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September 2, 2025

Via Electronic Mail and Hand Delivery

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 535 – The Towers, LLC 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 835 Norwich Worcester Turnpike (Route 169) in Woodstock, Connecticut**

Supplemental Response to Council's Interrogatory No. 54

Dear Attorney Bachman:

On behalf of The Towers, LLC, enclosed please find the original and fifteen (15) copies of the Applicant's Supplemental Response to the Council's Interrogatory No. 54. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

Enclosure

32864230-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF THE TOWERS, LLC FOR A : DOCKET NO. 535
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR THE :
CONSTRUCTION, MAINTENANCE AND OPERATION :
OF A WIRELESS TELECOMMUNICATIONS :
FACILITY AT 835 NORWICH WORCESTER :
TURNPIKE (ROUTE 169), WOODSTOCK, :
CONNECTICUT : SEPTEMBER 2, 2025

**SUPPLEMENTAL RESPONSE OF THE TOWERS, LLC TO
CONNECTICUT SITING COUNCIL INTERROGATORIES (SET ONE)**

On June 30, 2025, the Connecticut Siting Council (“Council”) issued Pre-hearing Interrogatories to The Towers, LLC (the “Applicant”), relating to Docket No. 535. Below is the Applicant’s Supplemental Response to Interrogatory No. 54.

Question No. 54

Referencing Application Attachment 11, the Wetland Inspection Report notes the wetlands on either side of the existing access road were divided. How could TT enhance the habitat and species dispersion related to the wetland complex?

Response

Based on historic aerial photography, the referenced existing access road was originally installed as early as 1934. While this historic alteration of Wetland 1 has resulted in varying degrees of hydraulic changes, it does not likely represent a significant impediment to migratory wildlife species. Bordering roadside areas currently consist of a dense understory of spice bush, smooth buckthorn, and winged euonymus with an overstory of predominately red maple creating a soft ecotone transition benefiting wildlife movement. While select tree removal is proposed for

roadway improvements, the wetland system will remain undisturbed and will not significantly alter this transitional shrub ecotone.

The proposed road improvements are not likely to significantly alter the ability for local wildlife populations to migrate across the road. The road is to be constructed without significant grade changes allowing for continued wildlife passage across the road. Furthermore, the proposed facility will not generate significant traffic post construction.

Due to the minimal impact associated with road improvements, historic nature of the farm road, and lack of existing impediments to wildlife movement, any proposed enhancement activities would provide a *de minimis* improvement to wildlife dispersion.

Supplemental Response

Upon further review of the proposed road improvement plan following the July 31, 2025 evidentiary hearing, the Applicant has decided to relocate the underground utilities between Route 169 and the Facility compound from the north side of the access roadway to the middle of the access roadway. This approach will eliminate potential impacts to trees, transitional shrub ecotone, and the stone walls along the northern side of the access roadway easement area that may have occurred in some locations as a result of the utility trench construction. Additionally, this approach will assist in further limiting potential indirect impacts to the wetlands north of the access roadway.

CERTIFICATION OF SERVICE

I hereby certify that a copy of the forgoing was sent electronically to the following:

Paska Nayden
c/o 44 Jesse Lee Drive
Easton, CT 06612
ct4rt@protonmail.com

September 2, 2025

Date



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