



CLOUGH HARBOUR & ASSOCIATES LLP

June 27, 2007

Mr. Michael McFadden
MCF Communications, Inc.
733 Turnpike Street, Suite 105
North Andover, MA 01845

**RE: Revised NEPA Screening
Groton, New London County, CT
CHA Project No.: 14957.1004.1106**

Dear Mr. McFadden:

The Groton Communications Facility is located in Groton, New London County, CT. The proposed project entails the construction of a 130-foot monopole. The associated ground equipment will be located at the base of the tower within a 35' x 50' lease area with a 15' x 15' bump out. The proposed site will be accessed by an existing driveway. The site is a combination of undeveloped forest and asphalt driveway. Refer to Attachment 1 for a copy of the proposed plans.

BL Companies completed a National Environmental Policy Act (NEPA) screening on July 28, 2006 (Attachment 2), however, since that time, the proposed tower height increased from 120' to 130'. Additionally, the project layout was rearranged, but is within the same impact area as originally proposed. Since there were some changes with the proposed project, two agencies needed to be re-contacted.

It has been over a year since the United States Department of Interior Fish and Wildlife Service (USFWS) was contacted, therefore, they were re-contacted on May 21, 2007. The USFWS provided a response letter on June 4, 2007 indicating that the USFWS is streamlining their review process and has indicated that projects of this nature are unlikely to adversely affect any federally listed or proposed species if the site is evaluated with the attached guidelines provided by the USFWS (Attachment 3).

Clough Harbour & Associates LLP evaluated the site based on the guidelines and identified that the chaffseed (*Scwalbea Americana*), an endangered perennial herb of the figwort family, is located in New London. According to the USFWS (<http://ecos.fws.gov>), the chaffseed is found in open pine flatwoods, savannas and other open areas that have moist to dry acidic sandy loams or sandy peat loams.

The site is a combination of undeveloped forest and asphalt driveway. The forested portion of the site contains maples and oaks. The site does not contain open pine flatwoods, is not considered to be a savannah and is not open. Additionally, the soil on

site is considered to be a stony loam as opposed to the sandy loams or sandy peat loams that are preferred by the chaffseed.

Based on the site information provided above, it does not appear that the preferred habitat of the chaffseed is within the project limits. Therefore, no further correspondence with the USFWS is required. Additionally, as mentioned above, BL Companies did receive a signoff letter from the USFWS back in 2006.

The project changes also needed to be reviewed by the Connecticut State Historic Preservation Office (SHPO). A submission was made to SHPO on May 21, 2007. SHPO responded on May 24, 2007 indicating that the proposed undertaking will have no effect on historic, architectural, or archeological resources listed on or eligible for the National Register of Historic Places. Refer to Attachment 4 for further details.

Based on the above information and the NEPA screening completed by BL companies, the proposed facility will not have a significant environmental impact on any of the environmental or cultural resources identified under Title 47 of the Code of Federal Regulations, Part 1, Subpart I, rule Section 1.1307. Therefore, no further work is required to comply with the requirements of NEPA. Should you have any questions please contact me at (518) 453-8211 or nfrazer@cha-llp.com.

Very truly yours,

CLOUGH HARBOUR & ASSOCIATES LLP



Nicole E. Frazer
Environmental Scientist



Attachment 1

PREPARED BY:
MCF Communications, Inc.
 720 TURNPIKE STREET, SUITE 100
 GROTON, CONNECTICUT 06340
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 FAX: (870) 340-2000

DATE:
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 A TRUST-CORPORATE SUBSIDIARY
 OF SPECTRUM USA, INC.
 1000 WEST STREET
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 OFFICE: (860) 492-7100
 FAX: (860) 492-7159

CHA
 CHA CONSULTING ENGINEERS ARCHITECTS & INTERIORS LLP
 CLARENCE WASHINGTON & ASSOCIATES LLP
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 PHONE: (860) 492-7100
 FAX: (860) 492-7159
 CHA PROJECT NO.:
 14887 - 1004 - 1001

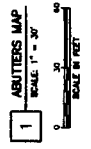
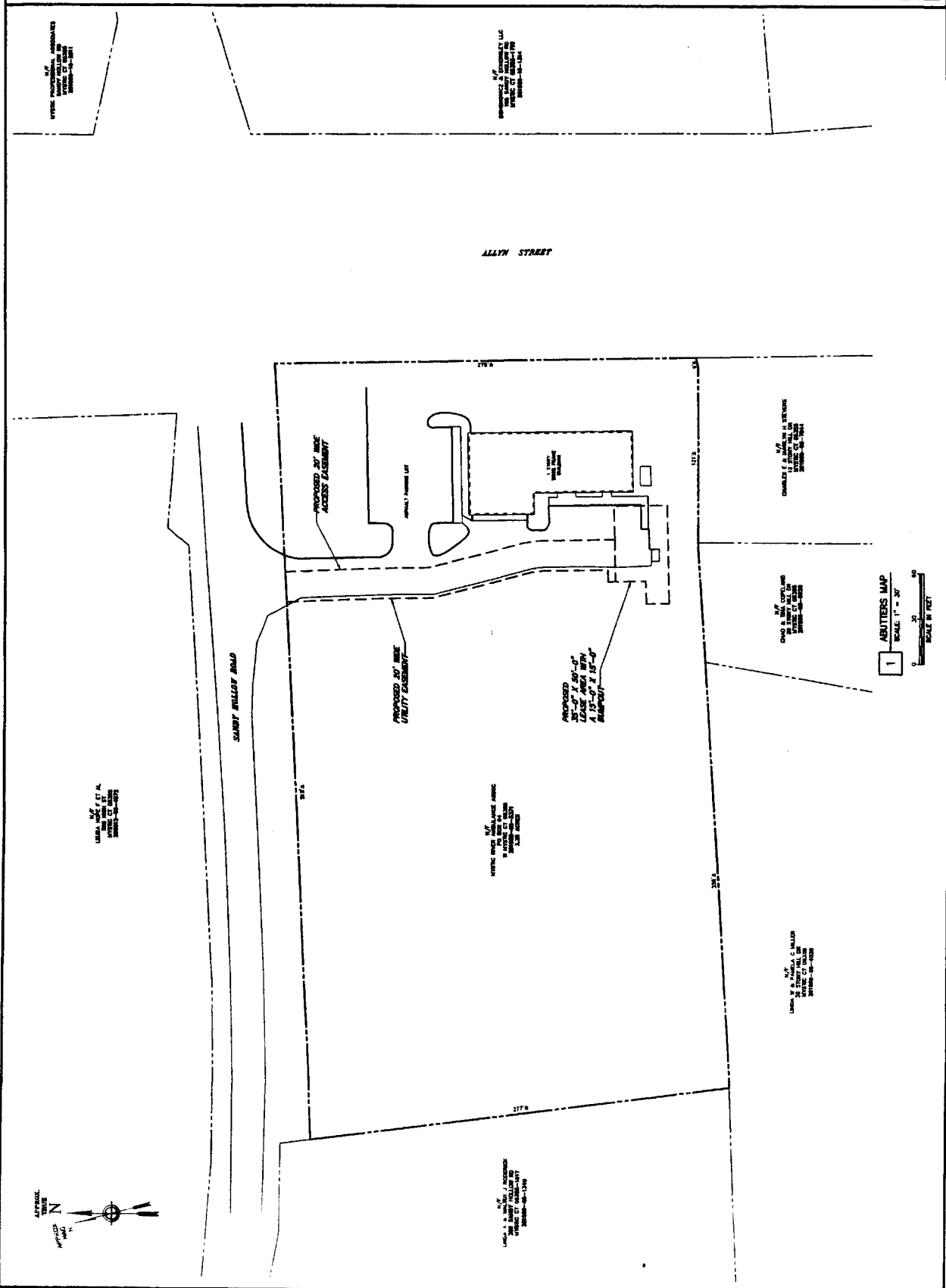
NO.	DATE	DESCRIPTION
0	02/17/08	ISSUED FOR REVIEW
1	02/27/08	REVISED FOR OWNER COMMENTS
2	03/07/08	FOR REVIEW OF LOCAL PERMITS
3	03/14/08	FOR REVIEW OF LOCAL PERMITS
4	03/21/08	FOR REVIEW OF LOCAL PERMITS
5	03/28/08	FOR REVIEW OF LOCAL PERMITS
6	04/04/08	FOR REVIEW OF LOCAL PERMITS
7	04/11/08	FOR REVIEW OF LOCAL PERMITS
8	04/18/08	FOR REVIEW OF LOCAL PERMITS
9	04/25/08	FOR REVIEW OF LOCAL PERMITS
10	05/02/08	FOR REVIEW OF LOCAL PERMITS
11	05/09/08	FOR REVIEW OF LOCAL PERMITS
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22	07/25/08	FOR REVIEW OF LOCAL PERMITS
23	08/01/08	FOR REVIEW OF LOCAL PERMITS
24	08/08/08	FOR REVIEW OF LOCAL PERMITS
25	08/15/08	FOR REVIEW OF LOCAL PERMITS
26	08/22/08	FOR REVIEW OF LOCAL PERMITS
27	08/29/08	FOR REVIEW OF LOCAL PERMITS
28	09/05/08	FOR REVIEW OF LOCAL PERMITS
29	09/12/08	FOR REVIEW OF LOCAL PERMITS
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98	01/08/10	FOR REVIEW OF LOCAL PERMITS
99	01/15/10	FOR REVIEW OF LOCAL PERMITS
100	01/22/10	FOR REVIEW OF LOCAL PERMITS

IT IS A VIOLATION OF LAW FOR ANY PERSON UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER TO SIGN THIS DOCUMENT.

SITE NAME:
MCF GROTON
SITE ADDRESS:
237 SANDY HOLLOW RD
GROTON, CT
06355
NEW LONDON COUNTY

SHEET TITLE:
ABUTTERS MAP

SHEET NUMBER:
A01



APPLICANT:
MCF Communications, Inc.
 100 FLEET STREET
 BLOOMFIELD, CT 06002
 TEL: (860) 462-7158
 FAX: (860) 462-7158

CONVEYOR:
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 A DIVISION OF SPRINT
 100 FLEET STREET
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CHA
 CHA CONSULTANTS, INC.
 2700 Elm Street, Suite 200, Groton, CT 06340
 TEL: (860) 462-7158
 FAX: (860) 462-7158

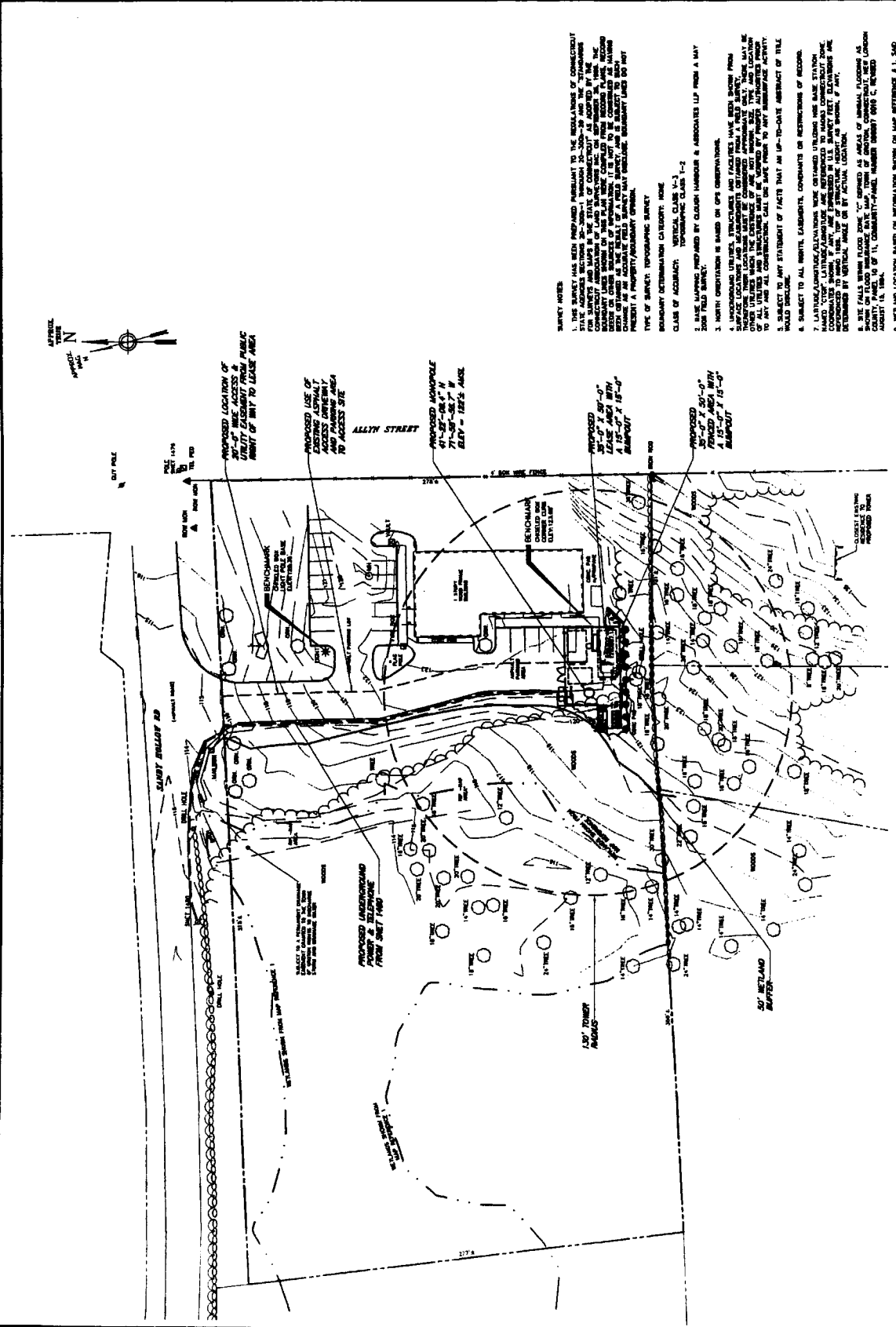
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6	5/17/06	FIELD SURVEY
7	5/17/06	FIELD SURVEY
8	5/17/06	FIELD SURVEY
9	5/17/06	FIELD SURVEY
10	5/17/06	FIELD SURVEY

IT IS A CONDITION OF LEASE FOR ANY PERSON USING THIS MAP FOR ANY PURPOSE OTHER THAN THAT AUTHORIZED BY THIS DOCUMENT TO OBTAIN THE DOCUMENT.

SITE NAME:
MCF GROTON
SITE ADDRESS:
237 SANDY HOLLOW RD
GROTON, CT
06355
NEW LONDON COUNTY

SHEET TITLE
SITE ACCESS MAP

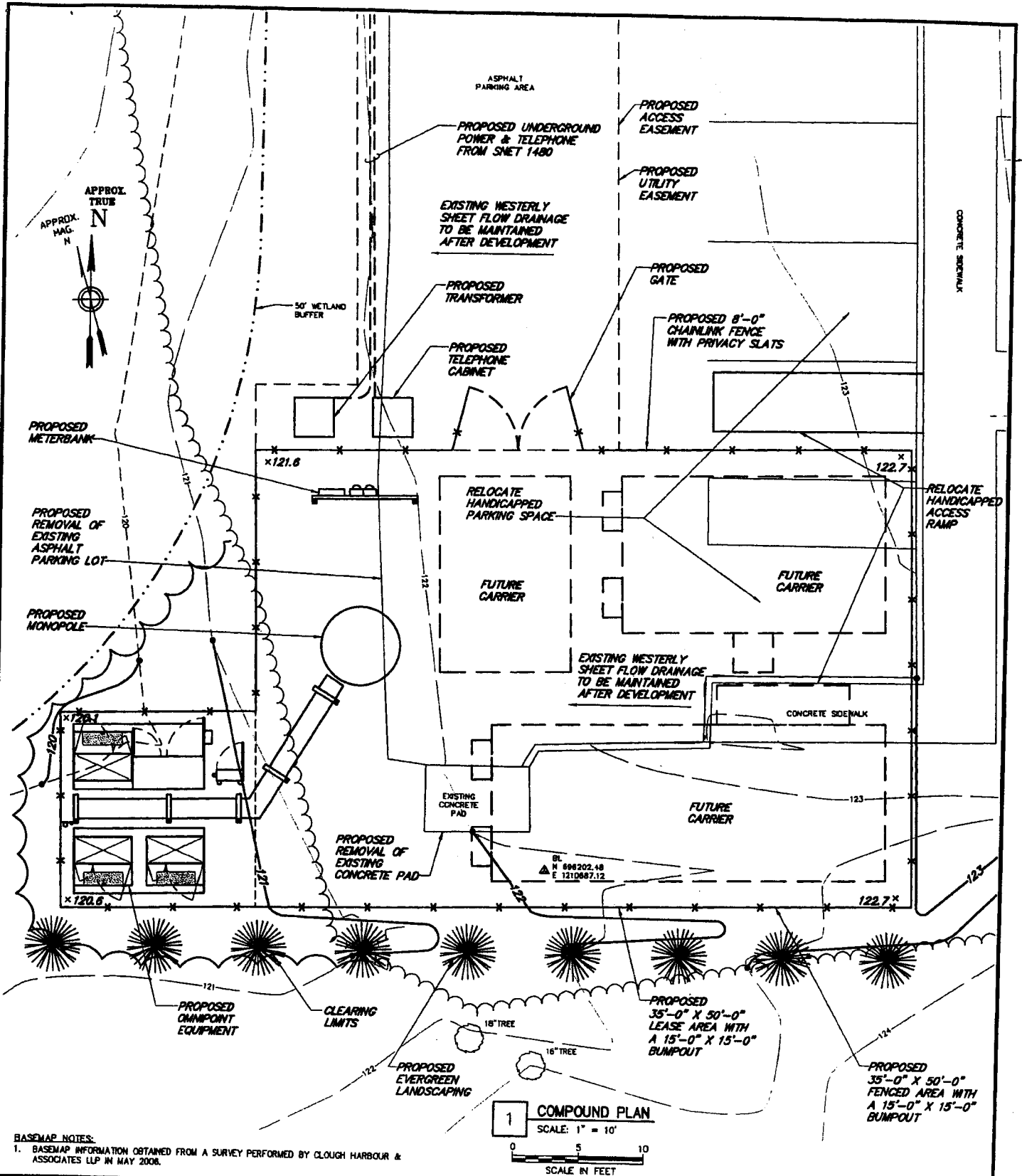
SHEET NUMBER
A02



1 SITE ACCESS MAP
 SCALE: 1" = 30'
 SCALE IN FEET


SURVEY NOTES:

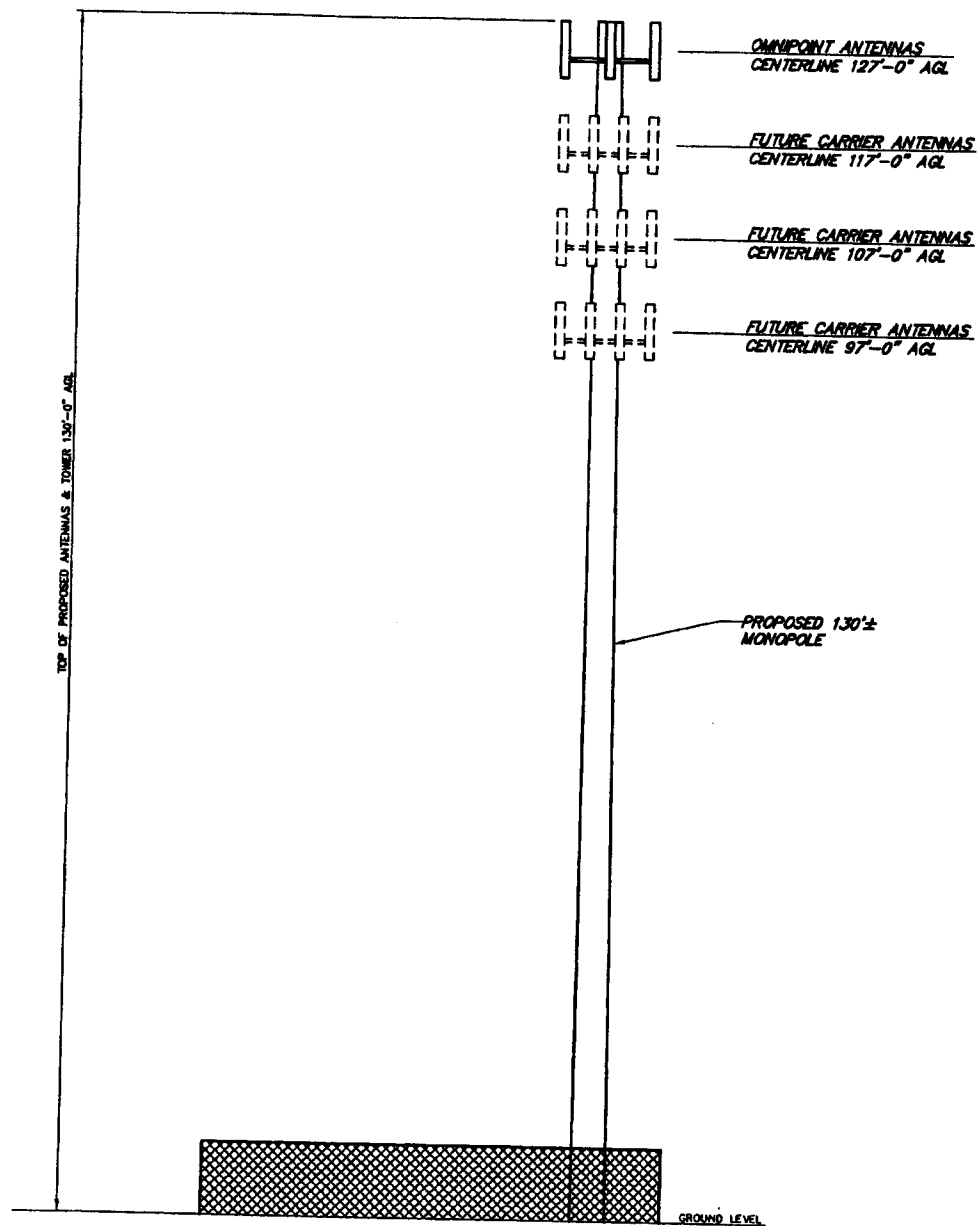
1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF THE CONNECTICUT STATE ADDRESS SYSTEMS 20-200a-1, 20-200b-29 AND THE REQUIREMENTS OF THE CONNECTICUT DEPARTMENT OF CONSTRUCTION FOR ALL ADDRESSING SURVEYS. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC., AND IS SUBJECT TO THE TERMS AND CONDITIONS OF THE SURVEY CONTRACT. THE SURVEYOR HAS NOT CONDUCTED A VISUAL INSPECTION OF THE SITE OR THE SURROUNDING AREA TO VERIFY THE ACCURACY OF THE DATA. THE SURVEYOR HAS NOT CONDUCTED A VISUAL INSPECTION OF THE SITE OR THE SURROUNDING AREA TO VERIFY THE ACCURACY OF THE DATA.
2. THE SURVEY IS BASED ON THE FOLLOWING DATA:
 - a. MONOPOLE LOCATIONS, STRUCTURES AND FACILITIES HAVE BEEN SHOWN FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
 - b. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
 - c. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
3. SUBJECT TO ANY STATEMENT OF FACTS THAT AN UP-TO-DATE ABSTRACT OF TITLE WOULD REVEAL.
4. SUBJECT TO ALL RIGHTS, EASEMENTS, COVENANTS OR RESTRICTIONS OF RECORD.
5. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
6. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
7. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
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9. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.
10. THE SURVEY DATA HAS BEEN OBTAINED FROM THE RECORDS OF THE REGISTERED PROFESSIONAL SURVEYOR, CHA CONSULTANTS, INC.



BASEMAP NOTES:
 1. BASEMAP INFORMATION OBTAINED FROM A SURVEY PERFORMED BY CLOUGH HARBOUR & ASSOCIATES LLP IN MAY 2006.

1 COMPOUND PLAN
 SCALE: 1" = 10'
 0 5 10
 SCALE IN FEET

 CLOUGH HARBOUR & ASSOCIATES LLP 2158 Shennecossett Highway, Suite 212 - Rocky Hill, CT 06067-2336 Tel: (860) 267-4887 www.cloughharbour.com	MCF Communications, Inc. 733 TURNPIKE STREET, SUITE 105 NORTH ANDOVER, MA 01845 OFFICE: (978) 687-2536 FAX: (978) 258-8850	SITE NAME: MCF GROTON SITE ADDRESS: 237 SANDY HOLLOW ROAD GROTON, CT 06355 NEW LONDON COUNTY	SHEET TITLE: COMPOUND PLAN
			DATE: 02/20/07
			REVISION: 1



1 TOWER ELEVATION
 SCALE: 1" = 20'
 0 10 20
 SCALE IN FEET

Drawing Copyright © 2008 Clough Harbour & Associates LLP

CHA
 CLOUGH HARBOUR & ASSOCIATES LLP
 2138 Silas Deane Highway, Suite 212 - Rocky Hill, CT 06067-2336
 Tel: (860) 267-2587 - www.cloughharbour.com

CHA PROJ. NO. - 14857-1004

MCF Communications, Inc.
 733 TURNPIKE STREET, SUITE 105
 NORTH ANDOVER, MA 01845
 OFFICE: (978) 687-2536
 FAX: (978) 258-8860

SITE NAME:
MCF GROTON

SITE ADDRESS:
 237 SANDY HOLLOW ROAD
 GROTON, CT 06355
 NEW LONDON COUNTY

SHEET TITLE:
TOWER ELEVATION

DATE:
 02/20/07

REVISION:
 1

FIG. 1. TOWER ELEVATION. PROJECT NO. 14857-1004. SCALE: 1" = 20'. DATE: 02/20/07. DRAWN BY: [Name]. CHECKED BY: [Name].

Attachment 2

FCC NEPA SUMMARY REPORT

MCF Groton Site

237 Sandy Hollow Road
Groton, New London County
Connecticut

BL Project No. 06L0869

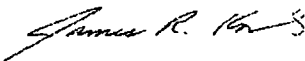
Prepared For:
MCF Communications, Inc.

On Behalf Of:
Clough, Harbour & Associates LLP

Prepared By:
BL Companies

July 28, 2006

Submitted By:



James R. Kodlick
Manager, Environmental Resources Group

BL Companies
Harrisburg, Pennsylvania

CONTENTS

<u>Part</u>	<u>Description</u>
I	Project Description
II	FCC NEPA Checklist and Summary Report
III	Section 106 Consultation
IV	Natural Resources

PART I

Project Description

PROJECT DESCRIPTION

MCF Communications, Inc. is proposing to construct a telecommunications tower in New London County, Connecticut. The site is located at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road.

PART II

NEPA Checklist And Summary Report

MCF Communications, Inc.
FCC NEPA CHECKLIST
(47 CFR Subpart 1, Chapter 1, Sections 1.1301-1.1319)

Site Name: MCF Groton Site Site Address: 237 Sandy Hollow Road, Groton, Connecticut
Site Number: _____

Category	Special Interest Item	Potential Effect	
		Yes	No
1	Is the antenna structure located in an officially designated wilderness area?		X
2	Is the antenna structure located in an officially designated wildlife preserve?		X
3	Will the antenna structure likely affect threatened or endangered species or designated critical habitats? (Ref. 50 CFR Part 402)		X
4	Will the antenna structure affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or potentially eligible for listing in the National Register of Historic Places (NRHP)? (Ref. 36CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act)		X
5	Will the antenna structure affect Indian religious site(s)?		X
6	Will the antenna structure be located in a flood plain? (Ref. Executive Order 11988 and 40 CFR Part 6, Appendix A)		X
7	Will construction of the antenna structure involve significant change in surface features (e.g. wetlands, deforestation, or water diversion)? (Ref. Executive Order 11990 and 40 CFR Part 6, Appendix A)		X
8	Is the antenna structure located in a residential neighborhood and required to be equipped with high intensity white lights?		X
9	a.) Will the antenna structure equal or exceed total power (of all channels) of 2000 Watts ERP (3280 Watts EIRP) and have antenna located less than 10 meters above ground level?		X
	b.) Will the roof-top antenna project equal or exceed total power (of all channels) of 2000 Watts ERP (3280 Watts EIRP)?		N/A

Attach this Checklist to the NEPA Summary Report along with the SHPO response letter and the Informal Biological Assessment (IBA) documenting No. 3 and No. 4. If any of the above responses is "yes", an Environmental Assessment must be prepared and filed with FCC Form 854. Construction can not start until the FCC issues a "Finding of No Significant Impact" (FONSI)

Preparer's Signature:  Date: 7-28-06

Printed Name and Title: James R. Kodlick, Manager, Environmental Resources Group

Company Name: BL Companies

MCF Communications, Inc.
FCC NEPA Summary Report
(47 CFR Subpart 1, Chapter 1, Sections 1.1301-1.1319)

Site Name: MCF Groton Site Site Number: _____

Site Address: 237 Sandy Hollow Road

City: Groton, New London County State: Connecticut

1. Is the antenna structure located in an officially designated wilderness area?

According to the National Park Service GIS Database¹, the National Wild and Scenic Rivers System², the United States Department of Agriculture Forest Service³, the US Department of the Interior Bureau of Land Management⁴, and the Connecticut Division of Parks and Recreation⁵, no officially designated forests, parks, grasslands, wild and scenic rivers, scenic trails, or other wilderness areas are located at or in the immediate vicinity of the action area.

2. Is the antenna structure located in an officially designated wildlife preserve?

According to the US Fish and Wildlife Service (USFWS)¹ and the Connecticut Department of Natural Resources², no officially designated wildlife preserves are located at or in the immediate vicinity of the action area.

3. Will the antenna structure likely affect threatened or endangered species or designated critical habitats? (Ref. 50 CFR Part 402)

A request for a threatened and endangered species review of this project was sent to the USFWS, Connecticut Natural Heritage Program on May 25, 2006.

In correspondence dated July 5, 2006 (attached), the USFWS indicated that 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.

In correspondence dated April 19, 2006 (attached), the Connecticut Department of Environmental Protection Natural Diversity Database stated that there are no known populations of Federal or State Endangered, Threatened or Special Concern Species at the subject site.

4. Will the antenna structure affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or potentially eligible for listing in the National Register of Historic Places (NRHP)? (Ref. 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act).

As part of the environmental review process for this project, a literature and records review was conducted to determine whether National Register listed or eligible historic structures or archaeological sites were located within the presumed area of potential effect (APE) for Visual effects—in this case, within a half-mile of the undertaking. Files researched in the literature and records review included the National Register of Historic Places (NRHP) database and the National Register eligibility files maintained by the Connecticut State Historic Preservation Office.

This review revealed that there are no known archaeological resources or NRHP listed or eligible historic structures located within a half-mile of the undertaking. Therefore, it was determined that the proposed undertaking will have no visual effect upon historic properties.

The physical attributes of the landform, namely its slope and the lack of previously recorded proximal archaeological sites at similar landforms, suggest that the site has a low probability as a potential location for prehistoric occupation or utilization. Additionally, due to the limited nature of the undertaking, disturbance of any intact subsurface archaeological deposits in the APE for Direct Effects is also unlikely. Additional archaeological survey is not recommended.

An opinion of **no effect** upon historic properties or archaeological resources was sent to the CT SHPO on May 22, 2006. The CT SHPO responded on May 26, 2006 and concurred with this finding.

In accordance with 36 CFR 800.2 (d), 800.3 (e), and 800.3 (f)(1), consultation was initiated with the Town of Groton and the Mystic River Historical Society (attached). To date, the Mystic River Historical Society responded on June 19, 2006 and expressed no concern with the project.

In addition, a Public Notice was advertised in the New London Day with the 30-day public comment period ending on June 25, 2006 (attached).

5. Will the antenna structure affect Indian religious site(s)?

Tribal consultation was initiated through the FCC's electronic Tower Construction Notification System (TCNS) on May 12, 2006 and was assigned TCNS number 15722. On May 23, 2006 the Mashantucket Pequot Tribe responded via TCNS and via letter dated June 14, 2006 and expressed to no concerns with the project (attached). In keeping with the Voluntary Best Practices Agreement of 2004, two tribes were notified in writing and invited to enter into consultation on March 30, 2006 (attached).

BL Companies notified the FCC about the Tribal Consultation status on June 29, 2006 and invited them to initiate government-to-government consultation. In a letter dated July 6, 2006, the FCC notified BL Companies that if no statement of interest were received from the Mohegan Indian Tribe and the Naranagansett Indian Tribe by July 26, 2006, the tribal consultation process would be deemed complete (attached). On July 10, 2006 the Mohegan Indian Tribe responded via TCNS and expressed to no concerns with the project (attached).

As of July 26, 2006, no response was received from the Naranagansett Indian Tribe, therefore tribal consultation is complete.

6. Will the antenna structure be located in a floodplain? (Ref. Executive Order 11988 and 40 CFR Part 6, Appendix A)

According to the Federal Emergency Management Agency¹, the proposed action area is not located within the 100-year floodplain. A Federal Insurance Rate Map has been attached to serve as supporting documentation.

7. Will construction of the antenna structure involve significant change in surface features (e.g. wetlands, deforestation, or water diversion)? (Ref. Executive Order 11990 and 40 CFR Part 6, Appendix A)

According to the USFWS's National Wetlands Inventory (NWI) Mapping (attached), no inventoried wetlands are shown within the action area. State level wetland mapping was not available for New London County, Connecticut. The Natural Resource Conservation Service's Hydric Soil Series Lists¹ indicates that mapped hydric soils do not exist at or in the immediate vicinity of the proposed project location. Additionally, on-site assessment of the site confirmed that hydric soils, hydrophytic vegetation, and hydrologic characteristics conducive to the formation of wetlands were not present within the action area.

Topographically, the site is relatively flat and located at an approximate average elevation of 110 feet above mean sea level. Locally, ground water in the site vicinity is expected to mimic the

surrounding topography and flow to the southwest towards Fishtown Brook, which is approximately 1,200 feet from the subject site.

The action area site is located in the Newark (Hartford Basin) terrain of the New England Physiographic Province of Connecticut. According to the United States Department of Agriculture (USDA), *Web Soil Survey*, soils mantling the site consist of the Canton and Charlton extremely stony loam with 3 to 15 percent slopes. These types of soils are generally found on upland hill landforms and the parent material consists primarily of schist, granite and gneiss.

Land use at the site currently consists of a wooded area associated with a larger property, occupied by a the Mystic River Ambulance facility. The land use in the vicinity of the site is predominantly occupied by residential properties and transportation uses.

Based upon the nature of the undertaking, it is also believed that the action area will be subject only to the effects of the direct impacts necessary to construct and maintain the proposed project. Indirect impacts such as runoff, noise, aesthetics, and fugitive dust are temporary in nature, and should only be realized during and shortly after construction.

8. Is the antenna structure located in a residential neighborhood and required to be equipped with high intensity white lights?

No.

9a. Will the antenna structure equal or exceed total power (of all channels) of 2000 Watts ERP (3280 EIRP) and have antenna located less than 10 meters above the ground?

No.

9b. Will the rooftop antenna project equal or exceed total power (of all channels) of 2000 Watts ERP (3280 EIRP)?

Not applicable.

Online Resources

1. ¹http://www.nps.gov/gis/park_gisData/connecticut/ct.htm
²<http://www.nps.gov/rivers/wildriverslist.html#ct>
³<http://www.fs.fed.us/recreation/map.shtml>
⁴<http://www.blm.gov/nhp/facts/index.htm>
⁵<http://nationalatlas.gov/natlas/natlasstart.asp>
⁶<http://www.dep.state.ct.us/rec/parks/ctforests.htm>
⁷<http://www.dep.state.ct.us/rec/parks/ctparks.htm>

2. ¹<http://www.fws.gov/r5gis/images/R5.jpg>
²<http://www.dep.state.ct.us/rec/>

3. ¹<http://www.dep.state.ct.us/cgnhs/nddb.htm>

4. None

5. ¹<http://www.doi.gov/bia/tribes/entry.html>
²http://www.gdsc.bia.gov/products/images/pdf/aoeasn_us.pdf
³<http://web.cast.uark.edu/other/nps/nacd/>

6. None

7. ¹<http://www.statlab.iastate.edu/soils/hydric/sslists.html>

8. None

- 9a. None

- 9b. None

PART III
Section 106 Consultation



May 25, 2006

Mr. David Poirier
Connecticut State Historic Preservation Office
Historic Preservation and Museum Division
59 South Prospect Street
Hartford, Connecticut 06106

RE: Section 106 Review: Proposed Monopole Telecommunications Tower
MCF Communications, Inc. - MCF Groton Site
237 Sandy Hollow Road
Groton, New London County, Connecticut
BL Project No. 06L0869
EBI #61052697, CTNL053A

Dear Mr. Poirier:

MCF Communications is proposing to construct a 120-foot tall monopole telecommunications tower and associated equipment within a fenced lease area at the above referenced location. In accordance with Section 106 of the National Historic Preservation Act (NHPA), this project is being evaluated to consider its potential effect to districts, sites, buildings, structures, or objects that are listed or are eligible for listing on the National Register of Historic Places (NRHP). In accordance with the Nationwide Programmatic Agreement (NPA) effective March 7, 2005, attached is FCC Form 620.

Your office previously reviewed this site and found there to be No Effect on historic properties (see attached correspondence). It is our opinion that the proposed undertaking will have **no effect** upon historic properties. A Section 106 Report detailing this finding is attached. We request your review and concurrence. If you require additional information, please feel free to contact me at (717) 651-9850.

Respectfully submitted,

BL Companies

A handwritten signature in black ink that reads 'James R. Kodlick/jr'.

James R. Kodlick
Manager, Environmental Resource Group

Enclosures

One South Market Square 213 Market Street, 6th Floor Harrisburg, PA 17101 Tel. (717) 651-9850 Fax (717) 651-9858

Architecture • Engineering • Planning • Landscape Architecture • Land Surveying • Environmental Sciences

BL Companies Pennsylvania, Inc. • David G. Ball, AIA • Mark S. Koellner, PG • Michael A. Lozanoff, PE • Rainer A. Muhlbauer, AIA • Stanley C. Novak, PE



Connecticut Commission on Culture & Tourism

May 9, 2006

Mr. David R. George
Heritage Consultants LLC
877 Main Street
Newington, CT 06111

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Subject: Telecommunications Facilities
Sandy Hollow Road
West Mystic (Groton), CT
EBI #61052697, CTNL053A

Dear Mr. George:

The State Historic Preservation Office has reviewed the reconnaissance survey prepared by Heritage Consultants LLC concerning the above-named project. In the opinion of the State Historic Preservation Office, the archival and archaeological methodologies employed by Heritage Consultants LLC are consistent with our *Environmental Review Primer for Connecticut's Archaeological Resources*.

The State Historic Preservation Office concurs with Heritage Consultants LLC that no further archaeological investigations appear warranted with respect to the proposed undertaking. This office believes that the proposed undertaking will have no effect upon Connecticut's archaeological heritage.

This office recommends that Heritage Consultants LLC consult with the Office of State Archaeology at the University of Connecticut (Storrs) concerning the professional transfer of all field notes, photographs, and artifactual materials generated by the archaeological investigations.

This comment updates and supersedes all previous correspondence regarding the proposed project. For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

cc: Bellantoni, Knowles, Mackey

New Tower ("NT") Submission Packet

FCC FORM 620

Introduction

The **NT Submission Packet** is to be completed by or on behalf of Applicants to construct new antenna support structures by or for the use of licensees of the Federal Communications Commission ("FCC"). **The Packet (including Form 620 and attachments) is to be submitted to the State Historic Preservation Office ("SHPO") or to the Tribal Historic Preservation Office ("THPO"), as appropriate, before any construction or other installation activities on the site begin. Failure to provide the Submission Packet and complete the review process under Section 106 of the National Historic Preservation Act ("NHPA")¹ prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules.**

The instructions below should be read in conjunction with, and not as a substitute for, the "Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission," dated September 2004, ("Nationwide Agreement") and the relevant rules of the FCC (47 C.F.R. §§ 1.1301-1.1319) and the Advisory Council on Historic Preservation ("ACHP") (36 C.F.R. Part 800).²

Exclusions and Scope of Use

The NT Submission Packet should not be submitted for undertakings that are excluded from Section 106 Review. The categories of new tower construction that are excluded from historic preservation review under Section 106 of the NHPA are described in Section III of the Nationwide Agreement.

Where an undertaking is to be completed but no submission will be made to a SHPO or THPO due to the applicability of one or more exclusions, the Applicant should retain in its files documentation of the basis for each exclusion should a question arise as to the Applicant's compliance with Section 106.

¹ 16 U.S.C. § 470f.

² Section II.A.9. of the Nationwide Agreement defines a "historic property" as: "Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian Organization that meet the National Register criteria."

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB
3060-1039
Estimated Time Per Response:
.5 to 10 hours

The NT Submission Packet is to be used only for the construction of new antenna support structures. Antenna collocations that are subject to Section 106 review should be submitted using the Collocation ("CO") Submission Packet (FCC Form 621).

General Instructions: NT Submission Packet

Fill out the answers to Questions 1-5 on Form 620 and provide the requested attachments. Attachments should be numbered and provided in the order described below.

For ease of processing, provide the Applicant's Name, Applicant's Project Name, and Applicant's Project Number in the lower right hand corner of each page of Form 620 and attachments.³

1. Applicant Information

Full Legal Name of Applicant: MCF Communications, Inc.

Name and Title of Contact Person: Michael McFadden

Address of Contact Person (including Zip Code):
668 Main Street, Suite 114
Wilmington, MA 01887

Phone: (978) 658-7360 Fax: (617) 543-7343

E-mail address: mikem@mcfcommunications.com

2. Applicant's Consultant Information

Full Legal Name of Applicant's Section 106 Consulting Firm:

BL Companies, Inc.

Name of Principal Investigator: James R. Kodlick, RPA

Title of Principal Investigator: Manager, Environmental Resources Group

³ Some attachments may contain photos or maps on which this information can not be provided.

Applicant's Name: MCF Communications, Inc.
Project Name: MCF Groton

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB
3060-1039
Estimated Time Per Response:
.5 to 10 hours

Investigator's Address: One South Market Square, 213 Market Street, 6th Floor

City: Harrisburg State Pennsylvania Zip Code 17101

Phone: 717-651-9850 Fax: 717-651-9858

E-mail Address: jkodlick@blcompanies.com

Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?⁴ YES / NO.

Areas in which the Principal Investigator meets the Secretary of the Interior's Professional Qualification Standards: Archaeology

Other "Secretary of the Interior qualified" staff who worked on the Submission Packet (provide name(s) as well as well as the area(s) in which they are qualified):

Gretchen Yarnall, BL Companies Historic Architecture

3. Site Information

a. Street Address of Site: 237 Sandy Hollow Road

City or Township: Groton

County / Parish: New London State: CT Zip Code: 06355

b. Nearest Cross Roads: Sandy Hollow R oad / Allyn Street

c. NAD 83 Latitude/Longitude coordinates (to tenth of a second):
N 41° 54' 59.6"; W 71° 49' 39.1"

⁴ The Professional Qualification Standards are available on the cultural resources webpage of the National Park Service, Department of the Interior: <http://www.cr.nps.gov/local-law/arch_stnds_9.htm>. The Nationwide Agreement requires use of Secretary-qualified professionals for identification and evaluation of historic properties within the APE for direct effects, and for assessment of effects. The Nationwide Agreement encourages, but does not require, use of Secretary-qualified professionals to identify historic properties within the APE for indirect effects. See Nationwide Agreement, §§ VI.D.1.d, VI.D.1.e, VI.D.2.b, VI.E.5.

Applicant's Name: MCF Communications, Inc.
Project Name: MCF Groton

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB
3060-1039
Estimated Time Per Response:
.5 to 10 hours

d. Proposed tower height above ground level:⁵ 120 feet; 36.5 meters

e. Tower type:

guyed lattice tower self-supporting lattice monopole

other (briefly describe tower) _____

4. Project Status:⁶

- a. Construction not yet commenced;
b. Construction commenced on [date] _____; or,
c. Construction commenced on [date] _____ and was completed on [date] _____.

5. Applicant's Determination of Effect:

a. Direct Effects (check one):

- i. No Historic Properties in Area of Potential Effects ("APE") for direct effects;
ii. "No effect" on Historic Properties in APE for direct effects;
iii. "No adverse effect" on Historic Properties in APE for direct effects;
iv. "Adverse effect" on one or more Historic Properties in APE for direct effects.

b. Visual Effects (check one):

- i. No Historic Properties in Area of Potential Effects ("APE") for visual effects;
ii. "No effect" on Historic Properties in APE for visual effects;
iii. "No adverse effect" on Historic Properties in APE for visual effects;
iv. "Adverse effect" on one or more Historic Properties in APE for visual effects.

⁵ Include top-mounted attachments such as lightning rods.

⁶ Failure to provide the Submission Packet and complete the review process under Section 106 of the NHPA prior to beginning construction may violate Section 110(k) of the NHPA and the Commission's rules. See Section X of the Nationwide Agreement.

Applicant's Name: MCF Communications, Inc.
Project Name: MCF Groton

NT SUBMISSION PACKET – FCC FORM 620

Approved by OMB
3060-1039
Estimated Time Per Response:
.5 to 10 hours

Certification and Signature

I certify that all representations on this FCC Form 620 and the accompanying attachments are true, correct, and complete.

Gretchen E. Yarnall
Signature

May 25, 2006
Date

Gretchen E. Yarnall
Printed Name

Senior Project Manager
Title

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1) AND/ OR FORFEITURE (U.S. Code, Title 47, Section 503).

Attachment 1. Résumés / Vitae

[The resumes of James R. Kodlick, RPA and
Gretchen E. Yarnall are on file at the CT SHPO.]

ATTACHMENT 2. ADDITIONAL SITE INFORMATION

MCF Communications, Inc. is proposing to construct a telecommunications tower in New London County, Connecticut. The site is located at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road.

The site is bordered by an asphalt parking lot, Sandy Hollow Road, wooded land, and Route 95 North to the north; woodland and residences to the south; the Mystic River Ambulance facility, Sandy Hollow Road and residences to the east; and woodland and residences to the west.

ATTACHMENT 3. TRIBAL AND NHO INVOLVEMENT

Indian Tribes and Native Hawaiian organizations (NHOs) within the undertaking's Area of Potential Effect (APE) were notified by initiating Tribal consultation through the FCC's electronic Tower Construction Notification System (TCNS)¹ on May 12, 2006 and was assigned Notification ID No. 15722.

The Mashantucket Pequot Tribe responded on May 18, 2006, to express their desire to consult on this project.

Two follow-up letters will be sent on May 30, 2006 to the tribes who declared their geographic preferences in TCNS.

¹ Federal Communications Commission (FCC) TCNS website:
<http://wireless.fcc.gov/outreach/notification/index.html>

Proposed Tower Structure Info - Email ID #1112834.txt
From: towernotifyinfo@fcc.gov
Sent: Friday, May 12, 2006 8:56 AM
To: Braun, Olivia
Subject: Proposed Tower Structure Info - Email ID #1112834

Dear Olivia Braun,

Thank you for submitting a notification regarding your proposed structure via the Tower Construction Notification Application. Note that the FCC has assigned a unique Notification ID number for this proposed structure. You will need to reference this Notification ID number when you update your project's Status with us. Below are the details you provided for the tower you have proposed to construct:

Notification Received: 05/12/2006

Notification ID: 15722

Tower Owner Individual or Entity Name: MCF Communications
Consultant Name: Olivia Braun

Street Address: One South Market Square
Street Address 2: 213 Market Street, 6th Floor
City: Harrisburg
State: PENNSYLVANIA
Zip Code: 17101
Phone: 717-651-9850
Email: obraun@blcompanies.com

Structure Type: POLE - Any type of Pole
Latitude: 41 deg 22 min 8.8 sec N
Longitude: 71 deg 59 min 00.5 sec W
Location Description: 237 Sandy Hollow Road
City: Groton
State: CONNECTICUT
County: NEW LONDON
Ground Elevation: 33.5 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 36.6 meters above ground level
Overall Height AMSL: 70.1 meters above mean sea level

ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #1

From: towernotifyinfo@fcc.gov
Sent: Friday, May 19, 2006 3:01 AM
To: Braun, Olivia
Cc: kim.pristello@fcc.gov; diane.dupert@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER
CONSTRUCTION NOTIFICATION INFORMATION - Email ID #1115423

Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribes and in making further contacts, the City and State of the Seat of Government for each Tribe and NHO, as well as the designated contact person, is included in the listing below. We note that Tribes may have section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribes and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribe or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribes and NHOs who have set their geographic preferences on TCNS. If the information you provided relates to a proposed antenna structure in the State of Alaska, the following list also includes Tribes located in the State of Alaska that have not specified their geographic preferences. For these Tribes and NHOs, if the Tribe or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribe or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event such a Tribe or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribe or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

1. THPO - Kathleen Knowles - Mashantucket Pequot Tribe - Mashantucket, CT - electronic mail
Exclusions: For every tower construction this Tribe requires a site location map, site plans for every project that will result in ground disturbance, and a detailed description of the proposed site. If the proposed tower construction is on an already existing building, the Tribe would like to be informed of that as well.
2. Historic Preservation Compliance Coordin - Stacy Dufresne - Mohegan Indian Tribe - Uncasville, CT - electronic mail and regular mail
3. Deputy THPO - Doug Harris - Narragansett Indian Tribe - Wyoming, RI - electronic mail and regular mail

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States. For these Tribes and NHOs, you are required to use reasonable and good faith efforts to determine if the Tribe or NHO may attach religious and cultural significance to historic properties that may be affected by its proposed undertaking. Such efforts may include, but are not limited to, seeking information from the relevant SHPO or THPO, Indian Tribes, state agencies, the U.S. Bureau of Indian Affairs, or, where applicable, any federal agency with land holdings within the state (NPA, Section IV.B). If after such reasonable and good faith efforts, you determine that a Tribe or NHO may attach religious and cultural significance to historic properties in the area and the Tribe or NHO does not respond to TCNS notification within a reasonable time, you should make a reasonable effort to follow up, and must seek guidance from the Commission in the event of continued non-response or in the event of a procedural or substantive disagreement. If you determine that the Tribe or NHO is unlikely to attach religious and cultural significance to historic properties within the area, you do not need to take further action unless the Tribe or NHO indicates an interest in the proposed construction or other evidence of potential interest comes to your attention.

None

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

4. SHPO - John Shannahan - Connecticut Historical Commission - Hartford, CT - electronic mail

5. SHPO - Cara Metz - Massachusetts Historical Commission - Boston, MA - electronic mail

6. Deputy SHPO - Brona Simon - Massachusetts Historical Commission - Boston, MA - electronic mail

7. SHPO - Bernadette Castro - Parks, Recreation & Historic Preservation - Albany, NY - regular mail

8. Director - Ruth Pierpont - Bureau of Field Services, NY State Parks &* Hist. Pres. - Waterford, NY - electronic mail

9. SHPO - Frederick Williamson - Rhode Island Historic Preservation & Heritage Comm - Providence, RI - regular mail

10. Deputy SHPO - Edward Sanderson - Rhode Island Historic Preservation & Heritage

ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #1
Comm - Providence, RI - electronic mail

"Exclusions" above set forth language provided by the Tribe, NHO, or SHPO. These exclusions may indicate types of tower notifications that the Tribe, NHO, or SHPO does not wish to review. TCNS automatically forwards all notifications to all Tribes, NHOs, and SHPOs that have an expressed interest in the geographic area of a proposal, as well as Tribes and NHOs that have not limited their geographic areas of interest. However, if a proposal falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribe, NHO, or SHPO. Exclusions may also set forth policies or procedures of a particular Tribe, NHO, or SHPO (for example, types of information that a Tribe routinely requests, or a policy that no response within 30 days indicates no interest in participating in pre-construction review).

If you are proposing to construct a facility in the State of Alaska, you should contact Commission staff for guidance regarding your obligations in the event that Tribes do not respond to this notification within a reasonable time.

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 05/12/2006
Notification ID: 15722
Tower Owner Individual or Entity Name: MCF Communications
Consultant Name: Olivia Braun

Street Address: One South Market Square 213 Market Street, 6th Floor
City: Harrisburg
State: PENNSYLVANIA
Zip Code: 17101
Phone: 717-651-9850
Email: obraun@blcompanies.com
Structure Type: POLE - Any type of Pole
Latitude: 41 deg 22 min 8.8 sec N
Longitude: 71 deg 59 min 0.5 sec W
Location Description: 237 Sandy Hollow Road
City: Groton
State: CONNECTICUT
County: NEW LONDON
Ground Elevation: 33.5 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 36.6 meters above ground level
Overall Height AMSL: 70.1 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

<http://wireless.fcc.gov/outreach/notification/contact-fcc.html>.

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8 a.m. to 7:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

Mashantucket Pequot Tribe no concern email.txt
From: towernotifyinfo@fcc.gov
Sent: Tuesday, May 23, 2006 10:04 AM
To: Braun, Olivia
Cc: towernotifyinfo@fcc.gov; KKnowles@mptn-nsn.gov
Subject: Reply to Proposed Tower Structure (Notification ID #15722) -
Email ID #1124442

Dear Olivia Braun,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from THPO, Kathleen Knowles in reference to Notification ID #15722:

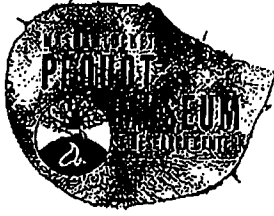
Dear Ms. Braun,
Regarding Notification ID # 15722, based on a review of the information provided, including the Phase I Archaeological Reconnaissance Survey conducted by Heritage Consultants, LLC, the research design and testing strategy meets acceptable professional standards and agree with the recommendations and conclusions. Please keep me informed of any further developments with respect to this project. Kathleen Knowles, Tribal Historic Preservation Officer Mashantucket Pequot Tribe

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 05/12/2006
Notification ID: 15722
Tower Owner Individual or Entity Name: MCF Communications
Consultant Name: Olivia Braun

Street Address: One South Market Square 213 Market Street, 6th Floor
City: Harrisburg
State: PENNSYLVANIA
Zip Code: 17101
Phone: 717-651-9850
Email: obraun@blcompanies.com
Structure Type: POLE - Any type of Pole
Latitude: 41 deg 22 min 8.8 sec N
Longitude: 71 deg 59 min 0.5 sec W
Location Description: 237 Sandy Hollow Road
City: Groton
State: CONNECTICUT
County: NEW LONDON
Ground Elevation: 33.5 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 36.6 meters above ground level
Overall Height AMSL: 70.1 meters above mean sea level

0620864



JUN 19 2006

6-14-06

Ms. Olivia Braun,
Project Scientist
BL Companies
One South Market Square
213 Market St. 6th Floor
Harrisburg, PA 17101

Re: Phase I Cultural Resources Reconnaissance Survey Of A Proposed Cellular Communications Facility Located At 237 Sandy Hollow Road, Mystic, Connecticut TCNS Notification ID # 15722

Dear Ms. Braun,

I have previously responded to you on May 23, 2006 at 10:04 A.M. and this response addresses your email dated Tues., May 30, 2006 – 10:23 A.M.

Regarding the archaeological assessment you have already sent May, 2006 – I have reviewed the Phase I Archaeological Reconnaissance Report entitled “Phase I Cultural Resources Reconnaissance Survey Of A Proposed Cellular Communications Facility Located at 237 Sandy Hollow Road, Mystic, 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,

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

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 30, 2006

Mr. Doug Harris, Deputy THPO
Narragansett Indian Tribe
P.O. Box 268
Charlestown, RI

RE: Invitation to Comment Under Section 106
Proposed Telecommunications Tower
MCF Communications (MCF Groton Site)
237 Sandy Hollow Road
Groton Township, New London County, Connecticut
BL Project No. 06L0869

Dear Mr. Harris:

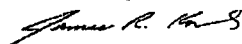
BL Companies has been retained by MCF Communications to prepare a Federal Communications Commission (FCC) National Environmental Policy Act (NEPA) study for a proposed telecommunications tower site known as the MCF Groton Site. BL Companies is submitting this correspondence as follow-up to the Tower Construction Notification System (TCNS) filing No. 15722 submitted to you on May 12, 2006 requesting whether you have any interest in consulting on this project.

MCF Communications, Inc. is proposing to construct a telecommunications tower at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road. A USGS topographical map is attached for your reference.

Please respond by June 23, 2006 with an opinion of interest or no interest.

Thank you for your attention in this matter. If you have any questions I can be reached at (717) 651-9850, ext. 223.

Respectfully,



James Kodlick
Environmental Resources Group Manager

Enclosure

Confirmation - Referral of a Proposed Tower Construction Notification - Email ID #1191381.txt
From: towernotifyinfo@fcc.gov
Sent: Thursday, June 29, 2006 11:25 AM
To: Braun, Olivia
Cc: kim.pristello@fcc.gov; diane.dupert@fcc.gov
Subject: Confirmation - Referral of a Proposed Tower Construction Notification - Email ID #1191381

Dear Olivia Braun,

Your referral of a proposed tower structure notification has been successfully submitted via the Tower Construction Notification System. The Federal Communications Commission (FCC) will be processing this referral for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages, and Native Hawaiian Organizations as specified by Section IV.G of the Nationwide Programmatic Agreement and the Declaratory Ruling of October 6, 2005. You will receive a Proposed Construction of Communications Facilities Notification of Final Contacts when the FCC has completed processing this referral. Below are the details you provided in the referral of the tower you have proposed to construct:

Notification Received: 05/12/2006
Notification Referred: 06/29/2006

Notification ID: 15722
Tower Owner Individual or Entity Name: MCF Communications
Consultant Name: Olivia Braun

Street Address: One South Market Square
Street Address 2: 213 Market Street, 6th Floor
City: Harrisburg
State: PENNSYLVANIA
Zip Code: 17101
Phone: 717-651-9850
Email: obraun@blcompanies.com

Structure Type: POLE - Any type of Pole
Latitude: 41 deg 22 min 8.8 sec N
Longitude: 71 deg 59 min 0.5 sec W
Location Description: 237 Sandy Hollow Road
City: Groton
State: CONNECTICUT
County: NEW LONDON
Ground Elevation: 33.5 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 36.6 meters above ground level
Overall Height AMSL: 70.1 meters above mean sea level

First Contact Date: 05/18/2006
Second Contact Date: 05/30/2006

Entities who Have Not Responded:
Mohegan Indian Tribe
Narragansett Indian Tribe

**Note that the FCC will assign a unique Notification ID number for a site where the initial contact was not made through TCNS. You will need to reference this Notification ID number when you update your project's Status with us.

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 30, 2006

Ms. Stacy Dufresne, Historic Preservation Compliance Coordinator
Mohegan Tribe of Indians
5 Crow Hill Road
Uncasville, CT 06382

RE: Invitation to Comment Under Section 106
Proposed Telecommunications Tower
MCF Communications (MCF Groton Site)
237 Sandy Hollow Road
Groton Township, New London County, Connecticut
BL Project No. 06L0869

Dear Ms. Dufresne:

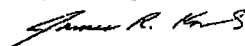
BL Companies has been retained by MCF Communications to prepare a Federal Communications Commission (FCC) National Environmental Policy Act (NEPA) study for a proposed telecommunications tower site known as the MCF Groton Site. BL Companies is submitting this correspondence as follow-up to the Tower Construction Notification System (TCNS) filing No. 15722 submitted to you on May 12, 2006 requesting whether you have any interest in consulting on this project.

MCF Communications, Inc. is proposing to construct a telecommunications tower at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road. A USGS topographical map is attached for your reference.

Please respond by June 23, 2006 with an opinion of interest or no interest.

Thank you for your attention in this matter. If you have any questions I can be reached at (717) 651-9850, ext. 223.

Respectfully,



James Kodlick
Environmental Resources Group Manager

Enclosure



FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

Proposed Construction of Communications Facilities
Notification of Final Contacts

MCF Communications
Olivia Braun
One South Market Square
213 Market Street, 6th Floor
Harrisburg, PA 17101

Date: 07/06/2006

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's recent Declaratory Ruling,¹ we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 06/29/2006 and 07/06/2006. Our contact with these Indian Tribes or NHOs was sent on 07/06/2006.

Thus, as described in the Declaratory Ruling,² if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 20 calendar days of 07/06/2006, your obligations under Section IV of the NPA with respect to these Indian Tribes or NHOs are complete.³ If an Indian Tribe or NHO responds that it is interested in participating within the 20 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review.⁴ In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Indian Tribe or NHO. An Indian Tribe's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Indian Tribe or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,

Dan Abeyta
Assistant Chief
Spectrum and Competition Policy Division
Wireless Telecommunications Bureau

¹ See Clarification of Procedures for Participation of Federally Recognized Indian Tribes and Native Hawaiian Organizations Under the Nationwide Programmatic Agreement, *Declaratory Ruling*, FCC 05-176 (released October 6, 2005) (Declaratory Ruling).

² *Id.* §§ 8-10.

³ We note that, under the Declaratory Ruling, an expression of interest by an Indian Tribe or NHO addressed solely to the Commission staff during the 20-day period is sufficient even if it does not contact the Applicant.

⁴ *Id.* at § 11.

LIST OF PROPOSED COMMUNICATIONS TOWERS

TCNS#: 15721 Referred Date: 06/29/2006 Location: Route 44 and Providence Pike Intersection, Putnam, CT
Tribe Name: Narragansett Indian Tribe

TCNS#: 15722 Referred Date: 06/29/2006 Location: 237 Sandy Hollow Road, Groton, CT
Tribe Name: Mohegan Indian Tribe
Tribe Name: Narragansett Indian Tribe

LEGEND :

* - Notification numbers are assigned by the Commission staff for sites where the initial contact was not made through TCNS.

Reply to Proposed Tower Structure (Notification ID #15722) - Email ID #1197342.txt
From: towernotifyinfo@fcc.gov
Sent: Monday, July 10, 2006 10:28 AM
To: Braun, Olivia
Cc: towernotifyinfo@fcc.gov; sdufresne@moheganmail.com
Subject: Reply to Proposed Tower Structure (Notification ID #15722) -
Email ID #1197342

Dear Olivia Braun ,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Historic Preservation Compliance Coordin, Stacy Dufresne in reference to Notification ID #15722:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the FCC and the Tribe, pursuant to 47 C.F.R Sec. 1.1312 of the Commission's rules.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 05/12/2006
Notification ID: 15722
Tower Owner Individual or Entity Name: MCF Communications
Consultant Name: Olivia Braun

Street Address: One South Market Square 213 Market Street, 6th Floor
City: Harrisburg
State: PENNSYLVANIA
Zip Code: 17101
Phone: 717-651-9850
Email: obraun@blcompanies.com
Structure Type: POLE - Any type of Pole
Latitude: 41 deg 22 min 8.8 sec N
Longitude: 71 deg 59 min 0.5 sec W
Location Description: 237 Sandy Hollow Road
City: Groton
State: CONNECTICUT
County: NEW LONDON
Ground Elevation: 33.5 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 36.6 meters above ground level
Overall Height AMSL: 70.1 meters above mean sea level

ATTACHMENT 4. LOCAL GOVERNMENT

In accordance with 36 CFR 800.2 (d), 800.3 (e), and 800.3 (f)(1), we have initiated consultation with the Town of Groton to give them the opportunity to participate in the review of this undertaking (attached). To date, no comments have been received.



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 25, 2006

Mark R. Oefinger, Town Manager
Town of Groton
45 Fort Hill Road
Groton, Connecticut 06340

RE: Invitation to Comment Under Section 106: Proposed Monopole Telecommunications Tower
MCF Communications, Inc. – MCF Groton Site
237 Sandy Hollow Road
Groton, New London County, Connecticut
BL Project No. 05L0869

To Whom It may Concern:

BL Companies has been retained by MCF Communications, Inc. to complete a Federal Communications Commission (FCC) National Environmental Policy Act (NEPA) study for a proposed telecommunications tower site known as the MCF Groton Site. BL Companies is completing Section 106 compliance as delegated by the FCC and outlined in 36 CFR Part 800.

MCF Communications, Inc. is proposing to construct an approximately 2,050-square-foot fenced compound containing a 15- by 15-foot lease area for associated equipment and a 120-foot tall monopole telecommunications tower. The proposed site currently consists of an asphalt parking lot and an undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), this project is being evaluated to consider its potential effect on districts, sites, buildings, structures, or objects that are listed in or are eligible for listing in the National Register of Historic Places (NRHP). Based on the research conducted, it is our opinion that the project as proposed will have no adverse effect on historic properties.

If you have any comments, we would appreciate receiving them within 30 calendar days. If you have any questions, or need any further assistance or information, please do not hesitate to contact me at (717) 651-9850, ext. 223.

Respectfully,

A handwritten signature in black ink that reads 'James R. Kodlick/jr'.

James R. Kodlick
Manager, Environmental Resource Group

Enclosure

One South Market Square 213 Market Street, 6th Floor Harrisburg, PA 17101 Tel. (717) 651-9850 Fax (717) 651-9858

Architecture • Engineering • Planning • Landscape Architecture • Land Surveying • Environmental Sciences

BL Companies Pennsylvania, Inc. • David G. Ball, AIA • Mark S. Koeltner, PG • Michael A. Lozonoff, PE • Rainer A. Muhtbauer, AIA • Stanley C. Novak, PE

ATTACHMENT 5. PUBLIC INVOLVEMENT

The public has been given the opportunity to comment on this undertaking through a public notice placed in The New London Day describing the proposed project with a 30-day comment period ending on Sunday, June 25, 2006. No comment has been received to date.

MCF Communications, Inc. is proposing to construct an approximately 2,050-square-foot fenced compound containing a 15- by 15-foot lease area for associated equipment and a 120-foot tall monopole telecommunications tower at 237 Sandy Hollow Road, Groton, New London County, Connecticut. The proposed site currently consists of an asphalt parking lot and an undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road. MCF Communications, Inc. invites comments from all interested persons regarding the likelihood that the proposed construction would adversely affect historic properties. All questions, comments, and correspondence should be directed to Ms. Nicole Frazier June 25, 2006.

Please be sure to give us a price quote before running this ad. Also, please be sure to include the affidavit with the invoice after publication. Thank you.

0660869

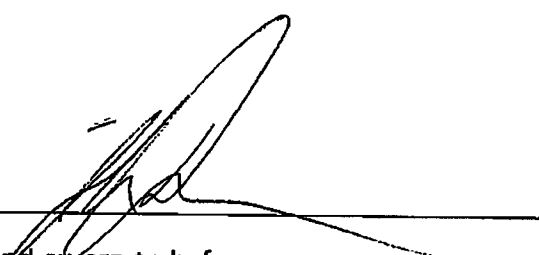
PUBLISHER'S CERTIFICATE

State of Connecticut)
County of New London,) ss. New London

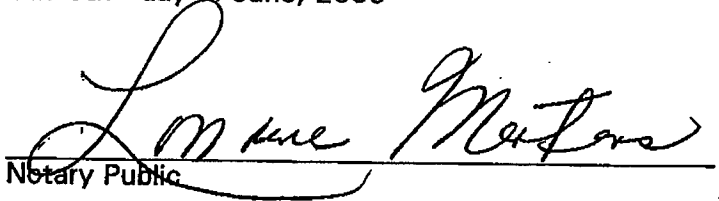
On this 8th day of June, 2006,
Personally appeared before the undersigned, a
Notary Public within and for said County and
State, John Dolahan, Legal Advertising Clerk,
of DAY CLASSIFIED, a daily newspaper published
at New London, County of New London, State of

Connecticut, who being duly sworn, states on
oath, that the Order of Notice in the case of
812 PUBLIC NOTICE MCF

a true copy of which is hereunto annexed, was
published in said newspaper in its issue(s) of
05/27/2006



Subscribed and sworn to before me
this 8th day of June, 2006


Notary Public

My commision expires 9-30-2008

812
Public Notice
MCF Communications, Inc. is proposing to construct an approximately 2,650-square-foot fenced compound containing a 15- by 15-foot lease area for associated equipment and a 120-foot tall monopole telecommunications tower at 237 Sandy Hollow Road, Groton, New London County, Connecticut. The proposed site currently consists of an asphalt parking lot and an undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road. MCF Communications, Inc. invites comments from all interested persons regarding the likelihood that the proposed construction would adversely affect historic properties. All questions, comments, and correspondence should be directed to Ms. Nicole Frazier June 25, 2006.

ATTACHMENT 6. ADDITIONAL CONSULTING PARTIES

An invitation to comment was sent to the Mystic River Historical Society to give them the opportunity to participate in the review of the proposed undertaking (attached). To date, no responses have been received.



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 19, 2006

Mystic River Historical Society
74 High Street
P. O. Box 245
Mystic, CT 06355

RE: Invitation to Comment Under Section 106: Proposed Monopole Telecommunications Tower
MCF Communications, Inc. – MCF Groton Site
237 Sandy Hollow Road
Groton, New London County, Connecticut
BL Project No. 05L0869

To Whom It may Concern:

Commission (FCC) National Environmental Policy Act (NEPA) study for a proposed telecommunications tower site known as the MCF Groton Site. BL Companies is completing Section 106 compliance as delegated by the FCC and outlined in 36 CFR Part 800.

MCF Communications is proposing to construct an approximately 2,050 square-foot fenced compound containing a 15- by 15-foot lease area for associated equipment and a 120-foot tall monopole telecommunications tower. The proposed site currently consists of an asphalt parking lot and an undeveloped wooded area. The compound will also include a proposed 20-foot wide by approximately 300-foot long access drive extending from Sandy Hollow Road to provide access to the site.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), this project is being evaluated to consider its potential effect on districts, sites, buildings, structures, or objects that are listed in or are eligible for listing in the National Register of Historic Places (NRHP). Based on the research conducted, it is our opinion that the project as proposed will have no adverse effect on historic properties.

If you have any comments, we would appreciate receiving them within 30 calendar days. If you have any questions, or need any further assistance or information, please do not hesitate to contact me at (717) 651-9850, ext. 223.

Respectfully,

A handwritten signature in black ink, appearing to read 'James R. Kodlick', written in a cursive style.

James R. Kodlick
Manger, Environmental Resource Group

Enclosure

One South Market Square 213 Market Street, 6th Floor Harrisburg, PA 17101 Tel. (717) 651-9850 Fax (717) 651-9858

Architecture • Engineering • Planning • Landscape Architecture • Land Surveying • Environmental Sciences

BL Companies Pennsylvania, Inc. • David G. Ball, AIA • Mark S. Koelner, PG • Michael A. Lozanoff, PE • Rainer A. Muhlbauec, AIA • Stanley C. Novak, PE



JUN 26 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 19, 2006

Mystic River Historical Society
74 High Street
P. O. Box 245
Mystic, CT 06355

RE: Invitation to Comment Under Section 106: Proposed Monopole Telecommunications Tower
MCF Communications, Inc. – MCF Groton Site
237 Sandy Hollow Road
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If you have any comments, we would appreciate receiving them within 30 calendar days. If you have any questions, or need any further assistance or information, please do not hesitate to contact me at (717) 651-9850, ext. 223.

Respectfully,


James R. Kodlick
Manger, Environmental Resource Group

Enclosure

*The Mystic River Historical Society
has no objections.*

Kevin Allyn, President 6/19/06

ATTACHMENT 7. AREAS OF POTENTIAL EFFECTS

APE for Direct Effects – The Area of Potential Effect (APE) for Direct Effects, as described in the Nationwide Programmatic Agreement, effective March 7, 2005, is limited to the area of potential ground disturbance and property, or portion thereof, that will be destroyed or altered during the construction of the proposed undertaking. For this undertaking, the APE for direct effects is the area of the proposed compound and proposed access drive.

APE for Visual Effects – The APE for Visual Effects, as described in the Nationwide Programmatic Agreement, effective March 7, 2005, is the geographic area in which the proposed has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for the National Register.

The Nationwide Programmatic Agreement describes the following APEs:

For new towers 200 feet or less in overall height – **½ mile APE**

For new towers greater than 200 feet to 400 feet in overall height– **¾ mile APE**

For new towers greater than 400 feet in overall height– **1 ½ mile APE**

For this undertaking, a proposed 120-foot tall monopole telecommunications tower, the APE for visual effects is a half-mile from the proposed tower site.

ATTACHMENT 8. HISTORIC PROPERTIES IDENTIFIED IN THE APE FOR VISUAL EFFECTS

In accordance with the Nationwide Programmatic Agreement, effective March 7, 2005, historic properties reviewed were limited to the following criteria:

- (a) Properties listed on the National Register;
- (b) Properties formally determined eligible for listing by the Keeper of the National Register;
- (c) Properties that the SHPO/THPO certifies are in the process of being nominated to the National Register;
- (d) Properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local agency representing HUD; and
- (e) Properties listed in the SHPO/THPO inventory that the SHPO/THPO has previously evaluated, found to meet the National Register criteria, and are identified accordingly in the SHPO/THPO inventory.

A historic properties search was conducted for all sites within the APE that satisfy the above criteria. Files researched in the literature and records review included the National Register of Historic Places (NRHP) database² and the National Register eligibility files maintained by the Connecticut State Historic Preservation Office (CT SHPO)³.

This review revealed that there are no properties that satisfy the above criteria located within a half-mile of the proposed undertaking.

In addition, no other historical resources were identified through any comments received by Indian Tribes, NHO's, local governments, or members of the public.

² National Park Service, National Register Information System, <http://www.cr.nps.gov/nr/research/nris.htm>

³ Connecticut State Historic Preservation Office, National Register listed and eligible property files, (Hartford, CT).

ATTACHMENT 9. HISTORIC PROPERTIES IDENTIFIED IN THE APE FOR DIRECT EFFECTS

The archaeological sensitivity study was completed to assess potential direct effects for this facility. No historical properties have been identified within the area of potential effects for direct effects. The APE for the review of direct effects included all areas of ground disturbance. It is unlikely that the proposed telecommunications facility will have a direct effect on historical properties.

Archival research was conducted to collect information regarding known archaeological resources within the study area. A literature and records review was conducted to determine whether known archaeological sites were located within a half-mile of the proposed undertaking. Files researched in the literature and records review included the NRHP database and the National Register eligibility files maintained by the CT SHPO. This review revealed that there were no previously recorded archaeological sites located within a half-mile of the undertaking.

The history of the site has been reconstructed from the review of historical topographic maps and aerial photographs. According to these sources, the site has been undeveloped wooded land since at least 1893. The subject site remained relatively unchanged through 1984; however, a 1991 aerial photograph illustrates that a portion of the subject site was utilized as a paved parking area. The site remained relatively unchanged through the site visit date of May 17, 2006, when it was confirmed that the proposed site remains an asphalt parking lot and wooded area.

The site has been bordered primarily by undeveloped lands since at least 1893, with the exception of scattered residences and the Town of Groton to the south. A historic topographic map dated 1984 illustrates scattered residences were located to the east and west and Route 95 was located to the north. Areas to the south remained unchanged. By 1991, the larger property was developed with the Mystic River Ambulance facility while the surrounding area remained relatively unchanged. As of the site reconnaissance date, the site is bordered by an asphalt parking lot, Sandy Hollow Road, wooded land, and Route 95 North to the north; woodland and residences to the south; the Mystic River Ambulance facility, Sandy Hollow Road, and residences to the east; and woodland and residences to the west.

Geologically, Iapetus (Oceanic) terrane of the New England Physiographic Province of Connecticut is underlain by Middle to Early Paleozoic-aged gneiss, schist, and quartzite. According to the *Natural Resource Conservation Service Web Soil Survey for New London County, Connecticut*, the soils mantling the site consist of the Canton and Charlton soils with 3 to 15 percent slopes. These soils are documented to be found on uplands hill landforms and are derived from schist, granite and gneiss.

Topographically, the site is situated on an undeveloped wooded area at an average elevation of approximately 110 feet above mean sea level. Locally, ground water in the site vicinity is expected to mimic topography and flow east towards Mystic River, which is located approximately 2,800 feet away.

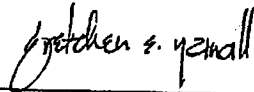
The physical attributes of the landform, namely its slope and the lack of previously recorded proximal archaeological sites at similar landforms, suggest that the site has a low probability as a potential location for prehistoric occupation or utilization. Additionally, due to the limited nature of the undertaking, disturbance of any intact subsurface archaeological deposits in the APE for Direct Effects is also unlikely. Additional archaeological survey is not recommended.

ATTACHMENT 10. EFFECTS ON IDENTIFIED PROPERTIES

No historical properties within the APE for direct effects have been identified during this review; therefore, the proposed undertaking will have **no direct effects on historical properties**.

No historical properties within the APE for visual effects have been identified during this review; therefore, the proposed undertaking will have **no visual effects on historical properties**.

BL Companies appreciates this opportunity to submit this Section 106 report for your review. Please review the enclosed information and respond within thirty (30) days.



Gretchen E. Yarnall
SIPQS Qualified Historian

Attachment 11. Photographs

**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:
BL Project No. 06L0869

Date Photographs Taken:
May 17, 2006

VIEW DIRECTION:
West

Photo : 1
View of the proposed location of the 120-foot tall monopole telecommunications tower.



VIEW DIRECTION:
North

Photo : 2
View facing north from the proposed monopole tower location.



**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:
BL Project No. 06L0869

Date Photographs Taken:
May 17, 2006

VIEW DIRECTION:
South

Photo : 3
View facing south from
the proposed monopole
tower location.



VIEW DIRECTION:
East

Photo : 4
View facing east from the
proposed monopole
tower location.



**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:

Date Photographs Taken:

BL Project No. 06L0869

May 17, 2006

VIEW DIRECTION:

West

Photo : 5

View facing west from the proposed monopole tower location.



VIEW DIRECTION:

North

Photo : 6

View from the proposed monopole location towards the access drive.



**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:
BL Project No. 06L0869

Date Photographs Taken:
May 17, 2006

VIEW DIRECTION:
East

Photo : 7
View toward the proposed tower location from Leoyard Road.

From this location, due to topography, the tower will be visible.



VIEW DIRECTION:
West

Photo : 8
View facing west towards the proposed tower location from River Road.

Due to topography, mature tree cover and intervening distance, the tower would not be visible.



**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:
BL Project No. 06L0869

Date Photographs Taken:
May 17, 2006

VIEW DIRECTION:

West

Photo : 9

View facing west towards the proposed tower location from Cow Hill Road.

Due to topography, the tower would be visible from this location.



VIEW DIRECTION:

Southwest

Photo : 10

View facing southwest from the intersection of Cow Hill Road and Allyn Street.

From this location due to mature tree cover and distance, the tower would not be visible.



**BL Companies
Photographic Record**

Client: MCF Communications, Inc.

Site Location: New London County, Connecticut

Site Name: MCF Groton Site

Project Number:
BL Project No. 06L0869

Date Photographs Taken:
May 17, 2006

VIEW DIRECTION:
South

Photo : 11
View facing south from
the intersection of Route
95 and Allyn Street.

From this location, the
tower would be visible.



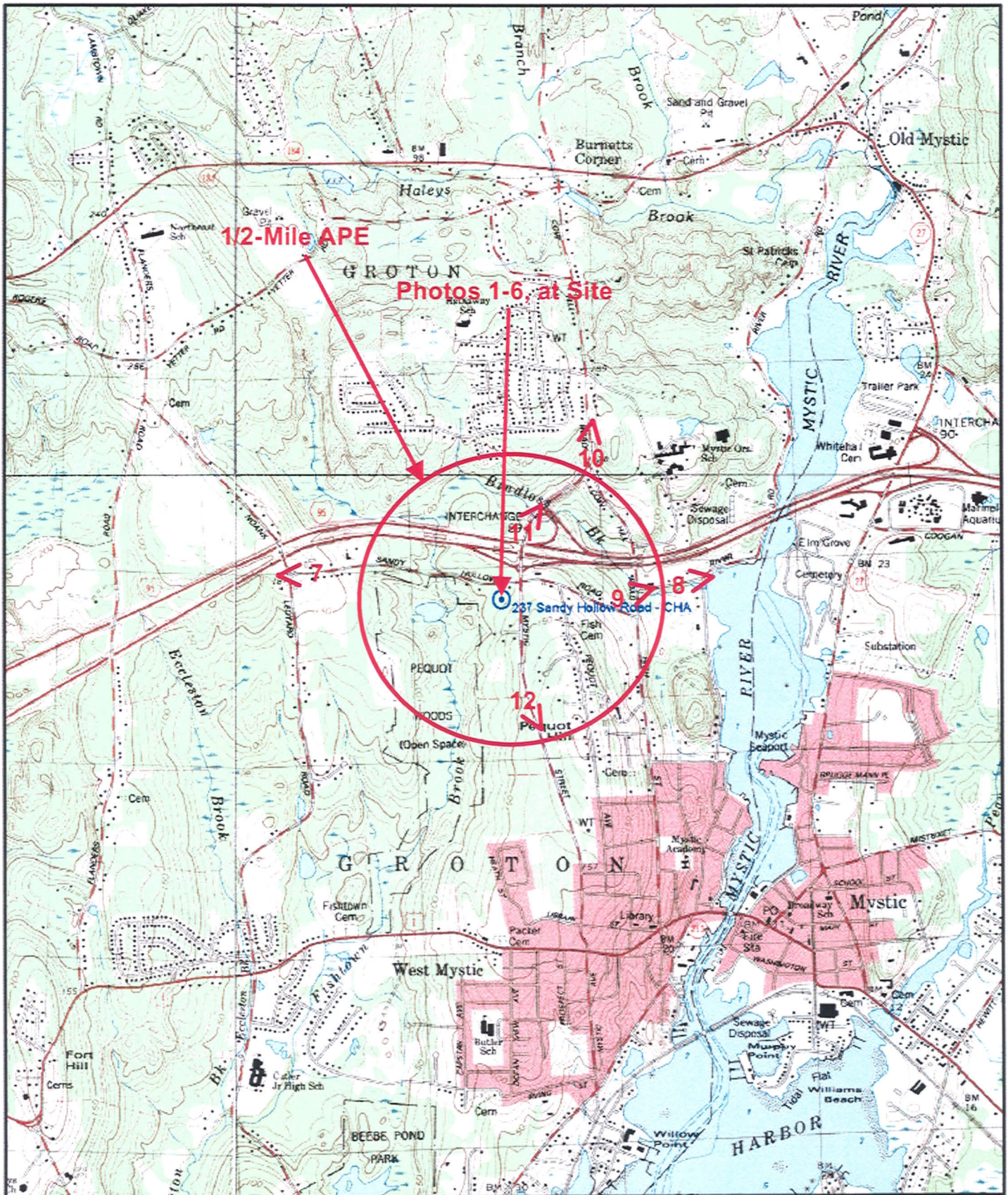
VIEW DIRECTION:
North

Photo : 12
View facing south from a
new residential
development along Allyn
Street.

From this location, the
tower would be visible



Attachment 12. Maps



Name: MYSTIC
 Date: 5/4/2006
 Scale: 1 inch equals 2000 feet

Location: 041° 22' 08.8" N 071° 59' 00.5" W
 Caption: 1984

MCF GROTON

MCF Communications, Inc.

MCF Communications, Inc.
 449 Main Street, Suite 114
 Westport, MA 01887
 (774) 659-7200

CHIA
 CONSULTING ENGINEERS & ARCHITECTS LLP
 270 Main Street, Suite 210 - Westport, CT 06894
 (860) 922-4455

NO.	DATE	DESCRIPTION
1	05/17/06	ISSUED FOR PERMIT
2	05/17/06	ISSUED FOR PERMIT
3	05/17/06	ISSUED FOR PERMIT
4	05/17/06	ISSUED FOR PERMIT
5	05/17/06	ISSUED FOR PERMIT
6	05/17/06	ISSUED FOR PERMIT
7	05/17/06	ISSUED FOR PERMIT
8	05/17/06	ISSUED FOR PERMIT
9	05/17/06	ISSUED FOR PERMIT
10	05/17/06	ISSUED FOR PERMIT

IT IS A CONDITION OF ANY PERMIT OR LICENSE GRANTED BY THE STATE OF CONNECTICUT THAT THE APPLICANT SHALL COMPLY WITH ALL APPLICABLE REGULATIONS, ORDINANCES, AND CODES OF THE STATE OF CONNECTICUT.

SITE NAME:
 MCF GROTON
SITE ADDRESS:
 237 SANDY HOLLOW RD
 GROTON, CT
 06355
 NEW LONDON COUNTY

SHEET TITLE:
 TITLE SHEET

SHEET NUMBER:
 T01

NOT FOR CONSTRUCTION

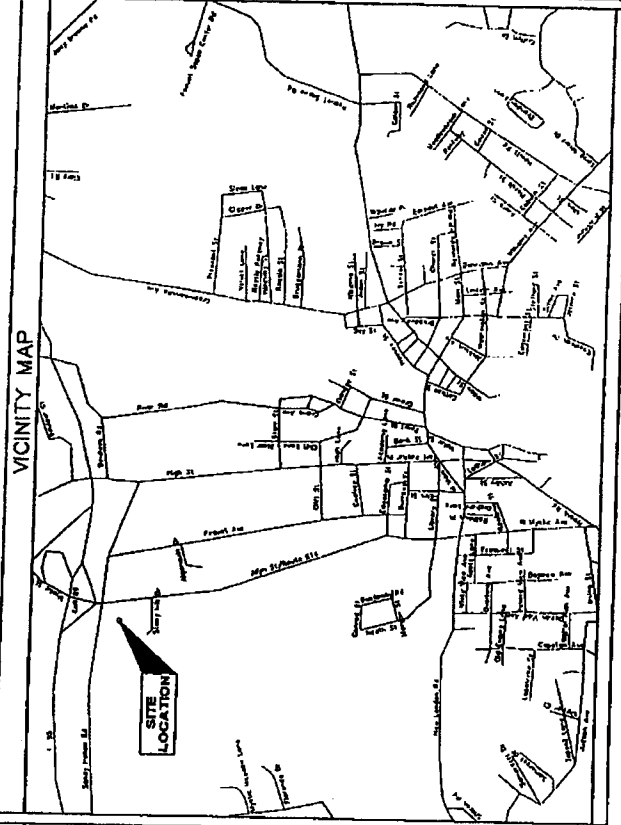
SHEET NO.	SHEET TITLE	REVISION HISTORY	
		NO.	DATE
201	TITLE SHEET	0	05/17/06
202	SITE DEVELOPMENT PLAN	0	05/17/06
203	EROSION CONTROL & DRAINAGE PLAN	0	05/17/06
204	COMPOUND PLAN & TOWER ELEVATION	0	05/17/06
205	SITE DETAILS	0	05/17/06

DO NOT SCALE DRAWINGS

CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND LOCATIONS OF EXISTING CONDITIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY REPORT ANY DISCREPANCIES TO THE ENGINEER FOR CORRECTION BEFORE PROCEEDING WITH THE WORK OF THE CONTRACTOR FOR SAME.

CALL ABOVE NO. 26

SAVE BIG, CALL BEFORE YOU DIG.
 1-800-922-4455



PROJECT SUMMARY

SITE NAME: MCF GROTON
SITE ADDRESS: 237 SANDY HOLLOW ROAD GROTON, CT 06355
PROPERTY OWNER: MCF OVER AIRMILAGE ASSOCIATION ATISTIC, CT 06398
APPLICANT: MCF COMMUNICATIONS, INC. 666 MAIN STREET, SUITE 114 WESTPORT, MA 01887
CONTACT: MICHAEL HOFMANN (774) 656-7300
CO-APPLICANT: OVERPORT COMMUNICATIONS, INC. 100 VALLEY STREET BLOOMFIELD, CT 06002
2C COORDINATES: 41° 22' 09.47" N 71° 56' 54.7" W
HORIZONTAL DATUM: NAD 83
GROUND ELEVATION: 127' AMSL
GRID REFERENCE: EPOCH 516, PAGE 635
TAX ID--B-L: 281900-04-4371
CURRENT ZONING: RS-30
ENGINEER: GLENN HANBOLD & ASSOCIATES LLP SUITE 212 ROCKY HILL, CT 06067
CONTACT: PAUL LUSTAR (860) 237-4557

DRIVING DIRECTIONS

FROM I-93 SOUTH:
 -EXIT 103A (EXIT 103) ST. MARYS/GROTON, LEAVE RT
 -TURN LEFT ON WYCKE ST.
 -DRIVE STRAIGHT TO END OF OLD ALLIANCE ST.
 -DRIVE WAY TO SITE IS FIRST LEFT.

MAY 2006



MCF Communications, Inc.
 680 Main Street, Suite 111
 Westport, MA 01886
 (978) 534-2900

GHA
 GEORGE HANCOCK & ASSOCIATES, INC.
 1000 Main Street, Suite 100
 Westport, MA 01886
 (978) 534-2900

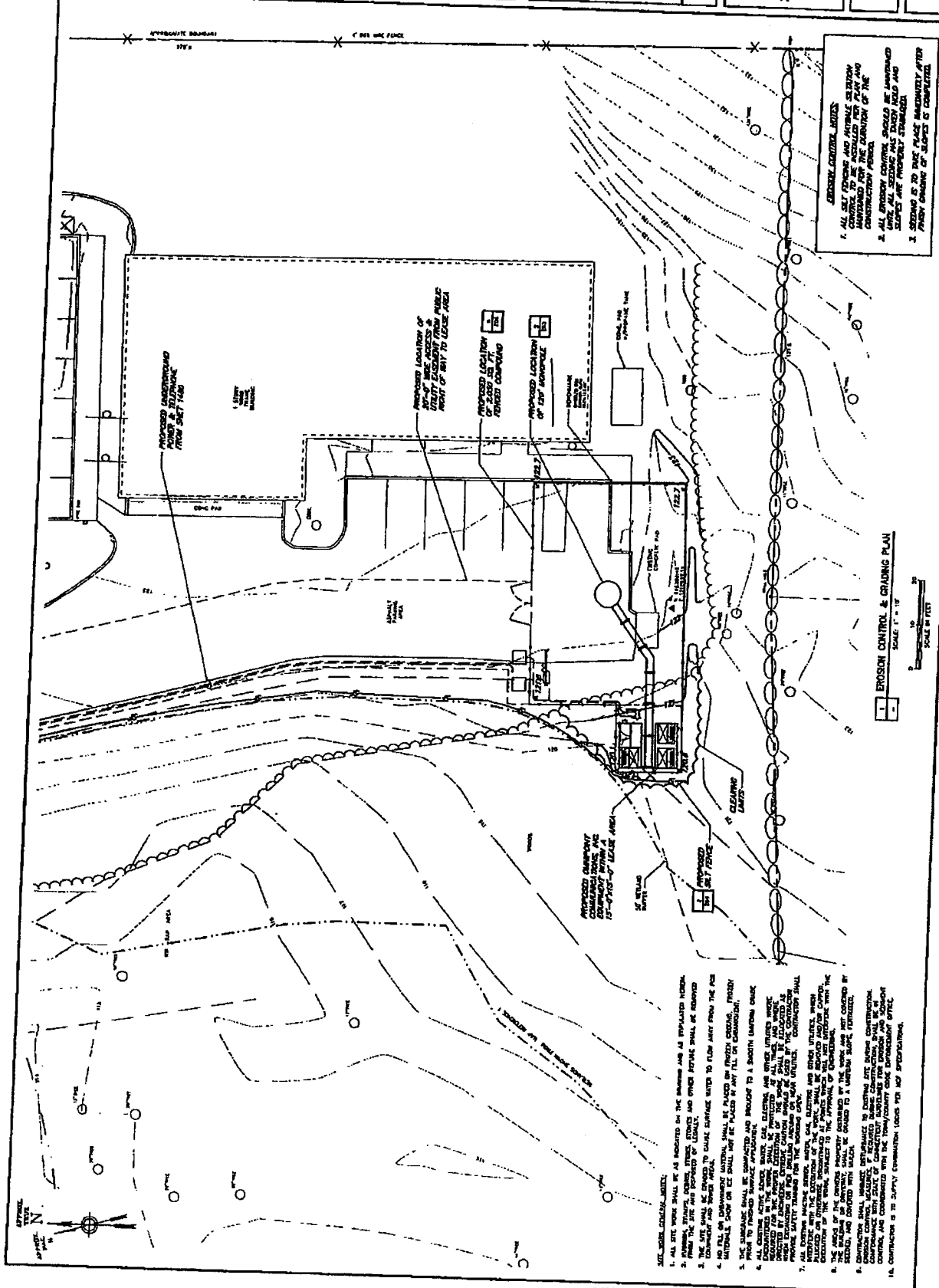
NO.	DATE	DESCRIPTION
1	10/27/03	ISSUED FOR PERMIT
2	11/10/03	REVISED PER PERMIT
3	11/10/03	REVISED PER PERMIT
4	11/10/03	REVISED PER PERMIT
5	11/10/03	REVISED PER PERMIT
6	11/10/03	REVISED PER PERMIT
7	11/10/03	REVISED PER PERMIT
8	11/10/03	REVISED PER PERMIT
9	11/10/03	REVISED PER PERMIT
10	11/10/03	REVISED PER PERMIT

IT IS UNDERSTOOD BY ALL PARTIES CONCERNED THAT THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICABLE AGENCIES.

SITE NAME
MCF GROTON
 SITE ADDRESS
**237 SANDY HOLLOW RD
 GROTON CT 06335**
 NEW LONDON COUNTY

SHEET TITLE
**EROSION CONTROL
 & GRADING PLAN**

SHEET NUMBER
702



- GENERAL NOTES:**
1. ALL SLOPE TRENCHES AND NATURAL SLOPES SHALL BE MAINTAINED TO BE ACCORDING TO THE CONSTRUCTION OF THE CONSTRUCTION PERIOD.
 2. ALL EROSION CONTROL STRUCTURES SHALL BE INSTALLED BEFORE ALL SEDIMENT HAS BEEN WASHED AWAY AND SLOPES ARE PROPERLY STABILIZED.
 3. SEDIMENT IS TO BE PLACED IMMEDIATELY AFTER COMPLETION OF SLOPE IS COMPLETED.

EROSION CONTROL & GRADING PLAN
 SCALE: 1" = 10'
 SCALE IN FEET

- SPECIAL NOTES:**
1. ALL SITE WORK SHALL BE AS INDICATED ON THE DRAWING AND AS SPECIFIED HEREIN.
 2. MATERIALS, METHODS, EQUIPMENT, TOOLS, AND OTHER DETAILS SHALL BE APPROVED BY THE ENGINEER BEFORE USE.
 3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE APPLICABLE AGENCIES.
 4. ALL SLOPE TRENCHES SHALL BE MAINTAINED TO BE ACCORDING TO THE CONSTRUCTION OF THE CONSTRUCTION PERIOD.
 5. ALL SLOPE TRENCHES SHALL BE MAINTAINED TO BE ACCORDING TO THE CONSTRUCTION OF THE CONSTRUCTION PERIOD.
 6. ALL SLOPE TRENCHES SHALL BE MAINTAINED TO BE ACCORDING TO THE CONSTRUCTION OF THE CONSTRUCTION PERIOD.
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 10. ALL SLOPE TRENCHES SHALL BE MAINTAINED TO BE ACCORDING TO THE CONSTRUCTION OF THE CONSTRUCTION PERIOD.

MCF Communications, Inc.
 100 South Street, Suite 114
 Westborough, MA 01581
 (508) 853-1000

GHIA
 CONSULTING ENGINEERS & ARCHITECTS
 110 Park Street, Westborough, MA 01581
 (508) 853-1000

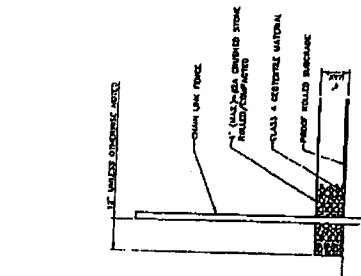
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4	01/15/04	REVISED PERMITS
5	02/15/04	REVISED PERMITS
6	03/15/04	REVISED PERMITS
7	04/15/04	REVISED PERMITS
8	05/15/04	REVISED PERMITS
9	06/15/04	REVISED PERMITS
10	07/15/04	REVISED PERMITS
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14	11/15/04	REVISED PERMITS
15	12/15/04	REVISED PERMITS
16	01/15/05	REVISED PERMITS
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96	09/15/11	REVISED PERMITS
97	10/15/11	REVISED PERMITS
98	11/15/11	REVISED PERMITS
99	12/15/11	REVISED PERMITS
100	01/15/12	REVISED PERMITS

11. IF A PORTION OF LOT FOR ANY PERMITS
 IS TO BE USED FOR ANY OTHER PURPOSE,
 THE PERMITS MUST BE REVISED.
 TO BE IN FULL COMPLIANCE

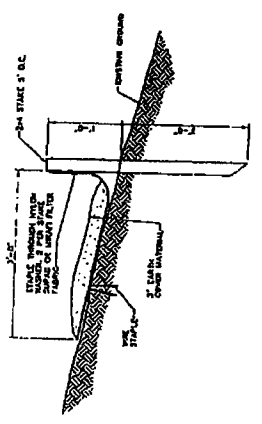
SITE NAME
 MCF GROTON
SITE ADDRESS
 237 SANDY HOLLOW RD
 GROTON, CT
 06355
 NEW LONDON COUNTY

SHEET TITLE
 SITE DETAILS

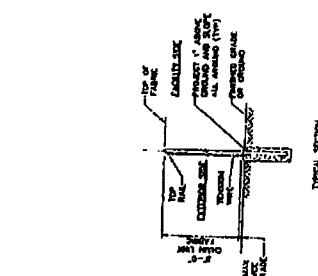
SHEET NUMBER
 Z04



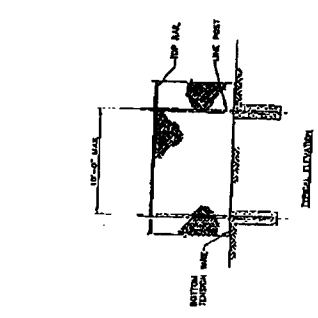
1.7' WOODEN CORNER FENCE DETAIL
 NO SCALE



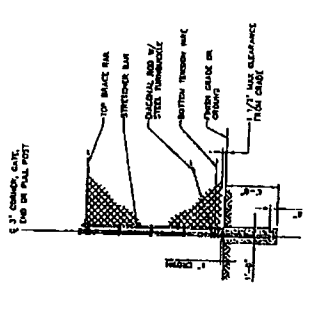
3. SILENT FENCE DETAIL
 NO SCALE



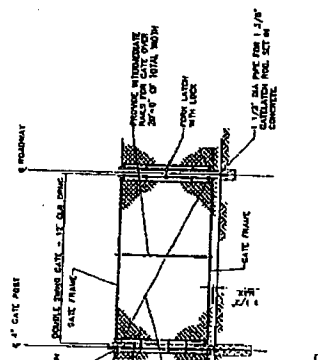
3. WOVEN WIRE FENCE DETAIL
 NO SCALE



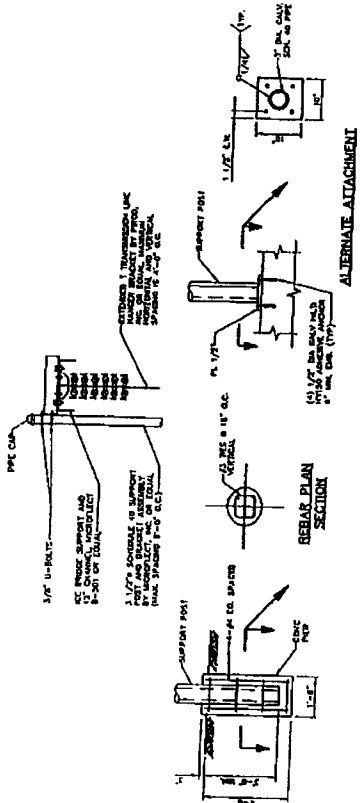
3. WOVEN WIRE FENCE DETAIL
 NO SCALE



3. WOVEN WIRE CORNER, GATE, END OR PULL POST DETAIL
 NO SCALE

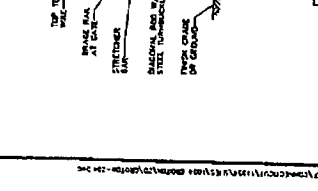


4. WOVEN WIRE SWING GATE DOUBLE DETAIL
 NO SCALE

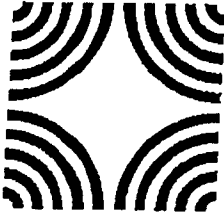


ALTERNATE ATTACHMENT
 NO SCALE

NOTE: THE BRACKLE SHALL SPAN NO MORE THAN 8'-0\"/>



4. WOVEN WIRE SWING GATE DOUBLE DETAIL
 NO SCALE



Connecticut Commission on Culture & Tourism

May 9, 2006

Historic Preservation
& Museum Division

Mr. David R. George
Heritage Consultants LLC
877 Main Street
Newington, CT 06111

59 South Prospect Street
Hartford, Connecticut
06106

Subject: Telecommunications Facilities
Sandy Hollow Road
West Mystic (Groton), CT
EBI #61052697, CTNL053A

(v) 860.566.3005
(f) 860.566.5078

Dear Mr. George:

The State Historic Preservation Office has reviewed the reconnaissance survey prepared by Heritage Consultants LLC concerning the above-named project. In the opinion of the State Historic Preservation Office, the archival and archaeological methodologies employed by Heritage Consultants LLC are consistent with our *Environmental Review Primer for Connecticut's Archaeological Resources*.

The State Historic Preservation Office concurs with Heritage Consultants LLC that no further archaeological investigations appear warranted with respect to the proposed undertaking. This office believes that the proposed undertaking will have no effect upon Connecticut's archaeological heritage.

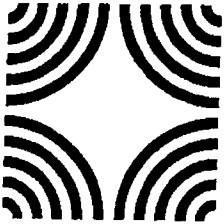
This office recommends that Heritage Consultants LLC consult with the Office of State Archaeology at the University of Connecticut (Storrs) concerning the professional transfer of all field notes, photographs, and artifactual materials generated by the archaeological investigations.

This comment updates and supersedes all previous correspondence regarding the proposed project. For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

cc: Bellantoni, Knowles, Mackey



Connecticut Commission on Culture & Tourism

JUN - 1 2006

May 26, 2006

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Mr. James R. Kodlick
BL Companies
One South Market Square
213 Market Street, 6th Floor
Harrisburg, PA 17101

Subject: Telecommunications Facilities
237 Sandy Hollow Road
Groton, CT
BL #06L0968, EBI #61052697, CTNL053A
869

Dear Mr. Kodlick:

The State Historic Preservation Office has reviewed the above-named project. This office expects that the proposed undertaking will have no effect on historic, architectural, or archaeological resources listed on or eligible for the National Register of Historic Places.

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,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

PART IV
Natural Resources



Companies

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 26, 2006

Mr. Marvin Moriarty
United States Fish and Wildlife Service
Regional Director
300 Westgate Center Drive
Hadley, Massachusetts 01035

RE: T&E Species Review
MCF Groton Site
237 Sandy Hollow Road
New London County, Connecticut
BL Project No. 06L0869

Dear Mr. Moriarty:

On Behalf of MCF Communications, BL Companies is performing a National Environmental Policy Act (NEPA) site assessment for the MCF Groton Site located at 237 Sandy Hollow Road in Groton, New London County, Connecticut. A location map taken from the Mystic, Connecticut USGS quadrangle mapping is attached. The purpose of the review is to determine whether site construction activity will impact environmental resources. As a regulated utility licensed by the Federal Communications Commission (FCC), MCF Communications, Inc. is required to consider the effects of proposed actions as identified in the FCC regulations implementing NEPA (47 CFR 1.1307).

MCF Communications, Inc. is proposing to construct a telecommunications tower at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road.

Land use at the site currently consists of a paved parking lot and an undeveloped wooded area, with a canopy consisting of red maple (*Acer rubrum*) and white oak (*Quercus alba*) ranging in size from 15 to 30 feet tall and having 8 to 12 diameters at breast height. Land use within the vicinity of the site consists primarily of highway corridors, and private residences. Features indicative of wetland communities, including hydric soils, hydrophytic vegetation, and wetland hydrology, were not observed at the site.

One South Market Square 213 Market Street, 6th Floor Harrisburg, PA 17101 Tel. (717) 651-9850 Fax (717) 651-9858

Architecture • Engineering • Planning • Landscape Architecture • Land Surveying • Environmental Sciences

BL Companies Pennsylvania, Inc. • David G. Ball, AIA • Mark S. Koeltner, PG • Michael A. Lozanoff, PE • Rainer A. Muhlbauer, AIA • Stanley C. Novak, PE



Mr. Marvin Moriarty
United States Fish and Wildlife Service
BL Project No. 06L0869
May 26, 2006
Page 2 of 2

BL Companies is requesting information regarding potential threatened or endangered species or designated critical habitats at the site. Please contact me concerning the results of your search via mail, fax, or telephone. Thank you for your assistance in this matter.

Sincerely,

BL Companies

A handwritten signature in black ink that reads "Olivia A. Braun". The signature is written in a cursive, flowing style.

Olivia A. Braun
Project Scientist

Attachment



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

July 5, 2006

Reference:	<u>Project</u>	<u>Location</u>
	Tower	Putnam, CT, BL # 06L0870
	Tower	Groton, CT, BL # 06L0869

Olivia Braun
BL Companies
One South Market Square
213 Market St., 6th floor
Harrisburg, PA 17101

Dear Ms. Braun:

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. **In the future, in order to expedite your reply, please direct any inquiries of this nature to this office at the above address.**

Sincerely yours,

Michael J. Amaral
Endangered Species Specialist
New England Field Office



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 26, 2006

Connecticut Bureau of Natural Resources
Wildlife Division
Main Office
79 Elm Street
Hartford, Connecticut 06106-5127

RE: T&E Species Review
MCF Groton Site
237 Sandy Hollow Road
New London County, Connecticut
BL Project No. 06L0869

To Whom It May Concern:

On Behalf of MCF Communications, Inc., BL Companies is performing a National Environmental Policy Act (NEPA) site assessment for the MCF Groton Site located at 237 Sandy Hollow Road in Groton, New London County, Connecticut. A location map taken from the Mystic, Connecticut USGS quadrangle mapping is attached. The purpose of the review is to determine whether site construction activity will impact environmental resources. As a regulated utility licensed by the Federal Communications Commission (FCC), MCF Communications, Inc. is required to consider the effects of proposed actions as identified in the FCC regulations implementing NEPA (47 CFR 1.1307).

MCF Communications, Inc. is proposing to construct a telecommunications tower at 237 Sandy Hollow Road in Groton, New London County, Connecticut. The proposed site will consist of a 2,050-square-foot fenced compound containing a 120-foot tall monopole telecommunications tower and a 15- by 15-foot lease area for associated equipment. The site currently consists of an asphalt driveway and undeveloped wooded area. The proposed compound will be accessed via an existing paved driveway and parking area associated with the Mystic River Ambulance facility, which extends from Sandy Hollow Road.

Land use at the site currently consists of a paved parking lot and an undeveloped wooded area, with a canopy consisting of red maple (*Acer rubrum*) and white oak (*Quercus alba*) ranging in size from 15 to 30 feet tall and having 8 to 12 diameters at breast height. Land use within the vicinity of the site consists primarily of highway corridors, and private residences. Features indicative of wetland communities, including hydric soils, hydrophytic vegetation, and wetland hydrology, were not observed at the site.

One South Market Square 213 Market Street, 6th Floor Harrisburg, PA 17101 Tel. (717) 651-9850 Fax (717) 651-9858

Architecture • Engineering • Planning • Landscape Architecture • Land Surveying • Environmental Sciences

BL Companies Pennsylvania, Inc. • David G. Boll, AIA • Mark S. Koelner, PG • Michael A. Lozanoff, PE • Rainer A. Muhlbauer, AIA • Stanley C. Novak, PE



Connecticut Bureau of Natural Resources
Wildlife Division
BL Project No. 06L0869
May 26, 2006
Page 2 of 2

BL Companies is requesting information regarding potential threatened or endangered species or designated critical habitats at the site. Please contact me concerning the results of your search via mail, fax, or telephone. Thank you for your assistance in this matter.

Sincerely,

BL Companies

A handwritten signature in black ink that reads "Olivia A. Braun". The signature is written in a cursive style.

Olivia A. Braun
Project Scientist

Attachment



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Natural Diversity Data Base

June 29, 2006

JUL - 5 2006

Olivia A. Braun
Project Scientist
BL Companies
One South Market Square
213 Market St, 6th Fl.
Harrisburg, PA 17101

Re: MCF Groton Site, 237 Sandy
Hollow Road, New London, BL Project
~~No. 06140869~~

Dear Ms. Braun :

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided and listed above. According to our information, there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species at the site in question.

Natural Diversity Data Base information includes all information regarding critical biologic resources available to us at the time of the request. This information is a compilation of data collected over the years by the Environmental and Geographic Information Center's Geological and Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base 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 Data Base as it becomes available.

Please contact me if you have further questions regarding this information (424-3585). Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Nancy Murray
Biologist/Senior Environmental Analyst
NDDB Program Coordinator

NM/blm



APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

FIRM
FLOOD INSURANCE RATE MAP

TOWN OF
GROTON,
CONNECTICUT
NEW LONDON COUNTY

PANEL 10 OF 11

(SEE MAP INDEX FOR PANELS NOT PRINTED)

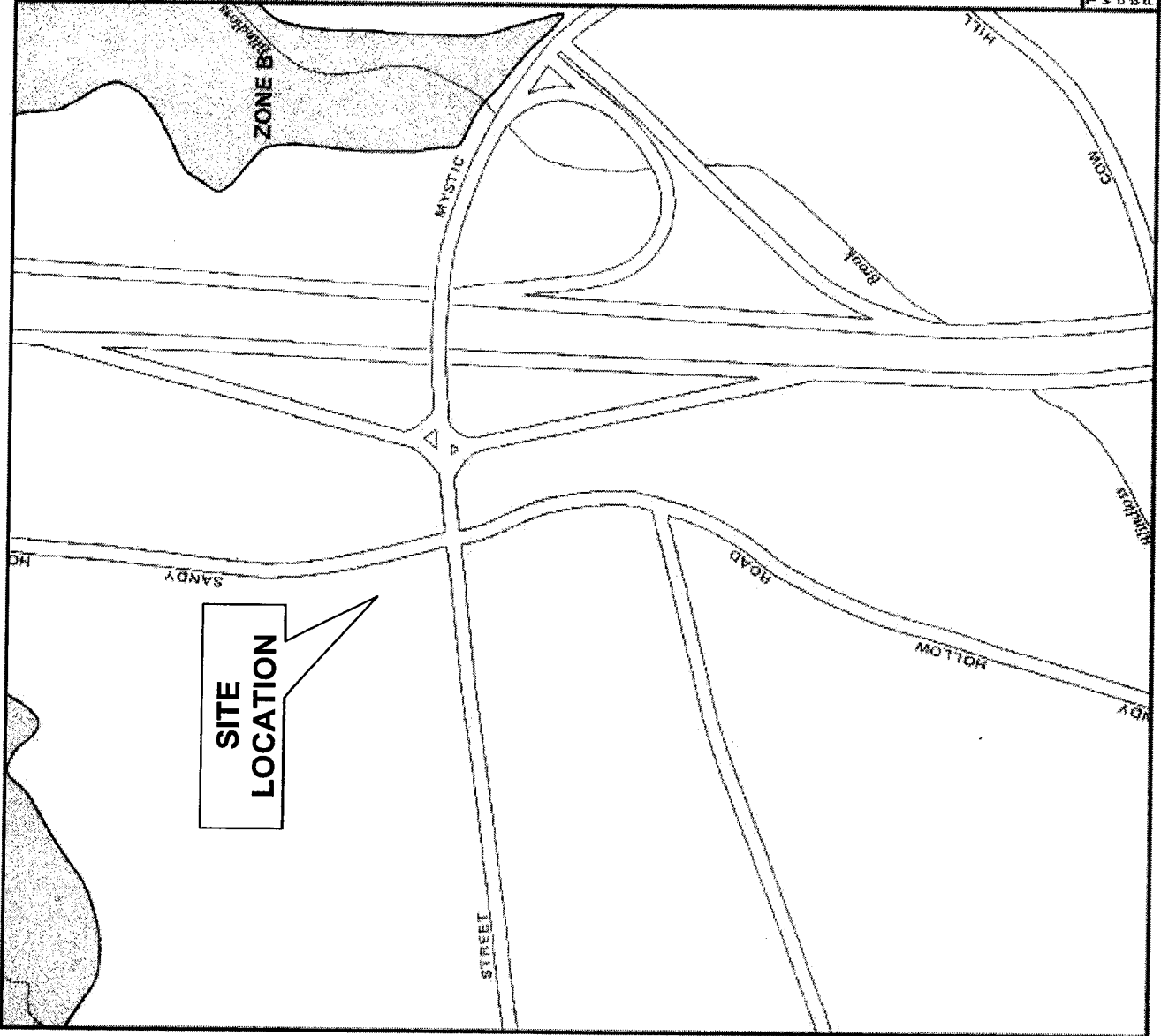
COMMUNITY-PANEL NUMBER
09D097 0010 C

MAP REVISED:
AUGUST 15, 1984

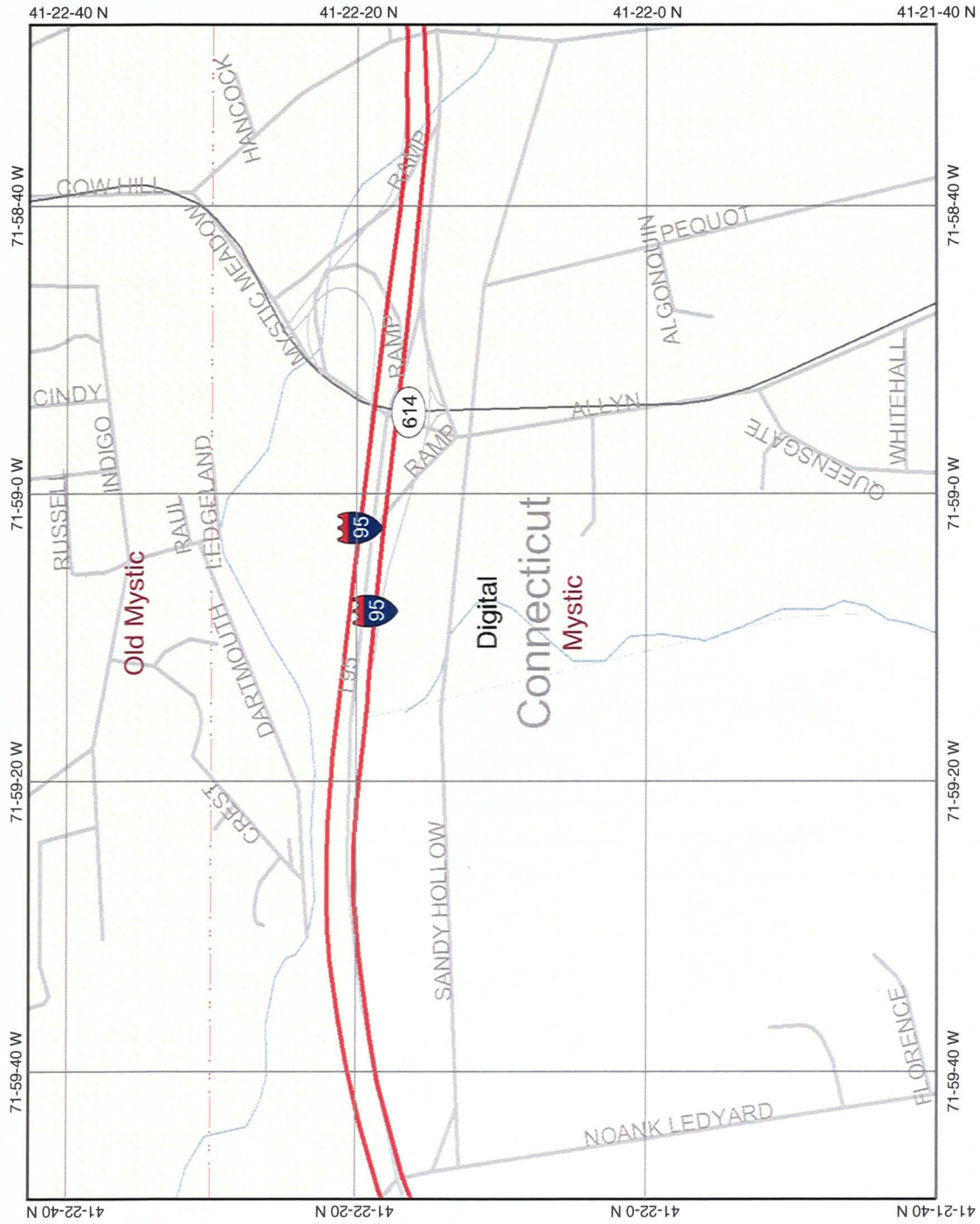


Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using 3-HIT CUT-LINE. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov



237 Sandy Hollow Road



Map center: 41° 22' 11" N, 71° 59' 8" W



Legend

- Interstate
- Major Roads
- Other Road
- Interstate
- State highway
- US highway
- Roads
- Cities
- USGS Quad Index 24K
- Lower 48 Available Wetland Data
- Non-Digital
- Digital
- No Data
- Scan
- NHD Waterbodies
- NHD Streams
- Counties 100K
- Urban Areas 300K
- States 100K
- South America
- North America



Scale: 1:18,079

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.



June 27, 2007

Ms. Nicole Frazer
Clough Harbor and Associates
111 Winners Circle
Albany, New York 12205

RE: Wetland Determination
MCF Groton Site
237 Sandy Hollow Road, New London County, Connecticut
BL Project No. 06L0869

As part of the NEPA compliance services performed by **BL Companies** on the above reference Site, a visual assessment for the presence/absence of wetland communities was performed at the proposed telecommunications tower facility located at 237 Sandy Hollow Road in New London County, Connecticut (see Figure 1). The study was conducted on May 17, 2006 using lease exhibits (ZDs) dated May 1, 2007, which were provided by the Client.

The purpose of this study was to confirm the presence or absence of regulated wetland systems and their buffer zones on-site. The results of this investigation are discussed below. The United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) mapping indicates the absence of wetlands located on the subject property (see Figure 2).

According to the ZD's provided by the Client, the edge of the proposed telecommunications compound is approximately 50 feet from a mapped wetland and very near the edge of a buffer zone. However, based on the provided ZDs and on-site observations made as part of the wetland determination, BL Companies confirmed that the proposed telecommunications facility will not be situated in a regulated wetland resource.

Land use at the site currently consists of a paved parking lot and an undeveloped wooded area, with a canopy consisting of red maple (*Acer rubrum*) and white oak (*Quercus alba*) ranging in size from 15 to 30 feet tall and having 8 to 12 diameters at breast height. Land use within the vicinity of the site consists primarily of highway corridors, and private residences. Features indicative of wetland communities, including

Ms. Nicole Frazer
BL Project No. 06L0869
June 27, 2007
Page 2


hydric soils, hydrophytic vegetation, and wetland hydrology, were not observed at the site.

Based upon these observations, it has been determined that there will be no wetland communities impacted by the proposed undertaking. It should be noted that these findings are only valid with regard to the proposed telecommunications facility layout as depicted on the Client provided ZDs dated May 1, 2007.

BL Companies appreciates the opportunity to provide environmental services to you. Should you have any questions regarding the above, please contact me at your convenience.

Respectfully submitted,

BL Companies



Scott V. Mowery, BA
Project Manager



James R. Kodlick, PWS, RPA, CE
Principal

Attachments

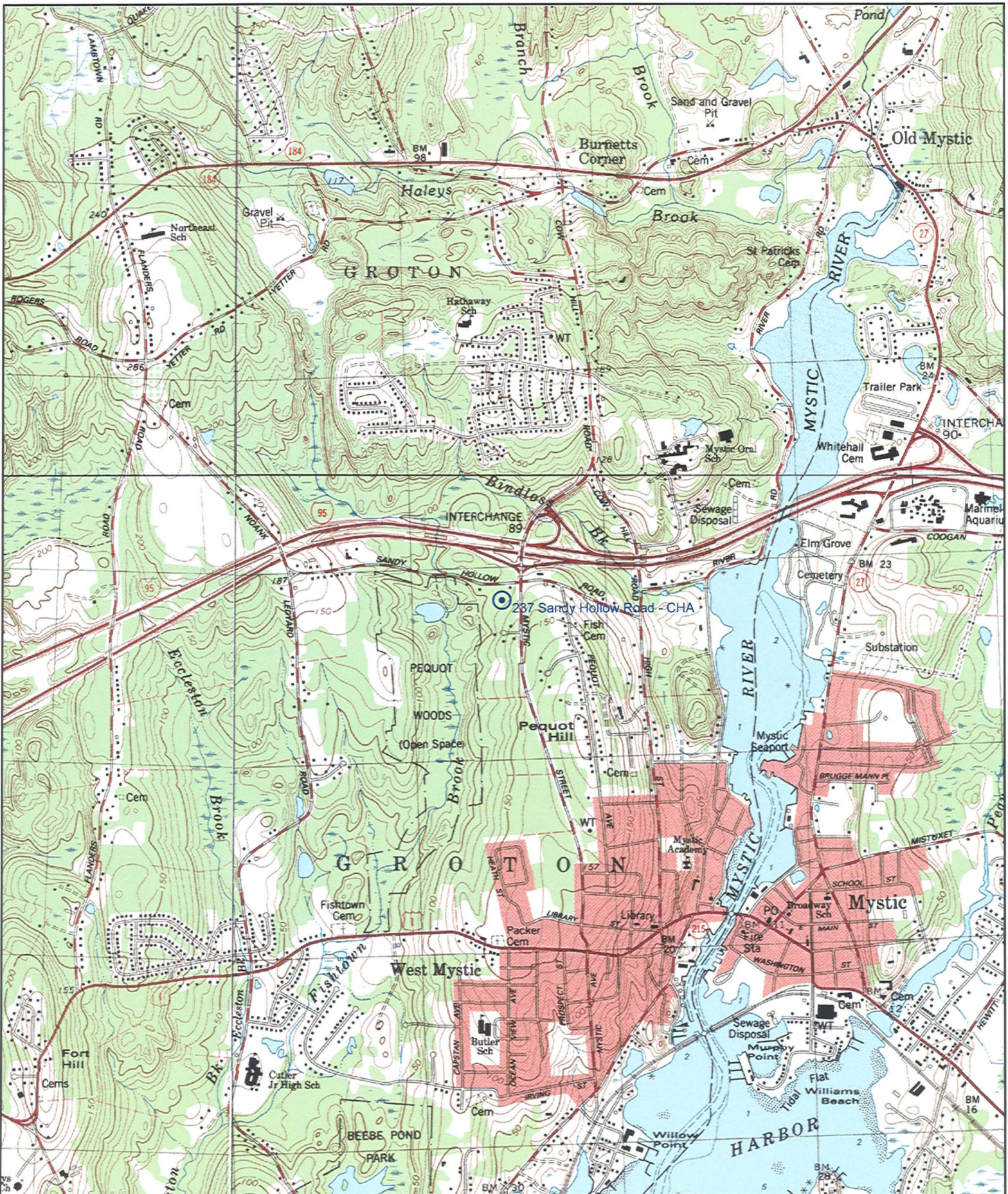
FIGURES

Figure 1 Site Location Map

Figure 2 National Wetlands Inventory Map

Figure 1

Site Location Map



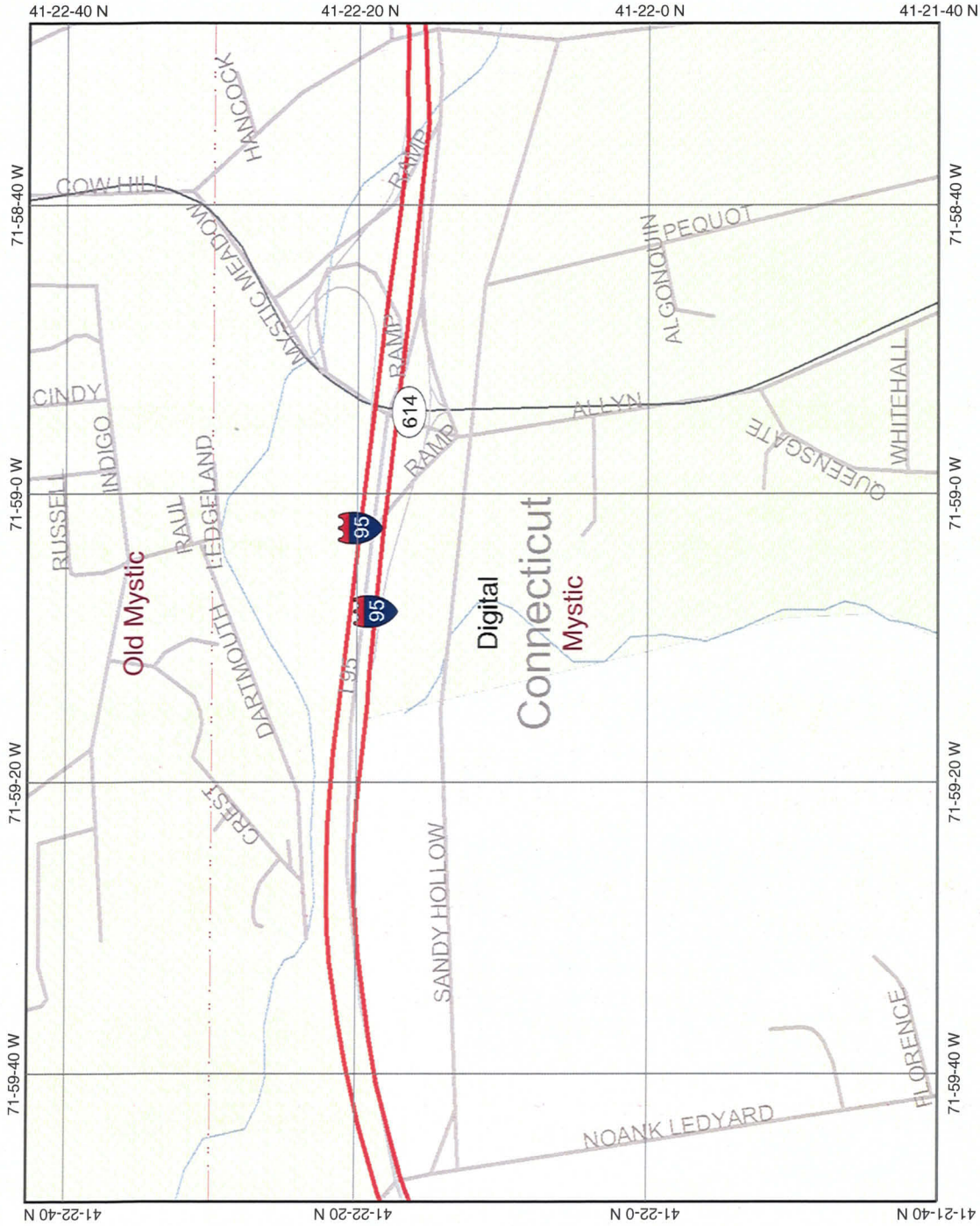
Name: MYSTIC
 Date: 5/4/2006
 Scale: 1 inch equals 2000 feet

Location: 041° 22' 08.8" N 071° 59' 00.5" W
 Caption: 1984

Figure 2

National Wetlands Inventory Map

237 Sandy Hollow Road



Map center: 41° 22' 11" N, 71° 59' 8" W

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.



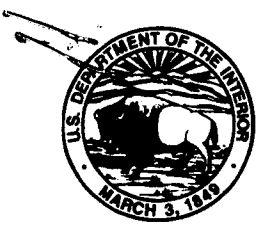
Legend

- Interstate
- Major Roads
- Other Road
- Interstate
- State highway
- US highway
- Roads
- Cities
- USGS Quad Index 24K
- Lower 48 Available Wetland Data
- Non-Digital
- Digital
- No Data
- Scan
- NHD Waterbodies
- NHD Streams
- Counties 100K
- Urban Areas 300K
- States 100K
- South America
- North America



Scale: 1:18,079

Attachment 3



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087



June 4, 2007

Nicole Frazer
Clough Harbour & Associates LLP
P.O. Box 5269
Albany, NY 12205-0269

Dear Ms. Frazer:

We are in receipt of your recent letter requesting our endangered species review with regard to your proposed telecommunications project.

We recently distributed a letter (enclosed) which we hope will streamline the consultation process.

Please review our letter. We're confident that it will adequately respond to your request. If you have any questions, please contact me at 603-223-2541.

Sincerely yours,

Anthony P. Tur
Endangered Species Specialist
New England Field Office

Enclosure

RECEIVED

JUN 06 2007

Clough, Harbour & Associates LLP



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

March 6, 2007

To Whom It May Concern:

The U.S. Fish and Wildlife Service's (Service) New England Field Office has determined that individual project review for certain types of activities associated with communication towers **is not required**. These comments are submitted in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Due to the rapid expansion of the telecommunication industry, we are receiving a growing number of requests for review of **existing** and **new** telecommunication facilities in relation to the presence of federally-listed or proposed, threatened or endangered species, critical habitat, wilderness areas and/or wildlife preserves. We have evaluated our review process for proposed communications towers and believe that individual correspondence with this office is not required for the following types of actions relative to **existing** facilities:

1. the re-licensing of existing telecommunication facilities;
2. audits of existing facilities associated with acquisition;
3. routine maintenance of existing tower sites, such as painting, antenna or panel replacement, upgrading of existing equipment, etc.;
4. co-location of new antenna facilities on/in existing structures;
5. repair or replacement of existing towers and/or equipment, provided such activities do not significantly increase the existing tower mass and height, or require the addition of guy wires.

In order to curtail the need to contact this office in the future for individual environmental review for **existing** communication towers or antenna facilities, please note that we are not aware of any federally-listed, threatened or endangered species that are being adversely affected by any existing communication tower or antenna facility in the following states: Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts. Furthermore, we are not aware of any **existing** telecommunication towers in federally-designated critical habitats, wilderness areas or wildlife preserves. Therefore, no further consultation with this office relative to the impact of the above referenced activities on federally-listed species is required.

Future Coordination with this Office Relative to New Telecommunication Facilities

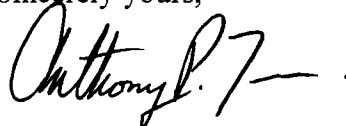
We have determined that proposed projects are not likely to adversely affect any federally-listed or proposed species when the following steps are taken to evaluate new telecommunication facilities:

1. If the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building, no further coordination with this office is necessary. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.
2. If the above criteria cannot be met, your review of the attached lists of threatened and endangered species locations within Vermont, New Hampshire, Rhode Island, Connecticut and Massachusetts may confirm that no federally-listed endangered or threatened species are known to occur in the town or county where the project is proposed.
3. If a listed species is present in the town or county where the project is proposed, further review of our enclosed lists of threatened and endangered species may allow you to conclude that suitable habitat for the species will not be affected. Based on past experiences, we anticipate that there will be few, if any, projects that are likely to impact piping plovers, roseate terns, bog turtles, Jesup's milkvetch or other such species that are found on coastal beaches, riverine habitats or in wetlands because communication towers typically are not located in these habitats.

For projects that meet the above criteria, there is no need to contact this office for further project review. A copy of this letter should be retained in your file as the Service's determination that no listed species are present, or that listed species in the general area will not be affected. Due to the high workload associated with responding to many individual requests for threatened and endangered species information, we will no longer be providing response letters for activities that meet the above criteria. This correspondence and the enclosed species lists remain valid until January 1, 2008.

Thank you for your cooperation, and please contact me at 603-223-2541 for further assistance.

Sincerely yours,



Anthony P. Tur
Endangered Species Specialist
New England Field Office

Enclosures

FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES
IN CONNECTICUT

Common Name	Species	Status	County/General Distribution
Sturgeon, shortnose ¹	<i>Acipenser brevirostrum</i>	E	Atlantic coastal waters and Connecticut River
Bat, Indiana	<i>Myotis sodalis</i>	E	New Haven/hibernaculum
Eagle, bald	<i>Haliaeetus leucocephalus</i>	T	Nesting: Hartford, Litchfield Wintering: entire state, major rivers
Plover, piping	<i>Charadrius melodus</i>	T	Nesting: Fairfield, Middlesex, New Haven, New London (coastal beaches) Migratory: Atlantic Coast
Tern, Roseate	<i>Sterna dougallii dougallii</i>	E	Nesting: New Haven (coastal island) Migratory: Atlantic Coast
Turtle, bog	<i>Clemmys mühlenbergii</i>	T	Fairfield, Litchfield
Wedge mussel, dwarf	<i>Alasmidonta heterodon</i>	E	Hartford
Beetle, Puritan tiger	<i>Cicindela puritana</i>	T	Hartford, Middlesex (Connecticut River floodplain)
Beetle, Northeastern beach	<i>Cicindela dorsalis dorsalis</i>	T	Coastal beaches/Extirpated
Small whorled pogonia	<i>Isotria medeoloides</i>	T	Litchfield, New Haven
Sandplain gerardia	<i>Agalinus acuta</i>	E	Hartford
Chaffseed	<i>Scwalbea Americana</i>	E	New London/Historic

¹ Principal responsibility for this species is vested with the National Marine Fisheries Service.



CLOUGH HARBOUR & ASSOCIATES LLP

May 21, 2007

Mr. Michael Amaral
US Fish and Wildlife Service
New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087

**RE: Threatened and Endangered Species Information Request
Groton, New London County, CT
CHA Project No.: 14957.1004.1106**

Dear Mr. Amaral:

Our firm is conducting an environmental review pursuant to the National Environmental Policy Act (NEPA) for the following project:

Groton Communications Facility, Groton, New London County, CT (approx. Lat. 41- 22-9.4/ Long. 71-58-56.7). The proposed project entails the construction of a 130-foot monopole. The associated ground equipment will be located at the base of the tower within a 35' x 50' lease area with a 15' x 15' bump out. The proposed site will be accessed by an existing driveway. The site is a combination of undeveloped forest and asphalt driveway.

Your office provided a response to a previous information request on July 2, 2006 (see attached). The project is being resubmitted because the proposed tower height has increased by 10' and because it has been almost a year since your office has reviewed the project.

Please accept this letter as a request for information on the potential presence of any threatened or endangered species and wildlife preserves on or within the vicinity of the above project site. A site location map has been included with this letter for your reference and review.

Should you have any questions please contact me at (518) 453-8211 or nfrazer@cha-llp.com.

Very truly yours,

CLOUGH HARBOUR & ASSOCIATES LLP

A handwritten signature in black ink, appearing to read 'Nicole E. Frazer'.

Nicole E. Frazer
Environmental Scientist



1 USGS TOPO MAP: MYSTIC 41071-CB
 SCALE: 1" = 2000'
 0 1000 2000
 SCALE IN FEET



Drawing Copyright © 2008 Clough Harbour & Associates LLP

CHA
 CLOUGH HARBOUR & ASSOCIATES LLP
 2130 Blue Deane Highway, Suite 215 - Rocky Hill, CT 06067-2338
 Tel: (860) 287-4887 - www.cloughharbour.com

CHA PROJ. NO. - 14957-1004

MCF Communications, Inc.
 733 TURNPIKE STREET, SUITE 105
 NORTH ANDOVER, MA 01845
 OFFICE: (978) 687-2538
 FAX: (978) 258-8850

SITE NAME:
MCF GROTON
 SITE ADDRESS:
**237 SANDY HOLLOW ROAD
 GROTON, CT 06355
 NEW LONDON COUNTY**

SHEET TITLE:
USGS TOPO MAP

DATE:
09/14/06

REVISION:
0



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Field Office
70 Commercial Street, Suite 300
Concord, New Hampshire 03301-5087

July 5, 2006

Reference:	<u>Project</u>	<u>Location</u>
	Tower	Putnam, CT, BL # 06L0870
	Tower	Groton, CT, BL # 06L0869

Olivia Braun
BL Companies
One South Market Square
213 Market St., 6th floor
Harrisburg, PA 17101

Dear Ms. Braun:

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.

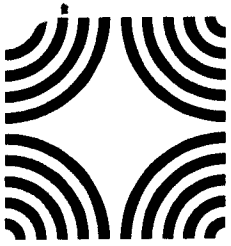
This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed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

Thank you for your coordination. Please contact us at 603-223-2541 if we can be of further assistance. **In the future, in order to expedite your reply, please direct any inquiries of this nature to this office at the above address.**

Sincerely yours,

Michael J. Amaral
Endangered Species Specialist
New England Field Office

Attachment 4



Connecticut Commission on Culture & Tourism

May 24, 2007

Historic Preservation
& Museum Division

Ms. Nicole E. Frazer
Clough Harbour & Associates LLP
111 Winners Circle
PO Box 5269
Albany, NY 12205-0269

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Subject: Telecommunications Facilities
237 Sandy Hollow Road
Groton, CT
CHA #16109.1001.1106

Dear Ms. Frazer:

The State Historic Preservation Office has reviewed the above-named project. This office expects that the proposed undertaking will have no effect on historic, architectural, or archaeological resources listed on or eligible for the National Register of Historic Places.

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

RECEIVED

JUN 04 2007

Clough, Harbour & Associates LLP



CLOUGH HARBOUR & ASSOCIATES LLP

May 21, 2007

Mr. Dave Poirier
Connecticut State Historic Preservation Office
Historic Preservation and Museum Division
59 South Prospect Street
Hartford, CT 06106

RE: MCF Groton Site
Section 106 Review
Groton, New London County, CT
CHA File: 16109.1001.1106
14957 4

Dear Mr. Poirier:

On behalf of MCF Communications, Inc., Clough Harbour & Associates LLP is submitting revised project information to re-request Section 106 review for the proposed Groton Communications Facility. The proposed project site is located at 237 Sandy Hollow Road, in Groton, CT.

On May 26, 2006 your office provided a letter of No Effect for the project (see attached). However, the plans for the proposed project have been slightly revised. The tower was proposed to be 120', and is now proposed to be 130'. Additionally, the tower location was shifted slightly; however, the ground disturbance is still within the original area of disturbance which is a 35' x 50' lease area with a 15' x 15' bump out. Basically, the arrangement of the tower and the associated ground equipment was rearranged. Refer to the attached revised plans for further details.

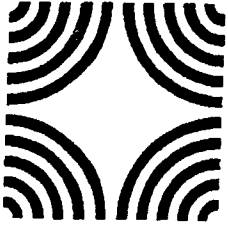
We hope the information contained herein is sufficient for you to complete your review. Should you have any questions, please contact me at 518-453-8211 or nfrazer@cha-llp.com.

Very truly yours,

CLOUGH HARBOUR & ASSOCIATES LLP

A handwritten signature in black ink, appearing to read 'Nicole E. Frazer'.

Nicole E. Frazer
Environmental Scientist



Connecticut Commission on Culture & Tourism

JUN - 1 2006

May 26, 2006

Historic Preservation
& Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Mr. James R. Kodlick
BL Companies
One South Market Square
213 Market Street, 6th Floor
Harrisburg, PA 17101

Subject: Telecommunications Facilities
237 Sandy Hollow Road
Groton, CT
BL #06L0268, EBI #61052697, CTNL053A
869

Dear Mr. Kodlick:

The State Historic Preservation Office has reviewed the above-named project. This office expects that the proposed undertaking will have no effect on historic, architectural, or archaeological resources listed on or eligible for the National Register of Historic Places.

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,

J. Paul Loether
Division Director and Deputy
State Historic Preservation Officer

APPLICANT:
MCF Communications, Inc.
 175 SANDY HOLLOW RD
 GROTON, CT 06340
 OFFICE: (878) 847-2528
 FAX: (878) 284-8887

DESIGNER:
OMNIPONT COMMUNICATIONS, INC.
 A TRISTAR COMPANY
 100 FULLEY STREET
 BLOOMFIELD, CT 06002
 OFFICE: (860) 482-7100
 FAX: (860) 482-7158

CHA
 Design Copyright © 2001, Chicago Highway & Associates LP
 CHICAGO HIGHWAY & ASSOCIATES, L.P.
 1100 West Duane Highway, Suite 711, Naperville, IL 60563-2228
 Phone: (630) 341-1100
 CHA PROJECT NO:
 14827 - 100M - 1801

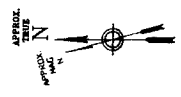
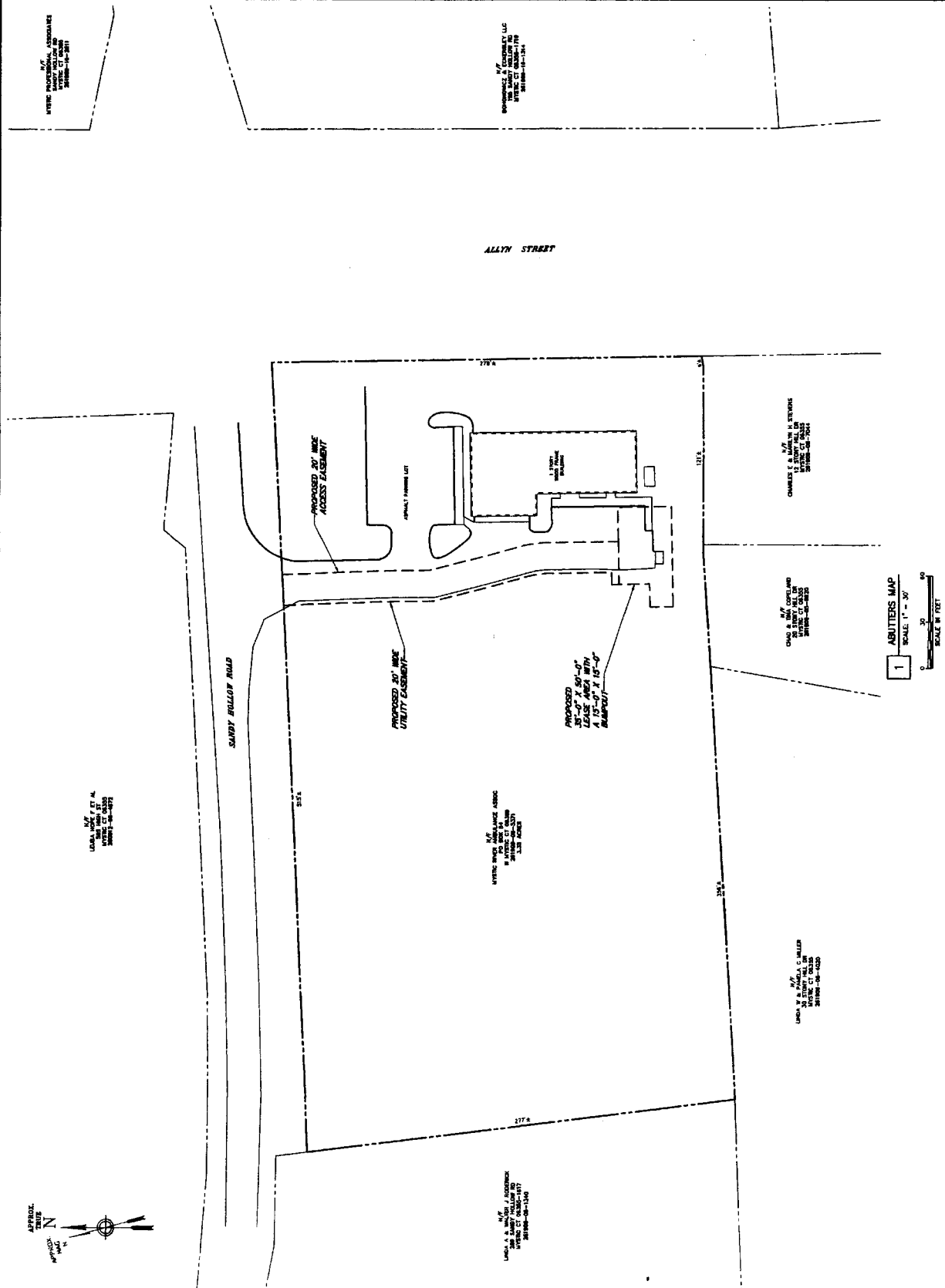
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3	07/17/07	COMPLETED
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9	03/17/08	COMPLETED
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98	08/17/15	RECEIVED FOR COMMENTS
99	09/17/15	COMPLETED
100	10/17/15	RECEIVED FOR COMMENTS

IT IS A VIOLATION OF LAW FOR ANY PERSON TO REPRODUCE OR TRANSMIT THIS DOCUMENT OR TO ALTER THIS DOCUMENT.

SITE NAME:
MCF GROTON
SITE ADDRESS:
237 SANDY HOLLOW RD
GROTON, CT
06355
NEW LONDON COUNTY

SHEET TITLE:
ABUTTERS MAP

SHEET NUMBER:
A01



1 ABUTTERS MAP
 SCALE: 1" = 30'
 SCALE IN FEET

APPLICANT:
MCF Communications, Inc.
 750 WEST 120TH STREET
 NORTH ANDOVER, MA 01854
 OFFICE: (978) 687-5288
 FAX: (978) 288-8880

CON-SUBMITTER:
OMNIPONT COMMUNICATIONS, INC.
 A DIVISION OF THE COMMUNICATIONS COMPANY OF MASSACHUSETTS, INC.
 100 FOLEY STREET
 BLOOMFIELD, CT 06002
 OFFICE: (860) 482-7100
 FAX: (860) 482-7129

CHA
 CHESAPEAKE HARBOR & ASSOCIATES LLP
 278 Old Corner Highway, Suite 212, North Attle, CT 06262-2328
 Phone: (617) 851-0000
 CHA PROJECT NO:
 14687 - 1004 - 11801

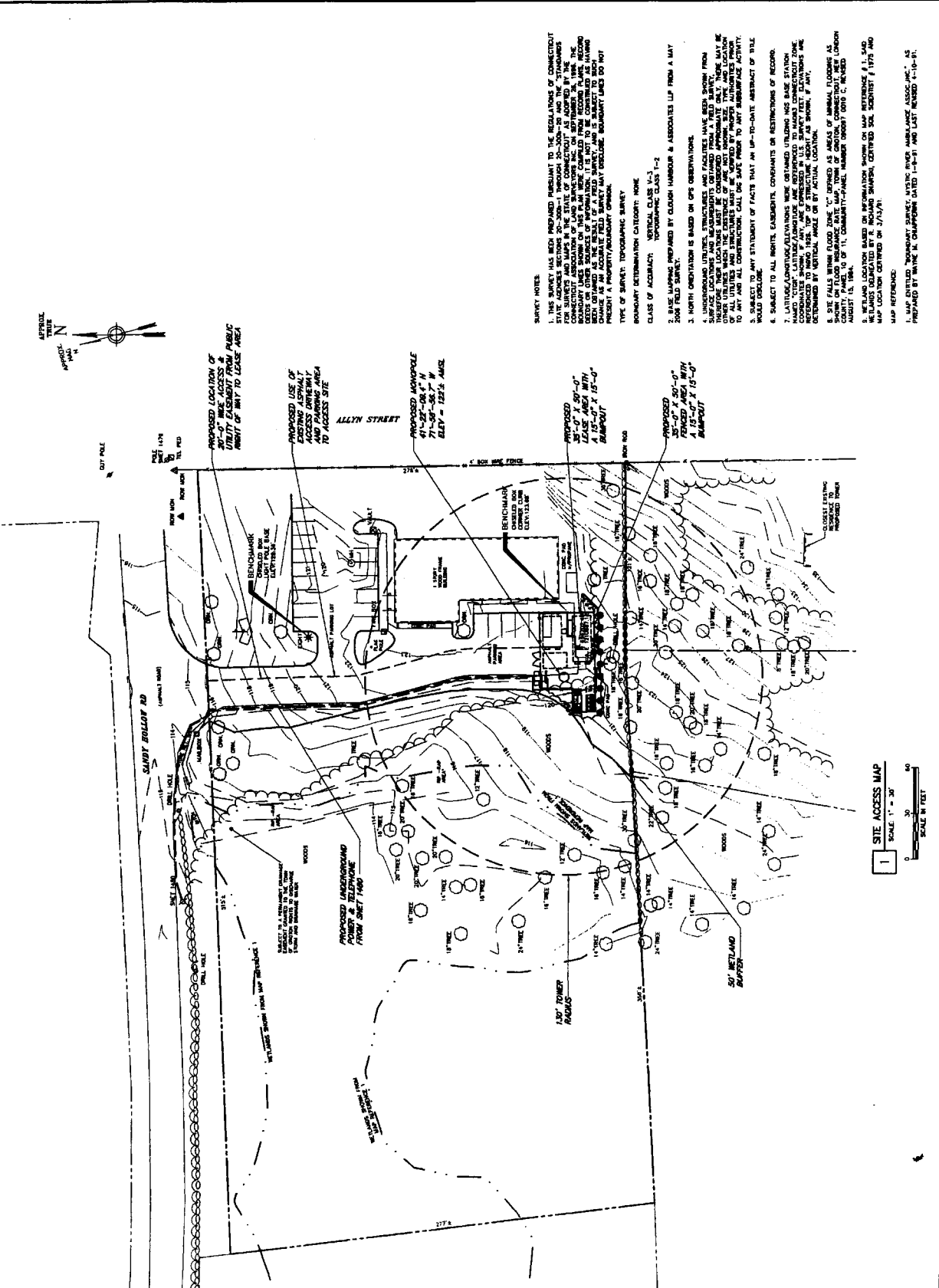
NO.	DATE	REVISION
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1	07/27/07	REVISED PER COMMENTS
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7	07/27/07	REVISED PER COMMENTS
8	07/27/07	REVISED PER COMMENTS
9	07/27/07	REVISED PER COMMENTS
10	07/27/07	REVISED PER COMMENTS

THIS SURVEY WAS MADE IN ACCORDANCE WITH THE RULES AND REGULATIONS OF A LICENSED PROFESSIONAL SURVEYOR. THE SURVEYOR'S NAME AND LICENSE NUMBER ARE PRINTED ON THIS DOCUMENT.

SITE NAME:
MCF GROTON
 SITE ADDRESS:
**237 SANDY HOLLOW RD
 GROTON, CT
 06355**
 NEW LONDON COUNTY

SHEET TITLE
SITE ACCESS MAP

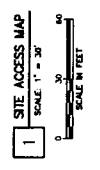
SHEET NUMBER
A02

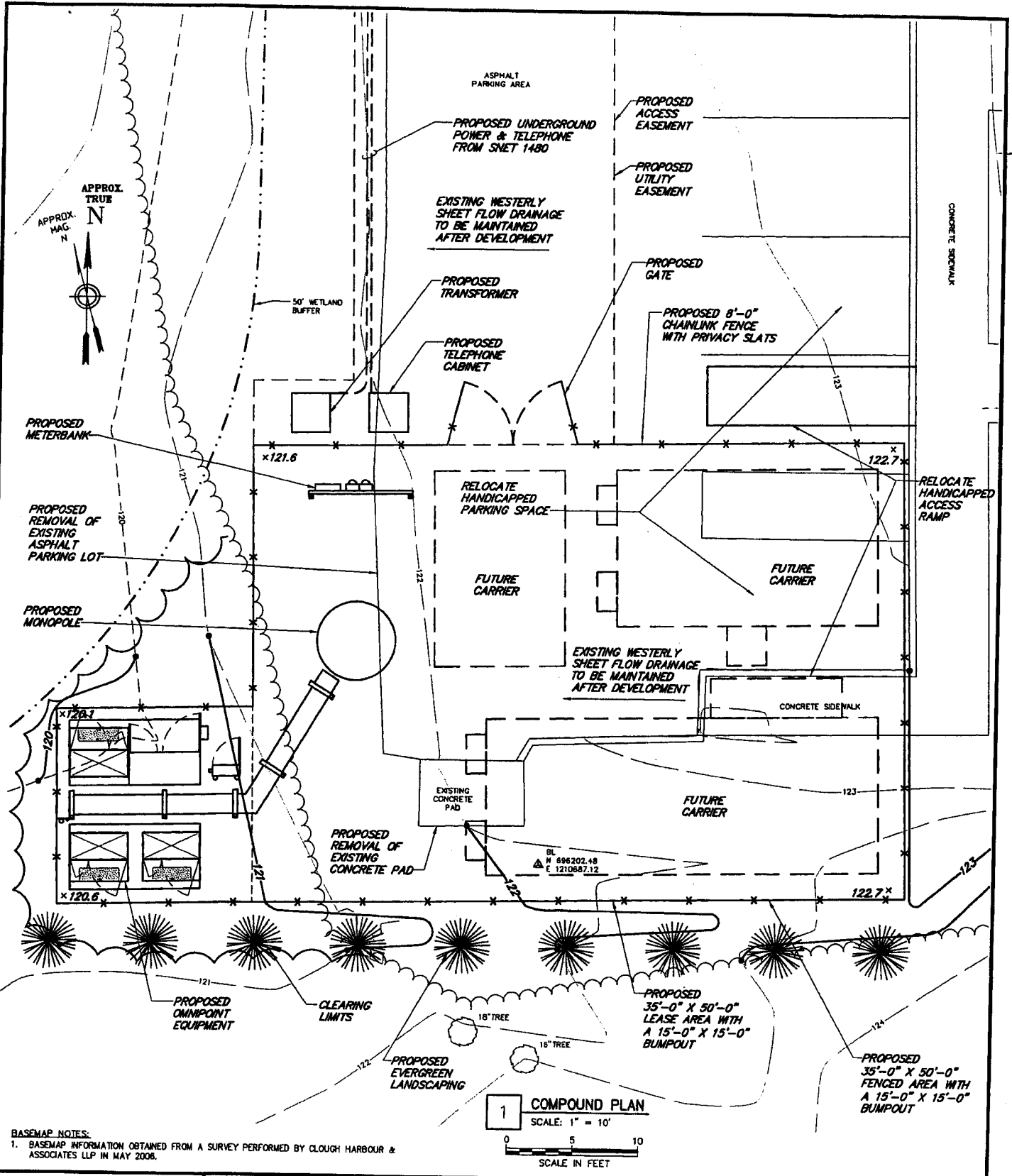


SURVEY NOTES:

1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-200a-1 THROUGH 20-200a-20 AND THE REGULATIONS OF THE CONNECTICUT DEPARTMENT OF CONSTRUCTION AND THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. ON SEPTEMBER 18, 2007. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.
2. THIS SURVEY WAS MADE IN ACCORDANCE WITH THE RULES AND REGULATIONS OF A LICENSED PROFESSIONAL SURVEYOR. THE SURVEYOR'S NAME AND LICENSE NUMBER ARE PRINTED ON THIS DOCUMENT.
3. NORTH ORIENTATION IS BASED ON GPS OBSERVATIONS.
4. SURFACE LOCATIONS AND MEASUREMENTS WERE TAKEN FROM A FIELD SURVEY. THEREFORE, THESE LOCATIONS MUST BE CONSIDERED APPROXIMATE ONLY. THERE SHALL BE NO LIABILITY FOR ANY ERRORS OR OMISSIONS IN THIS SURVEY. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.
5. ALL UTILITIES AND STRUCTURES MUST BE MARKED BY THE SURVEYOR PRIOR TO ANY AND ALL CONSTRUCTION. CALL THE STATE PRIOR TO ANY CONSTRUCTION. ANY STATEMENT OF FACTS THAT AN UP-TO-DATE ABSTRACT OF TITLE WOULD DISCLOSE.
6. SUBJECT TO ALL RIGHTS, EASEMENTS, CONSTRAINTS OR RESTRICTIONS OF RECORD.
7. LATITUDE/LENGTH COORDINATES WERE OBTAINED UTILIZING A GPS STATION. HORIZONTAL DATUM: NAD83; VERTICAL DATUM: NAVD83. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.
8. THE SITE IS WITHIN FLOOD ZONE 'C' DEFINED AS AREAS OF ANNUAL FLOODING AS SHOWN ON THE FLOOD INSURANCE RATE MAP FOR NEW LONDON COUNTY, CONNECTICUT, DATED AUGUST 15, 2004. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.
9. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.
10. THE SURVEYOR HAS REVIEWED ALL RECORDS OF THE PROPERTY AND HAS CONDUCTED A VISUAL INSPECTION OF THE PROPERTY.

BOUNDARY DETERMINATION CATEGORY: NONE
CLASS OF ACCURACY: TOPOGRAPHIC CLASS 1-2
DATE OF SURVEY: 07/27/07





1 COMPOUND PLAN
 SCALE: 1" = 10'
 0 5 10
 SCALE IN FEET

BASEMAP NOTES:
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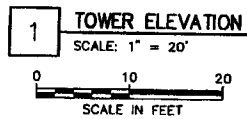
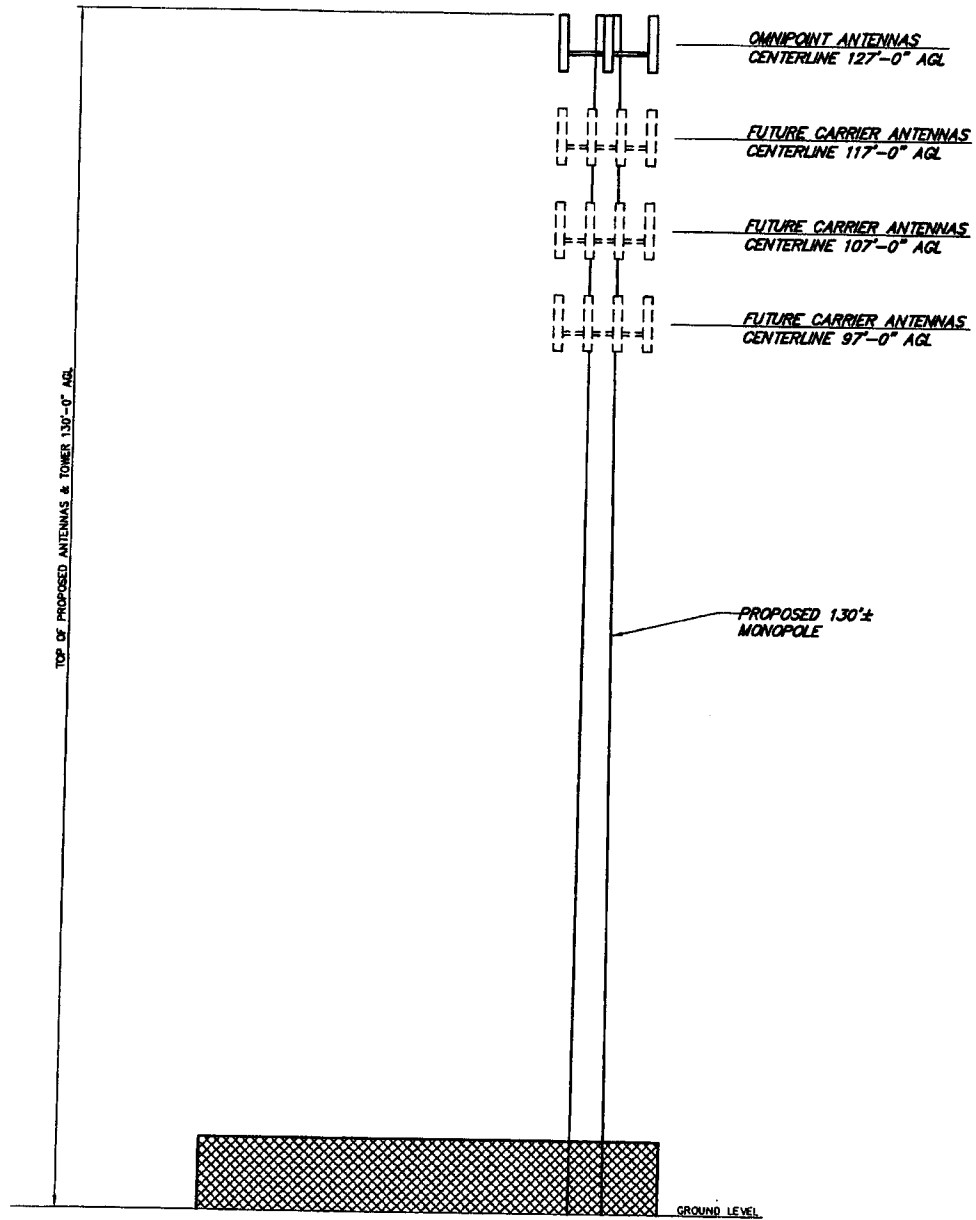
SITE NAME:
 MCF GROTON

SITE ADDRESS:
 237 SANDY HOLLOW ROAD
 GROTON, CT 06355
 NEW LONDON COUNTY

SHEET TITLE:
 COMPOUND PLAN

DATE:
 02/20/07

REVISION:
 1



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SITE NAME:
MCF GROTON

SITE ADDRESS:
**237 SANDY HOLLOW ROAD
 GROTON, CT 06355
 NEW LONDON COUNTY**

SHEET TITLE:
TOWER ELEVATION

DATE:
02/20/07

REVISION:
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Attachment 5

Scott Mowery

PROJECT MANAGER

EDUCATION

Bachelor of Arts in Geo-Environmental Studies
Shippensburg University, 1993

RELEVANT PROJECT EXPERIENCE

NEPA Summary Reports and Phase I Environmental Assessments, American Tower Corporation, Various Locations, Northeast and Mid-Atlantic Region

Conducted NEPA checks and Phase I Environmental Assessments for proposed telecommunication tower locations. Determined effect tower would have on natural and cultural resources. Performed all aspects of field reconnaissance, research, and report preparation.

Wetland Identification and Delineation, American Tower Corporation, Various Locations, Northeast and Mid-Atlantic Region

Conducted wetland identification and delineation on proposed telecommunication tower locations. Performed all aspects of wetland determination, including the identification of wetland boundaries, data collection, report preparation, and permitting.

Redevelopment Project, Spring Garden Township, York County, PA

Conducted wetland identification and delineation for a 54 acre parcel of land for the development of recreational areas. Responsible for wetland boundaries, data collection, analysis, permitting, and technical report writing. Also conducted a streambank survey for an 850 foot stretch of Mill Creek for the redevelopment of recreational areas. Responsible for surveying stream features, including bank height, stream depth, and stream width for the development of a conceptual plan for proposed restoration.

Home Depot Site, OLYMPIC Realty and Development Corporation, Borough of Carlisle, Cumberland County, PA

Conducted stream survey for length of Letort Spring Run to determine whether the stream was a gaining or losing system within the study corridor for a potential mixed use development site.

Stewart Terrace Housing Redevelopment, Department of the Navy, New Windsor, NY

Conducted wetland identification and delineation for a 90 acre parcel of land for the redevelopment of private housing. Performed all aspects of wetland determination, including the identification of wetland boundaries, data collection, and report preparation.

Phase II Environmental Assessment, American Tower Corporation, Pipersville Site, PA

Conducted a Phase II Environmental Assessment for the proposed expansion of a telecommunications tower compound. Collection and preparation of soil samples to determine the effect of past contamination of the surrounding property on the expansion area.



Scott
Mowery
CONTINUED

Riverview Redevelopment Project, O'Neill Properties, West Norriton Township, Montgomery County, PA

Conducted data collection, analysis, and technical report writing as part of an Environmental Assessment for the redevelopment of a 63 acre parcel of land into commercial, retail, and residential properties along the Schuylkill River

I-95 and I-276 Interchange Project, Pennsylvania Turnpike Commission, Bucks and Philadelphia Counties, PA

Conducted wetland delineation, data collection, and analysis as part of a Design Location Study and Environmental Impact Statement for the interchange of I-95 and I-276.

I-95 Intermodal Project, Pennsylvania Department of Transportation, Bucks and Philadelphia Counties, PA

Conducted various environmental studies, including Anderson Land Use mapping, and wetland delineation for the preparation of environmental documents for the reconstruction, rehabilitation, and improvements of Interstate 95.

S.R. 0068 Section 350, East Brady Bridge Project, Pennsylvania Department of Transportation, Armstrong and Clarion Counties, PA

Conducted wetland delineation and technical report writing for the replacement of the East Brady Bridge and the improvement of roadway approaches.

S.R. 0219, Johnsonburg Improvement Project, Pennsylvania Department of Transportation, Elk County, PA

Conducted wetland delineation, data collection, Anderson Land Use mapping, PAM-HEP Habitat Evaluation, and technical report writing for addressing traffic and safety concerns associated with the alignment of Route 219, through Johnsonburg and the Willamette Industries, Inc. paper mill.

Spring Creek Bridge Replacement Project, Pennsylvania Department of Transportation, Centre County, PA

Conducted Section 105 Permit Application Checklist preparation, technical report writing, and wetland delineation for the replacement of an existing bridge and adjustments of roadway alignments associated with the bridge.

Newton Hamilton Bridge Replacement Project, Pennsylvania Department of Transportation, Mifflin County, PA

Conducted wetland delineation for the replacement of an existing bridge over the Juniata River.

Scott
Mowery
CONTINUED

Mon/Fayette Transportation Project, Pennsylvania Turnpike Commission, Fayette County, PA and Monongalia County, WV

Conducted wetland field verification, data collection, and Phase I Archaeological studies for transportation improvements to help meet traffic safety and capacity needs, and to support economic redevelopment efforts in the 65 mile long corridor between I-68 in Morgantown, West Virginia and I-376 in Pittsburgh, Pennsylvania.

Defense Distribution Region East Connector Road, Pennsylvania Turnpike Commission, York County, PA

Conducted hazardous waste studies and soil borings for the evaluating of access improvements to the Defense Distribution Region East.

U.S. 0322, Section B01, "Missing Link", Pennsylvania Department of Transportation, Mifflin County, PA

Conducted wetland mitigation site determinations for a four lane limited access link between S.R. 0655 and the four lane section of S.R. 0322 north of the Mount Pleasant Community.

Ground Water Monitoring, Rite Aid Corporation, Philadelphia, PA

Conducted ground water sampling at a Rite Aid retail store in order to satisfy requirements of the Pennsylvania Department of Environmental Protection

SUMMARY OF QUALIFICATIONS

Scott Mowery has 7 years of experience in Wetland Delineation, Stream Studies, Phase I Archaeology, and Phase I and II Environmental Assessments. His work experience includes projects in both the public and private sectors. Scott's responsibilities have included hazardous waste studies, soil borings, and all wetland-related project work, including delineation of wetland boundaries, data collection, permitting, and technical report writing. He also is experienced in Anderson Land Use Mapping and the Cowardin Classification of Wetland and Deep Water Habitats.

James R. Kodlick, CE, PWS, RPA

MANAGER, ENVIRONMENTAL
RESOURCES GROUP

EDUCATION

Bachelor of Science in Biology

Indiana University of Pennsylvania , 1991

Bachelor of Arts in Anthropology

Indiana University of Pennsylvania, 1991

Masters of Science in Environmental Science and Policy

Johns Hopkins University, 1999

US Fish & Wildlife Service, Habitat Evaluation Procedure (HEP), 1998

Wildland Hydrology (Rosgen), Applied Fluvial Geomorphology, 1999

Advisory Council on Historic Preservation, Section 106 Review, 2000

National Preservation Institute, Telecommunications Towers: NEPA and NHPA, 2001

Wetlands Training Institute, Nationwide Permits Complete, 2002

PROFESSIONAL REGISTRATIONS

Registered Professional Archaeologist

Certified Senior Ecologist

Professional Wetland Scientist

PROFESSIONAL ORGANIZATIONS

American Water Resources Association

American Cultural Resources Association

Association of State Wetland Managers

Pennsylvania Association of Environmental Professionals

Pennsylvania Planning Association

Team Pennsylvania Foundation Ambassador

RELEVANT PROJECT EXPERIENCE

FCC NEPA Compliance, Various Telecommunication and Construction Clients

Senior Project Manager responsible for National Environmental Policy Act (NEPA) compliance, natural resource management, cultural resource management, viewshed analysis, and visual effect assessment for over 400 projects throughout the Mid-Atlantic, New England, and Mid-West Regions. Responsible for the completion of NEPA Summary Reports for proposed telecommunication tower locations. The primary objective of these investigations is to determine the effect of the tower on cultural and natural resources and to insure the client is in compliance with NEPA and Section 106 of the National Historic Preservation Act of 1966.



James R. Kodlick,
CE, PWS, RPA

CONTINUED

Streambank Stabilization and Floodplain Restoration Project, Former United Dye and Piece Works Property, York, PA

Senior Project Manager. Design and implementation of the streambank stabilization and floodplain restoration plan for Mill Creek on the former industrial property. Successfully completed and obtained two rounds of Pennsylvania Department of Environmental Protection Growing Greener Grant funding.

Riverview Redevelopment Project, Former Betzwood Industrial Park, Montgomery, PA

Senior Project Manager. Completion of the Environmental Assessment and Environmental Review Record necessary in obtaining Department of Housing and Urban Development Grant funding in reclaiming the former industrial property under the Brownfields Economic Development initiative.

Stewart Terrace Housing Redevelopment, New Windsor, NY

Senior Project Manager. Natural resource assessment and compliance services including wetland identification and delineation, floodplain assessment, permitting, and development of environmental compliance documentation.

Proposed Retail Development, Carlisle, PA

Senior Project Manager. Design and implementation of a Phase I Bog Turtle (*Clemmys muhlenbergii*) survey and a monumented vegetative survey to monitor the horizontal distribution of invasive plant species along the exceptional value LeTort Spring Run stream corridor.

The Preserve, Old Saybrook, Westbrook and Essex, CT

Senior Project Manager. Direct and coordinate all natural and cultural resource assessment and compliance activities in support of developing the project impact assessment compliance documentation, and securing all necessary permits and approvals.

Proposed Housing and Golf Development Plan, Marlborough, CT

Senior Project Manager. Direct and coordinate all natural and cultural resource assessment and compliance activities in support of developing the project impact assessment compliance documentation, and securing all necessary permits and approvals.

Mountaintop Mining/Valley Fill Environmental Impact Statement, WV, KY, and TN

Senior Scientist. Aquatic Impact issues analysis of mountaintop removal/valley fill mining operations in the Appalachia coalfields.

I-95/I-395 Transportation Improvement Project, Bangor, ME

Senior Scientist. Environmental Impact Study for proposed major transportation corridor improvement in and around the greater Bangor metropolitan area.

International Border Crossing Improvement Project, St. Stephen, New Brunswick and Calais, ME

Senior Scientist. Environmental Impact Study/Feasibility Analysis for proposed major improvement to the St. Stephen/Calais International Border Crossing.



James R. Kodlick,
CE, PWS, RPA

CONTINUED

SR 0412 Transportation Improvement Project, North Hampton, PA, Pennsylvania Department of Transportation

Senior Scientist. Environmental Impact Study for proposed transportation corridor improvement between Bethlehem and Hellertown, Pennsylvania.

I-76 Proposed Westgate Rest Area, Beaver County, PA, Pennsylvania Turnpike Commission

Senior Scientist. Phase I Archaeological Resource Identification Survey.

SR 0405 Proposed Muncy Bridge Replacement Project, Lycoming, PA, Pennsylvania Department of Transportation

Senior Scientist. Environmental Assessment for proposed replacement of the deteriorating Muncy bridge.

Proposed Pine Run Wastewater Interceptor, Hampden Township, Cumberland County, PA

Senior Scientist. Phase I Archaeological Resource Identification Survey.

US 301 Transportation Improvement Project, Charles County, MD

Senior Scientist. Environmental Impact Study, Streambank Characterization, and Tiered Environmental Impact Statement for the proposed US 301 Transportation Improvement Project bypassing Waldorf, Maryland.

Rock Creek Stream Restoration Project, Washington D.C., National Park Service

Senior Scientist. Stream Survey for the approximately 10-mile long stream corridor and design of restoration strategies for the removal of a series of 19th century check dams that impede anadromous fish passage.

SR 0015 Lisburn Road Interchange Transportation Improvement Project, Cumberland and York Counties, Pennsylvania, Pennsylvania Department of Transportation

Senior Scientist. Environmental Impact Study, wetland delineation, and development of the mitigation planting plan for the proposed Lisburn Road Interchange Project.

Montour Run Watershed, River Conservation and Land Use Plan, Allegheny, PA

Environmental Scientist. Environmental Studies investigations, and documentation related to the completion of the River Conservation and Land Use Plan for the 37 square mile Montour Run Watershed.

SR 0119 Improvement Project, Section 480, Homer City to SR 0022, Indiana County, Pennsylvania, PennDOT District 10-0

Senior Scientist. Wetland identification and delineation survey of the proposed SR 0119 improvement corridor. Phase I Archaeological Identification Survey.

SR 0074 Improvement Project, York County, Pennsylvania, PennDOT District 8-0

Environmental Scientist. Natural resource assessment for preparation of a Categorical Exclusion Evaluation for the proposed SR 0074 highway improvements.



James R. Kodlick,
CE, PWS, RPA

CONTINUED

B.C. Desar Property, Lebanon County, PA

Environmental Scientist. Wetland identification and delineation survey of the B.C. Desar property for proposed commercial development.

SR 11/15 Improvement Project, Perry County, PA, PennDOT District 8-0

Environmental Scientist. Wetland identification and delineation survey of the proposed SR 11/15 Improvement corridor. Phase III Archaeological Data Recovery of sites 36PE16, 36PE60, 36PE61, 36JU93, and 36JU95.

Red Lion Sewer System, New Castle County, DE

Environmental Scientist. Wetland identification and delineation survey of the proposed Red Lion Sewer System corridor.

West Goshen Sewage Treatment Plant Expansion, Chester, PA

Environmental Scientist. Wetland identification and delineation survey of the proposed expansion of the West Goshen Sewage Treatment Plant.

East Cocalico Township Authority's Well "F", Lancaster County, PA

Environmental Scientist. Wetland identification and delineation survey of the proposed East Cocalico Township Authority's public water supply Well "F".

Mon/Fayette Transportation Project, Fayette County, PA

Environmental Scientist. Stream Restoration Survey along the proposed corridor of the Mon/Fayette Expressway.

SR 0068, Section 350, East Brady Bridge Replacement, Armstrong and Clarion Counties, PA, PennDOT District 10-0

Environmental Scientist. Research project involving the historic ice flow elevations of the Allegheny River in the vicinity of the project area. Phase I Archaeological Identification Survey and Phase II Archaeological Significance Evaluation. Redevelopment of the Environmental Impact Statements.

SR 0219, Section CO9, Johnsonburg Improvement Project, Elk County, PA, PennDOT District 2-0

Environmental Scientist. Wetland identification and delineation survey of the proposed improvement project corridor.

Route 10, Man to Logan, Logan County, WV

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed 12-mile improvement corridor of Route 10 between the towns of Man and Logan, Logan County, West Virginia.

Mon/Fayette Transportation Project, Fayette County, PA

Environmental Scientist. Preliminary Area Reconnaissance survey along the proposed corridor of the Mon/Fayette Expressway.



James R. Kodlick,
CE, PWS, RPA

CONTINUED

I-95 Roadway Improvement Project, Stafford County, VA

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed 5-mile improvement corridor of I-95.

I-95 Roadway Improvement Project, Prince Georges County, MD

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed I-95 Improvement Corridor.

SR 0322 Improvement Project, Mifflin County, PA, PennDOT District 2-0

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed SR 0322 Improvement Corridor.

Derry Township – Inn at Walton Avenue, Dauphin County, PA

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed commercial development site.

Chester County Bridges, Chester County, PA, PennDOT District 6-0

Environmental Scientist. Wetland Identification and Delineation Survey of three proposed Bridge Improvement/Replacement sites.

Eldora/South Fairmont Interchange with I-79, Marion County, WV

Environmental Scientist. Wetland Identification and Delineation Survey of the proposed Eldora/South Fairmont Interchange Project.

I-95/I-276 Interchange, Bucks County, PA

Environmental Technician. Wetland Identification and Delineation Survey of the proposed I-95/I-276 Interchange Project area.

Goddard Space Flight Center, Prince Georges County, MD

Archaeologist. Phase I Archaeological Identification Survey.

Elk Mills Quarry Expansion Project, Cecil County, MD

Archaeologist. Phase I Archaeological Identification Survey.

I-95/I-276 Interchange, Bucks County, PA

Archaeologist. Phase I Archaeological Identification Survey of the proposed I-95/I-276 Interchange Project area.

US 301 Improvement Project, Price Georges County, MD

Archaeologist. Historic Resources Survey of the proposed US 301 Improvement Corridor.

I-95 Improvement Project, Stafford County, VA

Archaeologist. Phase I Archaeological Identification Survey of the proposed five-mile improvement corridor of I-95.

James R. Kodlick,
CE, PWS, RPA

CONTINUED

Mon/Fayette Transportation Project, Fayette County, PA

Crew Chief. Phase I Archaeological Identification Survey of proposed wetland mitigation site No. 55.

Mon/Fayette Transportation Project, Fayette County, PA

Archaeologist. Preliminary Cultural Resources Review of proposed wetland mitigation sites 26 and 28.

Newton Hamilton Bridge Replacement, Mifflin County, PA

Crew Chief. Phase II Archaeological Significance Evaluation of the Newtown Hamilton site (36M177).

Chester County Bridges (SR0926, SR4033, and SR3077), Chester County, PA

Crew Chief. Phase I Archaeological Identification Survey of the three areas of proposed bridge replacement.

Tinkers Creek (MD Rt. 5), Prince Georges County, MD

Archaeologist. Phase I Archaeological Identification Survey.

Bethlehem/Easton Transportation Needs Analysis (SR 2018 and SR2020), Northampton County, PA

Archaeologist. Preliminary Cultural Resources Review of proposed highway improvement corridors.

East Brady Bridge Replacement, Armstrong and Clarion Counties, PA

Crew Chief. Phase I Archaeological Identification Survey of the impacted area of the proposed bridge replacement project.

Mon/Fayette Transportation Project, Fayette County, Pennsylvania and Monongalia County, WV

Crew Chief. Phase II Archaeological Significance Evaluation of the proposed corridor of the Mon/Fayette Expressway.

Newton Hamilton Bridge Replacement, Mifflin County, PA

Crew Chief. Phase I Archaeological Identification Survey.

Greenside Vista, Proposed Housing Development, Baltimore County, MD

Crew Chief. Phase I Archaeological Identification Survey.

Athletic Field Construction, Navel Radio Transmitting Facility, Anne Arundel County, MD

Crew Chief. Phase II Archaeological Significance Evaluation of the Towne Neck Site (18AN944).

Johnsonburg (SR 0219) Improvement Project, Elk County, PA

Archaeologist. Phase I Archaeological Identification Survey.

Donegal Springs (SR 4002) Bridge Replacement, Lancaster County, PA

Archaeologist. Phase I Archaeological Identification Survey.

Chest Creek Bridge Replacement, Clearfield County, PA

Archaeologist. Phase I Archaeological Identification Survey.



James R. Kodlick,
CE, PWS, RPA

CONTINUED

MD 228 Wetland Mitigation Project, Charles County, MD

Archaeologist/Lab Technician. Phase III Archaeological Data Recovery of the Clifton Site (18CH358).

Hamilton Woods, Forest Drive Acres Sanitary Sewer Line, Adams County, PA

Archaeologist. Phase I Archaeological Identification Survey.

Mon/Fayette Transportation Project, Fayette County, PA

Archaeologist. Predictive Model Phase II Archaeological Significance Evaluation of rockshelters within the corridor of the proposed Mon/Fayette Expressway.

Mon/Fayette Transportation Project, Fayette County, Pennsylvania and Monongalia County, WV

Archaeologist. Phase I Archaeological Identification survey to investigate the potential significance of historic structures within the corridor of the proposed Mon/Fayette Expressway.

Mon/Fayette Transportation Project, Fayette County, Pennsylvania and Monongalia County, WV

Archaeologist. Preliminary Predictive Model Phase I Archaeological Identification Survey of the corridor of the Mon/Fayette Expressway.

Mifflinburg Buggy Museum, Union County, PA

Field Director/Crew Chief. Phase III Archaeological Data Recovery of a 19th century carriage shop, carriage house, and livery.

SR 0119, Corridor "G" Improvement Project, Mingo County, WV

Archaeologist. Phase III Archaeological Data Recovery of an Adena Burial Mound. Specialized in feature excavation, excavations of the central burial tomb, profile mapping, and laboratory analysis of faunal remains of the Cotiga Mound site (46MO1).

Castanea Bridge Replacement, Clinton County, PA

Archaeologist. Phase I Archaeological Identification Survey.

Lock Haven Dike/Levee Project, Clinton County, PA

Archaeologist. Phase III Archaeological Data Recovery of the Memorial Park site (36CN164).

Middlesex Township Municipal Authority Proposed Water Main Installation, Cumberland County, PA

Environmental Scientist. Phase I Archaeological Identification Survey.

Belvard Wetland Mitigation Project, Charles County, MD

Environmental Scientist. Phase I Archaeological Identification Survey includes the authoring and technical review of environmental assessments (EA), environmental impact statements (EIS), and categorical exclusions (CE).



James R. Kodlick,
CE, PWS, RPA

CONTINUED

SUMMARY OF QUALIFICATIONS

Mr. Kodlick has over 15 years of interdisciplinary experience as a consultant in natural resource and cultural resource management. He has served clients in both the public and private sectors throughout the Mid-Atlantic region, New England, and the Mid-West. He specializes in National Environmental Policy Act (NEPA) compliance issues and consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). He is a Certified Ecologist (CE) and a Professional Wetland Scientist (PWS) and has extensive natural resource management experience in providing the oversight and technical expertise for wetland delineation, functional assessment, and mitigation, stream assessment and restoration, watershed conservation, rare, threatened, and endangered species consultation, and aquatic and terrestrial ecological assessment. Mr. Kodlick is also a Registered Professional Archaeologist (RPA) and has extensive cultural resource management experience including the design, implementation, and management of Phase I Identification Surveys, Phase II Significance Evaluations, and Phase III Data Recovery Excavations. His cultural resource management experience also includes historic preservation, historic preservation law, architectural history, NRHP-eligibility determinations, watershed assessments, direct and indirect (visual) effect determinations, public involvement, and Native American consultation. Mr. Kodlick's additional education and experience in the natural sciences and environmental policy have proven invaluable in many cross-discipline applications such as floral and faunal analysis, osteology, anatomy, chemistry, pedology, geomorphology, fluvial geomorphology, landscape genesis, scale-dependent geographic analysis, climatology, probability and analysis of variation (ANOVA), and other relevant disciplines. His NEPA compliance experience includes the authoring and technical review of environmental assessments (EA), environmental impact statements (EIS), and categorical exclusions (CE).

Olivia Braun

PROJECT SCIENTIST

EDUCATION

Bachelor of Science in Geoenvironmental Studies
Shippensburg University, 2003

RELEVANT PROJECT EXPERIENCE

Phase I Environmental Site Assessments

Reviewed and assessed Phase I Environmental Site Assessments (ESAs) on residential, commercial and industrial properties in Burlington County, New Jersey for the purpose of land acquisitions and park development.

Phase II Site Investigations

Assessed Phase II Site Investigations (SIs) on residential and commercial properties in New Jersey, including soil and water samples, the logging of borings, interpretation of data analysis, and the completion of Phase II Site Investigation Reports.

Site Remediation

Coordinated and reviewed documentation concerning the remediation of residential and commercial lands in New Jersey for the purpose of obtaining a No Further Action determination from the New Jersey Department of Environmental Protection.

Burlington County, NJ

Assisted in the organization of the Remedial Action Work Plan for the remedial efforts necessary to use the property as a public park. Reviewed soil samples data and aided in the determination of the required remedial efforts through coordination with the New Jersey Department of Environmental Protection.

NEPA Compliance

Aided in the preparation and submission of NEPA reports for various sites throughout Pennsylvania, New Jersey, and Delaware by compiling information from the State Historic Preservation Office, Phase I reports and site investigations.

Wetland Delineation

Participated in the determination of wetlands in various locations in Pennsylvania through the use of soil borings, vegetation identification, and hydrologic data.

Water Sampling

Assisted in the process of water sampling over an extended amount of time to determine the presence and monitor the levels of ground water contamination at sites in Pennsylvania as well as completed all loggings of samples and chain of custody information.



Olivia
Braun
CONTINUED

SUMMARY OF QUALIFICATIONS

Olivia Braun has experience in the environmental sciences consulting industry. Her technical background includes completion of Phase I Environmental Site Assessments, the assessment of Phase II Site Investigations, NEPA Compliance Assessments, and collection of soil and water samples.

