

Michael W. Klemens, LLC
Environmental Land Use Planning
November 19th 2025

Brian E. Hagenbuch, Ph.D., Executive Director
Steep Rock Association, Inc.
116 Christian Street
New Preston, CT 06777

In Re: Connecticut Siting Council Docket 543

On October 12th 2025 I conducted a site examination of the above captioned project. The examination was quite limited as it was by necessity made from public land, i.e., the shoulder of Rte. 341, just south of the Washington-Warren town line. The proposed tower is to be located on a small rounded knob that rises steeply to over 950 feet, directly above the village of Woodville. This outcropping is part of a large habitat block to the west of forest and open fields including Rabbit Hill, The Pinnacle, and Tanner Hill that stretches to Lake Waramaug and includes an important migratory bird flyway—best observed from the top of Tanner Hill.

The importance of this core forest was discussed in the Connecticut Council on Environmental Quality's (CT-CEQ) comment letter of August 27, 2025. While All-Points Technology Corporation states on page 2 of their Wetland Assessment that "the wetland does not support vernal pool habitat" their inventory was conducted on October 23, 2024, a time of year when vernal pools are not ponded and their detection relies on various cryptic signatures visible in the dry wetland. From the shoulder of Rte. 341 I observed a stream corridor which fans out into a large flat area exhibiting some of these signatures. The ponding portion of the wetland has a dense seasonal herbaceous cover about two feet tall, emergent shrubs, and a large buttressed tree. These vegetational signatures are all those of an area of seasonal inundation, which likely is a vernal pool.

The steep talus slope that rises above the wetland (and will be traversed by the proposed access road) further adds to its importance as wildlife habitat, especially for pool-breeding amphibians, as these formations provide cover, protection from predation and desiccation, and a rich invertebrate fauna for the amphibians to feed upon. Amphibians would live the terrestrial portion of their lives on the forested talus sloped, and return to the vernal pool to breed. While most of the amphibians breed in the springtime, there is also the fall breeding marbled salamander (*Ambystoma opacum*). Recent field work has documented the presence of marbled salamanders on nearby Rabbit Hill. Other species that could reasonably be expected to be found in this pool include Jefferson salamander, (*Ambystoma jeffersonianum*) a State-listed special concern species, as well as vernal pool indicator (= obligate) species such as spotted salamander (*Ambystoma maculatum*) and wood frog (*Rana sylvatica*).

I have documented Jefferson salamanders at several sites in Washington (see Bogart and Klemens, 2008; Quinn, 2017; Klemens et al, 2021) where the combination of steep talus slopes and rugged topography interspersed with wetlands and the presence of a dense forest canopy cover provides excellent habitat for this species, arguably a forest interior species benefitting from the large blocks of forest that still remain in the Washington/Warren area. Another species worthy of consideration is the wood turtle (*Glyptemys insculpta*). Wood turtles are a riparian species that has significant upland habitat use during the late spring through early autumn. Wood turtles are well known from the Shepaug River, and the riparian habitat alongside River Road was examined on October 12th 2025. That stretch of habitat including deep pools and areas of undercut tree-lined banks, and the presence of sand bars and gravel islands in the mid-stream, are a habitat mosaic that could readily support wood turtles. While the adjacent roadway may discourage wood turtles from utilizing the subject property during the terrestrial part of their annual activity cycle, it does not completely obstruct their ability to cross the road to access the wetlands and wooded areas on the site. Not only is the wood turtle a State-listed special concern species, but it is a candidate for Federal protection under the Endangered Species Act.

Many other species will seasonally use this wetland for breeding, shelter, or foraging. If the site supports a vernal pool, there are Best Development Practices (Calhoun and Klemens, 2002) that call for protection of the Critical Terrestrial Habitat up to 750 feet from the edge of the pool. That distance encompasses terrestrial portions of the proposed access road, as well as the wetland crossing. These concerns are echoed in CT-CEQ's comment letter of August 27, 2025. Why I have gone into this level of detail is because the applicant has not provided a wildlife survey of the site, especially any biological assessment of Wetland 1 which they plan to cross with an access road to the proposed tower site. They cite a computer-generated letter from the CT-DEEP NDDDB as reporting no listed species on site (in the NDDDB data base) but also that very same letter—in the “fine print” states quite clearly that the NDDDB data are not a substitute for site specific surveys. Specifically, “this NDDDB consultation and determination should not be substituted for conducting biological field surveys assessing on site habitat and species presence.” From my experience both as an academic, private consultant, local decision-maker, and a former Connecticut Siting Council member, a great deal of money is spent on Docket applications, including detailed designs, photo simulations, propagation models, and engineering, but most of the natural resource information is computer generated “check the box” conservation and only rarely any field investigations beyond wetland delineations.

One cannot underestimate the importance and ecological value of the various preserves that the Steep Rock Association holds. Moreover, the Association is acquiring more parcels, each parcel contributing to the greater forest block. Such acquisition strategies are an important pathway to combat habitat fragmentation, the greatest threat to ecological integrity (Johnson

and Klemens, 2005). Intact interconnected habitats, such as exemplified by this amalgamation of protected areas, allows wildlife and plants to adapt to the effects of climate change, especially when there are significant elevation gradients as exemplified by this core forest block.

Some of Steep Rock's acquisitions are so recent that they were not included in the visual analysis submitted by All Points Technology Corporation in support of Docket 543. Coupled with other protected lands (e.g., Mount Tom State Park, Wyantenock State Forest) and privately owned lightly developed working lands, this represents one of the largest intact landscapes within the State. The majority of the cell tower sites that the CT Siting Council has approved over the years are in fragmented landscapes, often associated with the major population areas of the State. A cell tower that is proposed to be inserted into the heart of an ecologically intact and topographically diverse landscape encompassing thousands of acres requires extreme diligence on the part of the CT Siting Council. Perfunctory field visits and desk top reviews, while generating impressive amounts of paper, obfuscate what is really at stake here.

I respectfully remind all parties that the CT-Siting Council's Docket process is charged with balancing the public need with environmental compatibility. In my professional opinion the public needs and justifications for tower siting all too often incorrectly dwarf environmental concerns. To allow this proposed tower to proceed with so little site-specific field data is reasonably likely to cause unreasonable harm to the public trust in the natural resources of the State that the CT Siting Council is duty bound to protect. Much more biodiversity information on the site is needed, and a hard look at the access road and its potential to impact the nearby wetland/vernal pool, as well as a detailed analysis of the impacts of this tower at this location upon the ecological integrity of the much greater forested, biodiverse landscape where it is proposed to be sited.

Sincerely

A handwritten signature in black ink, appearing to read "Michael W. Klemens". The signature is fluid and cursive, with the first name "Michael" and last name "Klemens" being clearly legible, and "W." in the middle.

Michael W. Klemens, PhD

Literature Cited

Bogart, J. P. and M. W. Klemens. 2008. **Additional distributional records of *Ambystoma laterale*, *A. jeffersonianum* (Amphibia: Caudata) and Their Unisexual Kleptogens in Northeastern North America.**

American Museum of Natural History Novitates: 3627: 58 pp., 8 figures, 7 tables.

Calhoun, A. J. K. and M. W. Klemens. 2002. **Best Development Practices (BDPs) for Conserving Pool-breeding Amphibians in Residential and Commercial Developments.**

MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society, Bronx, NY.

Johnson, E. and M. W. Klemens (eds). 2005. **Nature in Fragments: The Legacy of Sprawl.**

Columbia University Press, NY 382 pp.

Klemens, M. W., H.J. Gruner, D. P. Quinn, and E.R. Davison. 2021. **Conservation of Amphibians and Reptiles in Connecticut.** CT-DEEP i-xix+pp 1-305.

Quinn, D. P. 2017. **Amphibian Inventory and Management Recommendations, Steep Rock Association, Washington, CT.** i+1-11, Fig.1-7, Table 1-2