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# TOWN OF WOODSTOCK

415 ROUTE 169  
WOODSTOCK, CONNECTICUT 06281-3039



January 11, 2008

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Chairman Daniel F. Caruso  
CT Siting Council  
10 Franklin Square  
New Britain, CT, 06051

**RE: Comments on Proposed Telecommunications Facility in Woodstock, CT north of Old Turnpike Road and East of Route 198, Docket No. 350**

Dear Chairman Caruso:

Attached please find detailed comments from the Woodstock Conservation Commission on the Cellco Partnership D/B/A Verizon Wireless telecommunications facility application for the Town of Woodstock, Woodstock Northwest Facility. Our comments are based on a review of the application dated October 26, 2007, provided to us by Robinson & Cole.

If you have any questions regarding these comments, please do not hesitate to contact Elizabeth Zimmerman of the Conservation Commission at (860) 974-3020.

Thank you in advance for giving due consideration to our input.

Sincerely,

Paul S. Wilbur  
Chair, Woodstock Conservation Commission

**Attachment**

cc:

- o Kenneth C. Baldwin, Robinson & Cole, 280 Trumbull Street, Hartford, CT 06103-3597
- o Sandy Carter, Cellco Partnership d/b/a Verizon Wireless
- o Gail Dickinson, Chair, Woodstock Planning & Zoning Commission
- o Delia Fey, Woodstock Town Planner
- o David Fox, CT DEP
- o Jean McClellan, Historic Properties Commission
- o Allan D. Walker, Jr., Woodstock First Selectman
- o Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, CT, 06457

**Date:** January 8, 2008

**RE:** **Comments on Proposed Telecommunications Facility in Woodstock, CT north of Old Turnpike Road and East of Route 198, Docket No. 350 Application of Celco Partnership D/B/A Verizon Wireless Woodstock Northwest Facility**

**FROM:** **The Woodstock Conservation Commission**

The Woodstock Conservation Commission appreciates the opportunity to comment on the above-referenced proposal to site a new cell tower in our town. We understand that the Siting Council has stated that "*While there may have been a refinement in jurisdiction, we strongly believe that municipal efforts and supporting documents should be maintained and will continue to be useful, and they should not be dismissed or abandoned.*" So, although towns no longer have the authority to approve or deny local applications, the Siting Council has agreed that "*Municipal input and guidance is absolutely necessary for this process to work.*" (Reference: Siting Council Press Release, November 2000)

**Description of Proposal:** The proposal involves a 140-foot tall monopole tower with twelve panel-type antennas, and a 12x30 foot equipment shelter at the base (with a diesel fueled generator and 210 gallon, double-walled diesel fuel tank with leak detection monitoring) enclosed within an 8-foot high security fence which would be "screened." Access gravel driveway would be 1,776 feet long and follow an existing "woods road" with a wetlands crossing.

**Comments:**

1. The application notes that the primary impact of this tower is visual. Woodstock is a rural community, renowned for its scenic vistas. With this in mind, we recommend that:
  - a. Towers and other supporting structures for antennas should be limited to a height at or near that of the forest canopy.
  - b. Service providers should be required to provide substantial evidence that they are requesting permits for the least intrusive facilities available in the least intrusive locations under the circumstances.
  - c. Antenna facilities should be placed on down slopes, rather than at the highest possible elevations, to prevent their being silhouetted against the sky. This would reduce the impact on scenic vistas. Height limitations would also alleviate the need to adhere to Federal Aviation Administration lighting requirements, and would reduce impacts on migrating birds.
  - d. Whenever possible, antennas should be placed on existing structures, such as electric-transmission towers. Monopoles disguised as flags, or church spires, or realistic trees can be used to support antennas if the height is not excessive.
    - o The tree canopy in this area is estimated by the applicant at 65'. The proposed tower would be 140' tall. It is located at the highest elevation in this area (refer to map ii in the main section of the application.) The height should be limited as much as possible. We request that the applicant demonstrate that a lower height

- would not be sufficient to provide adequate coverage. (Refer to section 10 of application.)
- A balloon was floated during the summer, when the tree canopy was fully leafed out. Although the application notes that there are currently no residences within 1000 feet of the location, the Viewshed Map in Section 10 shows visibility more than 0.5 miles away. There are 21 lots directly abutting the proposed location. The Woodstock Conservation Commission requests that serious consideration be given to any concerns raised by surrounding property owners regarding visual impacts.
  - The application notes that the tower is very visible from Black Pond. Nipmuck State Forest, a popular recreation area, is located directly to the south of Black Pond. The applicant does not state whether the tower would be visible from Nipmuck. The applicant does not state whether the tower would be visible from Keach Pond.
  - The proposed location is near two town-designated scenic roads – Sherman Road and Camp Road. The application indicates that the tower will be visible from Sherman Road.
  - The applicant has not proposed any measures to reduce visual impacts. If this location is utilized, suitable measures to reduce visual impacts should be instituted.
  - Note: The facility could impact the Roland Toutant airport. The FAA determination on the tower is not included in the package, which notes that comments are pending (page 19.) 1. FAA comments need to be submitted, reviewed and considered.
2. Cellular towers should be located in commercial or industrial areas in highway corridors.
- This location is neither a commercial or industrial area. It is near Routes 171, 198 and 197, however none of these roads are heavily travelled.
  - The owner of the former Eastford Tool & Die company located on 1053 Route 198 has apparently expressed interest in siting a tower on his property. If placed on a flagpole on an already developed piece of commercial property, it might be aesthetically more acceptable than the proposed location in the woods near Black Pond. We request that an analysis of this alternative be considered prior to making a decision.
3. Multiple antennas should be co-located on a single structure or clustered together on a single parcel of land. Providers should be encouraged to share towers instead of building separate adjacent towers.
- There is an existing Cellco tower on 87 West Quasset Road and in Union. Cellco's proposal to share an existing tower on George Davis's property at 1825 Route 198 is consistent with Objective #3.
  - The applicant has designed the tower to accommodate multiple antennas. However, they have failed to obtain any commitments from other cellular service providers. They indicate that the proposed tower sharing arrangement would "*reduce, if not eliminate the need for these other carriers to develop a separate tower in this same area in the future.*" Without any commitments, the evidence does not support this statement. The lack of other commitments may be an indication of need.
  - On page 2, the applicant states that "*Cellco currently offers little or no wireless coverage at all in the northwest portion of Woodstock.*" The map in Section 7 entitled "Existing and Approved Verizon Wireless Cellular Coverage in Woodstock and Surrounding Area" indicates that there is currently virtually no reception on Rtes. 171, 198 and 197 in the vicinity of the proposed tower. We understand that reception is spotty in these areas, but

anecdotal reports from some residents suggest it is adequate or more than adequate in areas for which the map shows no reception. We request that this information be verified and documented with the use of a Verizon phone(s) on these roads.

- While the applicant states that the federal Telecommunications Act of 1996 “*has pre-empted any state or local determination of public need for wireless services,*” the applicant should still be required to demonstrate that another tower in this specific area is needed to meet that general need. Woodstock consists of 61.8 square miles with numerous drumlins. Based on the maps provided in Section 7, it appears that coverage from Verizon facilities (e.g., Coatney Road) is limited to a 1 mile radius in some areas. How many towers total would be required to provide “adequate” coverage in a town like Woodstock, and where would preferred locations be? We understand that another cell tower location is under consideration on a property located east of Prospect St (south of Child Dome Rd).
  - Therefore, in accordance with Section 1 of Public Act No. 07-222, An Act Concerning the Connecticut Siting Council and Cellular Towers, we hereby request that the CT Siting Council develop a local telecommunications coverage assessment for Woodstock. “Such assessment shall identify locations within said municipality that provide inconsistent or nonexistent telecommunications coverage and shall contain an analysis of existing and projected demands for telecommunications coverage within said municipality.” An analysis like this might help to minimize the total number and intrusiveness of cell towers in Woodstock, and increase the likelihood that towers are placed in optimal locations from a coverage, aesthetic and environmental standpoint.
4. Fences, electrical sheds, and other parts of a telecommunications facility should be painted to blend in with the natural background. No advertisements on towers should be allowed.
- The proposed fence appears to be steel. The application indicates it will be “screened,” but it is not clear how this would be accomplished. We request that this information be provided.
  - There is no indication that advertisements on towers would not be allowed. We request that advertisements on towers be explicated prohibited.
5. Removal of towers should be required in case of disuse or noncompliance with standards.
- We request that this be made a requirement, and that a bond for removal in the event of disuse or noncompliance with standards be required.
6. Page 14 references pending comments from the State Historic Preservation Officer (SHPO). However, on Page 15, Cellco submits that “*the proposed facility will have no significant adverse impact on scenic, natural, historic or recreational facilities....*” It also notes on Page 15 “*This review by state administrative agencies furnishes ample expert opinion on the potential environmental impacts*” from the proposed facility.
- This determination can not be made absent a review of cultural and historic resources. SHPO comments need to be reviewed and considered. Note: The Keegan and Associates map of cultural resources does not indicate that there are any known cultural or historic resources on the affected parcel.
  - Nipmuck Forest is a recreational area located directly to the south of the proposed facility.
  - The affected property is part of a large forest block, with diverse large mammal species. The application should indicate how much land will be cleared to support the proposed tower.
  - The review of potentially affected species is only those on the federal list, and those in the Natural Diversity Database. The CT DEP and the Woodstock Conservation

Commission are aware that field data for Woodstock is very limited and inadequate. We therefore request that a field evaluation of this area be conducted for impact on sensitive habitats or species.

- We also request that due consideration be given to a 2004 study of Black Pond by Dr. Priscilla W. Baillie (Ph.D Ecologist, Botanist), which was provided to the Siting Council in Dr. Gail Dickinson's letter dated August 31, 2007.
7. Page 16: Consistency with Local Land Use Controls.
- The Conservation Commission defers to any comments submitted by the Woodstock Town Planner, Planning & Zoning Commission, and Inland Wetlands Agency. Please refer to Dr. Gail Dickinson's letter from the Woodstock Planning & Zoning Commission, dated August 31, 2007, which requests consideration of alternative locations.
8. Page 17, Local Input: PA 07-222, Section 16-50I(e) requires local input on matters before the Council. On July 9, 2007, Cellco representatives did meet with the Town of Woodstock First Selectman and Town Planner. They also appeared at an August 13, 2007 public meeting on the tower, which was noticed as a "Public Informational Meeting."
- Margaret Wholean, who was the First Selectman at the time, indicated that the applicant represented the meeting as informational or advisory only. As a result, apparently no minutes were prepared by the Town. At least some attendees were left with the impression that, due to the Siting Council's primary on this issue, **local input was not relevant**. Therefore, it is not clear that the applicant fully met the intent of Section 16-50I(e).
9. Attachment 1, Page 7, Physical Impact, A: states "*There are no lakes, ponds, rivers, streams, wetlands or other regulated bodies of water located in the area to be used for the access drive, tower or equipment shelter.*"
- This statement conflicts with statements elsewhere in the report that indicate that the proposed access drive would involve a wetlands crossing, and brings into question the applicant's attention to detail.
  - The application also notes that Black Pond is located to the Southeast of the proposed facility, within 2000 feet of the proposed tower.
  - The Conservation Commission recommends that, if impervious surfaces for this development are to be in excess of ten percent, rainfall should be collected and returned to the ground by an appropriate device(s), such as, but not limited to, infiltration basins or trenches, rain gardens, or in-ground perforated chambers. Approval of such impervious coverage should be conditioned on the maintenance of such structures.
10. Attachment 1, Page 7, Physical Impact, D, Noise, states there would be no noise except for "*occasional operation of a back-up generator which would be run during power failures and periodically for maintenance purposes.*"
- Diesel generators can be quite noisy, and sound would be expected to carry well over the adjacent water body. We request that the applicant identify expected noise levels of the generator in dba, and the expected duration and frequency for maintenance runs.
11. Note: Section 3, page 2, indicates that the first selectman is Margaret Wholean. As a result of elections held after the application was submitted, Allan Walker Jr. is now the First Selectman, and in the future, relevant correspondence should be addressed to his attention.