

# The Eightmile River

Wild & Scenic Coordinating Committee  
1066 Saybrook Road, Haddam, CT 06438 ~ (860) 345-8700

March 29, 2010

S. Derek Phelps, Executive Director  
State of Connecticut  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

ORIGINAL



RE: Docket No. 395 - New Cingular Wireless PCS, LLC (AT&T) application for a Certificate of Environmental compatibility and Public Need for the construction, maintenance and operation of two telecommunications facilities located off of Haywardville Road and Ed Williams Road, East Haddam, Connecticut

Dear Mr. Phelps and Siting Council Members:

Thank you for the opportunity to further comment on this proposal for the location of two telecommunication towers in the town of East Haddam.

The Eightmile River is a congressionally designated "Wild and Scenic" Watershed with six identified Outstanding Resource Values. These are cultural landscape, geology, water quality, watershed hydrology, unique species and natural communities, and the watershed ecosystem. The Eightmile River Wild and Scenic Coordinating Committee (ERWSCC) was established to implement the Eightmile River Watershed Management Plan and monitor the Outstanding Resource Values. It includes representatives from the three watershed towns of Salem, East Haddam and Lyme, the three local Land Trusts, The Nature Conservancy and the Department of Environmental Protection.

The first plan reviewed by ERWSCC included three proposed towers. Two of those towers were proposed within scenic vistas from a well known state park, Devil's Hopyard, located in the heart of the watershed. ERWSCC previously expressed its grave concern about the tower locations during an informational hearing at the East Haddam Planning and Zoning Commission. Subsequently, one tower was eliminated and the other was relocated. ERWSCC continues to support the preservation of scenic vistas as part of the Cultural Landscape Outstanding Resource Value and would like to acknowledge AT&T's actions in the elimination of both those towers adjacent to the state park.

ERWSCC would also like to express its concern for cell towers in general in the watershed (please see enclosed map), as it relates to both pending proposals and future applications.

1. One primary issue identified by the Committee has been the "determination of need". ERWSCC certainly recognizes the need for emergency calls and response

service. Beyond 911 calls however, a determination of need becomes more subjective. Granted there may be less ability to utilize certain wireless functions and applications within areas of this watershed, but does that translate into public need? ERWSCC believes it is essential that the Siting Council be convinced that the location of any new cell towers in the watershed meet a well documented public need.

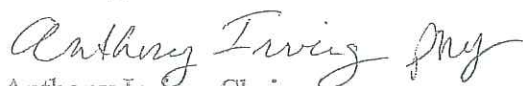
2. Another concern that ERWSCC has already expressed is the visual pollution on the landscape. Connecticut is known for its scenic vistas. The Eightmile Watershed has received federal recognition as "Wild and Scenic" due to its cultural landscape, among other resources. It is essential that proposals for new tower sites thoroughly address the visual impacts associated with installation and that co-location on existing towers is recommended or mandated wherever feasible.
3. Finally, potential impacts to wildlife, especially animals of flight, should be addressed. ERWSCC recognizes that single pole towers are certainly more wildlife sensitive than towers requiring guide wires and additional lighting. However long-term impacts and potential changes to migration patterns are not well documented and yet new towers seem to appear daily. Further documentation on the wildlife anticipated to use or migrate through the area should be a standard requirement as well as mitigation efforts to address potential impacts.

While certain construction and management aspects were already brought up by the Siting Council during the March 4, presentation, ERWSCC would like to reiterate several key points on any new cell tower sites:

1. That construction periods should be seasonally appropriate in terms of adjacent potential vernal pools and that nearby wetland areas be properly protected to minimize impact.
2. That the use of pesticides or herbicides be limited, especially adjacent to any water sources.
3. That a clause be included in any approval requiring the removal of any cell tower when it is no longer in use.

ERWSCC recognizes that the ultimate decision of tower approval location rests with the Siting Council and hopes that the concerns it has expressed will be taken into consideration. Again we appreciate the opportunity to comment and the willingness of AT&T to address our original location concerns. Should you have any questions, please contact us at (860) 345-8700.

Sincerely,

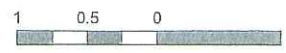
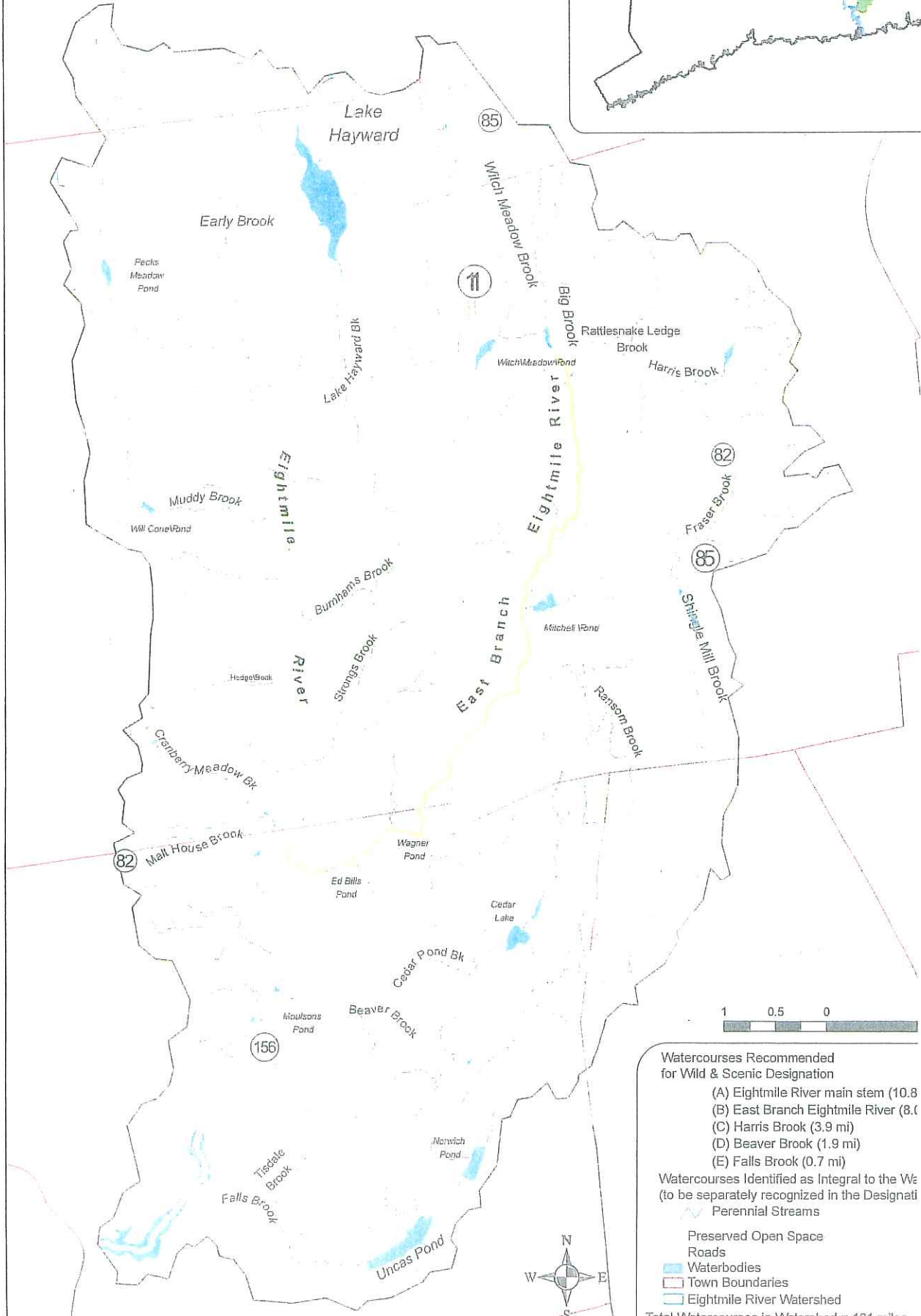
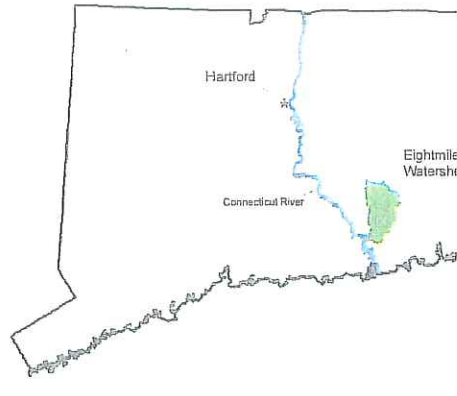


Anthony Irving, Chair

Eightmile River Wild and Scenic Coordinating Committee



# The Eightmile River Watershed



- Watercourses Recommended for Wild & Scenic Designation**
- (A) Eightmile River main stem (10.8)
  - (B) East Branch Eightmile River (8.0)
  - (C) Harris Brook (3.9 mi)
  - (D) Beaver Brook (1.9 mi)
  - (E) Falls Brook (0.7 mi)
- Watercourses Identified as Integral to the Watershed**  
(to be separately recognized in the Designation)
- Perennial Streams
  - Preserved Open Space
  - Roads
  - Waterbodies
  - Town Boundaries
  - Eightmile River Watershed
- Total Watercourses in Watershed = 161 miles  
Watercourses Recommended for Designation =

