

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND  
NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR  
A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR THE  
CONSTRUCTION, MAINTENANCE, AND OPERATION  
OF A TELECOMMUNICATIONS FACILITY AT  
1837 PONUS RIDGE ROAD,  
TOWN OF NEW CANAAN, CONNECTICUT

DOCKET NO. 509

June 21, 2022

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC (AT&T)  
SUPPLEMENTAL SUBMISSION

Applicants Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a/ AT&T respectfully submit the following supplemental information to the Connecticut Siting Council in the above-referenced proceeding:

Supplemental Information Regarding Emergency Generators and Equipment

The Applicants are modifying the proposed Facility to be equipped with a propane fueled emergency backup power generator and an associated propane tank to be placed on a concrete pad within the equipment compound. The proposed Facility drawings are being updated and will be forwarded when complete.

Letters of Support from New Canaan Emergency Services

Included in Attachment 1 are letters from the Town of New Canaan Police Department, dated 12/6/2021, the New Canaan Community Emergency Response Team, dated 12/6/2021, the Town of New Canaan Office of Emergency Management, dated 12/1/21, and two letters from the Town of New Canaan Fire Department both dated December 1, 2021, demonstrating support for the proposed Facility and noting that the Facility will improve the safety of the New Canaan residents, people traveling through the Town and greatly enhance the Town's emergency responders' ability to provide continuous emergency services to the community.

Supplemental Information Regarding Department of Public Health June 1, 2022 Comments

In response to the June 1, 2022 Connecticut Department of Public Health comments, the Applicants note the following:

*Source of imported Fill*

As currently proposed, the amount of excavation required for the proposed Facility exceeds the required amount of fill. Therefore, if the excavated earth onsite meets the specifications for the required fill, the source will be the onsite materials. The required specifications would be

outlined during the Development & Management (D&M) Plan submission, should the Application be approved.

#### *Sedimentation and Erosion Control*

Sedimentation and erosion controls for construction of the proposed Facility will be designed, installed and maintained in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. As detailed in the Wetland Inspection Report included in Application Attachment 9, the proposed Facility will not alter existing surface or subsurface water flow. Further, additional measures such as construction phasing, erosion controls, soil stabilization and redundant erosion control measures will be incorporated for additional protection of the Laurel Reservoir.

#### *Emergency Back-up Generator*

Given the proximity of the Proposed Facility to the Laurel Reservoir, the Applicants are modifying the Proposed Facility to be equipped with a propane fueled emergency backup power generator and associated propane tank on a concrete pad within the equipment compound. We note that the proposed equipment compound will be located approximately 410' from the nearest edge of Laurel Reservoir.

#### *Servicing of Machinery*

Servicing of machinery shall only be completed outside of the public water supply watershed protection zone.

#### *Storage of Fuel and Hazardous Materials and Spill Remediation*

A detailed Resource Protection Plan, including a Petroleum Materials Storage and Spill Prevention plan are being incorporated into modified Site Plans. The following measures will be included as part of the protection plan:

- a. Certain precautions that are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location within a public water supply watershed and in proximity to wetland resources and rare species habitat.
- b. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.
- c. Servicing of machinery shall only be completed outside of the public water supply watershed protection zone.
- d. At a minimum, the following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.

- i. Petroleum and Hazardous Materials Storage and Refueling
  1. Refueling of vehicles or machinery shall occur a minimum of 100 feet from wetlands and the Laurel Reservoir and shall take place on an impervious pad with secondary containment designed to contain fuels.
  2. Fuel and other hazardous materials shall not be stored within the public water supply watershed, which encompasses the entire subject property, during non-working hours.
  3. Any fuel or hazardous materials that must be kept on site during working hours shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands and the Laurel Reservoir.
  
- ii. Initial Spill Response Procedures
  1. Stop operations and shut off equipment.
  2. Remove any sources of spark or flame.
  3. Contain the source of the spill.
  4. Determine the approximate volume of the spill.
  5. Identify the location of natural flow paths to prevent the release of the spill to the sensitive nearby Laurel Reservoir, waterways, and wetlands.
  6. Ensure that fellow workers are notified of the spill.
  
- iii. Spill Clean Up & Containment
  1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
  2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
  3. Isolate and eliminate the spill source.
  4. Contact the Aquarion Water Company along with appropriate local, state and/or federal agencies, as necessary.
  5. Contact a disposal company to properly dispose of contaminated materials.
  
- iv. Reporting
  1. Complete an incident report.
  2. Submit a completed incident report to local, state and federal agencies, as necessary, including the Aquarion Water Company and the Connecticut Siting Council.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day the foregoing was sent electronically and one (1) original and fifteen (15) hard copies were sent overnight mail to the Connecticut Siting Council and sent electronically to the parties on the service list as noted below.

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Dated: June 21, 2022



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cc: Homeland  
AT&T  
APT  
Smartlink  
C Squared

# ATTACHMENT 1



# Town of New Canaan

POLICE DEPARTMENT  
174 SOUTH AVENUE  
NEW CANAAN, CONNECTICUT 06840  
TELEPHONE (203) 594-3500  
FAX (203) 594-3553

CHIEF OF POLICE  
LEON M. KROLIKOWSKI



DEPUTY CHIEF  
JOHN DIFEDERICO



CAPTAIN  
ANDREW WALSH



December 6, 2021

Mr. Raymond Vergati, Regional Manager  
Homeland Towers, LLC  
9 Harmony Street 2<sup>nd</sup> Floor  
Danbury, CT 06810

Mr. Vergati,

On behalf of the New Canaan Police Department and the Board of Police Commissioners, I write this letter of support for the construction of a cellular tower at the proposed site address of 1837 Ponus Ridge Rd. New Canaan CT.

We are pleased that Homeland Towers will provide space on this proposed tower to the Town of New Canaan for radio equipment which supports our public safety radio network. The New Canaan Police Department is responsible for town wide public safety radio communications and is the Public Safety Answering Point (PSAP) for the Town of New Canaan, which fields all 911 calls and routine calls for service. The PSAP is responsible for radio dispatch of first responders, including Police, Fire, EMS and DPW.

The town has been struggling with the poor quality of the current radio system in the northwest area of town where there are significant gaps in radio coverage for first responder personnel. There have been attempts in the past to improve the radio coverage in certain areas of the town, including the northwest area of town that never provided a complete, long-term solution.

Additionally, the residents and first responders of New Canaan rely heavily on cellular service in times of an emergency. When seconds count and reliable communications are imperative, we desperately need dependable cellular service in all areas of town. I would like to thank you in advance for providing space on the proposed tower and your commitment to ensure first responders are provided with a safe reliable radio and cellular network.

Deputy Chief John DiFederico  
New Canaan Police Department  
Town of New Canaan, CT





New Canaan  
Community Emergency Response Team  
174 South Ave, New Canaan, CT 06840

December 6, 2021

Mr. Raymond Vergati, Regional Manager  
Homeland Towers, LLC  
9 Harmony Street, 2<sup>nd</sup>, Floor  
Danbury, CT 06810

Dear Mr. Vergati,

On behalf of New Canaan's Community Emergency Response Team's (CERT's) Board of Directors, I write this letter supporting the construction of a cellular tower, which would include both cellular and public safety radio antennas, at 1837 Ponus Ridge Rd, New Canaan CT.

The Town has known about, and been unable to permanently correct, a severe radio "dead spot" in the northwest area of town, where portable radios are unable to be "heard" by 911 dispatch. The lack of cell towers in this area and the lack of radio coverage presents a major risk for emergency responders. The installation of at least one new receiver is crucial.

We therefore unequivocally support the installation of a cell tower supporting public service radio on Ponus Ridge Rd.

Sincerely,

*Stuart Sawabini*

Stuart Sawabini  
Executive Director  
New Canaan CERT  
On behalf of the CERT Board of Directors

## **CERT Background:**

The Community Emergency Response Team (CERT) program educates volunteers about disaster preparedness for the hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, search and rescue, team organization, traffic control, and disaster medical operations. CERT offers a consistent, nationwide approach to volunteer training and organization that professional responders can rely on during disaster situations.

CERT became a national program in 1993. There are now CERT programs in all 50 states and over 2,700 local CERT programs nationwide. More than 600,000 people have trained since CERT became a national program.

CERT reports to the Department of Homeland Security, Federal Emergency Management Agency (FEMA), and within FEMA, to the Citizen Corps.





# Town of New Canaan

## Office of Emergency Management

174 South Avenue, New Canaan, CT 06840  
(203) 594-4100

December 1, 2021

Mr. Raymond Vergati, Regional Manager  
Homeland Towers, LLC  
9 Harmony Street, 2<sup>nd</sup> Floor  
Danbury, CT 06810

Dear Mr. Vergati,

As the Director of Emergency Management for the Town of New Canaan, Connecticut, I am writing this letter to support the construction of a telecommunications tower at 1837 Ponus Ridge Rd, New Canaan Connecticut.

The Town of New Canaan's Public Safety Radio systems (Fire, Police and EMS) are essential to protecting the lives and property of our Town Residents – and the efficacy of this system is largely determined by adequate coverage with antenna placement in town providing the maximum coverage for our first responder agencies. The site on Ponus and the addition of antennas for these public safety radios to this new tower will have a direct positive impact on this system and its coverage, improving life safety and the effectiveness of all our agencies in their responses to emergencies.

Additionally, the need for cellular service in all areas in town is now no longer a luxury, rather it is a requirement for the same reasons of life safety and communications in the event of emergencies. The ability to reach 911 via cell phone at any location in town serves as a lifeline for many of our residents as well as visitors.

Regards,

Russell Kimes, III  
Director of Emergency Management  
Town of New Canaan



# New Canaan Fire Department

Assistant Chief Albe Bassett

60 Main St. New Canaan CT. 06840

(203) 594-3153

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December 1, 2021, 2021

Mr. Raymond Vergati, Regional Manager  
Homeland Towers, LLC  
9 Harmony Street, 2<sup>nd</sup> Floor  
Danbury, CT 06810

Dear Mr. Vergati,

As the chair of the New Canaan Board of Fire Commissioners, I am writing this letter to support the construction of a telecommunications tower at 1837 Ponus Ridge Rd, New Canaan Connecticut. I fully understand that there may be concerns expressed by citizens toward such a project, but I must consider public safety as my priority in supporting this endeavor.

The fire department's radio system needs to transmit and receive vital information to and from our dispatch center to keep our community safe. We are responsible for the provisions of fire protection and delivering emergency medical services to our citizenry, our personnel must have reliable technology that includes radio and cellular communications. Based upon the topography of this town and our current system, communications between dispatch, apparatus and personnel is often less than adequate. This is a life safety issue. An industry standard in today's fire service also involves the use of mobile display terminals or tablets to receive incident information. These devices are cellular based and with the lack of connectivity in many parts of town, this vital resource becomes compromised.

More importantly, this project will greatly improve cellular service in town for all users. This means if a person has an emergency and dials or sends a text message to 911, they will reach a public safety answering point. Moreover, we support any project that is available at no cost to the town and supports our mission. It is critical that public safety communication antennas are permitted access to the highest point on any tower which will greatly enhance fire and EMS operations.

In closing, I appreciate the opportunity to submit this letter of support and look forward to a new and improved town-wide public safety communications system.

Respectfully Submitted,

*Jack Horner*

Board of Fire Commissioners  
New Canaan, CT



# New Canaan Fire Department

Assistant Chief Albe Bassett

60 Main St. New Canaan CT. 06840

(203) 594-3153

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December 1, 2021, 2021

Mr. Raymond Vergati, Regional Manager  
Homeland Towers, LLC  
9 Harmony Street, 2<sup>nd</sup> Floor  
Danbury, CT 06810

Dear Mr. Vergati,

As the interim Fire Chief for the Town of New Canaan, CT., I am writing this letter to support the construction of a telecommunications tower at 1837 Ponus Ridge Rd, New Canaan Connecticut. I fully understand that there may be concerns expressed by citizens toward such a project, but I must consider public safety as my priority in supporting this endeavor.

The fire department's radio system currently utilizes a 3-point VHF simulcast system with 2 additional satellite receivers to transmit and receive vital information to and from our dispatch center. Responsible for the provisions of fire protection and delivering emergency medical services to our citizenry, our personnel must have reliable technology that includes radio and cellular communications. Based upon the topography of this town and our current system, communications between dispatch, apparatus and personnel is often less than adequate. This is a life safety issue. An industry standard in today's fire service also involves the use of mobile display terminals or tablets to receive incident information. These devices are cellular based and with the lack of connectivity in many parts of town, this vital resource becomes compromised.

As part of the NCFD mission, we have joined forces with the police and public works department to upgrade our public safety communications system. The construction of this supporting structure will allow the town to enhance its public safety communications infrastructure and elevate the level of safety provided to our first responders.

More importantly, this project will greatly improve cellular service in town for all users. This means if a person has an emergency and dials or sends a text message to 911, they will reach a public safety answering point. Moreover, we support any project that is available at no cost to the town and supports our mission. It is critical that public safety communication antennas are permitted access to the highest point on any tower which will greatly enhance fire and EMS operations.



# New Canaan Fire Department

Assistant Chief Albe Bassett

60 Main St. New Canaan CT. 06840

(203) 594-3153

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Finally, continuously faced with changes in technology, a new and reliable public safety communications, these towers provide redundancy for our communications.

In closing, I appreciate the opportunity to submit this letter of support and look forward to a new and improved town-wide public safety communications system.

Respectfully Submitted,

*Albe Bassett*

Interim Fire Chief  
New Canaan, CT