



## COUNCIL ON ENVIRONMENTAL QUALITY

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*Executive Director*

October 27, 2021

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

DOCKET NO. 506 - New Cingular Wireless PCS, LLC (AT&T) application for a Certificate of Environmental Compatibility and Public Need (Application) for the construction, maintenance, and operation of a telecommunications facility located at 499 Mile Lane, Middletown, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (Council) received for review and comment the Application for Docket 506, which was originally Petition 1465. The Application failed to include sufficient information to undertake a thorough assessment<sup>1</sup> of potential environmental impacts of the proposed tower facility and compound. Specifically, the Application includes no information regarding noise, and there is limited information regarding scenic, natural, historic, and recreational characteristics of the proposed site; the identification of nearby hiking trails, nature preserves and scenic roads; wildlife and the Natural Diversity Database (NDDDB); and wetlands. The wetlands map provided in the filing expressly states that "This map is for general reference only" and there is no discussion of wetlands, whether present or not, on the proposed site or access road. There is also little discussion of alternatives considered other than the structural assessment of the existing 180-foot lattice tower located on the proposed site.

The Information for Planning and Consultation (IPaC) tool of the U.S. Fish and Wildlife Service (USFWS) identifies that the Northern Long-eared Bat, the Monarch Butterfly, and six migratory birds may be present in the vicinity of the proposed project. An NDDDB polygon is located immediately north of the proposed site. Consequently, the Council recommends that the Petitioner survey the proposed site for any listed species or migratory birds identified by the USFWS, that might be present. If found, the Council recommends that the Petitioner consult with the NDDDB and or the USFWS to develop and implement plans to eliminate or mitigate any potential adverse impacts to those species.

The Council recommends that the Applicant provide additional information regarding the environmental factors noted above and include a more complete analysis of potential impacts that the proposed tower facility could have on those environmental factors if the proposed tower facility is approved. In addition, the Council recommends that the Applicant assess the possibility of 1) developing a 180-foot tower that can accommodate the telecommunications antennas for the Applicant, other carriers, and the users of the

<sup>1</sup> Based on the Application Guide for Community Antenna Television and Telecommunication Facilities, July 2012.

existing lattice tower, and 2) removing the existing 180-foot lattice tower, once the antennas are transferred to the new tower, to avoid the unnecessary proliferation of towers.

The Council notes that the comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council's administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Peter Hearn,  
Executive Director