



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



November 8, 2010

Daniel F. Caruso, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: Wireless Telecommunications Facility
The United Illuminating Company
Orange, Connecticut
Docket No. 406

Dear Chairman Caruso:

Staff of the Department's Wildlife Division has reviewed the above referenced *Application for a Certificate of Environmental Compatibility and Public Need* and offers the following comments to the Council for your use in this docket.

The United Illuminating Company proposes to erect a 100-foot self-supporting three-legged tower at 100 Marsh Road in Orange. It is the strong recommendation of the Wildlife Division that the applicant reconsider the tower design. Given the location of the proposed tower in Orange, the proposed lattice design will dramatically increase the likelihood that the tower attracts nesting monk parakeets. This invasive exotic species builds very large stick nests that can weigh hundreds of pounds. When built on utility structures, light poles, or telecommunication towers, the nests can cause shorts and create fires and will require an increased level of maintenance. This area of the state has the highest level of nuisance monk parakeet nesting and the site is in very close proximity to large nesting colonies in West Haven and Milford. It is not a question whether the birds will build nests on the proposed lattice tower, just a question of when. Control efforts can be complex, expensive and controversial. Changing to a monopole structure will significantly reduce the likelihood of nuisance nesting by this species.

Thank you for the opportunity to review this application and to submit these comments. If you have any questions regarding these comments, please contact Jenny Dickson of the Wildlife Division. She may be reached at 860-424-3494 or jenny.dickson@ct.gov.

Sincerely,

David J. Fox
Senior Environmental Analyst
Office of Environmental Review

cc: David Martin, CSC
Jenny Dickson, DEP/WD
Robert Hannon, DEP/OPPD