

STATE OF CONNECTICUT
SITING COUNCIL

DOCKET NO. 488 - Homeland Towers and New Cingular Wireless Application for a Certificate of Environmental Compatibility and Public Need for the proposed construction, maintenance and operation of a wireless telecommunication facility on one of two sites in Kent, Connecticut.

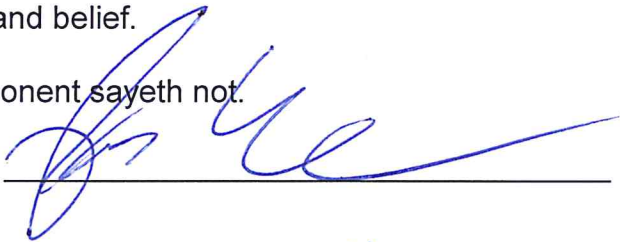
JULY 15, 2020

AFFIDAVIT OF PAUL ELCONIN

I, Paul Elconin, the undersigned, being duly sworn, do depose and say:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. I reside at 79 Mitchell Road, Somers, NY, 10589
3. I am the author of the pre-filed written testimony attached to this affidavit.
4. I believe the facts contained therein are true and accurate the best of my knowledge and belief.

FURTHER the deponent sayeth not.



Subscribed and sworn to before me this 15th day of July, 2020. This document was remotely notarized and/or witnessed and executed under the authority granted by Connecticut Governor Lamont's Executive Order 7Q, March 30, 2020, providing for remote execution of notarized documents, testamentary documents and documents to be recorded on the land records of a municipality using simultaneous and recorded remote video conferencing technology.

Kellyann Stapleton, Commissioner of the Superior Court/Notary Public.

Kellyann Stapleton My commission expires: 3/31/2025.



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HERITAGE LAND TRUST

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CONNECTICUT'S
LARGEST
LAND TRUST
PROTECTING
10,000 ACRES
AND GROWING

July 15, 2020

The Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

via email: siting.council@ct.gov

Re: Kent Proposed Cell Tower CSC Docket Number 488

Dear Melanie Bachman and the Council Members,

On behalf Northwest Connecticut Land Conservancy (NCLC, formerly Weantinoge Heritage Land Trust), please accept these comments on the AT&T cellular communications facility proposed for one of two ridgeline locations in Kent, CT.

Northwest Connecticut Land Conservancy (NCLC) was founded in 1965 to benefit the public through the conservation of natural areas, fish and wildlife, and working farmland. NCLC is the largest land trust in Connecticut and 18th largest in the United States by number of lands we protect. NCLC preserves 12,000 acres of vast, connected natural areas in Litchfield and northern Fairfield Counties. Our conserved lands include public hiking preserves; working farms; habitat for rare, threatened, and endangered species; and more than 42 miles of rivers, lakes, and streams. Through this great breadth of conservation work across the region and especially in Kent and New Milford, it has become clear that land and water conservation provide essential economic, public health, and natural resource benefits for all Connecticut residents.

As a regional organization, NCLC has dedicated 55 years to largescale, deliberate, scientifically-based land conservation spanning town boundaries. Town-based land trusts, as well as the State of Connecticut, and the Federal Government, have done the same. The result is a regional mosaic of conserved lands that protect our community viewsheds, ridgelines, public recreation areas, and vast forests. These conservation lands provide a wealth of public benefits including: clean air, clean water, carbon sequestration, wildlife habitat, hiking trails, hunting opportunities, and access to waterways for fishing, swimming, and boating. Economic benefits include attracting residents and tourists to our area by providing natural landscapes and a healthy environment, providing a natural world experience in and around a summer camp (in the shadow of one of the proposed towers), and the protection of property values and local community viewpoints with natural

views. Litchfield County's beauty attracts hundreds of thousands of annual visitors, some of whom come to drive or bicycle on our roads to admire our landscape.

The two towers, as proposed, will directly jeopardize the regional benefits that conservation and careful stewardship of our forests, ridgelines, and public recreational gems have created. Within 5 miles of the towers are:

- 14,500 acres of protected open space and
- 22,000 acres of identified core forests, the most ecologically important forested lands in the State.

According to the visual analyses completed by NCLC, across four towns the Bald Hill Road tower could be visible from over 24,000 acres and over 850 tax parcels, while the Richards Road tower could be visible from over 30,000 acres and over 1,500 tax parcels. As the July 4, 2020 balloon flight has clearly demonstrated, the proposed towers will be visible from: the public waterbodies South Spectacle Lake and Lake Waramaug, including the Town of Warren's public beach; the heavily traveled and popular tourist road Route 341; the public trails of the Steep Rock Association; and many residential properties. The visual impact from these potential towers is undeniable, significant, and long-term.

In addition, the towers do not appear to comply with local zoning regulations, especially the Town of Kent's carefully crafted Horizon-line Conservation Overlay District.

The purpose of the Horizon-line Conservation Overlay District (HCOD) is to conserve and protect the hill summits and ridges that form the high horizon visible from the town's system of roads....The specific goals of the District include the preservation of scenic views and vistas that are critically important to the rural landscape and character of the Town, and the minimization of erosion and sedimentation hazards caused by the development and use of steep hillsides and ridges. (Town of Kent Zoning Regulations effective July 1, 2018).

Furthermore, there is a designed and engineered alternative to the proposed towers that will provide better coverage for comparable cost with no detrimental scenic ridgeline impacts. A local group, engaged with the Town of Kent, has developed a small-cell solution—transmitters that are mounted on telephone poles—that provides better coverage than the proposed towers. The small cells will link up with the existing cell tower in the Town of Kent and the approved tower in the Town of Warren. This would allow better hand-off of calls at both ends of the Town of Kent and Route 341, providing more seamless and better safety coverage as it would blanket the curvy, hilly portion of Route 341

east of the hamlet of Kent. The currently proposed AT&T towers do not even cover this part of Town, thereby still leaving a gap in coverage while destroying the scenic ridgelines and vistas.

It would be short-sighted if the proposed towers were approved by the Siting Council when a locally supported solution is designed and fully feasible.

NCLC opposes the location of a tower at either proposed location as the sites are on heavily wooded, unspoiled ridgelines that are fundamental to the region's natural, scenic, and economic value and there is a feasible and viable alternative that provides better service and coverage.

Sincerely,



Paul Elconin, Director of Land Conservation

On June 30, 2020, Weantinoge Heritage Land Trust changed its name to Northwest Connecticut Land Conservancy. While our name has changed, our mission to safeguard the lands and waters of Northwest Connecticut remains the same. If you have any questions, please do not hesitate to contact info@weantinoge.org or info@ctland.org

Thank you for updating your records.