



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

June 2, 2022

TO: Service List, dated May 26, 2022

FROM: Melanie Bachman, Executive Director *MB*

RE: **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.

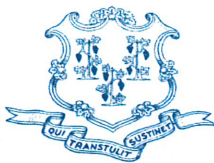
Comments have been received from the Department of Public Health on June 1, 2022. A copy of the comments is attached for your review.

MB/RDM/laf

c: Council Members

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Manisha Juthani, MD
Commissioner

Ned Lamont
Governor
Susan Bysiewicz
Lt. Governor

June 1, 2022

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

Re: 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 Drinking Water Section (DWS) of the Department of Public Health has reviewed the location and specific work items associated with the above noted Docket Number. This project is contained within the public water supply watershed of Laurel Reservoir, an active source of public drinking water for Aquarion Water Company (PWSID CT1350011).

The proposal appears to make little mention of the project's close proximity to Laurel Reservoir, an active drinking water supply source, and there is little to no analysis of the potential impacts this installation could have upon the active Laurel Reservoir, located approximately 70' southwest and downgradient from the property line of the proposed activity. It is suggested that a review by the applicant of potential drinking water source impacts be conducted for all CSC pending matters. Below are concerns and associated recommendations the department has identified for this proposed project:

1. Forests are ideal for enhancing drinking water source quality by maximizing contaminant filtration and minimizing runoff and mobilization of potential contaminants. According to the proposal, 106 trees will be removed. Due to the close proximity of this parcel to the drinking water reservoir and the existing slope on this and adjacent land, runoff is a significant concern to drinking water source quality. It is recommended that the number of trees removed is minimized and other vegetation is planted wherever possible.
2. 65 yards of fill is proposed to be brought onsite as part of this proposal. It is imperative that the source of the fill is known and that it is verified that no legacy contamination is contained within the fill. In numerous instances in Connecticut, the use of contaminated fill has impacted water quality. Also, with a large quantity of fill, erosion is a concern before a vegetative cover is



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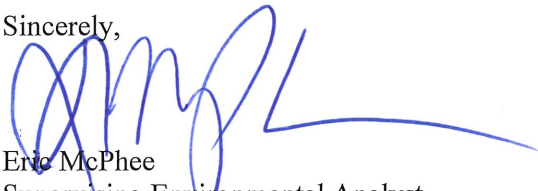


established.

3. The proposed access road will increase the amount of impermeability on the parcel and will increase the risk of runoff. Measures should be taken to increase infiltration near the road, such as a rain garden.
4. The proposal will include the installation of a diesel generator with the expectation of several more as other carriers are added. The department strongly recommends the use of propane generators, and if possible, the shared use of one propane generator.
5. Erosion and sedimentation controls should be in place and properly maintained as necessary.
6. A responsible party should be identified for maintenance, inspection, repair, and replacement and incorporation of new controls as may become necessary.
7. Servicing of machinery should be completed outside of the public water supply watershed.
8. Refueling of vehicles or machinery should take place on an impervious pad with secondary containment designed to contain fuels.
9. Fuel and other hazardous materials should not be stored within the public water supply watershed. Any fuel or hazardous materials that must be kept within the public water supply watershed during working hours should be stored on an impervious surface utilizing secondary containment.
10. A fuel spill remediation kit should be stored on-site so that any spills may be contained and cleaned quickly.
11. Aquarion Water Company should be contacted prior to starting this project to review the scope of this project.
12. Aquarion Water Company personnel should be allowed to periodically inspect this project to ensure that drinking water quality is not being adversely impacted.

If you have any questions regarding this matter, please contact me.

Sincerely,



Eric McPhee
Supervising Environmental Analyst
Drinking Water Section

- c: Heather Aaron, MPH, LHNA, CTDPH Deputy Commissioner
Lori Mathieu, CTDPH Public Health Branch Chief
Joseph Welsh, Manager of Natural Resources, Aquarion Water Company