



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

February 27, 2025

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DOCKET NO. 530 – Homeland Towers, LLC and Celco Partnership d/b/a Verizon Wireless (Applicants) 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 196 East Haddam-Colchester Turnpike, East Haddam, Connecticut.

Dear Attorney Bachman:

The Council on Environmental Quality (Council) offers the following comment regarding Docket 530.

Wetlands

The Applicants state that “the closest wetland area is located approximately 40 feet to the southeast of the facility compound”. The Council notes that the construction of the proposed facility would be considered a regulated activity according to the East Haddam Inland Wetlands Regulations since it would involve the “clearing, grubbing, filling, grading, paving, excavating, constructing, depositing or removing of material and discharging of storm water on the land within 100 feet measured horizontally from the boundary of any wetlands or watercourse”. As detailed in a recent report¹, “wetland buffers maintain or serve directly as habitat for aquatic and wetland-dependent species that rely on complementary upland habitat for critical stages of their life history.” Consequently, the Council recommends that the Applicants consider relocating the proposed facility compound to increase the vegetated buffer between the proposed facility compound and nearby wetlands to the greatest extent practicable.

The Council’s comment above addresses only certain elements of the materials provided by the Applicants 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 comment.

Sincerely,

Paul Aresta, Executive Director

¹ Environmental Protection Agency, Planner's Guide to Wetland Buffers for Local Governments, Environmental Law Institute, March 2008; https://www.epa.gov/sites/production/files/2014-03/documents/final_40.pdf