



**WESTPORT, CONNECTICUT
CONSERVATION DEPARTMENT**

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August 29, 2022

State of Connecticut
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

**RE: Docket No.510- New Cingular Wireless PCS, LLC d/b/a ATT&T and Tarpon Towers, II, LLC
Application for a Certificate of Environmental Compatibility and Public Need for the
Construction, Maintenance and Operation of Telecommunicates Facility Located at 92 Greens
Farms, Road, Westport, Connecticut**

Dear Members of the Connecticut Siting Council:

I'd like to start these comments by thanking the Council members. I watched the August 9, 2022 evidentiary hearing and can tell you were well-versed with the material and asked many of the questions and raised many of the concerns that were raised in my August 8, 2022 letter to you.

In the days to come you will be hearing from other town representatives who will submit follow-up testimony to that which was presented on August 9, 2022 regarding the placement of a cell tower at 92 Greens Farms Rd. Specifically, you'll most likely hear that there is no urgency for the Siting Council to be making a decision on this application as demonstrated by the fact that the applicant initially applied in 2014 for a tower in this location, walked away, and now, eight (8) years later is only just reconsidering the location. You'll also hear that there are other sites along Interstate 95 where the perceived need for the tower can be met which does not involve a residentially zoned piece of property. This option seemed important to you as well as it was one of the reasons the hearing was continued until September 22, 2022 so that other locations could be explored. Moreover, you may also hear that there are other technologies available that may be able to fill this need. However, I write this letter today as the Conservation Director for the Town of Westport regarding the environmental concerns I have with the placement of a cell tower at 92 Greens Farms Rd.

After listening to the hearings I would like to emphasize the most important concern I have with the placement of the tower on this property which is its proximity to a 48" culvert abutting this property that goes under I-95 and directly discharges into the Sherwood Mill Pond, located less than one-half mile away. This estuarine embayment is an ecological gem and is home to a commercial shellfishing operation and a multitude of avian species, including those listed as "Threatened" and of "Special Concern."

Page 34 of Vol 1 of 3 of the report says that the generator will be served by natural gas. Now, according to the testimony, it is uncertain this is the case. This is an important concern because if the two generators end up being powered by diesel, and there is a spill, I'm very concerned that that diesel fuel will find its way into the Mill Pond via the 48" culvert. I heard mention that a 93-gallon tank size is proposed to hold the diesel. Is that 186 gallons total?? If there is a leak and the diesel gets in there, those shellfish beds are ruined along with all the other animals. If you feel compelled to approve this, we would implore that you mandate that the generators be served by natural gas service.

A secondary concern I have is the lack of information provided to ensure that the on-site wetland and adjacent watercourse will not be adversely impacted. If this were a typical Inland Wetland and Watercourse application, the applicant would be compelled to appear before the Westport Conservation Commission, which acts as the wetland agency, because the cell tower and access driveway falls within our 75 ft. upland review area. If a hearing was held, we too, would have needed to continue it because there is not enough information on the plans submitted to determine if the on-site wetland will be affected. For example, the site plan provides only grading for the driveway. There is no drainage proposed. An accurate accounting of the number of trees to be removed should be shown on the site plan. I heard the applicant say that a gravel driveway is proposed and therefore, none is needed. This would not pass muster if our Engineering Dept were to review it. We know that gravel compacts over time and because there is no guarantee that it won't be paved in the years to come, we still would require drainage. Also, no stockpile or erosion controls are shown, even though I heard reference to them during the hearing. Also, if the geo-technical investigation reveals rock and either blasting or use of hoe-ram is required, will that affect groundwater flow or hydrogeologic conditions in the area? I heard testimony that it is possible the tower could be constructed 30 ft. higher than what is proposed. This would most likely necessitate a deeper footing and potentially more rock removal. Again, if the Council feels compelled to approve this proposal we would ask that you require the applicant to submit this information to us for review and approval prior to work commencement so we can ensure that the wetlands and watercourses in our community are protected.

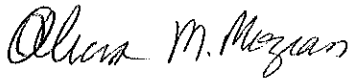
Lastly, the applicant provided testimony that landscape screening was not necessary because the location of the tower base is 6-7 ft lower in elevation than the road. I contend that the existing on-site trees are deciduous so a portion of the base and equipment will be visible from the road a good part of the year. Therefore, again, if the Council feels compelled to approve the application, I ask that you require evergreen tree screening to hide the tower's base and equipment.

In summary, I do not support installation of a cell tower on this residentially-zoned property for the reasons stated herein and those outlined in my August 8, 2022 letter. However, if the Council does decide to approve the application, I ask that you require that:

1. The generator(s) be fueled by natural gas;
2. An amended site plan be submitted which incorporates details regarding grading, drainage, driveway design, erosion controls and information about the need and method for rock removal to support the tower's base; and,
3. Evergreen screening be planted to shield the base of the tower and associated equipment.

Thank you for the opportunity to comment.

Sincerely,



Alicia M. Mozian
Conservation Director

Cc: Jennifer Tooker, First Selectwoman
Ira Bloom, Town Attorney



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