

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. 493 – Global Signal Acquisitions IV LLC and Crown Castle Towers 06-02 LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located off Lakeview Street, East Hampton, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (Council) has reviewed the application submitted in Docket 493 for a Certificate of Environmental Compatibility and Public Need. The Council offers the following comments for consideration by the Applicant and Siting Council.

1. Wildlife

The Applicant has committed to assessing the potential impacts the proposed facility construction may have on the 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.

Further, the Applicant noted that a portion of the proposed property to the north of the proposed tower site is within a Natural Diversity Database (NDDDB) buffer area. Little is known about the possible existence or suitable habitat for state-listed species on the proposed tower property and access road property. Consequently, the Council recommends that the Applicant conduct an on-site survey of the proposed tower compound and access road to determine if any state-listed species or suitable habitat exists.

2. 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 tower. Lake Pocotopaug is one of the largest lakes in central Connecticut. Many residences occupy its shore and the lake is used for recreational boating. The visibility analysis undertaken from various locations along the Lake suggests a very dramatic impact. Visual simulations from the lake, as suggested in the Siting Council’s Application Guideline G5, would be useful to assess the visual impact that a new structure, in excess of 200 feet would have for people using the lake. Because the proposed tower exceeds

200 feet, it would need obstruction marking and lighting per the requirements of the Federal Aviation Administration, which would make the proposed tower visible at night.

3. **Historic and Cultural Resources**

The Applicant provided a "Cultural Resources Screening Map" but failed to provide any information on whether the proposed sites (access road property and telecommunication tower property) have a moderate to high potential to contain intact archaeological deposits despite the undeveloped nature of the sites and their proximity to fresh water (Pocotopaug Lake). The Council recommends that the Applicant conduct a cultural resource reconnaissance survey for the proposed access road and tower compound that meets the standards set forth in the Environmental Review Primer for Connecticut's Archaeological Resources, and submit that information to the State Historic Preservation Office for concurrence.

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 printed name.

Peter Hearn,

Executive Director