

Statement of Inappropriateness – 1022 Trumbull Highway Site

Connecticut Siting Council Docket No. 538

The proposed cell tower at **1022 Trumbull Highway** is **not appropriate** under Connecticut statutory siting criteria and the application should be denied. Under **C.G.S. § 16-50k**, the CSC must evaluate applications for telecommunications towers based on:

- **Public need and alternatives** (including co-location feasibility).
- **Environmental compatibility** (wetlands, wildlife, scenic resources).
- **Community character and scenic quality** of local, regional, or statewide significance.

It appears that the site was selected based only on the willingness of the landowner to have a tower on their property and that the Applicant made only minimal attempts to secure alternative, better suited locations. The applicant listed 31 potential sites but these 31 locations included 5 sites on West Town Street which is on the Lebanon Green and part of the historic district and therefore clearly not appropriate, 9 other sites owned by a single entity and 6 other sites owned by a single owner and no sites located in the area identified as in the most need of additional coverage (207/32 area).

A 150-160 foot tower is completely out of character with the surrounding area which is rural, residential and agricultural in nature. Currently the tallest structures are houses, most 2 stories. The trees are 80 feet tall or less (per the Applicant's own assessment). The assertion by the Applicant that 'visual impacts are minimal and do not rise to the level of significant adverse effect' is ridiculous and shows a complete disregard for the scenic quality of our town/neighborhood. The Applicant has acknowledged how much the tower will stand out in their assertion that the tower does not need to be of 'stealth' design because any disguise would stand out due to the height of the tower (more on this below). In addition, the lease is basically a 50-year term and it is not unlikely that in that time some of the trees blocking view of the tower will come down increasing the visibility over time. (while new trees may grow, that is a much slower process). Furthermore, the focus on the view from houses disregards that at least some of us spend considerable time in our fields in closer proximity to the tower.

The construction of the tower will disrupt wetlands and potentially disrupt wildlife habitat, including an endangered bat species. The long term effects of cell towers on wildlife are not that well studied although effects on migratory birds and pollinators have been

documented (ie, Balmori 2015¹; Cucurachi 2013²) The area is rich in wildlife including deer, turkeys, Canada geese and more.

Certainly, there must be a more appropriate site that provides acceptable coverage and therefore the application should be denied.

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¹ Balmori 2015

<https://www.sciencedirect.com/science/article/abs/pii/S0048969715002296?via%3Dihub>;

²Cucurachi 2013 Environ Int. 2013 Jan;51:116-40 doi: 10.1016/j.envint.2012.10.009.)

Should the Council make the wrong decision and approve the application, then it must require a disguised tower.

The Applicant has claimed, *“However, deploying monopine towers at the edge of an open field backed by a deciduous forest stand, as is the case at this site, will not produce the desired effect of minimizing visibility. In deciduous forests, particularly in those months when the trees shed their leaves, a monopine can create a stark contrast to its surroundings. The combination of a monopine tower’s additional width (due to the presence of branches) and its proposed height (which exceeds the surrounding tree canopy height by anywhere from approximately 60 to 90 feet) would likely result in in the tower appearing more prominent to an observer, rather than camouflaging it. Therefore, it is the Applicant’s opinion that a monopine at this location would not be an effective visual mitigation option.”* However; being forced to look at an out of place tree is better under any circumstance than being forced to look at a metal/industrial structure.

Furthermore, a lone pine tree is not out of character with the natural environment. See below an image from across the street from 1038 Trumbull Hwy and an image from the property of the proposed site showing individual conifers. And also, a Google map image showing some conifers in the exact area of the proposed tower.

The fact that a stealth design will cost more money should not be a factor in requiring such a design to minimize impact. If it is not cost effective to put such a tower in the proposed location, all the more reason to find a more suitable location.



