



May 2, 2017

City of Andover
Andrew P. Flanagan, Town Manager
36 Bartlet Street
Andover, Massachusetts 01810

Submitted Via Email: aflanagan@andoverma.gov

SUBJECT: REQUEST FOR SECTION 106 CONSULTATION COMMENTS = CLG REPRESENTATIVE

**SITE: ANDOVER 1 (SITE NUMBER: BOSTHH008)
49 HAVERHILL STREET
ANDOVER, ESSEX COUNTY, MASSACHUSETTS 01810
RAMAKER & ASSOCIATES, INC. PROJECT NUMBER: 31931**

Dear Mr. Stapczynski:

Ramaker & Associates, Inc. (RAMAKER) was retained by inMOTION Wireless Inc. (inMOTION) to complete a NEPA and Section 106 review of an antenna and equipment installation to a proposed 70-foot inMOTION monopole tower (overall height with appurtenances of 74 feet). The activities will occur within the Massachusetts Bay Transportation Authority (MBTA) existing and active railroad right-of-way (ROW). The site is proposed to be located at 49 Haverhill Street in Andover, Essex County, Massachusetts. The location of the property is depicted on the attached Lawrence, Massachusetts Quadrangle. The project can also be identified as being located at: 42° 40' 23.75" North and 71° 8' 37.77" West.

The MBTA granted a license to inMOTION to construct, install and operate a wireless network to serve 40 million annual MBTA commuters. Features such as broadband internet access, live news broadcasts, live train tracker (displaying train progress), estimated train arrival times, train's speed of travel, availability of seats in each railcar, as well as reading material including magazines and newspapers. inMOTION proposes direct access to community specific events and support of local businesses. Additionally, future plans for the inMOTION system will allow MBTA to incorporate operations control features such as train telemetry systems, ticket scanners and video surveillance systems.

As noted, the proposed inMOTION improvements will occur in work areas within the existing active MBTA railroad ROW. The area of disturbance required for each installation will be an approximately 3-foot in diameter hole for the monopole tower's caisson foundation. The caisson will extend to a depth of approximately 25 feet below ground level. Soil erosion control procedures will be implemented at this site, with all existing grades to be restored, as described in the included site plans. Access to each site will be via the existing railroad ROW. In addition, the monopole tower will support a radio-equipment cabinet and an optional battery rack, mounted approximately 10 feet above grade. A 5-foot by 5-foot equipment pad has also been proposed for future radio equipment facilities. The location of this pad in relationship to the proposed monopole tower has been included in the site development plans, which also includes an elevation detail of the proposed inMOTION monopole tower. The monopole tower and associated antennas will be used solely for telecommunication purposes; no cameras will be mounted to the tower. Additionally, no lights will be mounted to the monopole tower unless required by the FAA.

The Section 106 review completed by RAMAKER considered both the Direct (area directly disturbed by the proposed undertaking) Area of Potential Effect (APE) and Indirect (viewshed area) APE. The APE reviews completed by RAMAKER concluded the following:

- **DIRECT APE:** When considering the Direct APE, RAMAKER consulted with Randy Dickson, Archaeologist with Midwest Archaeological Consultants, LLC. Mr. Dickson completed the appropriate due diligence as part of the Direct APE review and concluded that the proposed inMOTION undertaking would have "No Effect" to the Direct APE. A more detailed summary of these findings can be found in the Direct APE Summary report, completed by Mr. Dickson.

- INDIRECT APE: Using the FCC's guidance, RAMAKER reviewed a one-half mile search radius of the proposed undertaking to consider the potential for viewshed impacts to historic structures within this search area. RAMAKER completed research, consultation, and a window survey of the Indirect APE to qualify the presence of historic structures within the APE. Upon completion of this research, RAMAKER reviewed and considered the potential for effect (as further outlined in the Indirect APE summary report) and concluded that the proposed inMOTION undertaking would have "No Adverse Effect" to the Indirect APE.
- ADDITIONAL CONSULTING PARTIES: RAMAKER has been, or is in the process of, consulting with additional potentially interested consulting parties. Specifically, RAMAKER is seeking input on the potential for impact to historic properties that might not have otherwise been considered as part of the aforementioned Section 106 due diligence survey. As part of this consultation, RAMAKER filed public notice in the Eagle-Tribune newspaper. In addition, RAMAKER is soliciting comments from the City of Andover, the Town of Andover Board of Selectmen and the Andover Historical Society.

It is the opinion of RAMAKER that the proposed inMOTION undertaking will have "No Effect" to the Direct APE and "No Adverse Effect" to the Indirect APE.

Following the FCC protocols and procedures, should you wish to provide additional comments with respect to the potential to effect cultural and/or historic properties, please contact RAMAKER. Additionally, if you have any information regarding other potentially interested consulting parties that should be contacted, your input on this matter would also be greatly appreciated. As the project is proposed for development in the very near future, we would appreciate receiving your comments in the next 30 days.

Please direct all future correspondence to:

Ramaker & Associates, Inc.
Andrew J. Rice, Project Manager
855 Community Drive
Sauk City, Wisconsin 53583
Telephone: (608) 643-4100
Facsimile: (608) 643-7999
Email: arice@ramaker.com

If you have any questions or comments, please do not hesitate to contact our office.

Sincerely,

RAMAKER & ASSOCIATES, INC.



Andrew J. Rice, Project Manager

Attachments: Site Location Maps

Cc: Town of Andover Board of Selectmen
Paul Salafia, Chairman
36 Bartlet Street
Andover, Massachusetts 01810

Andover Historical Society
Elaine Clements, Executive Director
97 Main Street
Andover, Massachusetts 01810