



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

December 15, 2022

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Ten Franklin Square
New Britain, CT 06051

PETITION NO. 1552 - Crown Castle and Cellco Partnership d/b/a Verizon Wireless (Petitioners) proposed replacement and extension of an existing telecommunications facility located at 845 Ethan Allen Highway, Ridgefield, Connecticut.

Dear Attorney Bachman:

The Council on Environmental Quality (“Council”) offers the following comments regarding Petition 1552.

1. Wetlands and Floodway

The Petitioners note that the proposed facility is in the vicinity of sensitive wetland resources and the Norwalk River. Specifically, a wetland area associated with the Ridgefield Brook is located, “at its closest point, approximately twenty-five (25) feet north of the proposed retaining wall on the north side of the expanded facility compound.” In addition, the proposed compensatory flood storage area would be located immediately adjacent to Wetland 1 along the western property line. The Council generally supports the concept of compensatory wetland creation/flood storage; however, the success of such an effort largely depends on the hydrology of the created wetlands to support wetland vegetation and functions. The Council recommends that the Petitioners expand the provisions of the Wetland and Norwalk River Protection Program to include the following: 1) procedures to reduce the potential for introducing and/or spreading invasive species, such as phragmites; and 2) ongoing monitoring and maintenance of the project area. The ongoing monitoring and maintenance of the project area will help ensure that the hydrology of the constructed wetlands is appropriate, that dead plant materials are removed and replaced, and that any invasive and/or undesirable plant species are removed.

2. Visibility

The Petitioners state that the overall predicted visibility of the proposed facility represents approximately 0.3% of the 8,042-acre Study Area and that “there is no significant difference in the visibility footprint between the existing and proposed facilities”. While the calculated area of year-round and seasonal visibility of the proposed monopole tower with externally mounted antennas might be approximately the same as the existing tower, the aesthetics or visual impact of the proposed 110-foot monopole tower with externally mounted antennas would be different.

The construction of a ±100-foot telecommunications tower that resembles a “flagpole” is atypical of most telecommunications towers in Connecticut and has been used to

minimize the visual impact of a telecommunications facility. The Petitioners noted that the Town of Ridgefield Planning and Zoning (P&Z) Commission approved the 100-foot-tall tower with internally mounted antennas by Special Permit. But it is unclear from the Petition filing if the approval of the “flagpole” telecommunications tower was a special condition by the Town of Ridgefield P&Z Commission. Further, it is unclear if the Town of Ridgefield supports the replacement of the existing “flagpole” tower with a monopole tower with externally mounted antennas. The Council recommends that the Petitioners assess the possibility of replacing the existing 100-foot “flagpole” telecommunications tower with another “flagpole” telecommunications tower with internally mounted antennas, of sufficient height to achieve the desired coverage areas of the wireless carriers, to minimize the potential visual impact of the proposed facility.

The Council notes that the comments above address only certain elements of the materials provided by the Petitioners 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 the Council’s comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive, flowing style.

Paul Aresta
Executive Director

c. Rudy Marconi, First Selectman, Town of Ridgefield