STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

August 27, 2025

TO: Service List, dated July 16, 2025

FROM: Melanie Bachman, Executive Director MAB

RE: **DOCKET NO. 542 –** 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 Parcel No. 151-1-1, Pequotsepos Road, Stonington (Mystic), Connecticut.

Comments have been received from the Connecticut Council on Environmental Quality on August 27, 2025. A copy of the comments is attached for your review.

MAB/IN/dll

c: Council Members
CGS §16-50j(i) State Agency Comment List (via electronic mail)

Keith Ainsworth
Acting Chair

Timothy J. Bishop

Linda Bowers

Christopher Donnelly

David Kalafa

Cinzia Lettieri

Aimee Petras

Denise Rodosevich

William Warzecha

Paul Aresta
Executive Director

STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

August 27, 2025

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

DOCKET NO. 542 – 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 132 Pequotsepos Road, Stonington, Connecticut.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Docket 542.

Flood Zones
The Applicant states that "the proposed Mystic South 2 Facility would be located in Flood Zone X (500-year flood zone)." It is unclear from the application materials and site plans if the elevation of the facility compound would be modified during construction to be above the elevation of the 500-year flood zone. The Council recommends that the Applicant make the facility more resilient to flooding thereby minimizing potential impacts to human health and safety, and the environment.

Wetlands and Vernal Pools
In Attachment 11: Wetlands and Vernal Pool Assessment, the Applicant notes that two wetlands were identified on the project site: Wetland 1 is located within the eastern portion of the property and contains two potential vernal pools and Wetland 2 is located along the western portion of the property. The Applicant states that "the proposed Facility fenced compound will be located ±25 feet east of Wetland 2. Temporary development activities (e.g., erosion control installation, limited vegetation removal etc.) associated with the gravel access road and facility compound will be somewhat closer to wetlands." As detailed in a recent report[1], "larger buffers will be more effective over the long run because buffers can become saturated with sediments and nutrients, gradually reducing their effectiveness, and because it is much harder to maintain the long- term integrity of small buffers." In addition, "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 Applicant assess if it would be possible to maintain a minimum 100-foot buffer around both wetlands and the proposed facility compound. Since the proposed facility would be between Wetland 1, with the associated vernal pools, and Wetland 2, the Council recommends that the Applicant incorporate best development practices for "site clearing, grading, and construction activities" referenced in the *Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United*

States [2] in addition to the proposed protective measures identified in Attachment 11.

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,

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

[2] Calhoun, A. J. K. and M. W. Klemens. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society; https://www.nae.usace.army.mil/Portals/74/docs/regulatory/VernalPools/BestDevelopmentPractices20Oct2014.pdf