



TOWN OF WASHINGTON OFFICE OF THE FIRST SELECTMAN

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To: Jim Brinton, First Selectman, Town of Washington

From: Bob Papsin, Inland Wetlands Commission Chair, Town of Washington

Re: Site Number US-CT-5051 Telecommunications Facility

17 Warren Road, New Preston APT Project No. CT754210

After thorough review of the Wetlands Assessment submitted by All-Points Technology Corporation regarding the installation of a monopole cell tower at 17 Warren Road, I have encountered several concerns. In my 15 years of experience with the Commission, I have seen instances of irreparable damage. This permanent structure as well as the proposed access road will no doubt create long term negligible effects.

Primarily, All Points Technology Corporation, hired to perform the assessment, is certainly concerned with their client's needs above all else. Given the sensitivity of the site, I **strongly** recommend a peer review assessment to be performed by a more neutral organization. As well, Inland Wetland commissioners from both Warren and Washington should be invited to the site for an inspection. All wetlands should be flagged, and the access road should be delineated for a clearer picture of their proposal.

Indications show that a significant portion of wetlands would be disturbed during construction, most notably by the access road, which until now has been able to exist as nature intended. The potential negative effects will continue after construction, even with drainage proposed on a pervious surface. The planting plan proposed is insufficient and minimal. The general plan does not adequately address soil erosion and sediment control. No equipment proposed to be used on the site is listed, nor is there any mention of wash out stations for cement which presumably will be used. There is no mention of mitigation for the use of pesticides or herbicides, or petroleum products used and stored on the site for the equipment necessary to maintain the facility, which presumably will continue long after the project is complete.

Ours is a largely rural area. The potential impact on the local ecosystem is concerning. The plan will disrupt amphibious habitats and migratory birds. The report mentions the concern for endangered bats but makes no mention of other wildlife.

The site proposed is a sensitive one. It is located in the headwaters of Bee Brook. Changes to the hydrology are amplified exponentially as it moves through the watershed. The Macricostas Preserve, a holding of Steep Rock Association which includes Meeker Swamp, is within the downflow from the wetlands of site 5051. According to their website, "Meeker Swamp is a unique calcareous wetland – a chalky limestone-based geology rarely found east of the Appalachian Mountains. One of the last significant calcareous ecosystems in the Northeast Hills, it encompasses over 300 acres and includes part of the Bee Brook stream, wet meadows and agricultural fields as well as an adjacent ridge of talus slopes and rocky outcroppings. An excellent habitat for a variety of wildlife, the preserve overlies one of Washington's largest aquifers and protects the town's drinking water supply."

Monitoring and reporting is inadequately addressed in their proposed two year plan. To ensure this, a report should be made to both the towns of Washington and Warren by producing a photo journal during construction. No mention of the cessation of work during rain events. A clearer representation of careful monitoring from a general contractor is imperative.

While I understand the need to improve better cell coverage particularly for emergency purposes, I would hope that alternative locations can be found before impacting our precious wetlands.

Respectfully submitted,

Bob Papsin Chair, Inland Wetlands Commission