



*STATE OF CONNECTICUT*

**COUNCIL ON ENVIRONMENTAL QUALITY**

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*Executive Director*

**VIA ELECTRONIC MAIL**

May 28, 2025

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

DOCKET NO. 538 – 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 1022 Trumbull Highway in Lebanon.

Dear Attorney Bachman,

The Council on Environmental Quality (Council) offers the following comments regarding Docket 538.

**Wetlands and Wildlife**

The Applicant states that “the development of the Facility will result in direct wetland impacts of approximately 1,640 square feet (“SF”), which includes approximately 700 SF of temporary impacts and approximately 940 SF of permanent impacts. These impacts are all associated with improvements to the existing farm road that crosses the only wetland on the Property.” The Council suggests that the Applicant assess if there are any alternatives to access the proposed facility compound that would avoid direct and indirect impacts on Wetland 1. If an alternative route is not feasible, the Council recommends that the Petitioner minimize impacts to the wetland and the potential vernal pool’s critical terrestrial habitat to the greatest extent possible, and implement best development practices<sup>1</sup> in addition to the proposed protective measures identified in Section III.C.4.d and Attachment 1 (Site Plan: Sheets No.Z-3.3, Z-3.4, and Z-3.5). Specifically, the Council recommends limiting disturbance during the breeding season for the vernal pool obligate species and maintaining corridors connecting nearby wetlands to the potential vernal pool.

Further, the Applicant proposes to implement a “Wetland Restoration and Enhancement Plan (“Mitigation Plan”) with the goal of restoring temporarily disturbed wetlands and enhancing wetlands adjacent to the existing wetland crossing to compensate for unavoidable impacts associated with improvements required to the existing farm road.” The Council generally supports the concept of compensatory wetland creation; however, the success of such an effort largely depends on the proper design and maintenance of the created wetlands to support wetland vegetation and functions. The Council recommends that the Applicant conduct ongoing monitoring and maintenance of the proposed wetland restoration area to ensure that 1) the hydrology of the constructed wetlands is appropriate; 2) dead plant materials are removed and replaced; and 3) any invasive and/or undesirable plant species within the created wetlands are removed. The Council also recommends that the Applicant consult with the local inland

wetlands agency and/or the Connecticut Department of Energy and Environmental Protection regarding the proposed "Mitigation Plan".

The Council's comments above address only certain elements of the materials provided by the Applicant at the time of the filings. 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,

A handwritten signature in black ink that reads "Paul Aresta". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Aresta  
Executive Director

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<sup>1</sup> 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>.