

# Connecticut Siting Council

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APPLICATION OF HOMELAND TOWERS, LLC



**verizon**<sup>✓</sup>

222 CLINTONVILLE ROAD  
NORTH BRANFORD, CONNECTICUT

DOCKET NO. \_\_\_\_\_

JANUARY 27, 2022

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## EXECUTIVE SUMMARY

Homeland Towers, LLC (“Homeland”), in cooperation with Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”), proposes to construct a telecommunications tower and related facility in the easterly portion on an approximately 7.86-acre parcel at 222 Clintonville Road in North Branford, Connecticut (the “Property”). Cellco refers to this facility as its Northford 2 cell site (the “Northford 2 Facility”). The Property is owned by Gail and Michael Monaco and is used for residential purposes.

The Northford 2 Facility would provide Cellco with improved wireless service to existing gaps along portions of Routes 17, 22 and 150, as well as local roads in the Northford area. The Northford 2 Facility will also provide capacity relief to several existing Cellco facilities in the area which are currently operating at or near their respective capacity limits.

Homeland plans to construct a 110-foot “monopine” tree tower within a 4,061 square foot compound (4,631 square foot leased area) in the easterly portion of the Property. Cellco will install antennas and remote radio heads at a height of 96 feet above ground level (“AGL”). The Town of North Branford (“Town”) will install two (2) municipal and emergency service whip antennas at the top of the tower.

Equipment associated with Cellco’s and the Town’s antennas will be installed on the ground near the base of the tower within the fenced facility compound. Cellco’s equipment will consist of equipment and battery cabinets, a propane-fueled backup generator and a 500-gallon propane fuel tank. Vehicular and utility access to the facility compound would extend from Clintonville Road.

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF HOMELAND TOWERS,	:	DOCKET NO. _____
LLC FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY	:	
AND PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT	:	
222 CLINTONVILLE ROAD, NORTH	:	
BRANFORD, CONNECTICUT	:	JANUARY 27, 2022

APPLICATION FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (the “Application”) is submitted by Homeland Towers, LLC (“Homeland”), in cooperation with Celco Partnership d/b/a Verizon Wireless (“Celco”) (collectively the “Applicant”), pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes (“C.G.S.”), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (“R.C.S.A.”), as amended. The Application requests that the Connecticut Siting Council (“Council”) issue a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction, maintenance, and operation of a wireless telecommunications facility on an approximately 7.86-acre parcel at 222 Clintonville Road in North Branford, Connecticut (the “Property”). This site is identified throughout the Application as the “Northford 2 Facility”. If approved, the Council Certificate

would be issued to and held by Homeland.

The Property is owned by Gail and Michael Monaco and is used for residential purposes. The proposed Northford 2 Facility would be in the easterly portion of the Property. At this location, Homeland would construct a 110-foot self-supporting “monopine” tree tower within a 4,061 square foot facility compound (4,631 square foot leased area). The Town of North Branford (“Town”) will install municipal and emergency service whip antennas extending above the top of the tower to an overall height of 134 feet. Cellco would install up to twelve (12) panel-type antennas and six (6) remote radio heads (“RRHs”) at the 96-foot level on the tower. Equipment associated with Cellco’s antennas, including radio and battery cabinets, a propane-fueled generator and a 500-gallon propane fuel tank would be installed on concrete pads in the southeast portion of the facility compound. Vehicular access to the Northford 2 Facility would extend from Clintonville Road over a 40-foot portion of an existing paved driveway, then over a new gravel driveway extension, approximately 795 feet to the tower site. Utilities will extend from existing service along Clintonville Road.

Included in this Application, as Attachment 1, is a site evaluation report and project plans for the proposed Northford 2 Facility. This information, along with the other attachments submitted as part of this Application, contain all the site-specific information required by statute and the regulations of the Council.

**B. The Applicant**

Homeland Towers, LLC is a New York limited liability company with an office located at 9 Harmony Street in Danbury, Connecticut 06810. Homeland has developed numerous telecommunications facilities in Connecticut and New York. Homeland will construct, own and

maintain the proposed Northford 2 Facility and, if approved, would hold the Council Certificate.

Cellco is a Delaware Partnership with an administrative office located at 20 Alexander Drive, Wallingford, CT 06492. Cellco is licensed by the Federal Communications Commission ("FCC") to operate a wireless telecommunications system in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public. Operation of the wireless telecommunications systems and related activities are Cellco's sole business in the State of Connecticut.

Correspondence and/or communications regarding this Application may be addressed to:

Homeland Towers, LLC  
9 Harmony Street, 2<sup>nd</sup> Floor  
Danbury, CT 06810  
Attention: Raymond Vergati

Cellco Partnership d/b/a Verizon Wireless  
99 East River Drive  
East Hartford, CT 06108  
Attention: Timothy Parks

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
(860) 275-8200  
Attention: Kenneth C. Baldwin, Esq.

**C. Application Fee**

The estimated total construction cost for the Northford 2 Facility would be less than \$5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations of Connecticut State

Agencies, an application fee of \$1,250 accompanies this Application in the form of a check payable to the Council.

**II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50(b)**

Copies of this Application have been sent to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50(b). A certificate of service, along with a list of the officials served with a copy of the Application, is included as Attachment 2.

Notice of Homeland's intent to submit this Application was published on January 24<sup>th</sup> and January 25<sup>th</sup>, 2022, by Homeland in the *New Haven Register* pursuant to C.G.S. Section 16-50(b). A copy of the legal notice is included as Attachment 3. An Affidavit of Publication from the *New Haven Register* will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Homeland's intent to file this application was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50(b), as well as a list of the landowners to whom such notice was sent and a sample notice letter.

**III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES INFORMATION**

The purpose of this section is to provide an overview and general description of the proposed Northford 2 Facility.

**A. Federal Policy**

In 1996, the United States Congress adopted the federal Telecommunications Act (the "Act"). (Pub. L. No. 104-104, 110 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation

in all aspects of the telecommunications industry, including facility siting, to foster lower prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by state and municipal authorities, including the Council, with respect to public need for the service to be provided by the facility described in this Application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirements in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco's system throughout its New England and nationwide markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States Congress also enacted the Wireless Communications and Public Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging

the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004, Congress enacted the Enhanced 911 Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued President Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy<sup>1</sup> to ensure that all Americans would have access to broadband capability, whether wired or wireless; to establish the United States as a leader in wireless service innovation; and to establish, in America, the fastest and most extensive wireless network. To encourage a more timely review and approval of wireless facility siting applications, the FCC, in 2011, established specific time limits for local and State land use decisions on wireless facilities.<sup>2</sup>

In 2012, Congress passed the Middle Class Tax Relief and Job Creation Act which included a provision specifically designed to accelerate broadband deployment by improving the efficiencies of the wireless facility siting process.

Included as Attachment 5 are copies of Cellco's FCC licenses for its wireless service in New Haven County, Connecticut. The FCC's rules permit a licensee to modify its system, including the addition of new cell sites, without prior approval by the FCC, if, by doing so, the licensee's authorized service area is not enlarged. The addition of the Northford 2 Facility would

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<sup>1</sup> Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

<sup>2</sup> FCC Declaratory Ruling WT Docket No. 08-165.

not enlarge Cellco's authorized service area.

**B. Public Need and System Design**

**1. Need for the Northford 2 Facility**

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In New Haven County, Cellco holds FCC Licenses to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. Pursuant to its FCC Licenses, Cellco has developed and continues to develop a network of cell sites to serve the demand for enhanced wireless services throughout the State of Connecticut and nationwide.

Cellco currently provides wireless service in North Branford and in the adjacent Towns of Branford, Guilford, Durham, Wallingford, North Haven and East Haven. Plots showing the extent of reliable wireless service in the area reveals "gaps" in wireless service, primarily in Cellco's 700 MHz and 2100 MHz operating frequencies.

Street Name	700 MHz	2100 MHz
CT-17 Weak Coverage / Gap (mi)	0.9	2.1
CT-22 Weak Coverage / Gap (mi)	1.5	2.7
CT-150 Weak Coverage / Gap (mi)	1.6	2.3
State Road Total (mi)	2.4	4.8

All or significant portions of these gaps will be filled by service from the proposed Northford 2 Facility. (See Attachment 6). The proposed Northford 2 Facility will also provide some capacity relief to Cellco's existing Northford Facility (Alpha sector) which is currently operating at or beyond their respective capacity limits (a/k/a exhausting).

**2. Cell Site Information**

As mentioned above, Homeland intends to construct a 110-foot self-supporting

“monopine” tree tower within a 4,061 square foot gravel facility compound in the easterly portion of the Property. The tower would be setback approximately 96 feet from southern property boundary; 129 feet from the eastern property boundary; and 155 feet from the northern property boundary.<sup>3</sup> Cellco would install antennas and RRHs at the 96-foot level on the tower. The Town will install municipal and emergency service whip antennas at the top of the tower extending to a height of 134 feet above grade. Equipment associated with Cellco’s and the Town’s antennas will be located near the base of the tower within a fenced compound. Cellco will also install radio and battery cabinets, a 30-kW propane-fueled generator, and a 500-gallon propane fuel tank in the southeast portion of the facility compound. Cellco’s equipment cabinets would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The battery system and backup generator will provide backup power to Cellco’s wireless equipment if commercial power is interrupted. Once the site is operational, Cellco personnel will visit the cell site when needed for maintenance. All systems are monitored remotely at Cellco’s Mobile Telephone Switching Office (“MTSO”).

The proposed Northford 2 Facility will provide reliable wireless service to area roadways as describe in the table below.

Frequency	Area (sq mi)	CT-17 (mi)	CT-22 (mi)	CT-150 (mi)
700 MHz	7.2	1.6	3.2	0.8
850MHz	4.7	1.5	3.2	0.65
2100MHz	3.9	1.3	3.2	0.4
1900MHz	3.6	1.6	3	0.4
3550MHz	0.13	0.2	0.8	0

<sup>3</sup> Following the Public Information meeting and at the request of the Property owner, Homeland shifted the tower location approximately 45 feet to the southeast of its original location.

### 3. Cellular System Equipment

The key elements of the cellular system are Cellco's two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller equipment. This equipment can expand in modules to meet system growth needs. The cell site equipment primarily provides for message control on the calling channels; call set-up and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test demand; data from the wireless units in both directions and on all channels; scan receiver control; transmission of power control commands rescanning of all timing and commands and voice channel assignment.

Cellco intends to install up to twelve (12) panel-type transmit/receive antennas consisting of six (6) model MX06FRO660-03 antennas; three (3) model MT6407-77A antennas; three (3) model CBRS, XXDWM antennas. Cellco will also install a total of six (6) remote radio heads behind its antennas, two (2) HYBRIFLEX™ fiber optic antenna cables and one (1) GPS antenna. Backup power to the Northford 2 Facility will be provided by an onsite battery system and a 30-kW propane-fueled generator. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

### 4. Technological Alternatives

Pursuant to its FCC licenses, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no equally effective technological alternatives that would allow Cellco to provide its wireless service to the area than those described in this Application. In fact, Cellco's wireless system represents state-of-the-art

technology offering high-quality wireless service.

**C. Site Selection and Tower Sharing**

**1. Cell Site Selection**

The goal in selecting cell sites, like the one described above, is to locate a facility in such a manner as to allow for the development and operation of a high-quality wireless system with the least overall environmental impact. Homeland, in cooperation with Cellco and the Town has determined that the proposed Northford 2 Facility location satisfies this goal and will help resolve Cellco's wireless service problems and the Town's municipal and emergency service problems in the Northford area.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area or ring established by the carrier's Radio Frequency Design Engineers. In any search area, Homeland first examines the availability and use of existing towers or other sufficiently tall structures that might help satisfy the wireless service objectives. Cellco currently maintains seven (7) macro-cell wireless telecommunications facilities within approximately four (4) miles of the proposed Northford 2 Facility location. Cellco's existing Wallingford E, North Branford, Northford, North Haven and North Haven 2 cell sites will interact with the proposed Northford 2 Facility. *See Attachment 6.* The use of existing, non-tower structures in an area, when available are also suggested as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the Northford area.

Homeland initiated its site search process for the Northford 2 Facility in April of 2020 and investigated a total of thirty-one (31) possible candidates for a cell site for the reasons described in the Site Search Summary (Attachment 8). Cellco determined that an antenna centerline height of

96 feet at the Property would satisfy its wireless service objectives in the area. Homeland negotiated and ultimately entered into a Lease Agreement for the use of the Property. The Site Search Summary together with the site information contained in Attachment 1 and Attachment 6 support the Applicant's position that the site selected represents the most feasible alternative of the sites investigated.

**2. Tower Sharing**

Homeland will design the proposed tree tower and compound to be shared by a minimum of four (4) wireless carriers, and the Town of North Branford. This type of tower sharing arrangement will reduce, if not eliminate, the need for additional tower sites in the same area in the future.

**3. Overall Costs and Benefits**

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless services throughout significant portions of North Branford. The Northford 2 Facility would be a part of a communications system that addresses the public need identified by the FCC and the United States Congress for high-quality, competitive wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in the future. The overall costs for development of the proposed facility are set forth in Section III.D. of the Application.

**4. Environmental Compatibility**

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the Council is required to find and to determine, among other things, the nature of the probable

environmental impact, and determine if those impacts, whether alone or cumulatively with other effects, conflict with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

a. **Primary Facility Impact is Visual**

The wireless system of which the proposed Northford 2 Facility would be a part has been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a “sight line” toward the tower. Similarly, visual impact of a tower facility can be further reduced through the proper use of alternative tower structures; so-called “stealth or disguised installations.” Where appropriate, telecommunications towers camouflaged as trees, for example, could help to further reduce visual impacts associated with these structures.<sup>4</sup> A Visual Resource Assessment (“VRA”) prepared by Saratoga Associates (“Saratoga”) for the Northford 2 Facility is included in Attachment 9. The VRA assesses the visual impact of the proposed 110-foot “monopine” tower on the surrounding areas and includes photographic simulations for the Council’s review and consideration.<sup>5</sup>

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<sup>4</sup> Minimizing the overall visual impact of the proposed tower was, in fact, a goal of the Town when it selected a “tree tower” for development at the Property.

<sup>5</sup> The photo simulations included in the VRA reflect the shift in the tower location referenced above in footnote no. 3.

According to the Visibility Analysis, areas where the top portion of the tree tower would be visible above the tree canopy comprise approximately 39 acres or 0.48% of the two-mile radius (8,040 acre) study area. Of the 502 acres within one-half mile of the Northford 2 Facility, the tower would be visible from approximately 10 acres (2%). The Northford 2 Facility tower will not be visible above the trees from any location within the Northford Historic District.

There are thirty-six (36) residences within 1,000 feet of the Northford 2 Facility. The closest off-site single-family residence is located approximately 253 feet to the north at 61 Pistapaug Road.

**b. Environmental Reviews and Agency Comments**

Section 16-50j of the General Statutes requires the Council to consult with and to solicit comments on the Application from the Commissioners of the Departments of Energy and Environmental Protection, Public Health, Public Utilities Regulatory Authority, Economic Development, and Transportation, the Council on Environmental Quality, and the Office of Policy and Management, Energy Division. In addition to the Council's solicitation of comments, Homeland, as a part of the National Environmental Policy Act ("NEPA") Checklist, solicits comments on the proposed cell site from the U.S. Department of the Interior, Fish and Wildlife Service ("USFWS"), the Connecticut Department of Energy Environmental Protection ("DEEP") and the Connecticut Historical Commission, State Historic Preservation Officer ("SHPO"). Information on the USFWS and DEEP reviews regarding impacts on known populations of Federal or State Endangered, Threatened or Special Concern Species occurring at the proposed site are discussed in the Natural Resources Review Update included in Attachments 10.

(1) **USFWS & NDDB Compliance**

According to the Natural Resources Review prepared by EBI Consulting, two federal and state – listed species, the Indiana Bat and Northern Long-Eared Bat (NLEB), may occur in the vicinity of the Property. The Northford 2 Facility is not located in or near known NLEB hibernating or mature roost trees. Also, with appropriate restrictions on tree clearing, the Northford 2 Facility will not impact the Indiana Bat. See Attachment 10.

(2) **Wetlands Delineation Report**

As discussed in Section III.C.5.d. below, the development of the Northford 2 Facility will have no direct impact on wetlands or water courses, the closest of which is located approximately 168 feet to the west of the proposed Northford 2 Facility compound. Portions of the proposed access driveway and associated grading as well as certain proposed drainage improvements will occur within approximately 17 feet of on-site wetland areas. Homeland will comply with the Connecticut Guidelines for Soil Erosion and Sedimentation Control and employ best management practices (BMPs) (i.e. silt fencing; wattles; other erosion controls) so that construction and operation of the proposed Northford 2 Facility will minimize the occurrences of secondary and indirect wetland impacts. A copy of the Wetlands Delineation Report is included in Attachment 11.

(3) **State Historic Preservation Officer**

On October 8, 2021, the Connecticut Deputy State Historic Preservation Officer (“SHPO”) determined that the proposed Northford 2 Facility will have no adverse effect on sites listed on or eligible for listing on the National Register of Historic places. A copy of the SHPO’s October 8, 2021 determination letter is included in Attachment 12.

**c. General Power Density**

The FCC has adopted a standard for exposure to Radio Frequency (“RF”) emissions from telecommunications facilities like those proposed in this Application. To ensure compliance with the applicable standards, Cellco’s RF Engineers performed a worst-case general power density calculation for the proposed cell site according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) (“OET Bulletin 65”) and more recent Council guidance. The calculations indicate that the maximum permissible exposure level for all of Cellco’s frequencies would be well below (18.40%) the FCC’s Standard. (See Attachment 13). Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations.

**d. Other Environmental Issues**

No sanitary facilities are required for the Northford 2 Facility. The operations at the proposed Northford 2 Facility will not cause any significant air, water, noise or other environmental impacts; or hazard to human health.

Based on agency comments received and field investigations by the project team, the Applicant submits that the Northford 2 Facility will have no significant adverse effect on scenic, natural, historic or recreational features, and that none of the potential effects alone or cumulatively with other effects is sufficient reason to deny this Application.

**5. Consistency with Local Land Use Controls**

The Council Application Guide for Community Antenna Television and Telecommunication Facilities, as amended in July 2012, requires the inclusion of a narrative summary of the project’s consistency with the Town’s Plan of Conservation and Development (the

“Plan”), Zoning Regulations and wetland Regulations, as well as a description of planned and existing uses of the site location and surrounding properties.

**a. Planned and Existing Land Uses**

The proposed Northford 2 Facility is located on an approximately 7.86-acre parcel owned by Gail and Michael Monaco. The Property is located in the Town’s R-40 zone district and is used for residential purposes.

**b. Plan of Conservation and Development**

The Town of North Branford’s Plan of Conservation & Development (the “Plan”), effective December 21, 2009, does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town.

**c. Zoning Regulations**

According to the Town’s Zoning Map, the Property is located in the R-40 zone. In the Area, Location and Bulk Standards (Section 24) of the North Branford Zoning Regulations, communications towers are permitted in industrial districts and may exceed the height limit provided that such height does not exceed 100 feet and the applicant demonstrates a need for such additional height.

**d. Inland Wetland and Watercourse Regulations**

The North Branford Inland Wetlands and Watercourses Commission Regulations (the “IWWC Regulations”) define Regulated Activity as any operation within, or use of, a wetland or watercourse involving removal or deposition of materials, or any obstruction, construction, alteration or pollution of such wetlands or watercourses, or any clearing, grubbing, filling,

grading, paving, excavation, construction deposition of material within 100 feet of a wetland or within 200 feet of the Farm River. Four (4) copies of the North Branford IWWC Regulations were filed, in bulk, with the Council.

In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council for Soil and Water Conservation, adequate and appropriate soil erosion and sedimentation control measures will be established and maintained throughout the cell site construction period. In addition, the Applicant will employ appropriate construction best management practices to ensure that no pollutants would be discharged to any nearby watercourse or wetland areas or to area groundwater during the construction process.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Map Number 09009C0318J, the proposed facility would be located in Flood Zone X, an area outside the 500-year flood zone. A copy of the FIRM is also included in Attachment 14.

## **6. Local Input**

Section 16-50(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. Homeland’s initial consultation with the Town was in August of 2020. At that time, the discussion focused on the potential use of several Town-owned parcels in the Northford area for a new tower site. These discussions continued through September, October and November of 2020 and concluded in February of 2021. At its meeting on February 16, 2021, the North Branford Town Council confirmed that they were “not interested in having a tower on Town owned land” in Northford. Notice of this decision was to Homeland in a letter dated February 25, 2021.

On August 9, 2021, Homeland met with the North Branford Town Manager, Michael Paulhus and Town Planner Will Agresta, to discuss its plans to develop the Northford 2 Facility off Clintonville Road. Mr. Paulhus and Mr. Agresta reviewed project plans and a preliminary visual assessment for the proposed Northford 2 Facility. On September 1, 2021, Homeland commenced the ninety (90) day municipal consultation process with the Town. Town Manager Paulhus received a copy of Technical Information summarizing Homeland's plans to establish a telecommunications facility at the Property. Four (4) copies of Homeland's Technical Report were submitted in bulk with the Council. On October 28, 2021, Homeland hosted a Public Information Meeting ("PIM") on the proposed Northford 2 Facility. Notice of the PIM was published in the *Totoket Times* on October 1, 2021 and was sent to abutting property owners on September 29, 2021.

Included in Attachment 15 is a copy of the Town Council's February 25, 2021 letter to Homeland referenced above, copies of the PIM Legal Notice, the PIM notice letters sent to abutters and the Certificate of Mailing for the abutters' notice.

7. **Consultations With State and Federal Officials**

Attachments 10 and 12 and Section III.C. of the Application describes consultations with state and federal officials regarding the proposed Northford 2 Facility.

a. **Federal Communications Commission**

FCC approval of a particular tower site is not required where the authorized service area of the licensed carrier is not enlarged. The FCC did not, therefore, review this particular proposal.

b. **Federal Aviation Administration**

The proposed Northford 2 Facility received a determination of no hazard to air navigation

and therefore no FAA marking or lighting of the proposed tower is required. Included in Attachment 16 is a copy of the Wireless Application Corp. opinion letter and TOWAIR Determination Results for the proposed cell site. This evaluation confirms that the proposed tower would not constitute an obstruction or hazard to air navigation and no obstruction marking or lighting of the structure is required.

c. **United States Fish and Wildlife Service**

*See* Section III.C.4.b.(1) above.

d. **Connecticut Department of Energy and Environmental Protection**

(1) **Environmental and Geographic Information Center**

*See* Section III.C.4.b.(2) above.

(2) **Bureau of Air Management**

Under normal operating conditions, Cellco's equipment at the Northford 2 Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a diesel-fueled generator to provide emergency backup power. Cellco's backup generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b, and therefore is exempt from general air permit requirements.

e. **Connecticut State Historic Preservation Officer**

*See* Section III.C.4.b.(3) above.

**D. Estimated Cost and Schedule**

**1. Overall Estimated Costs**

The total estimated cost of construction for the Northford 2 Facility is \$830,000. This estimate includes:

Homeland Towers, LLC

(1)	Tower and foundation costs of approximately	\$160,000
(2)	Site development costs of approximately	120,000
(3)	Utility and Facility installation costs of approximately	70,000
	Subtotal – Homeland Towers, LLC	350,000

Cellco Partnership d/b/a Verizon Wireless

(1)	Cell site radio equipment costs of approximately	\$300,000
(2)	Antenna and coax costs of approximately	95,000
(3)	Power systems costs of approximately	40,000
(4)	Equipment costs of approximately	45,000
	Subtotal – Cellco Partnership d/b/a Verizon Wireless	480,000

**2. Overall Scheduling**

Site preparation and engineering would commence following Council approval of the Development and Maintenance (“D&M”) Plan and are expected to be completed within two to four weeks. Due to the delivery schedules of the manufacturers, installation of the platform and installation of the tower are expected to take an additional two to four weeks. Equipment installation is expected to take an additional two weeks after installation of the platform and installation of the tower. Cell site integration and system testing is expected to require two weeks

after equipment installation.

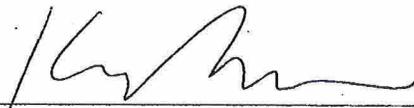
**IV. CONCLUSION**

Based on the facts contained in this Application, the Applicant submits that the establishment of the Northford 2 Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town of North Branford and throughout southern New Haven County, as determined by the FCC and the United States Congress; and a competitive framework for providing such service has been established by the FCC and the Telecommunications Act of 1996. Cellco submits that the need for these services, in general, and the Northford 2 Facility, in particular, far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, Homeland Towers, LLC respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Northford 2 Facility.

Respectfully submitted,

HOMELAND TOWERS, LLC

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