

COUNCIL ON ENVIRONMENTAL QUALITY



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Executive Director

September 30, 2020

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: DOCKET NO. 494 - Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located south of Chestnut Hill Road at the intersection with Grilley Road and Lyman Road (Parcel No. 101-1-5B), Wolcott, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (Council) has reviewed the application submitted in Docket 494 for a Certificate of Environmental Compatibility and Public Need. The Council offers the following comments for consideration by the Applicant and Siting Council.

1. Wetlands

The Applicant states that the proposed access drive would cross Wetland 1 at its narrowest point. However, Partial Site Plan (SP-1) depicts the narrowest point of Wetland 1 to be located approximately 200 feet south of the proposed wetland crossing, which makes the access drive longer and would require the removal of much more vegetation resulting in more ground disturbance. The Council recommends that the Applicant assess the possibility of relocating the proposed wetlands crossing and access road if the relocation would minimize impacts on wetlands and adjacent terrestrial habitat.

2. Wildlife

The Applicant states that they would “consider” voluntary conservation measures to reduce the potential impacts on northern long-eared bat (NLEB). The Council recommends that the Applicant commit to undertake the voluntary measures to reduce the potential impacts of activities for the NLEB as detailed in the “USFWS & NDDDB Compliance Determination”, page 2. Furthermore, a review of the US Fish and Wildlife Service (USFWS), Information for Planning and Conservation (IPac) tool indicates that there is the possibility that seven bird species, which are either on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention, may be present at or near the proposed project location. The Council recommends

that the Applicant conduct a site specific survey for suitable habitat for each of the seven bird species, and if present, propose conservation/mitigation measures¹ to minimize the impact on those species.

3. Visual Impact

The Council concurs with the Applicant that the visual impact is perhaps the most significant environmental issue associated with the construction of the proposed facility. The Council suggests that the Applicant maintain a vegetative buffer between the proposed access road and the neighboring properties located to the east and west of the access road entrance, which would require the removal of less trees while reducing visibility of the proposed access road.

4. Historic and Cultural Resources

The Applicant provided a “Cultural Resources Screening Map” but failed to provide any information on whether the proposed site has a moderate to high potential for intact archaeological deposits given that the remains of an old stone structure on the proposed site, the fact that the parcel is undeveloped and gently sloping, and it is proximate to fresh water (Chestnut Hill Reservoir). The Council recommends that the Applicant confer with the State Historic Preservation Office, and if appropriate, conduct a cultural resource reconnaissance survey for the proposed access driveway and tower compound that meets the standards set forth in the Environmental Review Primer for Connecticut’s Archaeological Resources.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and is positioned above the typed name of the signatory.

Peter Hearn, Executive Director

¹ Nationwide Standard Conservation Measures: <https://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>