STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

August 27, 2025

TO: Service List, dated July 30, 2025

FROM: Melanie Bachman, Executive Director MAB

RE: **DOCKET NO. 543** – 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 17 Warren Road, Washington (New Preston), 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/RDM/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. 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,

The Council on Environmental Quality (Council) offers the following comments regarding Docket 543.

Core Forest
The Council notes that most of the proposed access road and facility compound could be in an area designated as core forest per the Department of Energy and Environmental Protection's Forestland Habitat Impact Map[1] and the Applicant's Environmental Resources Map. Furthermore, in Attachment 10: USFWS & NDDB Compliance, the Applicant states that "the proposed Facility and access drive would be located primarily within an upland forested area requiring ±1 acre of tree clearing." The Council does not support the loss of core forest since disturbances to core forest (i.e. fragmentation) would provide substandard habitat for some species of wildlife. The Council recommends that the Applicant assess the potential impacts to core forest and implement appropriate measures to prevent or reduce disturbances to the core forest including, but not limited to, relocating the proposed facility and access road.

Wetlands and Vernal Pools
The Applicant notes that construction of the proposed access road would impact 1,013 square feet of Wetland 1, consisting of 255 square feet of temporary impacts and 758 square feet of permanent impacts. Further, the Applicant states that "to compensate for the relatively small area of unavoidable direct wetland impacts, a wetland restoration plan has been developed which includes planting with native wetland species within the ±255 sf of temporary wetland impacts along the north and south margins of the proposed access drive." The Council notes that the proposed impacts to wetlands and the tree clearing within the upland forested area noted above are avoidable and could be minimized. As noted above, the Council recommends that the Applicant assess the possibility of relocating the proposed facility and/or access road to minimize impacts to wetlands and vegetation, such as the cleared portion of the proposed site located south of the proposed access road. The Council questions why the proposed wetland restoration is only being planned to compensate for the 255 square feet of temporary impacts. If the facility is approved as proposed, the Council recommends that the wetland restoration plan include both restoration of the proposed temporary impacts (as proposed) and

compensation for the 758 square feet of permanent impacts to wetlands caused by the construction of the proposed access road. Such compensation might include creation of a new wetland on or near the proposed site of equal or greater area in a location that would support wetland functions and values.[2]

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]Connecticut Department of Energy and Environmental Protection, Wildlife Division. 2019. *Forestland Habitat Impact Map*; https://www.arcgis.com/home/item.html?id=f9175844f49b4385a6096bcd200ad931

[2] The success of any wetland creation largely depends on the hydrology of the created wetlands to support wetland vegetation and functions. The Council recommends that there be ongoing monitoring and maintenance of the project area to help ensure that the hydrology of the constructed wetlands is appropriate, that dead plant materials are removed and replaced, and that any invasive and/or undesirable plant species are removed.