



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

June 27, 2022

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DOCKET NO. 509 - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 1837 Ponus Ridge Road, New Canaan, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality ("Council") offers the following comments regarding Docket 509.

1. Visibility

The Council is concerned about the visual impact of the proposed tower on scenic resources. The Council recommends that best management practices be employed to minimize the visual impact of a telecommunications facility in this area, and that any telecommunications facility that is constructed, be no taller than necessary to provide coverage.

2. Water Quality

The proposed tower and access road would be located close to the Laurel Reservoir. The Council echoes the concerns expressed by the Department of Public Health (DPH) regarding the potential impact the proposed facility could have on water quality of the nearby Reservoir. Consequently, the Council supports the recommendations of the Drinking Water Section at DPH dated June 1, 2022, and recommends that if approved, the DPH's recommendations become conditions of approval.

3. Wildlife

The Applicant states that the Connecticut Department of Energy and Environmental Protection Natural Diversity Database (NDDDB) indicated that the proposed site could support suitable habitat for "one State Endangered Species: Little brown bat (*Myotis lucifugus*) and two State Species of Concern: Red bat (*Lasiurus borealis*) and Eastern box turtle (*Terrapene carolina carolina*)". The Applicant also states that a review of the potential impact of the proposed facility on the northern long-eared bat ("NLEB") and bog turtle, two federally listed threatened species, was undertaken. The Council recommends that if approved, the proposed mitigation measures identified by the NDDDB in their January 7, 2022 letter, including but not limited to time-of-year restrictions on tree clearing, be conditions of approval.

4. Access Drive

The Council is concerned about the proposed access drive and the potential environmental impacts associated with the loss of trees; root damage to the remaining trees adjacent to the proposed access drive; and the impacts to the edge habitats, which could be exposed to invasive species colonization. The Council recommends that the Applicant assess other opportunities to minimize the amount of earthwork associated with the construction of the proposed access drive, potentially including relocating the proposed access drive and/or tower compound. The Council also recommends that if blasting is required, the material excavated from the proposed site be tested to determine its suitability as fill to avoid any harmful leaching and that fill material brought onto the proposed site for the proposed earthwork be tested to determine its suitability as clean fill.

5. Stormwater

The Council is concerned about stormwater management on the proposed site and the potential impact of increased stormwater on wetland resources, water quality, and native vegetation and soils. The Council believes that the length and steepness of the proposed access drive, and all the proposed earthwork that might be required warrants additional scrutiny of the stormwater control measures during the application process as well as during the Development and Management (D&M) Plan, if approved. The Council notes that the review of critical environmental impact mitigation details during the administrative hearing process, by the public, parties and/or intervenors, benefits the Siting Council in assessing potential adverse impacts to the environment.

The Council's comments above address only certain elements of the materials provided by the Applicant and Parties and Intervenors at this time. 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 the Council's comments.

Sincerely,



Paul Aresta
Executive Director