

COUNCIL ON ENVIRONMENTAL QUALITY



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CONNECTICUT
SITING COUNCIL

Barbara C. Wagner
Chair

February 7, 2011

M. Howard Beach

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

Janet P. Brooks

RE: Docket #409, Proposed Telecommunications Facility at 8 Barnes Rd,
Canaan

Liz Clark

Dear Chairman Caruso:

Bruce R. Fernandez

Karyl Lee Hall

I am writing in response to the Siting Council's (CSC) solicitation of written comments and consultation regarding Docket #409. The Council on Environmental Quality (CEQ) offers the following comments regarding the application and proposed site.

John M. Mandycyk

1. As proposed, the tower will be visible from approximately one mile of state-designated scenic road and will have a large visual impact due to the topography of the area.

Richard Sherman

Norman VanCor

State scenic roads are important in establishing a "sense of place" in many parts of the state that are renowned for their aesthetic attraction. It follows that these areas of unique beauty contribute to the state's tourist economy. The importance of these travel routes to the state is implicit in their initial designation by the Department of Transportation, as well as in their inclusion within the CSC's application guidelines that mandate the identification of state scenic roads in applications for communication towers.

Karl J. Wagener
Executive Director

The shortness of the vegetation in the swampy area will accentuate the presence of the tower. The tower will rise 150' feet into the air, reaching a height of nearly 1,300 feet above sea level. Because of the flat topography near the site, the tower will be visible from 6% of the study area. The application's photo-simulations depict a tower that is conspicuous against the sky and across undeveloped terrain.

2. The proposal does not conform to the town's zoning guidelines for such facilities. The statement in the application (p. 21) that the proposed facility "will not

have a detrimental impact to any documented scenic area or vista” makes no sense in light of the visibility from a state scenic road. The assertion that the facility is “not located on a ridgeline” is questionable given the facility’s prominent location on a long hill and is irrelevant given the *town regulation’s specific reference to Cobble Hill as a significant feature* (a reference not noted in the application). The assertion that it is not in a wildlife corridor is not supported by information (see #3, below). The CEQ urges careful assessment of sections 9.2.3.d and 9.2.4.a of the town’s zoning guidelines for such installations. (These sections are labeled incorrectly in the application, p. 21.) These guidelines recommend that 1) the tower not be detrimental to scenic views and 2) stealth technology be employed in the design. These are mutually consistent requirements. It has been seen in applications for towers at other locations (Dockets #401 and 404, for example) that stealth designs reduce the visual disruption of the horizon when compared to traditional tower designs.

3. The CEQ recommends further analysis of the wildlife on and near the proposed site. The information in the application regarding wildlife habitat addresses the potential presence of endangered or listed species. There is only a very general description of the habitat types. In view of the large investments by public agencies and private conservation organizations to conserve the biodiversity of Robbins Swamp, the application should document the actual wildlife present on the site.

4. The proposed location for the tower is surrounded by many preserved lands that together should identify the area “a relatively undisturbed area that possesses scenic quality of local, regional, or state-wide significance.” These include the Robins Swamp and Wildlife Area, The Nature Conservancy’s Page Road Swamp, the Housatonic State Forest, Land trust property owned by the Weantinoge Heritage Trust, the Canaan Mountain Natural Area Preserve, The Nature Conservancy’s Wagnum Lake Brook easement and the Centennial Watershed State Forest. Pursuant to CGS Section 16-50p(b)(1), the Siting Council should examine whether public safety concerns demand the facility to be constructed in the proposed location and, if it does not, whether less scenic areas should be considered.

5. The existence of transmission lines or other unsightly objects placed in a region should not become a rationale for future unsightly installations. The application implies (p. 15) that the negative scenic impact on residents is diminished because many who will have views of the proposed tower from their homes also have views of high-voltage transmission lines. This should not be a consideration of the Siting Council. For any Connecticut resident, one cost of enduring the negative impacts of an electric utility right-of-way should not include being a magnet for additional installations.

6. The CEQ urges a re-examination of placement on existing electric transmission lines. A “co-location” of the antennae on existing electric transmission lines was rejected by the applicant because the existing support structures for those lines are too low and transmission to the north is blocked by Cobble Hill, the currently proposed tower site. The CEQ urges consideration of placement of antennae on these existing structures on one side of Cobble Hill and a new location on the other side to accomplish the same coverage objectives, without increasing the visual intrusion on the landscape.

7. The steep topography of the proposed location warrants a re-examination of the storm water and erosion mitigation proposed for the site. The tower pad and the road to the site were designed to a standard that will accommodate storms and flooding to be expected every 25 years (application Section 5). Recent meteorological history shows a trend of increasing precipitation in the northeast United States (for example, see “Trends in Extreme Precipitation Events in the Northeastern United States”, published by Carbon Solutions New England, University of New Hampshire, 2010). The topography of the area is steep and vulnerable to erosion. Design for a less frequent storm standard might be appropriate in this location to prevent damaging erosion in this important habitat area.

8. The CEQ suggests that the decision to relocate the tower from its originally-proposed location should be revisited. The decision to relocate the proposed site was made after town residents expressed reservations about the impacts associated with the construction of a longer road. The relocation, however, led to an increase in tower height. A re-examination of this decision, with town input, to allow a public weighing and evaluation of all the options and tradeoffs of this relocation decision is recommended.

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