers LLC is proposing to install a new wireless telecommunication facility, consisting of a ± 150-foot tall monopole (to be painted brown), antenna, and associated ground equipment, at 640 Hilliard Street in Manchester, Connecticut. This facility will provide improved wireless coverage to areas of Manchester.

Parties interested in submitting comments regarding any potential effects of the proposed facility on historic properties may do so by sending comments to Vanasse Hangen Brustlin, Inc. 54 Tuttle Place, Middletown, CT 06457, to the attention of Nicole Dentamaro. Questions about this proposed project may be submitted via regular mail, email to ndentamaro@vhb.com, or by calling (860) 632-1500 ext. 2317.

VHB will be accepting comments and/or questions with 30 days of the date of this publication. Therefore, all comments or questions regarding this matter should be post-marked/submitted by no later than March 22, 2007.

Journal Inquirer
February 20, 2007



Connecticut Commission on Culture & Tourism

March 2, 2007

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Mr. Nicole Dentamaro
Vanasse Hangen Brustlin Inc.
54 Tuttle Place
Middletown, CT 06457-1847

Subject: Telecommunications Facilities
640 Hilliard Street
Manchester, CT
Optasite #999-0075 – Middle Turnpike

Dear Ms. Dentamaro:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the E.E. Hilliard Woolen Mill possesses historic and architectural importance and has been determined to be eligible for the National Register of Historic Places by the National Park Service.

In the opinion of the State Historic Preservation Office, the proposed telecommunications facilities will effect the historic integrity of the E.E. Hillard Woolen Mill. However, this office believes that the proposed actions will constitute no adverse effect upon this important industrial resource.

This office appreciates the opportunity to have reviewed and commented upon the proposed undertaking.

This comment is provided in accordance with the National Historic Preservation Act and the Connecticut Environmental Policy Act.

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

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer





INTEGRATED HISTORIC PRESERVATION PLANNING

November 29, 2006

Nicole Dentamaro
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457

RE: Preliminary Archeological Assessment of Telecommunications Tower CT999-075 located at 640 Hilliard Road in Manchester, Connecticut

Ms. Dentamaro:

Heritage Consultants, LLC, is pleased to have this opportunity to provide Vanasse Hangen Brustlin, Inc., with the following preliminary archeological assessment of proposed telecommunications tower CT999-075 located at 640 Hilliard Road Manchester, Connecticut (Figures 1). The current project entailed completion of an existing conditions cultural resources summary based on the examination of GIS data obtained from the Connecticut State Historic Preservation Office, as well as historic maps, aerial photographs, and topographic quadrangles maintained by Heritage Consultants, LLC. This investigation did not consider the effects of the proposed construction upon built resources, and it is based upon project locational information provided to Heritage Consultants, LLC by Vanasse Hangen Brustlin, Inc. The objectives of this study were: 1) to gather and present data regarding previously identified cultural resources situated within the vicinity of the Areas of Potential Effect; 2) to investigate the proposed project parcel in terms of its natural and historical characteristics; and 3) to evaluate the need for completing additional archaeological investigations.

As shown in Figures 2 and 3, the proposed project parcel was situated in a primarily rural area outside of the heart of the Town of Manchester during the mid to late nineteenth century. The historic maps depict three to four structures situated in close proximity to the project parcel from 1849 through 1869 (Figures 2 and 3). These include residences and commercial facilities. The latter included a mill facility. In addition, the series of aerial photographs dating from 1934 through 2004 suggest that the project parcel has experienced substantial changes associated with construction and development of the project vicinity (Figures 4 through 9). This development included the construction of the nearby mill facility, as well as the installation of an ever-increasing number of residential housing units throughout the twentieth century. Today, the Areas of Potential Effect associated with proposed telecommunications tower CT999-075 are located within a highly disturbed parking area.

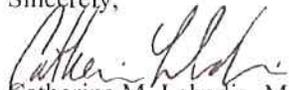
In addition to the above-reference map and aerial imagery research, Heritage Consultants, LLC completed a literature search in an effort to determine if any cultural resources investigations have been completed within the project vicinity, as well as to determine whether or not any previously recorded archaeological sites are located within a half mile of the proposed project items. The results of that literature search indicated that no cultural resources investigations have been completed in the area and no previously recorded archaeological sites and/or properties listed on the National Register of Historic Places are

Ms. Nicole Dentamaro
November 29, 2006
Page 2

situated within 0.8 km (0.5 mi) of the proposed tower location. Due to the lack of previously identified archaeological sites in the project vicinity and the degree of disturbance that has already taken place throughout the proposed project parcel, the Areas of Potential Effect no longer appear to retain the potential for containing intact archeological deposits. As a result, it is the professional opinion of Heritage Consultants, LLC that further archeological investigations of proposed telecommunications tower CT999-075 are not warranted.

If you have any questions regarding this Technical Memorandum, or if we may be of additional assistance with this or any other projects you may have, please do not hesitate to call us at 860-667-3001 or email us info@heritage-consultants.com. We are at your service.

Sincerely,



Catherine M. Labadia, M.A.
President & Principal Investigator

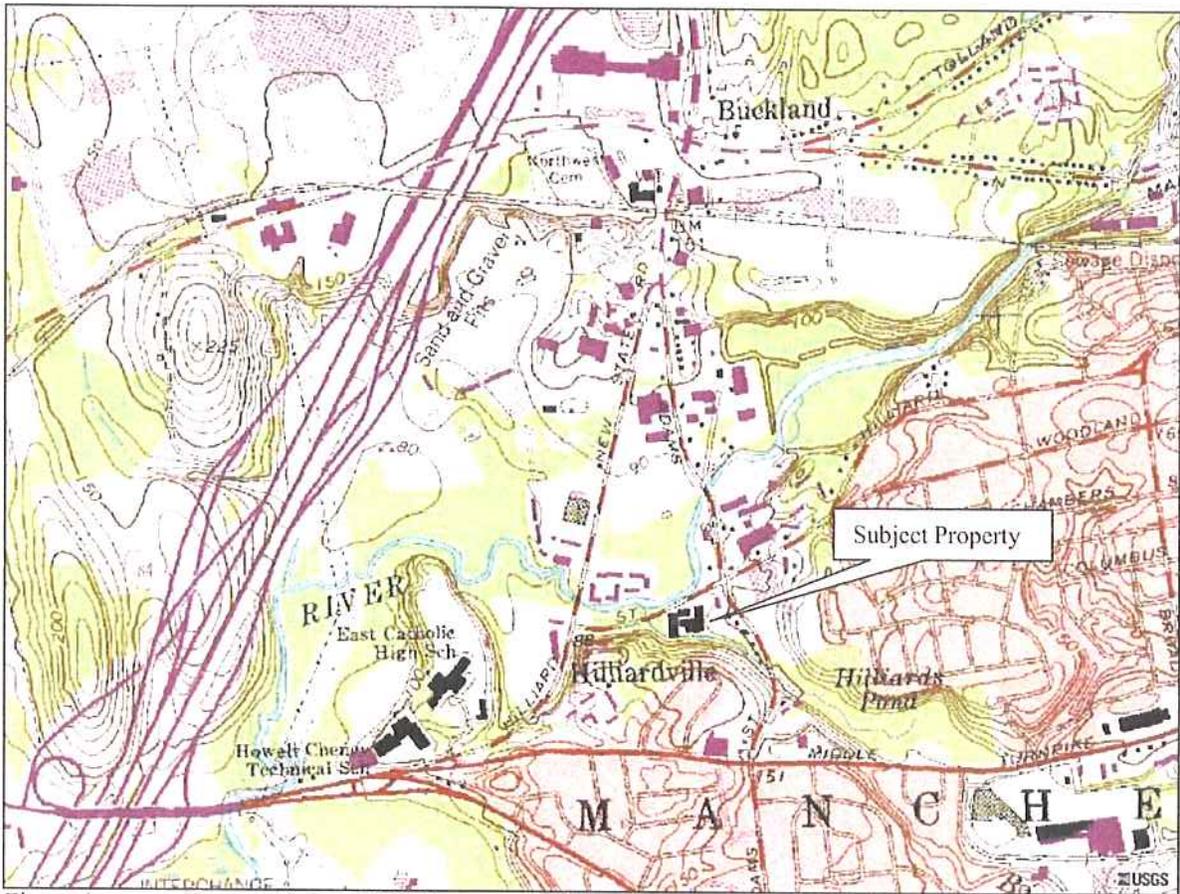


Figure 1. Excerpt from a USGS topographic quadrangle depicting the location of the Areas of Potential Effect.

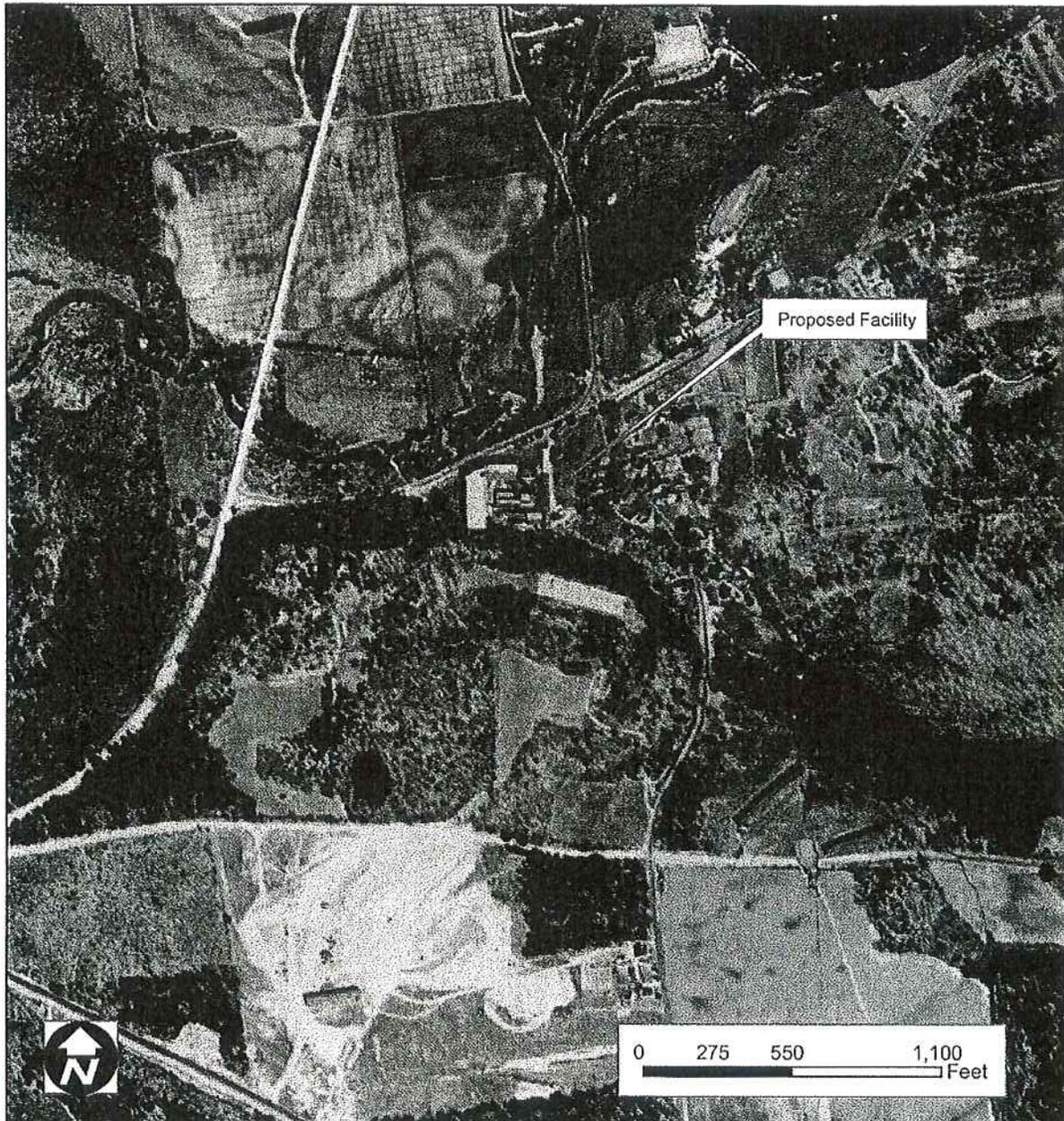


Figure 4. Excerpt from a 1934 aerial photograph depicting the location of the Areas of Potential Effect.

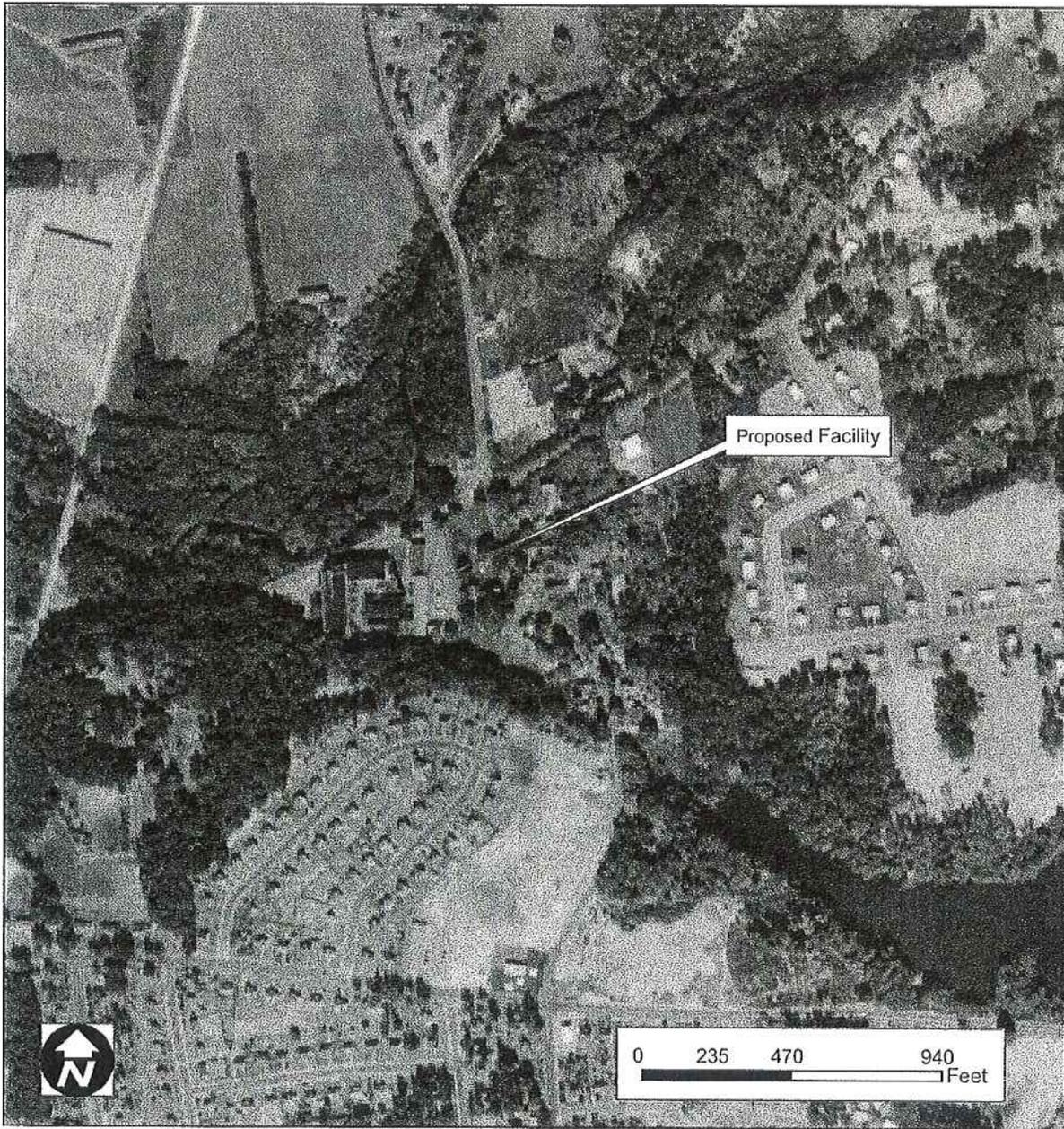


Figure 5. Excerpt from a 1957 aerial photograph depicting the location of the Areas of Potential Effect.



Figure 6 Excerpt from a 1970 aerial photograph depicting the location of the Areas of Potential Effect.

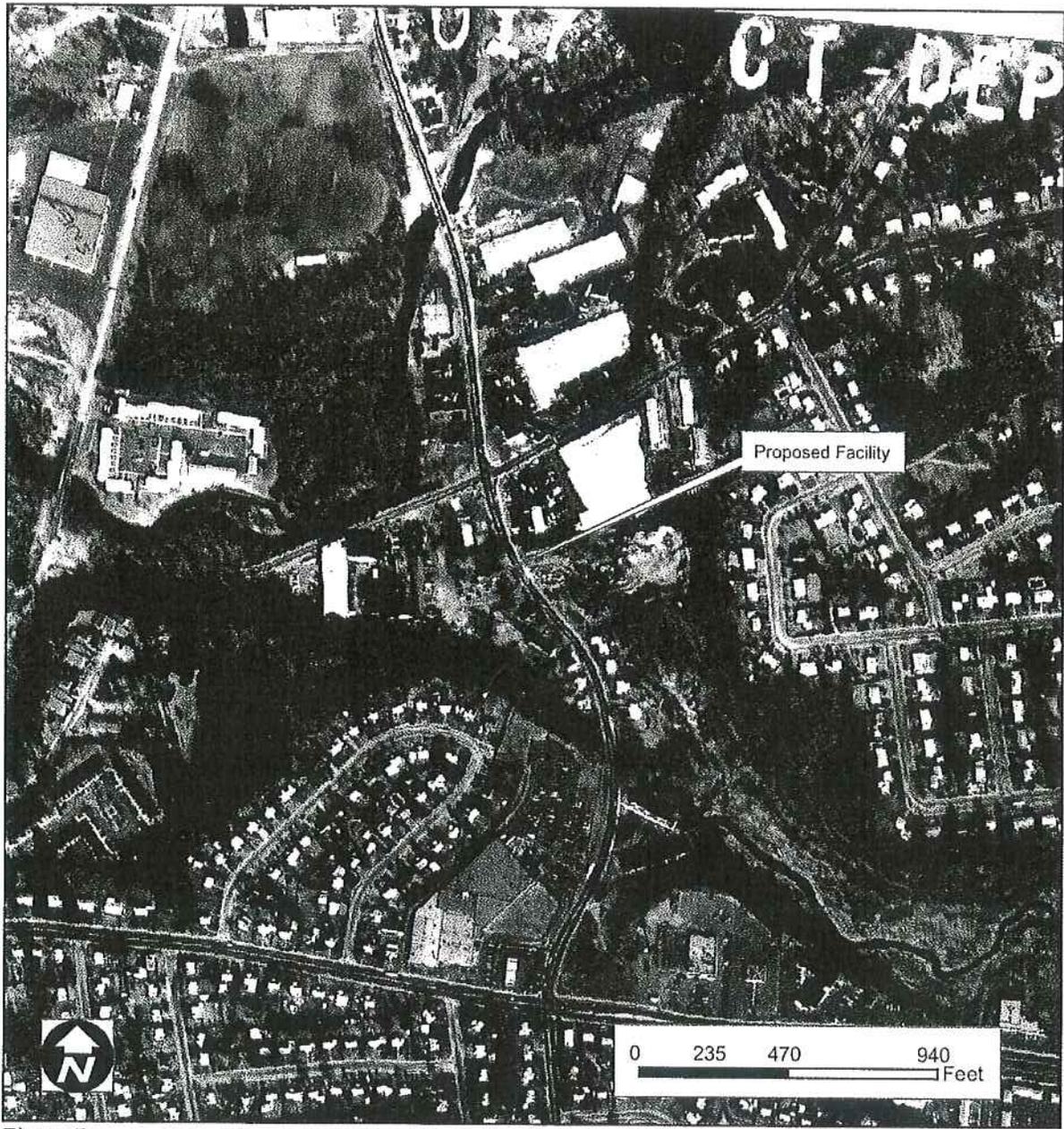


Figure 7 Excerpt from a 1986 aerial photograph depicting the location of the Areas of Potential Effect.



Figure 8 Excerpt from a 1999 aerial photograph depicting the location of the Areas of Potential Effect.

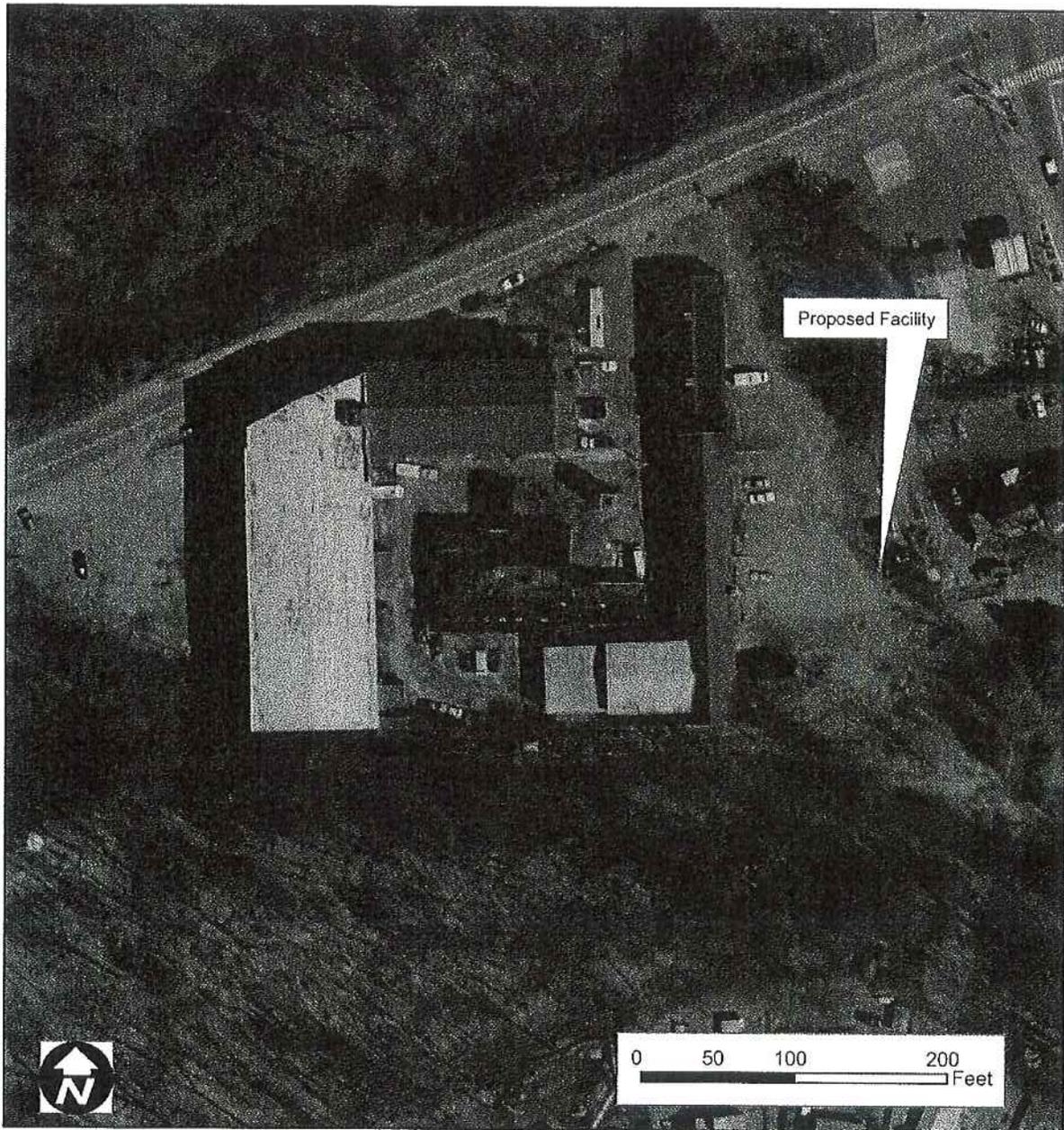


Figure 9. Excerpt from a 2004 aerial photograph depicting the location of the Areas of Potential Effect.



2-20-07

Ms. Nicole Dentamaro,
Environmental / GIS Analyst
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457-1847

Re: PRELIMINARY ARCHEOLOGICAL ASSESSMENT OF
TELECOMMUNICATIONS TOWER CT999-075 LOCATED AT 640 HILLIARD
ROAD IN MANCHESTER, CONNECTICUT TCNS # 22279

Dear Ms. Dentamaro,

I have reviewed the Preliminary Archeological Assessment entitled "PRELIMINARY ARCHEOLOGICAL ASSESSMENT OF TELECOMMUNICATIONS TOWER CT999-075 LOCATED AT 640 HILLIARD ROAD IN MANCHESTER, CONNECTICUT," submitted by Heritage Consultants, LLC.

The research design and testing strategy meets acceptable professional standards, and agree with the recommendations and conclusions.

Please keep me informed of any further developments with respect to this project.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Knowles".

Kathleen Knowles,
Tribal Historic Preservation Officer
Mashantucket Pequot Tribe

MASHANTUCKET PEQUOT MUSEUM
& RESEARCH CENTER

110 Pequot Trail, PO Box 3180
Mashantucket, CT 06338
Phone: 860 396 6800
Fax: 860 396 6850
www.pequotmuseum.org

NITHPO**Narragansett Indian Tribal Historic Preservation Office**

Narragansett Indian Longhouse
P. O. Box 700
Wyoming, Rhode Island 02898



26 April 2007

Nicole Dentamaro
Environmental Engineer
Vanasse Hangen Brustlin, Inc.
54 Tuttle Place
Middletown, CT 06457-1847

RE: NITHPO Section 106 Clearance
TCNS #2256
640 Hilliard St. Manchester, CT

Greetings, Nicole:

Site examination by a NITHPO representative of the proposed cell tower location designated TCNS #2256 located in Manchester, CT has revealed no evidence of cultural resources that are of significance to the Narragansett Indian Tribe. On behalf of the Narragansett Indian Tribe, the NITHPO considers this project in compliance with and cleared of the Narragansett Tribe's Section 106 concerns.

If, however, during your construction excavation artifacts, features or human remains or other significant tribal cultural resources are encountered, please halt excavation and contact our Office and the State Historic Preservation Office for evaluation.

Thank you for your support of the FCC's government-to-government consultation with the Narragansett Indian Tribe under Section 106 of the National Historic Preservation Act.

Sincerely,


Doug Harris,
Senior Deputy Tribal Historic Preservation Officer
(401) 742-4035
dh@nithpo.com