

PLANNED DEVELOPMENT ALLIANCE OF NORTHWEST CONNECTICUT, INC.

Planned Development Alliance of Northwest Connecticut, Inc. (“PDA”) is making three principal arguments:

I. THE PUBLIC BENEFIT OF THE PROPOSED TOWERS IS OUTWEIGHED BY THE ENVIRONMENTAL HARM

Limited Public Benefit - Only approximately 1.5 miles of Route 341 covered, versus approximately 4 miles of Route 341 for the proposed small cell solution

The Ridgeline Locations of the Towers are Unsuitable

Kent’s Ridgeline Views are a Prized Asset Which the Proposed Towers Violate

The Ridgelines Lie Within the Upper Housatonic Valley National Heritage Corridor a Scenic Preserve and are a key component of this Preserve

Conservation Organizations are Deeply Opposed to these Proposed Sites

The Town of Kent is Opposed to these towers and Supportive of a Small Cell Solution

The Residential Communities Purported to be Served by the Towers Do Not Want Them

II. A SMALL CELL SOLUTION IS BETTER FOR COVERING TRAVELLERS ON ROUTE 341 AND ITS ENVIRONS

Small cells can provide coverage from Kent Town Center Tower to Warren and Link with the Town Approved site in Warren, for seamless coverage

The proposed towers only Cover the Crest of Route 341 between Kent and Warren

III. A TOWER OF 80 FEET PROVIDES SUBSTANTIALLY THE SAME COVERAGE AS THE PROPOSED 154 FOOT TOWERS

The Siting Council precedent has denied similar sites in the Northwest Hills

A 120 Foot Monopole Tower in Docket #355 was denied with direction to consider multiple shorter towers for the Northwest Hills

ARGUMENTS:

I. THE PUBLIC BENEFIT OF THE PROPOSED TOWERS IS OUTWEIGHED BY THE ENVIRONMENTAL HARM

Limited Public Benefit:

Neither the Bald Hill Site (Site A) on top of Bald Hill nor the Richards Road Site (Site B) on top of Treasure Hill should be approved for the 154 foot towers, as the public benefit, is outweighed by the environmental harm due to the impact on the ridgeline viewshed by these large towers in the Kent environment where the local population has expressed a longstanding and clear preference to preserve these ridgeline views.

The proposed towers would cover fewer homes and fewer miles of Route 341 than would a small cell array of lesser impact.

The environmental impact is demonstrated by the viewshed maps (see attached).

The Ridgeline Locations are Unsuitable:

Bald Hill:

- The Bald Hill Ridgeline site is on top of a ridgeline between the Spectacle Lakes exposing that site to up-close, open, uninterrupted views from most of North Spectacle Lake (approx 0.5 mile away from the lake center) and all of South Spectacle Lake (approx 0.5 a mile away to the lake center) and distant views for miles around from other public recreation areas, such as the Appalachian Trail and Macedonia State Park.
- The Bald Hill Ridgeline site, while not directly in a protected ridgeline zone, is surrounded by protected ridgeline zones within approximately 500 feet, and a tall tower above tree-line will severely impact these surrounding protected zones even though the tower is not technically in the zone.
- Photographs showing these impacts are attached from a balloon flight conducted by PDA in early July 2020. Ex. A to Ex. G.

Richards Road (Treasure Hill):

- The Richards Road site is on top of a ridgeline between South Spectacle Lake and Lake Waramaug, exposing that site to up-close, open, uninterrupted views from portions of North Spectacle Lake (approximately 1.6 miles from the lake center), portions of South Spectacle Lake (approximately 0.6 miles from the lake center) and distant views from Lake Waramaug and for miles around from other public recreation areas, such as the trails maintained by the **Steep Rock Association** at Macricostas Preserve overlooking Lake Waramaug, which is designated as a **Connecticut Heritage Lake** and listed in “1,000 Places to Visit Before You Die”.
- The Richards Road site is in a protected ridgeline zone.

- Photographs from the PDA balloon flight are attached. Ex. A to Ex. G.

Both Sites:

- Are on some of the highest points in Connecticut, 1300 feet in the case of Bald Hill and 1330 feet in the case of Richards Road (Treasure Hill).
- Are on ridgelines, rising approximately 85 feet above treetops with no backdrop other than open sky, making the visual impact particularly severe.
- Are on natural east/west sightlines so that they are positioned so that the many residents in the areas who have located homes specifically to enjoy the views will have those views impaired by the towers.

Importance of Ridgeline Views and Violation of Community standards:

Importance of Protection of Ridgeline Views:

The Town of Kent has ordinances to protect the ridgelines as an important natural resource which would be violated by the towers, the Town of Kent Conservation Commission is opposed to the towers as is the Town itself.

Kent Zoning Regulations §5700 et seq. 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 while allowing reasonable, appropriate and compatible uses of the land. 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, ...

Violation of Community Standards:

The towers violate clear community standards as noted by the letter from the **Town of Kent Planning and Zoning Commission** to the Kent Board of Selectmen which details numerous violations of zoning standards and concludes:

“After examining the sites and reviewing the plans, the Commission concludes that both projects, as proposed do not comply with Town regulations. ... In conclusion, we believe that either project would be in violation of the Town's zoning regulations and ask that alternative sites be located.”

The Planning & Zoning Commission thereafter went into great detail about how the proposed towers will violate these carefully crafted regulations. (Kent P&Z Letter Pre-filed testimony of Jean Speck Town of Kent).

Importance of the Housatonic Valley and the negative impact:

The Upper Housatonic Valley National Heritage Area Act was enacted into law by the US Congress in 2006 with the preamble noting that:

“The [upper Housatonic] region became a national leader in scenic beautification and environmental conservation efforts following the era of industrialization and deforestation and maintains a fabric of significant conservation areas including the meandering Housatonic River. ... [and stating as a goal]: To provide a management framework to foster a close working relationship with all levels of government, the private sector, and the local communities in the upper Housatonic Valley region to conserve the region’s heritage while continuing to pursue compatible economic opportunities.”

The **Housatonic Valley Association** laid out the negative impact of the proposed tower sites in the context of the **The Upper Housatonic Valley National Heritage Area Act** (see attached):

“As an accredited land trust and regional watershed organization working to conserve natural character and environmental health across the entire tristate Housatonic River Watershed, our primary concern is the negative impact that both alternatives, Richards Road and Bald Hill Road, would have on the scenic vistas that drive the region’s environmental and economic health.

The negative impacts of a tower on these assets cannot be overstated and are a poor tradeoff indeed given the limited, incremental increase in cell service identified in the proponent’s Technical Report to the Town of Kent. The number of people served is very small, less than 400, failing to demonstrate a public need for a tower at one of these locations.

These sites are in the heart of what is arguably the most exceptional stretch of Housatonic River Valley and the Sweeping unspoiled ridgelines that define it. The region is a state jewel that is nationally recognized for its breathtaking views, natural beauty and world class outdoor recreation. Congress designated this region as the Upper Housatonic Valley National Heritage Area – one of just 50 such designations in the country. ...The Housatonic River corridor is a world-renowned recreation destination. The longest riverfront stretch of Appalachian National Scenic Trail on the eastern seaboard travels right through Kent.

It is no accident that there exists a concerted, and quite substantial, financial investment by residents, government agencies at all levels, and numerous non-profit partners to secure the region’s natural heritage through conservation and increased recreational access. Millions of public and private funds invested through five decades of coordinated effort has yielded a vast network of publicly accessible lands and waters in this region.”

Local Conservation Organizations are Deeply Concerned About and Opposed to these Proposed Sites:

As mentioned above, **The Kent Conservation Commission** and the **Housatonic Valley Association** have voiced their concerns over the negative effects of these towers, as have the other local conservation organizations: **The Kent Land Trust**, the **Warren Land Trust**, **The Northwest Connecticut Land Conservancy**, **Steep Rock Association** and the **Lake Waramaug Association**.

The **Kent Land Trust** described its concerns as follows (Pre-filed Testimony of Connie Manes):

“We agree with the comments submitted by the Kent Conversation Commission regarding the critical importance of scenic vistas to Kent’s rural character and the prospective impact of the cell tower sites described in the Technical Report. Simply stated, a tower at either of the Bald Hill Road or Richard Road sites would negatively impact scenic views from public roads and public recreation attractions including fishing and swimming areas in North and South Spectacle Lakes and Lake Waramaug. In addition, it is possible that towers at either of the Bald Hill or Richards Road sites would be visible during leaf-off season from public trails on Kent Land Trust properties including trails in East Kent Hamlet Nature Preserve, Bull Mountain Preserve, West Aspectuck Scenic Wetlands, and Skiff Mountain South Preserve. Scenic views are integral to Kent’s identity as a beautiful, small, special, healthy place to live and visit in the great outdoors.”

The **Warren Land Trust** stated: (See Town of Kent pre-filed exhibits)

“Either site would adversely affect scenic vistas extending well beyond their immediate vicinity. Mapping projections show that the towers would be visible not only from the Warren side of Lake Waramaug, but from other areas in our town as well – including properties protected by the Warren Land Trust.”

The **Northwest Connecticut Land Conservancy** stated:

“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 spaces and
22,000 acres of identified core forests, the most ecologically important forested lands in the State*

And according to the bare earth visual analyses completed by CCGIS, 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. These towers could be visible from important public destinations like the Appalachian Trail and South Spectacle Pond in Kent and Lake Waramaug in Warren. Clearly, the impact from these potential towers is significant and would persist for decades.”

We encourage the Siting Council to read these letters in their entirety.

The Town of Kent is Opposed to these Towers and Supportive of a Small Cell Solution

The Town of Kent has joined with PDA to oppose the towers and is supportive of the small cell solution outlined in the testimony of David Maxson, the RF Engineer retained by PDA.

The Residential Communities Purported to be Served by the Towers Do Not Want Them

The application states that the purpose of the towers is to provide telecommunication services to:

“the central portion of Kent, including portions of Segar Mountain Road [Route 341], Richards Road, Bald Hill Road, Stonefence[s] Lane, Spectacle [Ridge] Road, and the residential neighborhoods and business/retail areas in the vicinity.”

Based on the residents that have spoken up in letters to the Town of Kent or the Siting Council or that attended the December, 2019 Town Meeting to discuss the towers, each of the enumerated residential communities is opposed to the towers. Of the approximately 100 people who attended the Town Meeting, only two residents spoke in favor of the towers, the balance of the speakers were opposed to the towers. **A list of persons who have written to the Town of Kent, the Siting Council or PDA to oppose the towers is attached.**

There are only three local businesses in the proposed coverage area that are visited by customers on any regular basis, Kent Falls Brewing and the Hopkins Inn and Vineyard, both of which are only served by the Richards Road site and **KenMont and KenWood Camps (who has written to the Town of Kent opposing the tower close to the near 100-year old camp)**. Other businesses in the coverage are work-from-home residential locations where customers do not regularly visit. The proposed coverage area has telecommunications cable access permitting residents and business owners to make and receive cell phone calls at their businesses and residences over Wifi.

The towers cover only a small portion of Route 341 (**appx 1.5 miles**) in contrast to a **small cell array** which can cover **appx 4 miles**. Notwithstanding their large size, the proposed towers do a poor job of covering Route 341. We believe that Kent Town residents anticipating cell phone coverage on Route 341 will be very disappointed to learn how little incremental coverage these looming towers will provide.

II. A SMALL CELL SOLUTION PROVIDES BETTER COVERAGE FOR TRAVELERS ON ROUTE 341 AND THE SURROUNDING HOMES

Due to the hilly topography of Route 341 a small cell solution can:

- (i) provide better coverage of Route 341, including the most dangerous S curve portion that is not served by either proposed tower,

- (ii) provide for a hand-off of coverage from the cell tower in Kent Town Center (which the towers do not) and
- (iii) provide for a hand-off to the tower site in the Town of Warren (which the towers do not) that is leased from the Town by Homeland.

The voters of the Town of Warren have approved the Warren tower site on Town owned land and want a tower there. The small cell solution would cover more miles of Route 341, more homes and more people and could provide seamless coverage from the Town of Kent to the Warren border. The small cell solution would obviate the need for the towers and, from discussions with our engineers, we understand it is roughly the same cost. (Pre-filed testimony of Maxson).

III. A TOWER OF 80 FEET PROVIDES SUBSTANTIALLY THE SAME COVERAGE AS THE PROPOSED 154 FOOT TOWERS

If there is to be a tower, a much shorter tower can provide substantially the same coverage with much less view shed impact. Our analysis shows that towers as low as 80 feet can provide much of the same coverage. An 80 foot tower on Bald Hill or Richards Road would cover nearly the same number of homes and miles of road as the 154ft tower. At this lower height, camouflaging the tower to resemble a tree would be very helpful in diminishing viewshed impact as the ridge line locations are surrounded by trees. A 100-foot tower does not provide meaningful additional coverage versus an 80-foot tower, but the visual impact as it rises more noticeably over the ridgeline will be much more severe. Reference is made to the coverage maps provided by our engineers for expected coverage of towers at 80 and 100 feet in height. (Ex. A Fig 1, 2, 3 Maxson Pre-filed testimony)

THE SITING COUNCIL HAS PREVIOUSLY DENIED SIMILARLY SITUATED TOWERS IN THE NORTHWEST HILLS – THESE DOCKETS PROVIDE A TEMPLATE FOR THIS DOCKET

In Docket 355¹, the Siting Council denied a proposed tower siting in New Milford with much less view shed impact than the proposed towers due to the height, commenting:

“Visual impacts of the tower would be detrimental to the surrounding neighborhood. Several residences in close proximity to the site would have year-round, near tower views of the upper portions of the structure. Seasonal views from these same residences could include the entire facility since Big Bear Hill Road pass directly northeast of the site, eliminating a natural buffer to nearby homes. Views from adjacent roads, including Big Bear Hill Road, Route 202 and Upland Road, would be continuous in nature rather than isolated spot views.... the Council finds the proposed site to be visually obtrusive to the surrounding area, environmentally disruptive to the site property, and sited too close to an abutting property.

In the current Docket, both towers are visible year-round with near tower views from both North Spectacle Lake and South Spectacle Lake and many of the residents of those

¹ See administrative notice request.

communities without natural buffers. Both sites are embedded in residential areas, with homes nearby. In addition, due to the ridgeline locations, the towers would spoil treasured and protected ridgeline views, and are visible from miles around, including from many public recreation areas, state parks, and land trust trails.

Additionally, in its Decision & Order in Docket 347² (at p.3), the Council noted the following observations relevant to these proceedings:

The Council also acknowledges that the terrain in this region makes finding acceptable sites particularly challenging. Consequently, the Council strongly encourages the wireless carriers serving this region to collaborate with each other, with municipal officials, and with any other parties having resources relevant to the region's telecommunications infrastructure, on developing strategies to provide the needed services.

- ***While the legislature has directed the Council to minimize proliferation of towers, the Council recognizes one potential strategy may be to include more but shorter towers.***
- ***Other strategies possible could be to identify a wider range of municipal sites, to expand stealth options, or to design coverage with the maximum use of new wireless technologies.***
- ***In light of the above discussion, ...the Council would prefer to base such a determination on a wider evaluation of available alternatives.***

If a tower is approved in this Docket, it should be at 80 feet so that it rises just above the tree-line and be camouflaged to the greatest extent practicable. **Attached to this testimony are coverage maps showing the coverage of the towers at several shorter heights as well as the coverage of the small cell solution.**

PDA's engineer Isotrope's filing has a table showing the difference in miles of Route 341, homes covered for the towers versus the small cell solution. The table demonstrates that a small cell solution will actually provide better coverage to more target areas.

Respectfully submitted,

Planned Development Alliance of Northwest Connecticut, Inc.



Robert (Todd) Powell

² See administrative notice request.



Housatonic Valley Association

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Merwin House
14 Main Street
PO Box 496
Stockbridge, MA 01262
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37 Furnace Bank Road
PO Box 315
Wassaic, NY 12592
T: (845) 442-1039



July 16, 2020

Kent Board of Selectmen
Kent Town Hall
41 Kent Green Blvd
Kent, CT 06757

Re: Cell Tower Proposed by Homeland Towers & New Cingular Wireless (Richards/Bald Hill Roads, Kent)

To the Kent Board of Selectmen,

On behalf of the Housatonic Valley Association (HVA), thank you for this opportunity to comment on the two candidate cell tower locations proposed by New Cingular Wireless and Homeland Towers.

As an accredited land trust and regional watershed organization working to conserve natural character and environmental health across the entire tristate Housatonic River Watershed, our primary concern is the negative impact that both alternatives, Richards Road and Bald Hill Road, would have on the scenic vistas that drive the region's environmental and economic health.

The negative impacts of a tower on these assets cannot be overstated, and are a poor tradeoff indeed given the limited, incremental increase in cell service identified in the proponent's Technical Report to the Town of Kent. The number of people served is very small, less than 400, failing to demonstrate a public need for a tower at one of these locations.

These sites are in the heart of what is arguably the most exceptional stretch of Housatonic River Valley and the sweeping unspoiled ridgelines that define it. The region is a state jewel that is nationally recognized for its breathtaking views, natural beauty and world class outdoor recreation. Congress designated this region as the Upper Housatonic Valley National Heritage Area – one of just 50 such designations in the country. It is part of the congressionally designated four-state Highlands Region, an area of core connected forest that protects our drinking water, rivers, wetlands and critical wildlife habitat and is a critical conservation focus area for the state's Forest Legacy program. The Housatonic River corridor is a world-renowned recreation destination. The longest riverfront stretch of Appalachian National Scenic Trail on the eastern seaboard travels right through Kent.

It is no accident that there exists a concerted, and quite substantial, financial investment by residents, government agencies at all levels, and numerous non-profit partners to secure the region's natural heritage through conservation and increased recreational access. Millions of public and private funds invested through five decades of coordinated effort has yielded a vast network of publically accessible lands and waters in this region.

This effort has paid off. Visitors from all over the world come here to experience unrivaled natural beauty and outdoor recreation, and support the region's inns, restaurants and shops, too. Here,

unspoiled scenic beauty and outdoor recreation are the undeniable economic drivers for the entire region and, in turn, contribute mightily to the state's economy.

One or both of the proposed tower sites will be visible at different times of the year from multiple such public areas and recreation lands and waters. These include North and South Spectacle Lakes, Lake Waramaug, the Appalachian Trail, and thousands of acres of public lands and trails held by the state, the Kent Land Trust, The Nature Conservancy, Weantinoge Heritage and Steep Rock Association. The views from these areas would be significantly marred, their appeal forever diminished.

Kent residents recognize how important its scenic vistas and unspoiled ridgelines are to the continued vitality of the region. They've worked diligently to preserve unmarred ridgelines and ensure that telecommunication siting is done in the least intrusive manner. Kent became a leader among Connecticut communities when it worked with HVA to craft a zoning Horizon Line Conservation Overlay District (Kent Zoning Regulations section 5600) and more recently adopted its Telecommunication Provisions (section 9600).

The proposed sites violate these thoughtfully crafted town regulations and compromise the region's natural and economic health in exchange for what looks to be little demonstration of public need.

We second the comments of the Kent Conservation Commission, Kent Land Trust and Weantinoge Heritage Land Trust, and appreciate this opportunity to express our strong concern.

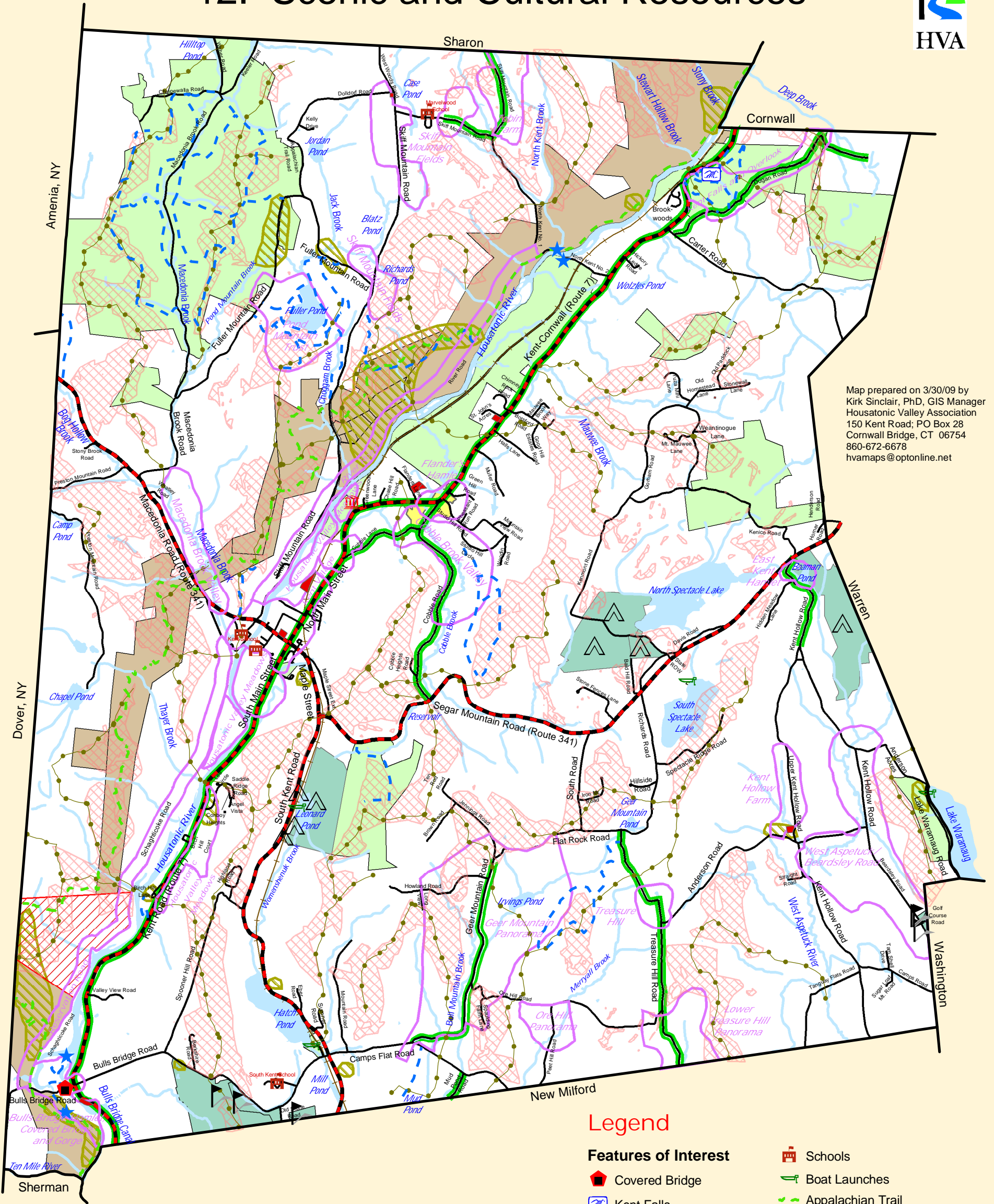
Sincerely,



Lynn Werner
Executive Director

TOWN OF KENT, CONNECTICUT

12. Scenic and Cultural Resources



Map prepared on 3/30/09 by
 Kirk Sinclair, PhD, GIS Manager
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DATA SOURCES

Most data were obtained from the Environmental GIS Data distributed by the Connecticut DEP. Roads, lakes, and streams are based on USGS DLG files. Road data were enhanced through the use of GPS, digital orthophotos, and town review. The Appalachian Trail was obtained through the use of a GPS receiver with 2-5 meter positional accuracy.

Archeological Sites obtained from the State Archeology Office.

Town Character Areas are taken from the 1990 Town Character Study by Michael Everett. They represent cultural and scenic areas of great significance for the town character and open space purposes. Horizon belts and scenic ridgelines were determined by the Kent Planning and Zoning commission and defined in their Horizon Line Regulations.

This is not to be construed as an accurate survey and is subject to change

Legend

Features of Interest

- Covered Bridge
- Kent Falls
- River Access
- Sloane-Stanley Museum

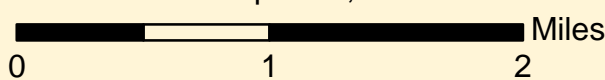
Recreational Lands

- Camps
- Golf Course
- Appalachian Trail Corridor
- State Lands and Town Parks

- Schools
- Boat Launches
- Appalachian Trail
- Public Trails
- Designated Scenic Roads
- Scenic Ridgelines
- Horizon Belts
- Schaghticoke Indian Reservation
- Archeological Areas
- Town Character Areas
- Flanders Historic District
- Cemeteries



1 inch equals 4,000 feet



Town Resources Map Series Sponsored by the
 Kent Conservation Commission

List of Objectors to the Cell Towers:

1. John Johnson, The Town of Kent Planning and Zoning Commission letter to/filing with Attorney Lucia Chiochio dated December 12, 2019
2. Andrew E. Richards letter to/filing with the Town of Kent/Connecticut Siting Council dated December 12, 2019 – **Richards Road**
3. Sue and Peter Beerman letter to/filing with First Selectman Jean Speck dated December 12, 2019
4. Tom Troche and Hylton Werner, KenMont and KenWood Camps letter to/filing with First Selectman Jean Speck dated November 20, 2019 – **North Spectacle Lake**
5. Connie A. Manes, Kent Conservation Commission letter to/filing with the Town of Kent/Connecticut Siting Council dated December 12, 2019
6. Melanie Ough letter to/filing with First Selectman Jean Speck dated November 19, 2019 – **Bald Hill Road**
7. Robert A. Karr letter to/filing with First Selectman Jean Speck dated November 12, 2019 – **North Spectacle Lake**
8. Lynn Werner, Housatonic Valley Association letter to/filing with the Kent Board of Selectman dated December 13, 2019
9. Rebecca Neary, Warren Land Trust letter to/filing with the Kent Board of Selectman dated December 13, 2019
10. Paul Elconin, Weantinoge Heritage Land Trust letter to/filing with the Kent Board of Selectman dated December 12, 2019
11. Connie A. Manes, The Kent Land Trust letter to/filing with the Kent Board of Selectman dated December 12, 2019
12. Notice to PDA from North Spectacle Lake Association to/filing with the Town of Kent/Connecticut Siting Council dated December 23, 2019 – **North Spectacle Lake**
13. Richard Chizzonite and Lynna Lesko letter to/filing with the Town of Kent/Connecticut Siting Council dated July 12, 2020 – **Richards Road**
14. Claire H. Irving letter to/filing with the Town of Kent/Connecticut Siting Council dated July 2020 – **Treasure Hill Road**
15. Robert and Jane Harrison letter to/filing with the Town of Kent/Connecticut Siting Council dated July 11, 2020 – **Treasure Hill Road**
16. Edward and Carolyn Wagner, letter to/filing with the Kent Board of Selectman dated July 13, 2020 – **Richards Road**
17. Connie A. Manes, Kent Land Trust letter to/filing with the Town of Kent/Connecticut Siting Council dated July 11, 2020
18. Raph A. Posner and Brian Hermann letter to/filing with the Town of Kent/Connecticut Siting Council dated July 14, 2020 – **Richards Road and Oak Ridge Road**
19. Paul Elconin, Northwest Land Conservancy letter to/filing with the Kent Board of Selectman dated July 15, 2020
20. Walter and Karen Eckmeier letter to/filing with the Town of Kent/Connecticut Siting Council dated July 11, 2020 – **South Road**
21. Steep Rock Association letter to/filing with the Town of Kent/Connecticut Siting Council dated July 16, 2019
22. Spectacle Ridge Association letter to/filing with the Town of Kent/Connecticut Siting Council dated July 15, 2020 – **Richards Road, Spectacle Ridge Road**
23. South Spectacle Lakeside Residents letter to/filing with the Town of Kent/Connecticut Siting Council dated July 16, 2020 – **Spectacle Ridge Road**
24. Kent Chamber of Commerce letter to Daniel Rosemark, Attorney for the Town of Kent dated July 15, 2020
25. Lake Waramaug Association letter to the Connecticut Siting Council dated July 16, 2020



July 11, 2020

Via electronic mail siting.council@ct.gov

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

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Clark Gifford
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Gwynne Seufert
Office Manager

RE: **Docket No. 488** – 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 one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut

Dear Siting Council Members:

Please accept this letter on behalf of the Kent Land Trust in support of the positions taken and arguments made in the filing by Planned Development Alliance of Northwest CT, Inc. in the above Docket 488, which we summarize as follows:

- Due to the limited number of residents served and miles of Route 341 covered by the proposed towers, the public need of the proposed towers is outweighed by the environmental harm due to their location on highly visible ridgelines, dramatic local and long range viewshed impacts and their locations close to residences. This is especially true where a viable "small-cell" solution exists to provide better coverage of Route 341 and its vicinity.
- Dramatically shorter towers, as short as 80 feet, provide substantially the same coverage as the 154 foot towers, and if these shorter towers were camouflaged as trees the view shed impact would be substantially reduced. If a tower is to be approved, the shortest possible tower should be approved and required to be camouflaged as a tree.

Please contact the undersigned with any questions.

Respectfully Submitted,
Connie Manes

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