



COUNCIL ON ENVIRONMENTAL QUALITY

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Executive Director

February 23, 2022

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

DOCKET NO. 507 – Homeland Towers, LLC and 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 wireless telecommunications facility
located at 222 Clintonville Road, North Branford, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (Council) received for review and comment the
Application for Docket 507.

The Applicant states that the Information for Planning and Consultation (IPaC) tool of the
U.S. Fish and Wildlife Service (USFWS) identified that the Northern Long-eared Bat and
the Indiana Bat might be present in the vicinity of the proposed project. The Applicant also
states that “with appropriate restrictions on tree clearing, the Northford 2 Facility will not
impact the Indiana Bat”. Specifically, the Applicant states that “clearing trees between
October 1 and March 31, during hibernation, would eliminate the possibility of taking
individual bats.” Consequently, the Council recommends that, if approved, a restriction be
paced on the removal of trees on the proposed site between October 1 and March 31.

The Applicant also included a completed “Request for Natural Diversity Data Base
(NDDB) State Listed Species Review” dated April 26, 2021, in the application, but failed to
include correspondence from the NDDB regarding the determination of the review. The
Council recommends that the Applicant provide the results of the NDDB determination
letter for the proposed project, including any correspondence regarding protective measures
for any state-listed species on or near the proposed site.

The Council notes that, based on the proposed contours, there would be a significant
amount of fill required adjacent to the access road immediately up gradient of the existing
pond and wetlands as well as along the northern property boundary. The Council
recommends that the Applicant provide additional details regarding measures to protect
wetlands on the proposed site; specifically, all information that is required for a regulated
activity within the Town of North Branford’s wetland regulations.

The Applicant states that the proposed site is zoned R-40 (Residential) and that the Town of North Branford's Zoning Map and Regulations allow for telecommunications facilities on parcels in 'industrial districts'. Consequently, the Council questions if the proposed facility is inconsistent with the Town's planning documents.

The Council notes that the comments above address only certain elements of the materials provided by the Applicant 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, appearing to read "Peter Hearn", written in black ink on a white background.

Peter Hearn,
Executive Director