

Woodstock Conservation Commission
415 Route 169
Woodstock, CT 06281-3039
January 12, 2010

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

RE: Comments on Proposal to Construct a Wireless Telecommunications Facility in the Town of Woodstock, CT – 445 Prospect Street, East Woodstock

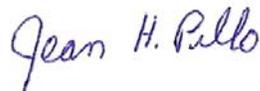
Dear Chairman Caruso:

Attached please find detailed comments from the Woodstock Conservation Commission on the Cellco Partnership D/B/A Verizon Wireless telecommunications facility application for 445 Prospect Street in Woodstock. Our comments are based on a review of the package provided to the Town of Woodstock by Robinson & Cole, dated December 9, 2009. Because the Conservation Commission regular meeting is not held until the fourth Monday of the month, and our Development Review Subcommittee does not meet until the second Tuesday of the month, we were unable to get comments to you earlier.

Thank you in advance for giving due consideration to our input, consistent with the Siting Council's stated intent 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... Municipal input and guidance is absolutely necessary for this process to work.*" (Reference: Siting Council Press Release, November 2000)

If you have any questions regarding these comments, please do not hesitate to contact me at (860) 974-3508.

Sincerely,



Jean Pillo
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, Regulatory Manager, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108
- o Delia Fey, Woodstock Town Planner

- David Fox, CT DEP
- Jeffrey Gordon, Chair, Woodstock Planning & Zoning Commission, and member Telecommunications Task Force, Town of Woodstock
- Jean McClellan, Historic Properties Commission
- Allan D. Walker, Jr., Woodstock First Selectman

Date: January 12, 2010

RE: Comments on Proposed Telecommunications Facility in Woodstock, CT,
East Woodstock, 445 Prospect Street
Application of Cellco Partnership D/B/A Verizon Wireless

FROM: The Woodstock Conservation Commission

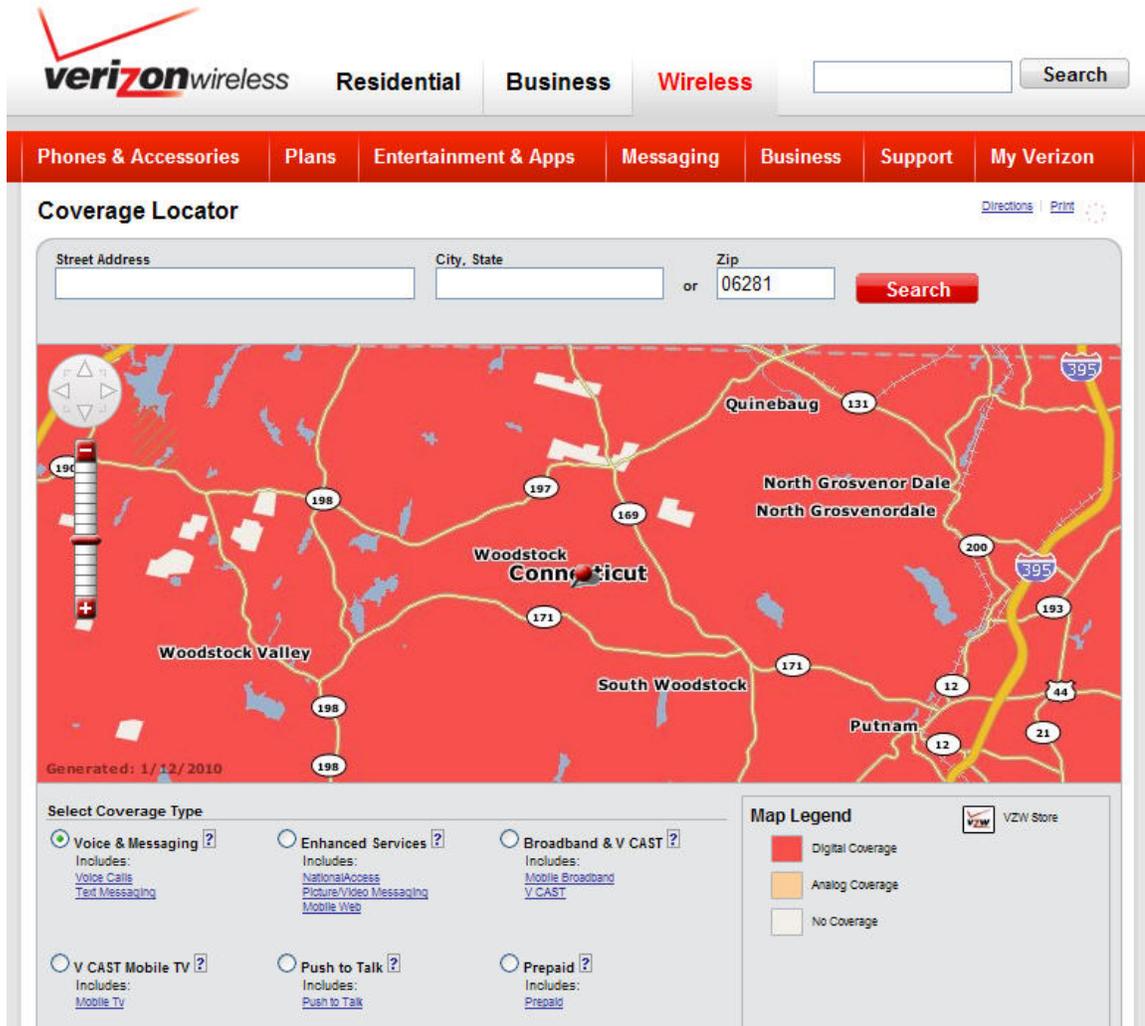
The Woodstock Conservation Commission appreciates the opportunity to comment on the above-referenced proposal to site another cell tower in our town.

Description of Proposal: The application indicates that the location is on a 44.2 acre agricultural and residential parcel on the western edge of the parcel on 445 Prospect Street, in East Woodstock, CT. This land is owned by Frederick C, Barbara P, Frederick C Jr, and Kimberly Rich. The proposal involves a 130-foot tall monopole tower with 15 panel-type antennas resulting in an overall height of 134 feet, extending approximately 69 feet above the average tree canopy in the area. There would also be a 12x30 foot equipment shelter at the base for radio equipment, a diesel generator, and a 275 gallon diesel fuel tank. The new access gravel driveway for this proposed tower would be 345 feet long, surrounded by an 8 foot high security fence that would be partially screened (to the W and S) by 6-8 foot tall evergreens (per Attachment 1, Map 2 West Elevation.) The tower would be located on a ridge. The application indicates that the land is relatively flat and no clearing and minimal grading would be required for the access road.

The application indicates that there are no Federal or State Endangered, Threatened or Special Concerns Species at the property, and there are also no historic or archeological resources. It also indicates that operations will not cause any significant air, water, noise or other environmental impacts (page 16), and that it would not have any “*significant adverse effect on scenic, natural, historic or recreational features.*” An air operating permit will be requested from the CT DEP for the back-up diesel generator.

Comments:

1. **NEED**
 - a. The application indicates that the cell tower would provide additional high quality, reliable coverage along Routes 197 and 169, and on local roads in the northeast part of Woodstock. However, to date, no other carriers have expressed any interest in sharing the proposed tower (page 3). This may be an indication of need.
 - b. The online Verizon Wireless coverage indicator (downloaded from Verizon’s coverage locator at <<http://www.verizonwireless.com/b2c/CoverageLocatorController>> on 01/12/2010) shows only small gaps in coverage in the area of the proposed cell tower.



- c. The Woodstock Conservation Commission has commented on previous applications that the coverage maps provided in applications (e.g., in Section 7) do not appear to accurately reflect the reception experienced by people using cell phones in these areas. Some areas shown with little or no coverage are reported to have adequate coverage. We request that this information be verified and documented with the use of a Verizon phone(s) on these roads.
- d. Section 9 lists other five other existing or approved cell towers within six miles of the proposed location. Note that the 215 Coatney Hill Road tower in Woodstock, owned by MCF Communications, appears to be underutilized by cellular service providers, which perhaps is another indicator of demand and need. Section 9 does not list the following cell towers which also provide coverage in Woodstock, perhaps because of their distance from the proposed location:
- o 107 Stickney Hills Road in Union, CT
 - o 23 Holland Road, Union CT
 - o 227 Carpenter Hill Road in Charlton MA
- e. Page 8 states that the Federal Telecommunications Act of 1996 “has pre-empted any state or local determination of public need for wireless services.” If this were the case, it is not clear

why Cellco would need to apply for a Certificate of Environmental Compatibility and Public Need from the Siting Council.

2. PLACEMENT AND ALTERNATIVE TECHNOLOGIES

- a. Town of Woodstock has established a Telecommunications Task Force. Its charter is to provide a coordinated effort with regard to the placement, construction and modification of wireless telecommunications facilities and to develop the Town of Woodstock's Master Wireless Telecommunications Plan. We respectfully request that the Siting Council and Verizon take the Task Force's recommendations into account, and the comments provided in this letter, when reviewing this application and planning for any new facilities in Woodstock, CT.

The application has been submitted in advance of proposed changes to the Woodstock Plan of Conservation and Development and Woodstock regulations, as recommended by the Woodstock Telecommunications Task Force. The proposed tower does appear to not meet any of the revised preferences (#1 on existing or approved towers; #2 on new towers located on property occupied by one or more existing towers, #3 -5, utilizing stealth or alternative technologies (see page 18).

- b. The Conservation Commission appreciates the desire of cellular service providers and their customers to have adequate coverage wherever they go. However, cell towers permanently scar a landscape. The application states that "*no equally effective technological alternatives to the proposal*" exist (page 10.)

However, several alternative technologies are now available, including mobile amplifier products (e.g., mobile wireless amplifier system and direct connection amplifier systems), network extenders (which operate as a miniature cell tower for home or office) and other boosters. There is an initial investment cost. However, the cost is minimal compared to the cost of cell phones; cell phone plans; and the cost of installing cell towers (the latter estimated at \$795,000 on page 21 of the application), which is passed along to consumers.

Mobile devices address reception issues in multiple locations. In addition, they do not impact any natural resources or scenic vistas. We request that the application of alternative technologies be seriously considered *in lieu of* placement of another cell tower in such scenic, rural areas.

3. IMPACT - SCENIC VISTAS

The application notes that the primary impact of the cell tower would be visual. Woodstock is a rural community, renowned for its scenic views. The Woodstock Conservation Commission requests that serious consideration be given to any concerns raised by surrounding property owners regarding visual impacts.

- a. Towers and other supporting structures for antennas should be limited to a height at or near that of the forest canopy. The tree canopy in this area is estimated by the applicant at 65 feet. The proposed tower would be 134' tall. Therefore, this proposed tower would be 69' above the canopy. While it would not be as tall as some other towers, 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 in this area.

- b. As noted above, the application does not proposed any type of “stealth” application to camouflage the tower. If this location is utilized, suitable measures to reduce visual impacts should be instituted.
- c. Public notice of a balloon flight allowing for verification of views has not been made yet, as the application notes on page 14. A balloon was floated on 10/02/09 as part of reconnaissance, during which time there was leaf cover. Therefore, the photos in the application only indicate visibility with leaf cover.

The application concludes that, when trees are in leaf, eleven surrounding residential properties would be impacted by views of the proposed tower, affecting an estimated 167 acres (Section 10, page. 4), as would all drivers (including tourists) going through this area. The tower would be visible from another 102 acres when leaves are off, affecting an additional five existing residential properties along Prospect Street and Curtiss Road (per Section 10, page 5).

Three residences are within 1,000 feet of the proposed cell tower. One of the properties is owned by Arthur and Phillis Kuper (529 Prospect St.) The Kupers placed agricultural land in the Purchase of Development Rights (PDR) program, with the exception of several parcels specifically reserved for future residential development, which could help compensate for value lost by restricting future development of the remaining agricultural land. The proposed placement of this tower is next to the edge of the Kuper property, as is the proposed access road. The Kupers indicated that their ability to sell or develop the reserved parcels would be significantly impacted by proximity to the proposed cell tower.

- d. The Woodstock Conservation Commission requests a determination as to whether the proposed tower would be visible from the Woodstock Academy, as this is considered one of the premier scenic vistas in our town.
- e. 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. We request that advertisements on antennas and equipment be explicated prohibited.
- f. 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. A land lease agreement is included in section 14, but page 1 is not dated, and it has not been signed by the applicant. Clause 14 does include a provision for removal at end of term and restoration of the property to its original condition.
- g. NOTE: the Woodstock Assessor’s office apparently does not have clear information on ownership of a 21 acre parcel to the northeast of the proposed location (see Att.1, Abutter’s Map), so this owner could not be notified of the proposal. The map block and lot number of these parcels is confusing – both the Collins parcel and the unknown owners parcel are listed as 5703/05/08 on the Woodstock parcel map.

4. IMPACT –NATURAL RESOURCES

- a. The CT DEP review of the proposed location is found in Section 11 of the application. 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. Note that in November 2009, Bald Eagles were observed foraging and roosting in Woodstock.

The CT DEP notes that *“This information is not necessarily the result of comprehensive or site-specific field environmental assessments. Consultations with the Database should not be substitutes for on-site surveys required for environmental assessments.”* We request that a field evaluation of this area be conducted for impact on sensitive habitats or species.

- b. The cell tower would be located on valuable agricultural soils – Prime Agricultural and Soil of Statewide Importance. This area would be lost to agricultural use.

On the other hand, siting a cell tower on farmland provides income to farmers, increasing the likelihood that the land will continue to be farmed. However, the Rich property is not protected from residential or commercial development (e.g., through the Purchase of Development Rights program.) Also, as discussed above siting a tower in this location potentially diminishes the value of adjacent farmland and residential parcels belonging to the Kupers, who are also farmers.

NOTE: There is committed open space belong to the West Wyndham Land Trust to the NW of the proposed location (about 4400 feet away.)

- c. The only bodies of water mentioned in Section 10, page 1, are Morse Pond approximately 1.5 Miles to the NW and the Quinebaug River. However, a pond appears on the top map (Section 1, page 2) but does not appear on other maps. This pond (called Prospect St. Pond on our GIS maps) connects to a stream that is part of the headwaters and Little River Watershed. There is no discussion of potential impact to this water body.
- d. The proposed tower location is more than 400 feet away from a forested wetland system, and the application indicates no adverse impacts to wetland resources are anticipated, although best management erosion control practices will be employed during construction (per page 19.) There are wetlands to the E and S of the proposed location on the property. Therefore, 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.

5. IMPACT: NOISE

The application indicates there would be no noise except for an emergency generator that would be run *“only during the interruption of utility service to the cell site and periodically as required for maintenance purposes”* (Page 21.) Diesel generators can be quite noisy, and sound would be expected to carry well in some areas, especially since cell towers are typically located on ridges. We request that the applicant identify expected noise levels of the generator in dba, and the expected duration and frequency for maintenance runs.

6. CONSISTENCY WITH LOCAL LAND USE CONTROLS

The Conservation Commission defers to any comments that may be submitted by the Woodstock Town Planner, Planning & Zoning Commission, and Inland Wetlands Agency.

7. OTHER COMMENTS ON THE APPLICATION

There may be an error on the cell tower map, sheet C-1. The Town Planner indicated that the parcel where the cell tower is proposed is Map 5703 Block 05 Lot 06, *not* Block 10 Lot 25 as shown. Also, the smaller rectangular lot immediately south of the cluster of buildings is labeled as Map 5703 Block 10 Lot 25, but is really Block 05 Lot 07.

Section 10, View 10 lists the road as “Blacknor Road” - this is probably actually *Blackmar* Road in Southbridge, MA.