

COUNCIL ON ENVIRONMENTAL QUALITY



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February 22, 2011

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

RE: Docket #408, Proposed Telecommunications Facility at 95 Balance Rock Road, Hartland

Dear Chairman Caruso:

On behalf of the Council on Environmental Quality, I am writing in response to the Siting Council's solicitation of written comments and consultation regarding Docket #408.

At its meeting of January 26, 2011 the (CEQ) was presented with information pertinent to the proposed location. The Council urges your heightened consideration of the three points noted below.

First, however, the CEQ wants to express its dismay at how infrequently the Department of Environmental Protection (DEP) comments on Siting Council applications, or even reviews them in detail. The CEQ had been under the impression that each application was subjected to thorough review at the DEP. In most instances, bureau and field staff are sent a memo indicating a proposed facility's location, but those staff persons are not necessarily trained in analysis of impacts. The CEQ makes this point to emphasize that the absence of comment from the DEP on any application should not be construed as a studied conclusion that the facility will have no impacts.

The CEQ's specific points relative to Docket #408 are as follows:

1. The CEQ recommends detailed analysis of the proposed tower's effect on wildlife. At the CEQ's January 26 meeting, Mr. George Logan, a wildlife biologist, presented information that points to the project area as being unusually important to the conservation of wildlife, particularly birds. The proposed site is within an area identified by Connecticut's Comprehensive Wildlife Conservation Strategy (page 1-14) as Key Wildlife Habitat. Furthermore, the Barkhamsted Reservoir area is known

to attract both birds and birders. As most migrants travel the corridor at night, the potential for impacts would potentially increase with elevation. With the proposed tower being exceptionally tall and within a migration corridor, its potential impact on wildlife should receive exceptional scrutiny.

2. The proposed location for the tower is visible from several important scenic areas and should be evaluated as a potentially “relatively undisturbed area that possesses scenic quality of local, regional, or state-wide significance.” The application shows that the tower will be visible from Route 20 as one looks across the reservoir toward the site, an area that nearly anyone would consider scenic. Also, residents stated that the tower will be visible from an area known as “Lookout Point.” The potential scenic impacts deserve careful scrutiny and deliberation by the Siting Council.

3. The CEQ recommends that the CSC consider the implications of approval of the location if it was the site of illegal wetlands filling. The CEQ received documents suggesting portions of this property may have been the site of illegal wetlands activity. Should this activity, if it occurred, have included the access road or other areas essential to the proposed tower, approval to use those areas should be withheld.

Thank you for consideration of these comments. I would be pleased to answer any questions you or your staff may have.

Sincerely,

Karl J. Wagener
Executive Director

CC: Amey Marrella, Commissioner of Environmental Protection
Linda Roberts, Executive Director, Connecticut Siting Council

