# Board of Selectmen Special Meeting 



Present: Jean Speck, Chris Garrity and Ed Matson.
Also, present: Keith Answorth, Darlene Brady, Daniel Casagrande, Melissa Cherniske, Tony DiPentima, David Maxim, and Daniel Rosemark.

Ms. Speck called the meeting to order at 1:38 p.m.
Keith Answorth confirmed the filings have been submitted. The intent was to meet with the BOS Before the filings but by meeting after, we have the advantage of seeing everyone's case. The cases are as anticipated and we are prepared to rebut.

David Maxim provided an overview of technical terminology and the technical component of Homeland's proposal. Their proposal of a large tower on Bald Hill Road leaves a large gap on Route 341. Our proposal of seven (7) nodes on telephone poles off of Route 341 and onto town roads achieves slightly more coverage. A physical count of the residents in this area that would benefit from the two proposals was conducted. A tower on Bald Hill would benefit 148 residents and our proposal would benefit 178 residents. Our proposal honors the skyline of the town with better coverage and more adaptability. Homeland's proposal for Richards Road has some benefit but it sits on top of a scenic ridge.

Mr. Garrity stated that a small cell network would work better with a model he has been thinking about which would expand beyond the proposed location and could be rolled out across the town. Mr. Answorth stated that New York has been rolling out small cell systems to entire communities. Connecticut has not encouraged this type of system yet, so carriers are resistant to the concept.

There was a discussion regarding the fee structure and rental options for the owner of the proposed tower. It was determine that the Siting Council only considers two factors: public need and environmental compatibility. It has been confirmed that currently there is no chairman and one less environmentalist on the Siting Council.

Yesterday, Dan Casagrande and Dan Rosemark filed Ms. Speck's affidavit and a letter the lawyers drafted and Ms. Speck signed that discussed the concerns and comments of the town. Ms. Speck made a motion to approve and endorse the pre-file testimony that was submitted to the Siting Council July $16^{\circ}$. Mr. Garrity seconded the motion. A copy of the complete package is attached. Mr. Garrity suggested sending a letter to the residents of the each neighborhood with copies of the proposed coverage maps. Ms. Speck asked for comments on the letter. Mr. Matson expressed concern with the reference of Ms. Speck being President of KVFD and a member of the ambulance, he feels it looks like KVFD endorses the letter and he does not agree with that being in the letter. Ms. Speck clarified that information was added for transparency and to show she understands the need for communication. Mr. Matson added that his comments do not matter, as the letter has already been submitted. Mr. Garrity reiterated his main priority is to have a small cell network all around town and that was not mentioned in the letter. Ms. Speck confirmed that she could work that into her oral testimony. Ms. Speck called for the vote. Ms. Speck and Mr. Garrity voted yes. Mr. Matson abstained. The motion carried. Ms. Speck thanked everyone and the meeting was adjourned at 2:41 p.m.

Joyce Kearns<br>Administrative Assistant

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# STATE OF CONNECTICUT SITING COUNCIL 

DOCKET NO. 488 - Homeland Towers and New Cingular Wireless Application for a Certificate of Environmental Compatibility and Public Need for the proposed construction, maintenance and operation of a wireless telecommunication facility on one of two sites in Kent, Connecticut

JULY 16, 2020

## AFFIDAVIT OF JEAN CONLON SPECK

I, Jean Conlon Speck, the undersigned, being duly sworn, do depose and say:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. I reside at _196 Kent Cornwall Road, Kent $\qquad$ , Connecticut.
3. I am the author of the pre-filed written testimony attached to this affidavit.
4. I believe the facts contained therein are true and accurate the best of my knowledge and belief.

FURTHER the deponent sayeth not.


Subscribed and sworn to before me this 16th day of July, 2020. This document was remotely notarized and/or witnessed and executed under the authority granted by Connecticut Governor Lamont's Executive Order 7Q, March 30, 2020, providing for remote execution of notarized documents, testamentary documents and documents to be recorded on the land records of a municipality using simultaneous and recorded remote video teleconferencing technology.


# Town of Kent 

July 16, 2020

VIA ELECTRONIC AND U.S. MAIL

Connecticut Siting Council
State of Connecticut
Ten Franklin Square
New Britain, Connecticut 06051
Email: siting.council@ct.gov

Re: Docket No. 488 - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT\&T (collectively, "Applicants") application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID \#M10, Block 22, Lot 38 Bald Hill Road ("Site A") or 93 Richards Road, Kent, Connecticut ("Site B")

## Pre-Filed Testimony of Jean Conlon Speck, First Selectman, Town of Kent, Connecticut

On behalf of the Town of Kent ("Kent"), I respectfully submit the following written testimony ("Pre-Filed Testimony") prior to the hearing scheduled for July 23, 2020 ("Hearing") in connection with the Applicants' application to the Connecticut Siting Council ("Council") for a Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of a wireless telecommunications facility located at Site A or Site B (the "Application").

As the First Selectman of Kent, I have a responsibility to actively represent the interests and concerns of the residents of our community. By way of brief background, I have been a member of the Kent Volunteer Fire Department for the last 21 years, serving in the roles of certified EMT, past Ambulance Chief, President and Secretary. I am familiar with many of the issues relating to wireless telecommunications tower applications and the very strong past opposition by residents to towers that visually impact residential neighborhoods, historical residences and protected open space. In fact, Kent has a HorizonLine Conservation Overlay District to conserve and protect the hill summits and ridges that form the high horizon visible from Kent's roads while allowing reasonable, appropriate and
"This institution is an equal opportunity provider and employer"
41 Kent Green Boulevard, P.O. Box 678 • Kent, CT 06757-0678
Phone: (860) 927-4627•Fax: (860) 927-1313 • www.townofkentet.org
compatible uses of the land. ${ }^{1}$ Kent is a community that is visited by people all around the world for such scenic views and vistas. It is critically important to the rural landscape and character of Kent to preserve such natural resources and viewsheds. ${ }^{2}$

## A. Kent Public Hearing

On December 13, 2019, the Applicants' representatives and consultants presented the telecommunications facility project to the Board of Selectmen ("Board") at a public hearing. Numerous citizens of Kent showed up and voiced their concerns about the substantial environmental impact a tower would cause to Kent, and the limited number of residences that would (or could) receive service from the proposed tower (assuming those residents were AT\&T customers), given the topography and sparse number of homes located within the estimated coverage area. During the public hearing, AT\&T indicated their primary "coverage objective" or "target coverage" is to serve its customers traveling through Kent along Segar Mountain Road (Route 341) and the adjacent roads leading between Kent and the Town of Warren ("Warren"). As presented by AT\&T, its coverage is non-existent in the corridor between the ridgelines along Route 341 . According to AT\&T, it is attempting to cover a portion - but not the whole - corridor with a tower and antenna installation at an approximate height of 154 ' AGL at Site A or $175^{\prime}$ AGL at Site B ${ }^{3}$. The tower height of Site A or Site B will extend well above the surrounding tree line and ridge lines. AT\&T's coverage was based on its 700 MHz LTE radio frequency. No other radio frequencies were identified by the Applicants or shown as part of their presentation. AT\&T did not provide any guidance on how it would "fill-in" the coverage gaps along Route 341 that were shown on its maps. In other words, AT\&T's signal will still drop service along Route 341 in several places even with a tower in one of the site locations.

Leading up to and during the public hearing, the Board received letters of opposition from many citizens of Kent, various Kent departments such as the Planning and Zoning Commission and the Kent Conservation Commission, and local organizations including KenMont and KenWood Camps, Kent Land Trust, Housatonic Valley Association, Warren Land Trust, and Weantinoge Heritage Land Trust, all of which were read into the public record and are attached to this Pre-Filed Testimony and incorporated herein by reference. Also attached to this Pre-Filed Testimony is a letter of support in terms of fire protection and emergency medical services from the Kent Volunteer Fire Department. Overwhelmingly, the responses were clearly not in favor of a proposed tower at either of the proposed locations for the reasons set forth in their respective letters and comments submitted or provided on the record during the public hearing. I understand several of those citizens and local organizations will be providing testimony at the Council's Hearing.

## B. Use of Small Cell Alternative Technology

The Board has carefully considered the options and has determined that the best outcome in mitigating the substantial environmental impact to Kent and the surrounding towns as well as meeting the public need for service, would be a series of "small cells" ${ }^{4}$ along Route 341 and adjacent roads. A

[^1]lesser alternative, and least preferred option, would be a shorter tower at $80^{\prime}$ AGL to limit the substantial environmental impact of the tower if small cells are not implemented. However, according to the Board's understanding, five or six small cells would more than replicate the coverage proposed by a tower at either Site A or Site B, and should AT\&T add additional small cells along Route 341, close the coverage gaps from Kent to the Warren border.

In prior Council decisions, the small cell alternative was outweighed by the unknown quantity of small cells necessary to meet the applicant's broader coverage objectives (See and compare Council's decisions for Docket No. 467 (October 13, 2016) and Docket No. 473 (September 14, 2017). In the pending Application, it is clear that the minimal number of small cells solves not only the narrowly tailored coverage objective, but significantly reduces the environmental impact to Kent, Warren and the surrounding towns that would otherwise be significantly impacted by one of the proposed tower sites. Moreover, the sparse residential development presents a more streamlined installation and less impact of the small cells as opposed to a more densely populated residential neighborhood as noted in prior Council decisions. Finally, as the Board understands, small cells can accommodate multiple cellular carriers and/or radio frequencies, including those for first responders. Back-up power can be achieved through an on-site generator and batteries.

## C. Conclusion

In assessing the significant environmental impact of the proposed tower, the need for cellular service on Route 341 and adjacent roadways from Kent to Warren, and the target coverage area presented by AT\&T in its Application, the Board is convinced that a minimal number of small cells, implementing current technology, would solve the proposed coverage gap presented by AT\&T in the least obtrusive manner to the environment and viewsheds of Kent, Warren and the surrounding communities. In a view of the recent filings before the Council, as well as the Board's understanding of the activities throughout the United States and around the world, small cells are being implemented to solve coverage and capacity challenges in areas such as Route 341, as well as major transit areas. Here, in Kent, a rural community of about 3,000 residents located in the scenic northwest corner of Litchfield County, with many small hamlets, such as Bulls Bridge, Kent Hollow, South Kent, The Cobble, and neighboring destinations such as Lake Waramaug, we embrace a balance of technology and aesthetics, and strongly encourage the Council to implement a small cell solution in lieu of the tower at either of the two proposed locations - Site A or Site B.

Sincerely,

Town of Kent
Board of Selectmen


Jean Conlon Speck, First Selectman

## ATTACHMENTS

TO
PRE-FILED TESTIMONY OF JEAN CONLON SPECK

| No. | Description | Date |
| :--- | :--- | :--- |
| 1 | Town of Kent Planning and Zoning Commission | December 12, 2019 |
| 2 | Kent Conservation Commission | December 12, 2019 |
| 3 | Kent Volunteer Fire Department, Inc. | December 13, 2019 |
| 4 | Weantinoge Heritage Land Trust | December 12, 2019 |
| 5 | Warren Land Trust | December 13, 2019 |
| 6 | Housatonic Valley Association | December 13, 2019 |
| 7 | The Kent Land Trust | December 12, 2019 |
| 8 | KenMont and KenWood Camps | November 20, 2019 |
| 9 | Robert A. Karr | November 12, 2019 |
| 10 | Melanie Ough | November 19, 2019 |
| 11 | Sue and Peter Beeman | December 12,2019 |
| 12 | Andrew E. Richards | December 12,2019 |

# TOWN OF KENT PLANNING AND ZONING COMMISSION 

December 12, 2019

Lucia Chiocchio, Esq.<br>Partner and Vice-Chairman Telecommunications Practice<br>Cuddy + Feder, LLP<br>445 Hamilton Avenue, $14^{\text {th }}$ Floor<br>White Plains, NY 10601

## Re: Homeland Towers, LLC and New Cingular Wireless PCS LLC ("AT\&T") <br> Proposed Wireless Telecommunications Tower Facility <br> Bald Hill Road - OR - 93 Richards Road, Kent, Connecticut

Dear Attorney Chiocchio,
The Town of Kent Planning \& Zoning Commission has reviewed the above proposal and has the following comments.

In evaluating this proposal, the Commission applied the same criteria it would use to judge any application from any citizen of the town. After examining the sites and reviewing the plans, the Commission concludes that both projects, as proposed, do not comply with Town regulations. Consequently, the Commission would necessarily reject these proposals if they were to come before us in their present form as a normal application.

To make it easier to understand, I have listed both properties and how the proposed locations of the towers would be affected by the Town's zoning regulations.

Bald Hill Road (Map 10 Block 22 Lot 38)

- The regulations require a minimum lot size of 3 acres. This lot is listed on the tax records as 1.99 acres.
- Our regulations state that a new tower "shall be of an area and configuration such that the tower in the proposed location shall be set back from all property lines by a distance no less than 120 percent of the height of the tower." According to our calculations, that would require the tower to be located a minimum of 185 ' from all property lines.
- A related unmanned equipment and/or storage building(s) shall be permitted provided that it contains no-more than 750 sq- ft. of gross floor area. According to the site plan presented, a totat of 5 equipment areas are proposed for a total gross floor area of $1200 \mathrm{sq} . \mathrm{ft}$.
- Screening requirements were not submitted as required by $\S 9660.7 . b$. and c.

[^2]- The regulations prefer a location that has the least long-range visual effect. Based on an analysis by the Center for Community GIS, done on November 22, 2019, this tower will be seen by portions of the Appalachian Trail, Macedonia State Park, portions of Lake Waramaug and both North and South Spectacle Lakes.
- During a discussion with the Town Sanitarian, I was informed that an application would need to be submitted and approval granted before construction could begin. In addition, it was noted that the property owner would need to understand that there may be limitations for future development of the property beyond the cell tower.


## 93 Richards Road (Map 17 Block 25 Lot 1)

- The current regulations state that a locational preference would be outside of the HorizonLine Conservation Overlay District. This property and the proposed location of the cell tower are within that district. One of the Town's greatest achievements was the creation of the HorizonLine Conservation Overlay District. It is within this regulation that the Town has the ability to conserve and protect the hill summits and ridges that form the high horizon visible from the town's system of roads while allowing reasonable, appropriate and compatible uses of the land. The specific goals of the District include the preservation of scenic views and vistas that are critically important to the rural landscape and character of the Town. Based on the height of this tower, those scenic views and vistas are threatened.
- The regulations prefer a location that has the least long-range visual effect. Based on an analysis by the Center for Community GIS, done on November 22, 2019, this tower will be seen by portions of the Appalachian Trail, a large portion of Lake Waramaug, portions of North Spectacle Lake and all of South Spectacle Lake.
- Our regulations state that a new tower "shall be of an area and configuration such that the tower in the proposed location shall be set back from all property lines by a distance no less than 120 percent of the height of the tower." According to our calculations, that would require the tower to be located a minimum of $210^{\prime}$ from all property lines.
- A related unmanned equipment and/or storage building(s) shall be permitted provided that it contains no more than 750 sq. ft . of gross floor area. According to the site plan presented, a total of 4 equipment areas are proposed for a total gross floor area of 960 sq. ft. plus a future municipal equipment area of $100 \mathrm{sq} . \mathrm{ft}$.
- Proposed plantings were shown on the site plan, but the specifics are missing.
- The area of disturbance seems to encroach on the adjoining property.
- It was noted during a conversation with the Town Sanitarian that an addition application as well as a map showing the location of the existing septic system and well would have to be submitted to Torrington Area Health District before construction can begin. A requirement of that approval could be that no heavy equipment shall be driven over the existing septic system.

In conclusion we believe that either project would be in violation of the Town's zoning regulations and ask that alternative sites be located.

Best Regards,

Town of Kent Planning and Zoning Commission
Cc: First Selectman Jean Conlon Speck


## KENT CONSERVATION COMMISSION

Kent Town Hall<br>41 Kent Green Boulevard<br>Kent, Connecticut 06757

December 12, 2019
Kent Board of Selectmen
Kent Town Hall
41 Kent Green Blvd
Kent, CT 06757
Re: Cell Tower Proposed by Homeland Towers \& New Cingular Wireless, Richards or Bald Hill Roads, Kent

To the Board of Selectmen:
The Kent Conservation Commission works to protect Kent's natural beauty and resources and keep Kent a healthy place to live, work and visit. We are responsible for creating and updating reports including the Town Natural Resources and Conservation Inventory, maintaining open space and public recreational inventories, educating the public about the natural resources and environment in and around Kent, and advising municipal commissions and departments on matters impacting conservation and environmental resources. In that regard we respectfully submit the following comments on the cell tower proposed by Homeland Towers and New Cingular Wireless PCS on Richards Road or Bald Hill Road.

## 1. Kent Community Priorities for Preserving Scenic Views

Fundamental to Kent's natural beauty and rural character are its stunning, sweeping views of the Southern Berkshire foothills from scenic country roads as well as public trails and lakes.

Kent residents have taken great pains to enact zoning regulations that are protective of Kent's scenic aspect. In 2005, the Town of Kent was the first in Connecticut to enact Horizon-line Conservation District overlay zoning, "to conserve and protect the hill summits and ridges that form the high horizon visible from the town's system of roads".' In its most recent update to the Zoning Regulations, Kent's Planning and Zoning Commission addressed telecommunications facilities in Section 9600. The stated purpose of the regulations is to "• Preserve the scenic, historic, environmental, and natural character and appearance

[^3]of the Town of Kent while allowing adequate telecommunications services to be developed. • Establish locations least distuptive to the public health, safety and welfare in Kent and consistent with the Plan of Conservation and Development. • Minimize adverse visual effects through proper design, siting and vegetative screening. • Avoid potential damage to adjacent properties. $\cdot$ Minimize the height of towers and the number of towers, especially free-standing towers. $\bullet$ Provide for the orderly removal of abandoned antennas and towers. $\bullet$ Provide guidance for towers and other wireless communication facilities which are subject to the jurisdiction of the Connecticut Siting Council. $\bullet$ Require the submission of information necessary to evaluate the proposed facility." Kent Zoning Regulations, Section 9610. For towers, the Regulations encode a preference for locations outside the Horizon-line Conservation Overlay District, and locations where the existing topography, vegetation, buildings or other structures provide the greatest amount of screening and have the least long-range visual effect. Kent Zoning Regulations, Section 9630.

Kent's most recent town Plan of Conservation and Development (POCD) was completed in 2012. Both the introduction to the POCD and the order in which strategies are presented strongly underscore that protecting and maintaining scenic rural character is Kent's topmost priority. ${ }^{2}$ The POCD strongly underscores a community objective of protecting scenic beauty, recognizing that Kent's scenery plays a large part of what draws visitors to our town and its businesses, influences parental choices about our exceptional boarding schools, and compels new residents to purchase homes and settle here. Among strategies to preserve natural and rural heritage, the POCD asserts that "Kent will continue and refine use of the Horizonline Conservation District standards to help preserve scenic integrity of the Town's landscape." POCD, p.8. The POCD goes on to discuss means of mitigating the impact of "disruptive" communications infrastructure in the Village Center by limiting future above-ground facilities, as well as other means of limiting the impact of residential and commercial development on the rural, scenic aspects of the town.

This conservation-weighted approach continues throughout the POCD, which addresses telecommunications as such: [T]he Town should carefully evaluate proposed locations and siting of telecommunications towers or other major facilities to prevent or mitigate environmental and scenic impacts" POCD, p.25, and "[t]he Town should continue to monitor state regulations regarding cell towers in order to ensure inclusion in siting discussions of possible future installations. Cell tower locations should not be approved without comment by PZC and Town Officials." POCD, p.45.

These explicit directives are supported by many additional municipal mandates to protect Kent's scenic views. In 1989, the Town passed a Scenic Road Ordinance intended to protect scenic vistas among other specific criteria. ${ }^{3}$ This Commission's Town Character Study, incorporated within the POCD as Appendix

[^4]$L_{\text {, names, }}$, maps and describes special areas of beauty and character to provide guidance on preserving critical elements of the Town's rural character. Finally, the Conservation Commission's Natural and Cultural Resources Inventory, again updated and incorporated by reference into the POCD, devotes an entire chapter to Recreational and Scenic Resources (Chapter 10).

## 2. Impact of Proposed Tower Sites

It should be noted that a full environmental assessment of the Richards Road site is not included in the Technical Report provided by Homeland Towers and New Cingular Wireless. The Conservation Commission makes no statement about non-viewshed-related environmental impacts of the Richards Road site at this time; it will do so once a full assessment has been published. It should additionally be noted that the Technical Report filed in connection with the tower proposal states that a "balloon float" will be conducted at each of the proposed sites in order to prepare a visibility analysis. In the event such activities are performed, the Conservation Commission may prepare additional comments related to viewshed, to supplement its comments herein.

At this time however it is clear that a tower at either of the proposed cell tower sites would be visible from many areas of Kent. The Richards Road site is within the Horizon-line Conservation District, a map of which is appended hereto. ${ }^{4}$ A viewshed analysis prepared by the Center for Community GIS in late November, also appended hereto, demonstrates the projected visibility of a tower from either site in both bare-earth and leaf-on scenarios.

As can be seen, a tower sited at either Bald Hill Road or Richards Road would be clearly visible - even during times of full foliage - from all of South Spectacle Lake, a publicly accessible lake. At both sites, a tower would be visible from North Spectacle Lake, the location of a popular summer camp business in town. During leaf-off at both sites a tower would likely be visible from the Appalachian Trail and many other public trails in Kent, Warren and Washington, as well as from a substantial part of Lake Waramaug, a renowned publicly-accessible lake drawing countless visitors each year to vacation homes and a popular State Park. The Richards Road site maintains this impact on Lake Waramaug even during times of full foliage.

[^5]In sum, a tower at either of the Bald Hill Road or Richards Road sites would negatively impact scenic
views from public roads and public recreation attractions including fishing and swimming areas, These scenic views are integral to Kent's identity as a beautiful, small, special, healthy place to live and visit in the great outdoors. Kent's residents care deeply about the natural and rural appearance of their town and in fact depend significantly on Kent's scenic aspects as an economic driver and contributor to personal wellness. For these reasons, the utmost care should be taken to: (a) limit cellular infrastructure to the minimum necessary. (b) site cellular infrastructure in areas of least impact on viewshed, and (c) use infrastructure designed to minimize visibility and viewshed impact. Care should also be taken to weight these considerations against the marginal impacts in coverage shown in the Technical Report.

Thank you for helping to ensure that the priorities and strategic objectives of the Town of Kent and its residents are given full consideration in planning and decisionmaking in matters significantly impacting these objectives.


Chair, Kent Conservation Commission



## Visibility of Proposed Cell Tower, South Kent, CT

This bare earth analysis does not factor in possible visible obstructions from land cover, such as trees or buildings.


## Visibility of Proposed Cell Tower, South Kent, CT

This analysis uses land cover data to account for forested areas obstructing tower visibility.

4. Proposed cell tower - Richards Road

Visible from tower
Within 5 miles of tower
Appalachian Trail
Other trail

Analysis based on USGS 10 meter Digital Elevation Model, circa 201530 meter Land Use Land Cover data prepared by UConn, and proposed tower locations and heights. Analysis by Center for Community GIS, 11/26/19


## Visibility of Proposed Cell Tower, South Kent, CT

This analysis uses land cover data to account for forested areas obstructing tower visibility.



[^0]:    These are draft minutes and the Board of Selectmen at the subsequent meeting may make corrections. Please refer to subsequent meeting minutes for possible corrections and approval of these minutes.

[^1]:    ${ }^{1}$ See Town of Kent Planning and Zoning Commission letter dated December 12, 2019 regarding the proposed Application.
    ${ }^{2}$ See Kent Conservation Commission letter dated December 12, 2019 regarding the proposed Application.
    ${ }^{3}$ The Application submitted to the Council shows the tower height at Site A and Site B to be 154 ' AGL.
    ${ }^{4}$ For purposes of this Pre-Filed Testimony, reference to "small cells" means, in general, smaller installations where antennas are affixed to a utility pole (or its equivalent) or a series of poles predominantly located in the public rights-of-way or on private property. Small cells are also sometimes known as "distributed antenna systems" or "DAS".

[^2]:    41 Kent Green Boulevard, P.O. Box $678 \bullet$ Kent, CT 06757-0678
    Phone: (860) 927-4625 • Fax: (860) 927-4541 • www.townofkentct.org
    "This institution is an equal opportunity provider and employer."

[^3]:    1 "The specific goals of the District include the preservation of scenic views and vistas that are critically important to the rural landscape and character of the Town, and the minimization of erosion and sedimentation hazards caused by the development and use of steep hillsides and ridges." Town of Kent Zoning Regulation 5710. Proposed uses within Horizon-line District areas are subject to additional review depending on area, height, and other potential disturbances.

[^4]:    ${ }^{2}$ According to the POCD "Kent's rural character is highlighted by the valley and ridge topography of the Town's land area... Open space protection efforts and strong land use controls, including horizonline protection, have helped preserve Kent's rural character and should be continued." POCD at p.2.

    3 uIn 1987 the Connecticut State Legislature enacted PA 87-280 authorizing certain rural two-lane state highways or portions of them to be designated as "Scenic Roads." The Act was intended to recognize the sight-seeing appeal of such roads ...Many towns, including Kent, followed with similar ordinances. Kent's Scenic Road Ordinance, passed

[^5]:    in 1989, allows property owners to petition the Planning and Zoning Commission to designate their road as "scenic" based on specific criteria, including scenic vistas, stone walls and a preponderance of mature roadside trees. Natural \& Cultural Resourcos Inventory, p. 101.
    ${ }^{4}$ HORIZON BELTS METHODOLOGY The Horizonline Conservation District defines the elevated areas of Kent where the construction of a 35 ' structure, or portion of, would project above the natural topography and thus form a silhouette against the sky. The intersection of sky and landform (regardless of vegetation height) is defined as the horizonline and is specific to viewing locations. The viewing locations for this map were considered to be from along Kent's system of public roads. The viewing points selected for GIS analysis include road intersections, town boundaries, and hydrographic ridgelines. The horizon belts selected for protection were those within 1000 feet of a ridge or overlaying slopes $>=15 \%$.

