



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

January 28, 2026

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DOCKET NO. 543 – 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 17 Warren Road, Washington (New Preston), Connecticut.

Dear Attorney Bachman,

On August 27, 2025, the Council on Environmental Quality (Council) provided comments that addressed potential impacts to core forest and inland wetlands associated with the proposed telecommunications facility, including a recommendation to minimize potential environmental impacts and “assess the possibility of relocating the proposed facility and/or access road to minimize impacts to wetlands and vegetation.” The Council offers the following additional comments regarding Docket 543:

#### **Wetlands**

The Applicant notes that a “new driveway would access Warren Road at a point approximately 240 feet to the south of the location proposed in the Application” and that “the alternate project access driveway will now cross the southern end of the isolated wetland within a narrow area that primarily consists of a seasonal intermittent watercourse channel.” Further, the Applicant states that “the proposed wetland crossing will result in 267 square feet of *[sic]* permanent impacts and 170 square feet of temporary impacts. As noted on Sheet No. Z-3.4, Wetland Mitigation Plan, temporary wetland impacts will be properly restored, and a 9,000 square foot wetland enhancement area will more than compensate for the unavoidable permanent wetland impacts and activities in proximity to this wetland area.” The Council notes that the success of any compensatory wetland creation effort largely depends on the hydrology of the created wetlands to support wetland vegetation and functions. The Council recommends that any wetland mitigation plan include ongoing monitoring and maintenance of the project area to help ensure that the hydrology of the wetlands is appropriate, that dead plant materials are removed and replaced, and that any invasive and/or undesirable plant species are removed.

#### **Visibility**

The Council notes that the Applicant completed verification activities of its visibility modeling on April 25, 2025, which consisted of a balloon test, vehicular and pedestrian reconnaissance, and photo-documentation. While the Council does not assert that the visibility analysis is inaccurate or incomplete, questions have been raised regarding the location of the balloon flight the height of the balloon during the flight, and the visibility of the balloon from the area near the proposed facility and the Macricostas Preserve. Further, the Steep Rock Association, an

Intervenor in this proceeding, stated that “if the applicant agrees to fly another balloon from the location of the proposed tower at the height of the proposed tower, Steep Rock Association will endeavor to provide the photographs requested.” If the Applicant does raise a balloon at the proposed site to assess/confirm the visibility of the proposed tower, the Council suggests that the Applicant also consider raising a balloon at any alternative tower location(s) at a height that would achieve the Applicant’s coverage objectives. Raising a balloon at an alternative tower location(s) could assist the CSC to assess if an alternative location for the proposed facility would minimize any potential visual impacts.

The Council’s additional comments above address only certain elements of the materials provided by the Applicant, Parties and Intervenors. 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,

A handwritten signature in black ink, appearing to read "Paul Aresta". The signature is written in a cursive style with a long horizontal stroke at the end.

Paul Aresta  
Executive Director