



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

July 24, 2024

Keith Ainsworth
Acting Chair

Christopher Donnelly

David Kalafa

S. Derek Phelps

Denise Rodosevich

Charles Vidich

William Warzecha

Paul Aresta
Executive Director

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Melanie.Bachman@ct.gov

DOCKET NO. 523 – The Towers, LLC (Applicant) application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 425 Old Tavern Road, Orange, Connecticut.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Docket 523.

1. Wetlands

The Applicant notes that “there are two wetland areas on the Property proximate to the proposed facility compound. The proposed facility has been designed and located so as to maintain a 37-foot setback from both Wetland 1 and Wetland 2”. The Council recommends that the Applicant maximize the wetland buffer to the extent practicable and that the proposed wetland buffer enhancement plan, which consists of an environmental monitor, retention of a mature forested buffer, and “±10,000 SF that would include plantings of native shrubs and removal of invasive species multiflora rose and Japanese barberry” be a condition of approval.

2. Site Search

The Applicant notes that properties located at 1650 Boston Post Road and 1525 Boston Post Road in Milford were explored for the installation of a rooftop installation; however, the “RF rejected the location due to inadequate height” for both locations. Given that both locations are commercial/retail establishments and previously developed, the Council questions if the Applicant explored the possibility of developing a telecommunications tower at or near those locations or at locations further north along Route 1 in the Town of Orange, which are zoned Commercial, to achieve the desired coverage.

The Council’s comments above address only certain elements of the materials provided by the Applicant at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council’s administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed

project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Thank you for your consideration of the Council's comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Paul Aresta
Executive Director