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14 September 2012

State of Connecticut
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Attention: Linda Roberts, Executive Director

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SITING COUNCIL

Dear Mrs. Roberts:

The Town of Roxbury Conservation Commission submits this letter in opposition to the Application for Certificate of Environmental Compatibility and Public Need submitted by AT&T on 2 July 2012 to the Connecticut Siting Council under Docket No. 428.

First, we object to the form of the application. AT&T has structured its application fundamentally as a choice between two sites for construction of a communication tower facility in Roxbury. Except for the election of public officials, decisions made by the voters, the legislators and regulatory bodies in the State of Connecticut are Yes/No choices. AT&T has proposed its Candidate A site in a manner that at least suggests Roxbury will get the Candidate B site it previously has opposed unless it is agreeable to AT&T's construction of Candidate A. We believe this strategy to be improper and, if allowed to succeed, a bad precedent.

Second, we join in the statements, criteria, questions, and concerns submitted by the Town of Roxbury on 1 August 2012 and object to the significant impact, as outlined therein, either of these sites will have on the environment, town infrastructure, the picturesque historical New England drive along Route 67 which follows the Transylvania Brook and the valuation of resident properties.

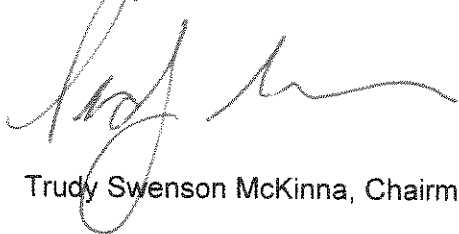
Third, we note that AT&T's marketing material on its consumer websites claims at least "moderate" coverage throughout much of Roxbury. This characterization stands in sharp contrast to the poor to non-existent coverage throughout large areas of Roxbury indicated by the coverage maps included in its application. Both claims cannot be true. Indeed, coverage is poor to non-existent in many locations in Roxbury. We believe the primary objective of any new tower to be located in Roxbury at this time should be to materially extend and improve coverage in Roxbury. The 8-14% increase in coverage claimed to result from either proposed tower is small in comparison both to the need for improvement in Roxbury and to the coverage enhancement that would be provided in other towns. We believe that any coverage enhancement in Roxbury afforded by either proposed tower, except for drivers on Route 67 who should not be using cell phones while driving, is a bi-product rather than the primary objective of AT&T's application.

Fourth, the Conservation Commission, the Town as a whole, and many of its residents had strenuous objections to the site designated Candidate B in the application on the grounds both of the impact the proposed tower facility would have on this environmentally and infrastructurally

fragile area and on the less than satisfactory engineering plan for site development. Whatever improvements now might apply to the site plan, the area is still fragile. There is no assurance AT&T will act quickly and responsibly to preserve its character and integrity when problems occur and indemnify both the Town and its residents against any expense or liability associated with such problems. We would expect storm water run-off from Candidate site B to regularly damage Transylvania Road – a dirt road eligible for both historic and scenic status, – to create safety hazards for drivers and hikers in doing so, and to impair nearby downstream wetlands. We continue to object, also, to Candidate Site A but acknowledge that its potentially adverse environmental and infrastructural impacts are less severe.

In summary, as you consider AT&T's application, we ask that you reflect on these important issues. The application appears to us to be disingenuous in several ways and it appears to ignore local interests and disregard the rights of those most vested in our community. There is a significant lack of investigation into alternate sites, particularly sites that would serve Roxbury better with less adverse impact. While apparently legal in the context of state law, AT&T's proposed installations do not conform to local regulations designed to avoid or minimize adverse impact on natural diversity, local endangered species, vernal pools and wetlands, historic and scenic town-maintained dirt roads, drainage systems, scenic resources, and the appraised and comparative value of many homes in which residents have made life time investments.

Sincerely,



Trudy Swenson McKinna, Chairman

On behalf of all Roxbury Conservation Commission members:

Hugh Rawson, Vice Chair
Cathy Masi, Secretary
Ronald Faanes, Ph.D.

Cecelia Santillo
Gary Steinman
Barbara Mousted