

STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 11, 2008

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

> RE: Wireless Telecommunications Facility Cellco, dba as Verizon Wireless Farmington, Connecticut Docket No. 356

Dear Chairman Caruso:

Staff of this department has reviewed the above-referenced application for a Certificate of Environmental Compatibility and Public Need and has conducted a field review of the site on April 8, 2008. Based on these efforts, the following comments are offered to the Council for your use in this proceeding.

The applicant proposes to erect a 110' monopole and a 12' x 30' equipment shelter within a 60' x 60' fenced compound to be located to the rear (west) of the farmstead at 199 Town Farm Road in Farmington. The host site is on a working farm owned by the Town of Farmington and leased to Mr. Simmons.

Description of Site

The corners of the lease area and compound as well as the site of the proposed tower were clearly marked on the day of the DEP field visit. The site sits near the bottom of an eastward facing slope at the western edge of the farmstead between an equipment storage shed to the west and the farmer's firewood operation to the east. Immediately west of the farm's equipment shed, a wooded slope ascends toward the nearest homes of the Devonwood neighborhood. The elevation of the lease parcel varies perhaps 8' from a low point at the northeast corner to the high point marked by a large white pine on a small rise just above this low point.

From the proposed lease area, a view of the farm and the flood plain of the Farmington River is afforded, with Talcott Mountain further to the east across the Farmington River. Aside from the Simmons home, the only other residences visible from the site are those on Talcott Mountain which are approximately 4,000' or more from the site. The home at 184 Town Farm Road, which is across the street from the southernmost portions of the Simmons Farm, was not visible from the lease parcel, nor was the 80 white pine within the lease parcel, which was used

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as a proxy for the tower, visible from the front yard of the 184 Town Farm Road home. Access to the tower site would be via an existing farm access road.

The nearest homes to the tower site, other than the Simmons house, are on Belgravia Terrace in Devonwood, atop the wooded slope west of the farm. These homes are not visible from the lease parcel but become visible as one ascends the wooded slope. From a vantage point atop the wooded slope and approximately 50 yards behind the nearest home to the tower, the white pine in the lease area could not be seen and it was very difficult to make out any structure on the farm. Only flashes of the white roof of one of the barns could be seen. The deciduous forest was without any foliage at the time of this early April site visit.

The home immediately south of the nearest home on Belgravia Terrace has a slightly better view toward the tower site due to the alignment of a small ravine from that house directly toward the lease area. Again, the white roof of one barn was visible as an undiscernable white patch, but the white pine on the lease parcel was not visible. It appears doubtful that the tower would be visible from the vantage point behind this second home, a vantage point which was still well within the woods and therefore not taking full advantage of all the available forest screening.

DEP Easement

This department has purchased three Conservation and Public Recreation Easements covering an aggregate of 96.4 acres of property within the Farmington portion of the farm using funding from the Open Space and Watershed Lands Acquisition Program. These purchases covered parcels of 32, 47 and 17.4 acres. The developed property of the farmstead, within which the home, farm buildings and tower lease parcel are located, is not covered by the Conservation and Public Recreation Easement and Agreement with the Town of Farmington.

Monopine Tower Design

The application mentions on page 2 that the Town of Farmington has requested a stealth design tower and that Cellco would construct a monopine tower if deemed appropriate by the Council. The two primary visual access points from which the tower would be visible are from southbound Town Farm Road traffic and from the homes to the east on Talcott Mountain. (Northbound traffic on Town Farm Road could also see the tower but the view of the structure would be blocked by a hill until almost coming even with the tower, whereas the southbound travelers would see the tower across the open pasture well before reaching the Simmons farmhouse area).

Scattered white pines are found within the wooded slopes south and east of the lease parcel but the forest cover is 95% or more deciduous. In situations where a monopine design tower is employed against an incompatible background, the monopine design typically is more eyecatching and conspicuous than a conventional tower would be because it fails to blend in with its surroundings. This would likely be the case for those viewing the tower from Town Farm Road. For the more numerous but more distant visual receptors on Talcott Mountain, either tower design would not be silhouetted because of the higher vantage point of the homes and the presence of the hillside behind the tower. However, the greater width and visual mass of a monopine would make it more visible from these distant viewpoints than a standard monopole design would be. Though it is unlikely that a tower of either design would be seen from the

Belgravia Terrace homes, the much wider profile and darker color of the monopine would be more likely to be seen than a monopole would be. The difference in height of the 110' monopole or 117'monopine designs is probably not significant to any potential viewers.

Miscellaneous Application Commentary

The address for the Council on Environmental Quality in appendix 3 lists the mailing address as being Post Office Box 5066 in Hartford. Although that post office box was initially set up when the Council moved into this building in 1992, it went out of use within a very short time and has not been used since. CEQ mail is now delivered directly to 79 Elm Street and has been for many years. Cellco may wish to update its mailing list in this regard for future applications.

Thank you for the opportunity to review this application and to submit these comments to the Council. Should you, other Council members or Council staff have any questions, please feel free to me at (860) 424-4110.

Respectfully yours, Frederick L. Riese

Frederick L. Riese

Senior Environmental Analyst

cc: Commissioner Gina McCarthy