



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

March 22, 2023

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Paul Aresta  
*Executive Director*

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

DOCKET NO. 513 - Cellco Partnership d/b/a Verizon Wireless (Applicant) application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility to be located at Parcel No. 258-10C-001, Mason Hill Road, Litchfield, Connecticut.

Dear Attorney Bachman:

The Council on Environmental Quality ("Council") offers the following comments regarding Docket 513.

### 1. Wildlife

The Applicant notes that a review of the U.S. Fish and Wildlife Service (USFWS), Information for Planning and Conservation (IPAC) tool indicates that there is the possibility that the northern long-eared bat (NLEB)<sup>1</sup>, a species that has recently been reclassified as "endangered" under the Endangered Species Act, might occur in the vicinity of the proposed project. The Council also notes that a known NLEB hibernacula is located in the Town of Morris, which is located immediately south of Litchfield and west of Thomaston. Since the Applicant states that the proposed project involves the removal of trees on the proposed site, the Council recommends that the Applicant consult with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Wildlife Division regarding protective measures, such as time of year restrictions on tree removal, to minimize any potential impacts on NLEB.

### 2. Wetlands

The Applicant notes that there are two wetland systems on the proposed site, including Wetland 1 that would be located approximately 56 feet south and southeast of the proposed tower compound. The Council supports the Applicant's proposed "Wetland Protection Program", which includes provisions for contractor education; inspection and reporting; installation and maintenance of erosion and sedimentation controls; a Petroleum Materials Storage and Spill Prevention plan; and restricted use of herbicides, pesticides and salt. The Council also supports the Applicant's intention to maintain a vegetated buffer between the facility compound and Wetland 1. The Council questions if the proposed tower and facility compound could be relocated further north or northwest within the proposed lease area in order to increase the distance and vegetated buffer between the proposed facility and Wetland 1.

<sup>1</sup> The CTDEEP Northern Long-eared Bat Map identifies Morris, the town immediately south of Litchfield, as an area with known NLEB hibernacula; <https://portal.ct.gov/-/media/DEEP/NDDDB/NoLongEaredBat-Map.pdf>.

### **3. Visibility**

The Applicant states that the primary impact of the proposed facility is visual, and that year-round visibility of the proposed tower would be approximately 21 acres and seasonal views (leaf-off conditions) of the proposed tower would be 54 additional acres within a two-mile radius of the proposed tower. The Applicant also states in Attachment 8 – Site Search Summary that “there are no other existing towers or other sufficiently tall structures available in this area that would help Cellco satisfy its need for service”. However, the Site Search Summary makes no mention of the existing electric transmission line structures that are located within and adjacent to the proposed site. The Council questions if the Applicant assessed the possibility of utilizing one or more of the existing transmission line structures to support the Applicant’s proposed antennas.

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 the Council’s comments.

Sincerely,

A handwritten signature in cursive script that reads "Paul Aresta". The signature is written in black ink and is positioned above the printed name and title.

Paul Aresta  
Executive Director