



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

May 27, 2026

Melanie Bachman, Executive Director
Connecticut Siting Council
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DOCKET NO. 552 – Crown Castle Towers, T-Mobile Northeast, LLC, and Cellco 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 445 Putnam Avenue, Hamden, Connecticut.

Dear Attorney Bachman:

The Council on Environmental Quality (Council) offers the following comments regarding Docket 552.

Drinking Water

The Applicants state that “the subject property is located within a public water supply watershed that feeds this drinking water resource operated by the Regional Water Authority (PWS ID CT0930011).” The Council supports the provisions of the Applicants’ “Wetland and Public Water Supply Protection Measures” that incorporate many of the protective measures identified in the Department of Public Health’s (DPH) “General Construction Best Management Practices for Sites within a Public Drinking Water Supply Area”¹ guidance document and recommends that the Applicants notify the RWA of the project’s start date as soon as it is determined.

Flood zones

The Applicants state that “the Facility is located in Flood Zone AE, 100-year floodplain associated with the Mill River” and that “this Facility will include elevating equipment on a steel platform a minimum of one (1) foot above the 100-year base flood elevation and incorporating a flood compensatory storage area to offset the floodplain displacement associated with the tower foundation and elevated steel platform foundations.” The Council notes that the Town of Hamden Zoning Regulations (Zoning Regulations), Section 430.3 - Provisions for Flood Hazard Reduction, specify that new non-residential construction in Flood Zone AE shall have the lowest floor elevated at least two feet above the base flood level. The Zoning Regulations also specify that above ground storage tanks should be elevated on a concrete pad or be securely anchored. The Council recommends that the Applicants review and incorporate the “Provisions for Flood Hazard Reduction” of the Zoning Regulations as appropriate.

Wetlands and Watercourses

The Applicants note that “one wetland area was identified on the Property, located approximately 56 feet east of the proposed tower compound.” The Council notes that the Town of Hamden Inland Wetlands and Watercourses Regulations, effective May 27, 2009, states that “the Agency shall require, at a minimum, a Non-Disturbance Buffer Zone encompassing the land area one

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hundred (100) feet from any wetland or watercourse as a condition of granting wetlands permits unless the applicant demonstrates through substantial evidence in the record that such activity within the 100-foot non-disturbance area does not pose an impact to the regulated area.” The Council recommends that the Applicants assess the possibility of relocating or reorienting the proposed facility and/or access road to minimize additional disturbance within 100 feet of the wetlands to the greatest extent practicable.

The Council’s comments above address 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 comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta", with a stylized, flowing script.

Paul Aresta
Executive Director

¹ https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/pdf/BMPFactSheetpdf.pdf