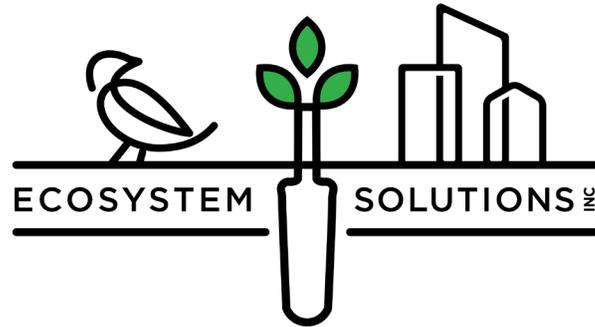


Est. 2003



RI: 401.741.3263
MA: 508.997.0268
www.ecosystem-solutions.com

January 13, 2026

Robert Deblois / 232 Realty Associates
420 Scrabbletown Road, Suite G
North Kingstown, RI 02852

RE: BALD EAGLE SITE INVESTIGATION
0 Tiffany Road / AP 32, Lots 149, 150, 151, & 153
Coventry, Rhode Island

Mr. Deblois,

At your request, Ecosystem Solutions, Inc. (ESI) conducted a site investigation on January 2, 2026, for the presence of the Bald Eagles (*Haliaeetus leucocephalus*) and/ or bald eagle nests, both currently occupied and/or unoccupied. Although there is no exact protocol for investigating bald eagle occupation, ESI referenced the “*Protocol for Evaluating Bald Eagle Habitat and Population in California*” (see attached references), which contains information regarding nesting habitat, methods for searching for nest sites, breeding season foraging habitat, wintering habitat, etc.

Regulatory Compliance

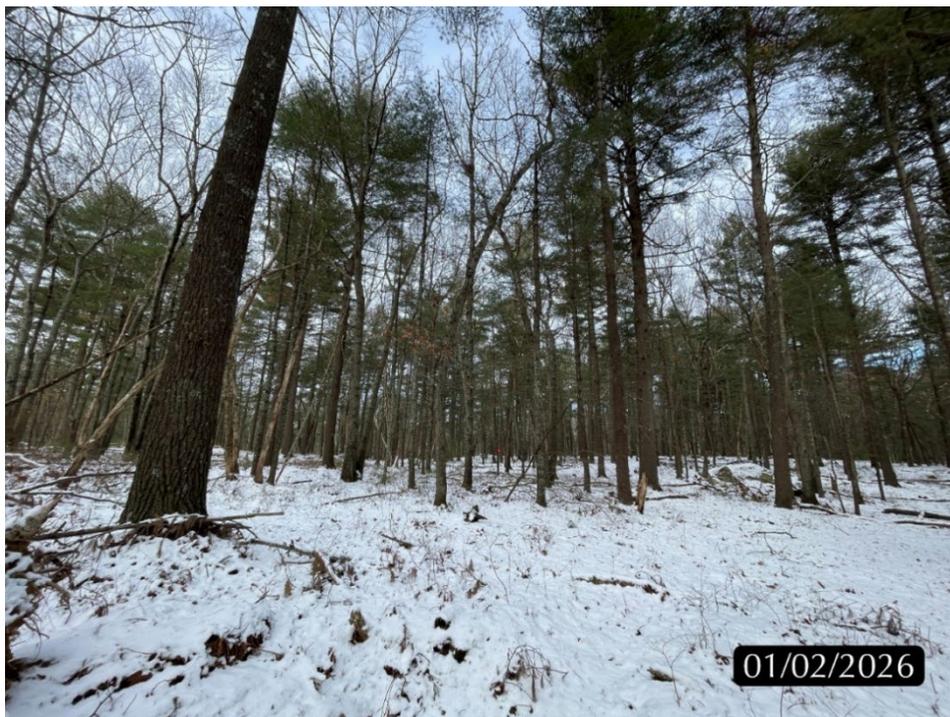
The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. § 703-712) prohibits the take (including but not limited to, *killing, capturing, selling, trading, and transport of any migratory bird, any part, nest or egg*) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service. The bald eagle is included in the list of protected species (Title 50 § 10.13) under the MBTA, as Amended in August of 2023, and therefore falls under the protection of this Act and all it encompasses.

The Bald and Golden Eagle Protection Act of 1940 (16 U.S.C §668-668d) prohibits anyone, without a permit issued by the Secretary of the Interior, from “taking” bald or golden eagles, including their parts, feathers, nests, or eggs. The Act defines “take” as to “*pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb*” and the Regulations further define “disturb” as to “*agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior*”

In order to comply with The Bald and Golden Eagle Protection Act, the U.S. Fish and Wildlife Service provides national guidelines for management of bald eagles including recommended no-disturbance buffers around bald eagle nests. Depending upon the proposed activity and its visibility from the nest (please see the attached “Northeast bald Eagle Screening Form” to understand what buffer would be applicable to certain activities being conducted), the guidelines recommend that a buffer of at least 330 feet (100-meters) be maintained year-round between all project activities and the nest, and if a similar activity (i.e., similar kind and size) is closer than 330 feet and has been tolerated by eagles, the distance buffer will be the same or greater than that of the existing tolerated activity. Additionally, the guidelines outline that disruptive (disruptive activities include but are not limited to, external construction, excavation, use of heavy equipment, use of loud equipment or machinery, vegetation clearing, earth disturbance, planting and landscaping) activities are not to be performed within 660 feet (200 meters) of the nest during the breeding season. Please note that the breeding season in Rhode Island spans from January 1st to July 31st, and the time of year restriction is in addition to the recommended distance buffer. If proposed activities cannot be conducted outside of the required nest buffer areas, the U.S. Fish and Wildlife Service may require the acquisition of an eagle incidental take permit.

Site Description

The site is located north of Tiffany Road, south of Tiogue Avenue, and includes Map 32, Lots 149, 150, 151, & 153, collectively known as the “Property”. According to the Town of Coventry CAI Property Card, the Property is approximately 27.2 acres in size and currently exists as an undeveloped forested parcel (apart from an abandoned “Cape” style house built in 1948 located directly south of Tiogue Avenue) containing stone walls, walking paths, and a predominance of upland vegetation species including but not limited to eastern white pine (*Pinus strobus*), scarlet oak (*Quercus coccinea*), pitch pine (*Pinus rigida*), white oak (*Quercus alba*), and black huckleberry (*Gaylussacia baccata*).



Picture 1. Typical view of the site looking northwest.

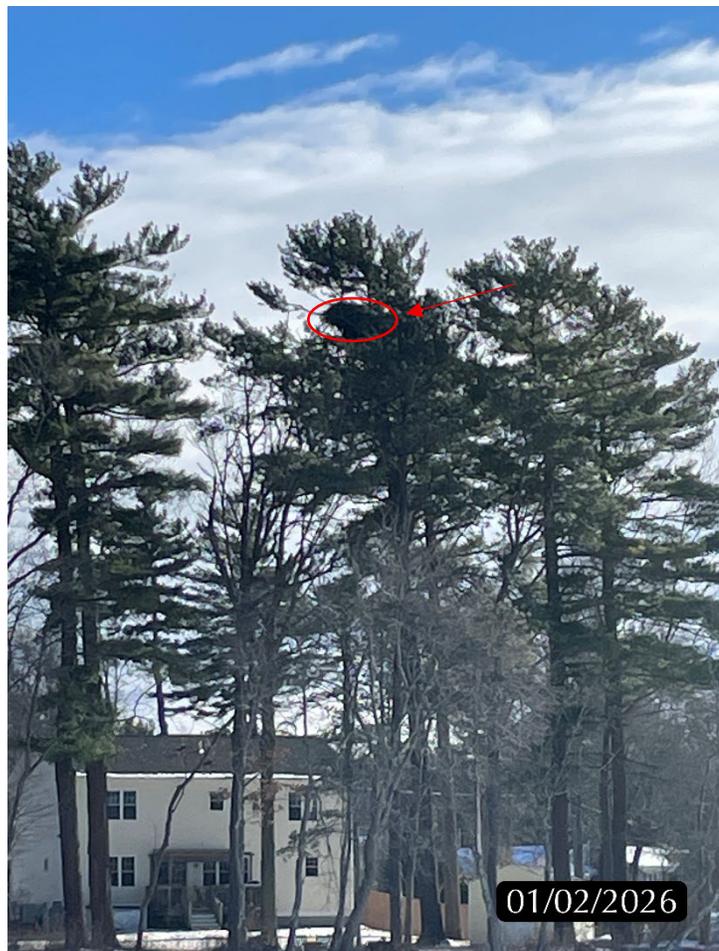
Survey Methods and Findings

The field survey was conducted by both ground transect and aerial transect via drone. Equipment used to conduct the survey included field notebooks, binoculars, and a DJI Phantom 4 RTK Drone (flown by a licensed drone pilot). Ground transects were performed by 3 (three) biologists who, beginning at the southern Property line, walked northerly, parallel to one another (spaced out approximately 100' from one another to cover the entire width of the site) throughout the entirety of the site, until reaching the northern Property line. Methods for the ground survey included one linear transect per biologist, walking north in a "zig zag" pattern to cover the most ground, while looking up into the canopy for any signs of existing nests, nests being constructed, or any signs of bald eagle activity. Additionally, biologists stopped every several hundred feet to listen for bald eagle calls.

Methodology for aerial surveys via drone included flying 300 feet above the canopy in parallel transects, moving from east to west, beginning at the north end of the Property, heading south. The drone provided live video to the pilot who, if a nest was located, could communicate with the biologists below to give them the exact location. The drone survey extended onto adjacent lots to the west, south, and east to ensure that all areas within 660 feet of the site were evaluated.

In addition to ground surveying on site, the biologists conducted a visual survey using binoculars from Tiogue Lake itself (accessed via Briar Point Beach located northwest of the site across Tiogue Lake). Due to low water levels and frozen conditions, the biologists were able to walk out approximately 1,000 linear feet southeast of Briar Point Beach, to look east toward the site for any potential nests and/ or bald eagle activity. A bald eagle nest was located along the southeast edge of Tiogue Lake, seemingly on a residential lakefront property. No bald eagles were seen during both the survey on site or the survey from the Lake. Using aerial photography, ESI pinpointed the approximate location of the nest (see Figure 1) which is +/- 950 linear feet west of the subject Property.

Picture 2. Bald eagle nest found off site to the west. View from Tiogue Lake.



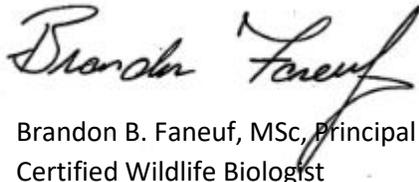
Conclusion

After careful review, it is the professional opinion of ESI that there are currently no active or inactive bald eagle nests located on the subject Property. There is, however, a nest located off site to the west, approximately 950 linear feet from the Property line. Any work proposed within the above-referenced buffer areas and timelines requires the acquisition of an eagle disturbance take permit through the U.S. Fish and Wildlife Service. Although ESI did not conduct a ground survey on the abutting properties to the west between the Property and the lake, an aerial drone survey was conducted over said lots and revealed no additional visible nests within 660' of the Property.

Should you have any questions regarding this letter, please do not hesitate to call at (401) 741-3263 or by using the other contact information above.

Sincerely,

Ecosystem Solutions, Inc



Brandon B. Faneuf, MSc, Principal
Certified Wildlife Biologist

Samantha Carew, WPIT



BF/sc

References:

-Protocol for Evaluating Bald Eagle Habitat and Populations in California

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83707&inline>

-Northeast Bald Eagle Screening Form

<https://www.fws.gov/sites/default/files/documents/2024-10/northeast-bald-eagle-project-screening-form-2024-10-29.pdf>

-Bald and Golden Eagle Protection Act

<https://www.fws.gov/law/bald-and-golden-eagle-protection-act>

-Migratory Bird Treaty Act of 1918

<https://www.fws.gov/rivers/law/migratory-bird-treaty-act-1918>

-National Bald Eagle Management Guidelines

https://www.fws.gov/sites/default/files/documents/national-bald-eagle-management-guidelines_0.pdf

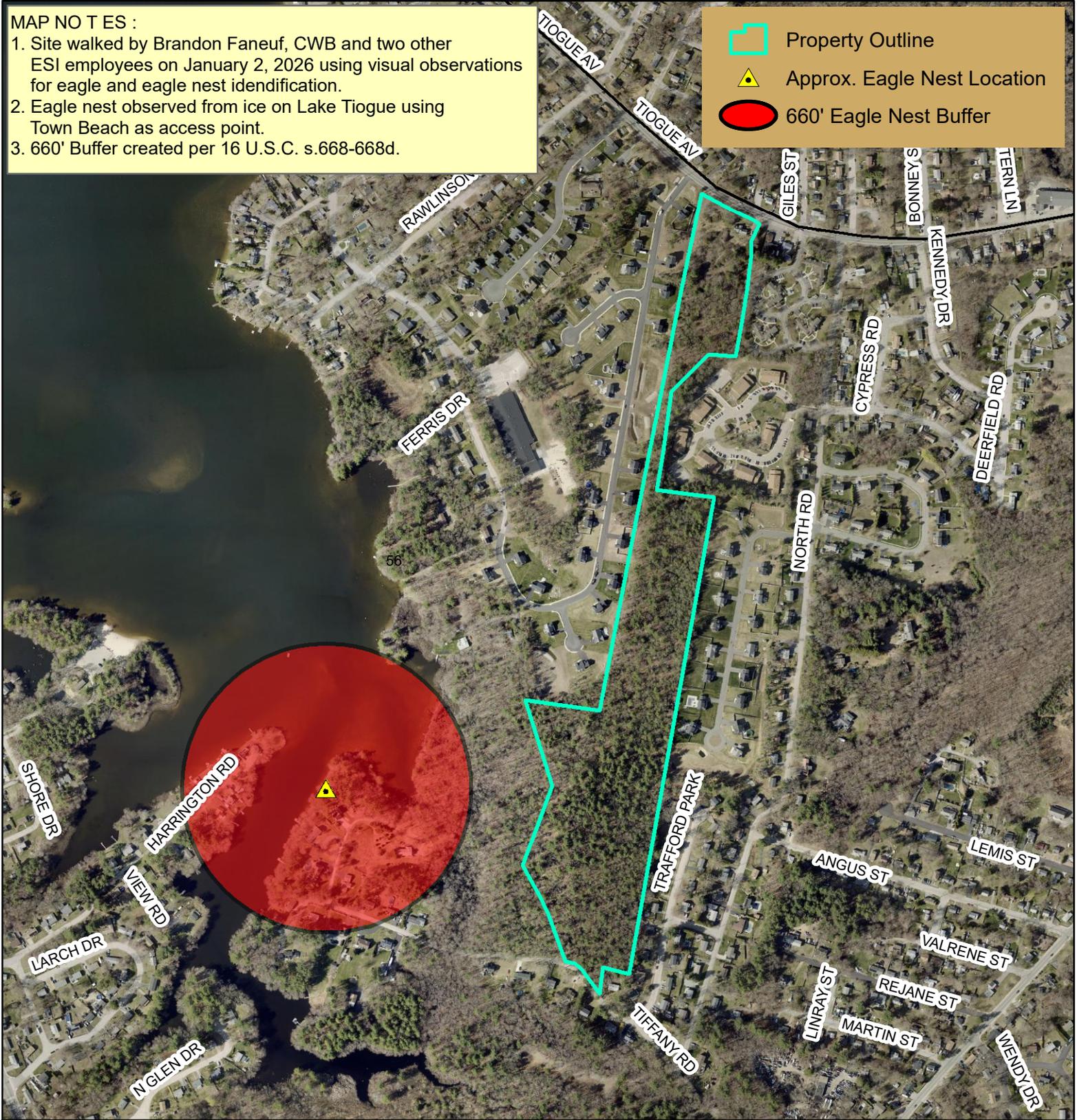
-Southwest Region Bald Eagle Disturbance Take Determination Key

https://www.fws.gov/sites/default/files/documents/2025-01/r2-bald-eagle-disturbance-determination-key_20241121.pdf

MAP NOTES :

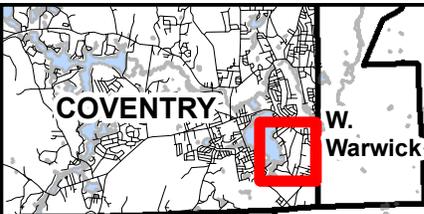
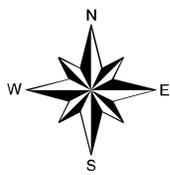
1. Site walked by Brandon Faneuf, CWB and two other ESI employees on January 2, 2026 using visual observations for eagle and eagle nest identification.
2. Eagle nest observed from ice on Lake Tiogue using Town Beach as access point.
3. 660' Buffer created per 16 U.S.C. s.668-668d.

-  Property Outline
-  Approx. Eagle Nest Location
-  660' Eagle Nest Buffer



100 Jefferson Blvd, Suite 225
Warwick, RI 02888

FIGURE 1

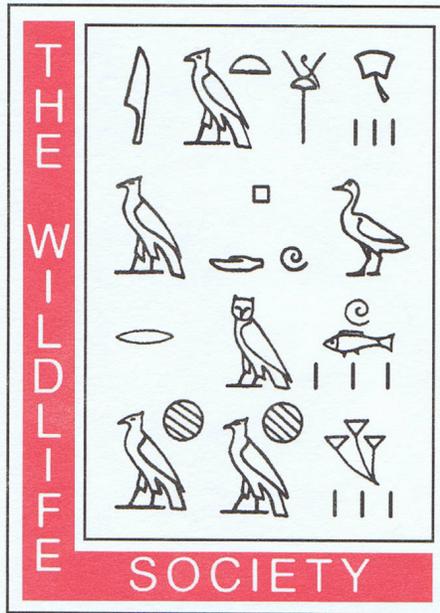


Bald Eagle Investigation Map
Tiogue Avenue & Tiffany Road/ A.P. 32, Lots 149,150,151, & 153
Coventry, Rhode Island

DATE:	1-5-2026	PROJECT #:	W25-2175
CREATED BY:	BF	SCALE:	1 inch = 600 feet

2025 Spring Aerial Photograph





The Wildlife Society

INCORPORATED IN WASHINGTON, D.C.

grants the designation

Certified Wildlife Biologist

to

Brandon B. Faneuf

in recognition of fulfillment of all the professional requirements approved by The Wildlife Society and verified by the Society's Certification Review Board on this 14th day of October 2010. This certificate remains valid provided membership in the Society remains in good standing.

President, The Wildlife Society

Chairman, Certification Review Board

Executive Director, The Wildlife Society