

Woodstock Conservation Commission
Woodstock Town Hall
415 Route 169
Woodstock, CT 06281-3039
August 14, 2008

Chairman Daniel F. Caruso
CT 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 – Woodstock Northwest, off Sherman Road

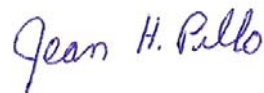
Dear Chairman Caruso:

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, Sherman Road. Our comments are based on a review of the package provided to the Town of Woodstock by Robinson & Cole, dated June 24, 2008.

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

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

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 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 Lisa Rapose, Telecommunications Task Force, Town of Woodstock

Date: August 14, 2008

RE: Comments on Proposed Telecommunications Facility in Woodstock, CT,
Woodstock Northwest, off of Sherman Road
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 location is on an approximately 38.96 acre parcel of land off of Sherman Road, owned by Colin G. Hallquest. As in the original application (Siting Council Docket No. 350, off of Black Pond and Old Turnpike Roads, since withdrawn), the proposal involves a 140-foot tall monopole tower with 12 panel-type antennas, and a 12x30 foot equipment shelter at the base, designed for multiple carriers. The access gravel driveway for this proposed tower would be 1,050 feet long from Sherman Road along an existing gravel driveway and then along a 160 driveway extension.

Comments:

1. The application states that the Town is “*entitled to receive technical information.*” It does not acknowledge the direction provided by the Siting Council regarding proposed telecommunications facilities:

"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)

On January 11, 2008, the Woodstock Conservation Commission submitted detailed comments on the similar facility proposed off of Black Pond Road and Old Turnpike Road. There is no indication that these comments were taken into account when developing the application for this alternative location. Therefore, many of the same comments and concerns must be re-stated in response to the Sherman Road application.

Since that time, the 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.

2. The applicant says that “...*Cellco submits that the public need for high quality wireless service, and a competitive framework for providing such service has been determined by the FCC to be in the public interest and that such public need far outweighs any perceived environmental effects of the proposed facility.*”

We are not aware that the FCC has a stated position that environmental effects are outweighed by a business’s desire to have cellular coverage in all locations. The residents of Woodstock have expressed strong interest in protecting the rural and scenic qualities that are part of the Town’s character. Many place a higher value on those qualities than they do on the convenience of having 100% cellular coverage in all locations.

3. The application notes that the primary impact of this tower is visual, but on page 5 says “*Cellco submits that the proposed facility would not have any significant, adverse environmental effects.*”

Verizon (and other applicants) typically fly balloons when trees are in full leaf (in this case, on May 29, 2008). This only provides an indication of scenic impact for the months of May – September. During the remainder of the year, the impact may be much more significant, and it is not possible for nearby residents to assess the impact on their property without vegetative screening. The modeling conducted by Cellco with ESRI’s ArcView Spatial Analyst supposedly considers visibility without vegetative screening. The analysis concluded that five existing residences could have at least partial year-round views of the proposed facility (three along Route 197, one on Corbin Road, and one on Moren Road. (Note: The road is actually called Noren Road.) No views are anticipated from Sherman Road, Marcy Road or Camp Road, all of which are locally designated scenic roadways, nor from Black Pond. The report says seasonal views are anticipated for four additional properties along Route 197 and one off Corbin Road.

We believe seasonal views are also likely from Sherman Road when trees are not leafed out. Nipmuck State Forest, a pristine, popular recreation area, is located directly to the south of Black Pond. As with the previous location, the applicant does not state whether the tower would be visible from the State Forest, but it certainly appears that it would be, based on the topography. The Woodstock Conservation Commission requests that serious consideration be given to any concerns raised by surrounding property owners regarding visual impacts, and to the visual impact on Nipmuck State Forest.

As noted above, Woodstock is a rural community, renowned for its scenic vistas. With this in mind, we recommend that:

- a. 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. No attempt to do this has been made in this application.
- b. 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.
- c. Towers and other supporting structures for antennas should be limited to a height at or near that of the forest canopy. As with the Black Pond/Old Turnpike Road proposal, the tree canopy in this area is estimated by the applicant at 65’. The proposed tower would be 140’ tall. This proposed tower would then be 75’ above the canopy. It is located at one of the highest elevations in this area, at the top of a hill, at 908 feet (see Map T-1, Section 2) immediately adjacent to the SE border of Nipmuck State Forest. 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.

- d. This tower would be placed on the peak of a drumlin. 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.
 - e. Height limitations would also alleviate the need to adhere to Federal Aviation Administration lighting requirements, and would reduce impacts on migrating birds. The same map says “*There will not be any lighting unless required by the FCC or the FAA.*” The applicant should indicate whether lighting is, or is not required for the proposed location and height. The application does not indicate whether the proposed location could impact the Roland Toutant airport. The FAA determination on the tower is not included in the package, FAA comments need to be submitted, reviewed and considered.
 - f. 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. No attempt to do this has been made in this application.
4. Cellular towers should be located in commercial or industrial areas in highway corridors.
 - o 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. As noted above, it is located next to a pristine State Forest.
 - o 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. In response to the previous application for Black Pond, we requested that an analysis of this alternative be considered prior to making a decision. There is no indication that this request was considered.
 5. 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.
 - o There is an existing Cellco tower on 87 West Quasset Road and in Union. Cellco has proposed sharing an existing tower on George Davis’s property at 1825 Route 198.
 - o The applicant has designed the tower to accommodate multiple antennas. However, they have failed to obtain any commitments from other cellular service providers. The applicant states that “*The availability of space on the proposed facility may reduce, if not eliminate, the need for additional towers in the Town for the foreseeable future.*” Without any commitments, the evidence does not support this statement. The lack of other commitments may be an indication of need. Also, does this mean that Verizon is withdrawing its proposals and/or plans for siting additional towers in Woodstock? We understand that another cell tower location is under consideration on a property located east of Prospect St (south of Child Dome Rd).
 - o On page 2, the applicant states that “*Cellco currently offers little or no wireless coverage at all in the northwest portion of Woodstock.*” Due to inconsistencies in the application, we request that this information be verified and documented with the use of a Verizon phone(s) on these roads.
 - o The map in Section 7 entitled “Existing and Approved Verizon Wireless Cellular Coverage in Woodstock and Surrounding Area” indicates that there is currently little or no reception on Rtes. 171, 198 and 197 in the vicinity of the proposed tower. However,

- the first map in Section 1 shows substantial coverage around Witches Woods, Lake Bungee, and Black Pond, while the second map (with the same title) does not.
- 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, especially the segment along Route 197. For example: After reviewing this application, one of the members of the Conservation Commission did a simple test. He drove to the intersection of Routes 171 and 197, stopped, and placed a call (hands free) to his spouse in Massachusetts. Both were using Verizon LG 8350 phones. They were able to speak to each other until crossing the Union/Woodstock town line, when the call was dropped. He immediately redialed, was connected, and continued to converse with decent reception to the Route 197/198 intersection. He turned right on Route 198 and continued to drive and converse until he returned to Woodstock Valley. Reception was fine with the exception of one or two low spots on 198 where he broke up a little.
 - 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 necessary 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? In accordance with Section 1 of Public Act No. 07-222, An Act Concerning the Connecticut Siting Council and Cellular Towers, the Town of Woodstock has requested 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. As noted above, we have also established a Telecommunications Task Force and request that their input and recommendations be considered prior to making any decisions about new proposed or planned facilities.
6. 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 map in Section 1, T-1, does note “*there will not be any signs or advertising on the antennas or equipment.*” We request that advertisements on towers be explicated prohibited. 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.
 7. 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.
 8. Page 4 of the cover letter indicates that the State Historic Preservation Officer (SHPO) was consulted on this new proposed location, but no copy of their determination is provided. However, Cellco claims no page 5 of the cover letter that “*...the proposed facility would not have any significant, adverse environmental effects.*”
 - 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 (for the tower facilities and improvements to roadways).
 - A copy of the determination on potentially affected species is also not included in the package. 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.
9. 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.
10. The application does not indicate whether any lakes, ponds, rivers, streams, wetlands or other regulated bodies of water are located in the area to be used for the access drive, tower or equipment shelter. 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.
11. 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 in some areas. We request that the applicant identify expected noise levels of the generator in dba, and the expected duration and frequency for maintenance runs.