

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 2, 2022

**RESPONSES OF HOMELAND TOWERS, LLC/NEW CINGULAR WIRELESS PCS,
LLC (AT&T) TO CONNECTICUT SITING COUNCIL
PRE-HEARING INTERROGATORIES – SET ONE**

General

- Q1. Referring to Application Attachment 11, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Describe any additional attempts to contact those property owners.
- A1. *Certified mail receipts were sent to all abutting property owners and all but two certified mail receipts were received. The Applicants re-sent notice to one abutting property owner by first class mail on May 5, 2022. A copy of this mailing is included in **Attachment 1**. The property owner of 1845 Ponus Ridge Road called and requested an electronic copy of the notice, which was emailed to her on April 25, 2022.*
- Q2. Referring to Application p. 24, how is the construction cost of the facility recovered for both Homeland and AT&T?
- A2. *For Homeland, the cost of tower construction is recovered through rent from tenants that utilize the tower/facility. For AT&T, costs are recovered as part of business operations for their customers.*
- Q3. Referring to Application pp. 23-24, how many residents attended the January 24, 2022, public information meeting? What concerns were raised by residents and town officials and how were these concerns addressed?
- A3. *Approximately 50 residents attended the January 24, 2022 public information meeting. Some concerns that were raised by residents were perceived health effects, diminished property values and aesthetics. The police chief noted that the proposed Facility will allow critical emergency communications in this area of town, which is currently lacking and one resident spoke in favor of the proposed Facility for emergency communications.*

Site Search

- Q4. When did AT&T commence a site search for the proposed service area? Identify the approximate center and radius of AT&T's site search area.
- A4. *AT&T funded this ring in February of 2021. The ring center is 41.170965, -73.543148 and radius was approximately 0.25 mile.*
- Q5. When did Homeland commence a site search in the northwestern New Canaan area?
- A5. *Homeland began its site search in the northwestern New Canaan area in early 2018.*
- Q6. Referring to the site search summary, is Location 6 (Proprietors Circle) an undeveloped parcel?
- A6. *In the site search summary, Location 6 (Proprietors Circle) is an undeveloped parcel that is currently for sale.*
- Q7. Referring to the Site Search Summary it states Location 24 (Lost District Drive) was rejected by AT&T's RF engineers. What height was modeled in this location? Provide a coverage plot from this location.
- A7. *The height analyzed was the same height as the proposed site – 110' AGL. Please see the propagation map included in **Attachment 2**.*
- Q8. The 2014 New Canaan Wireless Market Study identified the intersection of West Road and Dan's Highway as a Likely Site location for an AT&T facility. Did AT&T agree with this assessment? Was a search conducted in this area?
- A8. *AT&T's target area is better described as the West side of Dan's Highway. Homeland concentrated its search efforts in the northwestern section of New Canaan and the northeastern section of Stamford.*

Site/Tower

- Q9. Would any blasting be required to develop the site? How would bedrock be removed?
- A9. *Homeland does not anticipate the need for blasting to construct the proposed Facility. The geotechnical investigation will evaluate subsurface conditions. If ledge is encountered, chipping is preferred to blasting. If blasting were required, an appropriate protocol would be followed in accordance with state and municipal regulations.*
- Q10. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
- A10. *The tower and related equipment would be surrounded by an eight-foot-tall security fence and a locked gate. AT&T's radio equipment cabinets are equipped with silent intrusion alarms. If someone attempts to tamper with or break-in to the cabinet, cell site technicians monitoring the site will be alerted and local police will be contacted.*

Q11. Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

A11. *The applicable safety standards include:*

- *2015 International Building Code with the 2018 CT Building Code Amendments*
- *National Electric Code (NFPA70)*
- *2005 CT State Fire Safety Code with the 2009 Amendments*
- *2018 CT State Fire Safety Code*
- *TIA-222-G-4 “Structural Standards for Steel Antenna Towers and Antenna Supporting Structures”*
- *Occupational Safety and Health Administration (OSHA)*

AT&T Coverage/Capacity

Q12. Application Attachment 7 indicates other frequencies will be installed in addition to the 700 MHz frequency. Does the 700 MHz frequency act as the “base frequency” of the network where most of the wireless traffic occurs? How do the other frequencies interact in AT&T’s wireless system?

A12. *The 700 MHz frequency has the best propagation characteristics of all the spectrum available to AT&T and its coverage defines the “footprint” of the AT&T wireless network. The other frequencies (850 MHz, 1900 MHz, 2100 MHz and 2300 MHz) serve to augment the capacity of the network. By serving as many “close-in” customers as possible, they also minimize the number of customers the 700 MHz network must serve and maximize its geographic reach.*

Q13. Would the proposed antennas be capable of offering 5G services? If yes, at what frequencies?

A13. *AT&T delivers two methods of 5G service:*

- *AT&T 5G, using low-band spectrum (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 2300 MHz and 3500 MHz)*
- *AT&T 5G+, which is broadband 5G delivered via millimeter wave spectrum (24 GHz to 39 GHz).*

The antennas that will be installed at the proposed site will support 5G in the low-band spectrum. The antennas that will be installed at the proposed site do not support the millimeter wave spectrum where broadband 5G+ operates.

Q14. Provide coverage models for existing and proposed 1900 MHz services.

A14. *Please see the plots included in **Attachment 3**.*

Q15. The 700 MHz coverage plot appears to show marginal service to Route 137 (High Ridge Road). Was there any other type of analysis conducted to determine the site would provide adequate service to Route 137? If yes, discuss and provide relevant studies.

A15. *The road labeled “High Ridge Road” has almost no existing coverage and will pick up over a mile of coverage at -93 dBm with the proposed Facility.*

Q16. Can coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the proposed service area.

A16. *AT&T's objective, particularly with respect to FirstNet service, is to maximize the coverage achievable from this site. Any reduction in centerline height would reduce the coverage of the site. Even at the proposed height, the tower would not fill every coverage gap in this area. Reducing the height of the tower would also reduce the coverage achievable by collocators, possibly necessitating the construction of more towers than would be needed if the tower were constructed at the proposed height. This would be contrary to the Siting Council's statutory obligation to minimize the proliferation of towers.*

Q17. The 2014 New Canaan Wireless Market Study included an assessment of AT&T's network by a third party (Centerline). Did AT&T provide data to Centerline for this study? Did AT&T comment to Centerline or the town regarding the study conclusions?

A17. *AT&T has been directly engaged with Town of New Canaan officials for over a decade and looking for ways to develop communications network infrastructure needed for reliable services in the community.*

In 2011, Town officials requested that AT&T meet with them to discuss the lack of service from all carriers in major parts of the community and explore solutions. At that time AT&T disclosed its long term needs and siting plans to the extent developed including planned upgrades at existing sites, collocation, and development of new tower sites, such as the facilities which were subsequently approved by the Council in Dockets 442 and 487. At that time, one of the areas AT&T identified as needing a new tower site was in northwest New Canaan west of State Route 124 and towards the Stamford border, the location of this project in Docket 509.

Over the next two years, AT&T worked with Town officials to explore options throughout the community and in collaboration with the Town Utilities Commission which became actively engaged in the discussions and conducted various public forums in 2013. One of the Commission's goals at that time was to obtain a Town funded third party drive test of the community to verify coverage gaps in the community and in response to public comments. The Town Utilities Commission procured the study prepared by Centerline in 2014, a study which did not include any data supplied to it by AT&T. For purposes of Docket 509, the 2014 Centerline study did verify what AT&T had shared with Town Officials in 2011, that a new tower site was going to be needed in northwest New Canaan to adequately serve the community and AT&T commented publicly at follow up Town Utilities Commission meetings.

Q18. Referring to Application p. 12, provide technological limitations, if any, that would preclude the installation of a network of small cells to serve the area. Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

A18. *As set forth in the Application, DAS systems or small cells are not a practical or feasible alternative for addressing the coverage gap in this area of New Canaan. The RF maps*

included in Application Attachment 1 clearly demonstrate a significant coverage gap in this area of New Canaan. In addition to providing reliable wireless services to AT&T's customers, the proposed Facility is being built as part of the AT&T's FirstNet public safety network, where wide area coverage is of paramount importance. DAS or small cells cannot technologically provide reliable wireless service to cover this area of need. Small cells and DAS are best suited for specifically defined areas where capacity is necessary, such as more urban environments, shopping malls, stadiums and other densely populated areas.

AT&T does use small cells in Connecticut to provide capacity relief in targeted areas. The Council is referred to PURA Docket No. 18-06-13, which includes over 200 small cells approved and either constructed or planned for deployment in urban/downtown areas and more densely populated areas of the state. In addition, AT&T has six petitions (Petitions 1501, 1502, 1504, 1505, 1511 and 1512) for the deployment of small cells currently pending before the Siting Council and has had many others approved recently. This area of New Canaan does not have the same usage patterns and density like Bridgeport, New Britain, Waterbury, Danbury, New London and Greenwich.

AT&T's objective in proposing this facility is to provide primary coverage to this area. Small cells on utility poles are particularly inappropriate for bringing primary coverage to a wide area with low population density such as New Canaan. There is no battery backup, so the only coverage in this area would be lost in a power outage. Widespread power outages are often the result of major weather events (ice storms, hurricanes, etc.), so the primary coverage is most likely to be lost when it is needed the most.

AT&T small cells are generally limited to PCS and AWS frequencies which further limits coverage and capacity for primary service. If 700 MHz is deployed on utility pole mounted small cells, then only 700 MHz can be deployed and only one of the two available 700 MHz carriers can be deployed due to equipment limitations. This also results in significant reductions in available capacity.

AT&T estimates that at least 30 utility pole mounted 700 MHz small cells would be necessary to replace all the high-quality (-83dBm) coverage that would be provided by the proposed macro facility. This estimate assumes that utility poles for small cell installations are either available to AT&T or can be installed anywhere AT&T deems appropriate, so the actual number of small cells needed would likely be significantly higher.

Equipment costs for a utility pole mounted small cell are approximately \$30k. Other costs are in the range of \$80k for a total of approximately \$110k per small cell on an existing utility pole.

Backup Power

- Q19. Is the Town proposing a backup power source for its equipment? If yes, provide detail.
- A19. *The Town is proposing a 25 kW Kohler generator with a 500 gallon above-ground propane tank as a backup fuel source for its equipment.*
- Q20. What would be the respective run time for AT&T's proposed generator before it would need to be refueled, assuming it is running at full load under normal conditions?

A20. *The proposed generator has a 92 useable gallon fuel tank and uses 1.9 Gallons per hour at 100% capacity. Maximum run time between fueling is approximately 48 hours.*

Public Safety

Q21. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?

A21. *Yes, the proposed Facility will support text-to-911 service and no additional equipment is required.*

Q22. Does the deployment of FirstNet require additional equipment? Explain.

A22. *FirstNet services will be supported by the equipment already proposed for the facility. No additional equipment is necessary. FirstNet operates on spectrum known as Band 14. Band 14 is part of the 700 MHz band that all the major wireless operators use in their networks. This specific portion of the 700 MHz spectrum is deployed by AT&T as part of the FirstNet Public-Private Partnership. Under normal circumstances, this spectrum is available to both public safety users and AT&T customers, but priority is given to public safety use. In the case of a major emergency, the entire Band 14 can be dedicated to public safety users. If Band 14 is dedicated to public safety users, 700 MHz Band 5/12 will still be available to non-public-safety AT&T customers.*

Q23. Why was the proposed site selected for FirstNet deployment?

A23. *AT&T and the state of Connecticut agreed upon New Canaan and Stamford knowing that coverage was lacking in the area, including critical emergency communications pointed to the need for increased coverage for emergency responders. FirstNet is a nationwide First Responder dedicated network that relies on statewide coverage for all subscribing agencies.*

Q24. Referencing Application Attachment 7, revise Power Density Table 2 to include the Town's antennas.

A24.

Carrier	Antenna Height (Feet)	Operating Frequency (MHz)	Number of Trans.	ERP Per Transmitter (Watts)	Power Density (mw/cm2)	Limit	% MPE
AT&T	106	1900	3	5877	0.0020	1.0000	0.20%
AT&T	106	2100	2	9690	0.0028	1.0000	0.28%
AT&T	106	739	2	3541	0.0047	0.4930	0.96%
AT&T	106	885	1	3883	0.0022	0.5900	0.37%
AT&T	106	3500	1	24286	0.0367	1.0000	3.67%
Town of New Canaan PD 1	119.25	155.64	1	69.7	0.0002	0.2000	0.10%
Town of New Canaan FD 1	119.25	155.9475	1	20.8	0.0001	0.2000	0.03%
Town of New Canaan DPW	119.25	154.355	1	22.8	0.0001	0.2000	0.03%
Town of New Canaan EMS	119.25	155.175	1	20.3	0.0001	0.2000	0.03%
Town of New Canaan CERT	119.25	153.005	1	63.0	0.0002	0.2000	0.09%
Town of New Canaan Microwave Dish	114	5800	2	100	0.0006	1.0000	0.06%
						Total	5.82%

Environment

Q25. Referring to Application p. 16, has the Applicant completed the Phase IB Survey and submitted the results to the State Historic Preservation Office?

A25. *The Phase 1B Survey results were submitted to the State Historic Preservation Office (“SHPO”). The SHPO concurred with the findings of the Phase 1A and Phase 1B reports that no historic properties will be affected by the proposed activities. See the SHPO Determination Letter dated May 19, 2022 included in **Attachment 4**.*

Q26. Referring to Application Attachment 8 - Visibility Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower.

A26. *A total of 13 residences within 0.5-mile of the proposed towers may have seasonal and/or year-round views. This includes 10 residences estimated to have seasonal views only and three (3) residences estimated to have both year-round and seasonal views.*

Q27. What is the expected visibility of the proposed tower from the abutting residential property at 359 Dan’s Highway?

A27. *The abutting residential property at 359 Dan’s Highway is expected to have both year-round and seasonal views of the proposed tower.*

Q28. What is the expected visibility of the proposed tower from the abutting residential property at 59 Squires Lane?

A28. *The abutting residential property at 59 Squires Lane is expected to have both year-round and seasonal views of the proposed tower.*

Q29. Are there sections of the Centennial Watershed State Forest in the area of the Laurel Reservoir? Revise the Viewshed Analysis Map (Application Attachment 8) to show the boundaries of the state forest. What is the expected view of the proposed tower from the state forest?

A29. *There are sections of the Centennial Watershed State Forest located primarily south and west of Laurel Reservoir. No views of the proposed tower are predicted from the Centennial Watershed State Forest properties. See the revised Viewshed Analysis Map included in **Attachment 5**.*

Q30. Would any mapped areas of prime farmland soil be impacted by the project? If yes, estimate the amount of disturbance?

A30. *There are no prime farmland soils on the proposed Facility property.*

Q31. Would the project require a DEEP Stormwater Permit? If yes, do the proposed stormwater controls conform to the requirements of the Stormwater Permit?

A31. *A DEEP Stormwater Permit will not be required.*

- Q32. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. site access and interior access road(s);
8. tower location/compound;
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

- A32. *Please see the Remote Field Review included in **Attachment 6**.*

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.

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
kbaldwin@rc.com

David F. Sherwood, Esq.
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60 Squires Lane
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Phone (510) 913-3476
Justin.nishioka@gmail.com

Dated: June 2, 2022



Lucia Chiochio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Ave, 14th Floor
White Plains, NY 10601
(914)-761-1300

cc: Homeland
AT&T
APT
Smartlink
C Squared

ATTACHMENT 1



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cuddyfeder.com

Lucia Chiochio, Esq.
lchiochio@cuddyfeder.com

May 5, 2022

VIA FIRST CLASS MAIL

Aquarion Water Co of CT
Attn: Tax
Ponus Ridge Road
New Canaan, CT 06840

Re: Homeland Towers, LLC ("Homeland Towers") and New Cingular Wireless PCS, LLC
("AT&T")
Wireless Telecommunications Tower Facility
New Canaan, Connecticut

Dear Sir or Madam:

Our office previously attempted to contact you on behalf of our clients, Homeland Towers, LLC and New Cingular Wireless PCS, LLC, with respect to the above-referenced matter. A certified return receipt envelope was sent to your attention on April 7, 2022 but a signed receipt was not returned. The address listed for you corresponds with the records on file with the Town of New Canaan's Assessor's Office as an owner of property abutting the subject parcel detailed in the attached notice. This letter along with a copy of the notice sent on April 7, 2022, is being sent via first class mail in the hope that this method may be successful in reaching you.

If you have any questions concerning this information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script that reads 'Lucia Chiochio'.

Lucia Chiochio

Enclosures



445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
T 914 761 1300
F 914 761 5372
cuddyfeder.com

April 7, 2022
**VIA CERTIFIED MAIL/
RETURN RECEIPT REQUESTED**

Aquarion Water CO of CT
Attn: Tax
Ponus Ridge Road
New Canaan, CT 06840

Re: Homeland Towers, LLC (“Homeland Towers”) and New Cingular Wireless PCS, LLC
 (“AT&T”)
Wireless Telecommunications Tower Facility
New Canaan, Connecticut

Dear Sir or Madam:

We are writing on behalf of our clients Homeland Towers, LLC (“Homeland Towers”) and New Cingular Wireless PCS, LLC (“AT&T”) with respect to the above referenced matter and our clients’ intent to file an application with the State of Connecticut Siting Council (“CSC”) for approval of a proposed wireless communications tower (the “Facility”) in the northwest section of the Town of New Canaan.

We are writing to you to provide notice as you are an abutting neighbor to 1837 Ponus Ridge Road in the Town of New Canaan and is identified as Map 23, Block 27, Lot 57 on the Town of New Canaan Tax Map. The facility project will be unmanned with no sanitary or water facilities and would consist of a 110’ tall monopine structure with faux branches extending another 5’ above the top of the monopine within a fenced compound in the north-central portion of the 5.16-acre parcel. Included with this letter please find a Notice of this application with details of the proposed Facility.

The location, height and other features of the Facility are subject to review and potential change by the CSC under the provisions of Connecticut General Statutes §16-50g et seq.

If you have any questions concerning this application, please contact the CSC or the undersigned after April 17, 2022, the date which the application is expected to be on file.

Very truly yours,

A handwritten signature in blue ink that reads 'Lucia Chiochio'.

Lucia Chiochio, Esq.

Enclosure

cc: Kristen Motel, Esq., Cuddy & Feder LLP

NOTICE

NOTICE IS HERBY GIVEN, pursuant to Section 16-50g et seq. of the Connecticut General Statutes, as amended, and Section 16-50j-1 et seq. of the Regulations of Connecticut State Agencies, as amended, of the intent of Homeland Towers, LLC (“Homeland Towers”) and New Cingular Wireless PCS, LLC (“AT&T”) (together the “Applicants”) to file an Application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council (“Siting Council”) on or after April 13, 2022 to construct a wireless telecommunications tower facility (“Facility”) at 1837 Ponus Ridge Road in the Town of New Canaan.

The Facility is proposed on a 5.16-acre parcel of land owned by 1837 LLC identified as Map 23, Block 27, Lot 75 on the Town of New Canaan Tax Map and includes an approximately 5,100 square-foot lease area in the central-northwestern section of the parcel.

The Facility consists of a new self-supporting monopole designed to resemble a pine tree (“monopine”) that is 110’ in height with faux branches extending an additional 5’ above the top of the pole, bringing the total height of the monopine to approximately 115’. The monopine tower will be located within a 3,000 square-foot fenced equipment compound at grade level. AT&T’s antennas would be installed at a centerline height of 106’ on the monopine tower and the Facility will be designed to support the antennas and equipment of other FCC licensed wireless carriers. The proposed Facility will also be used by the Town of New Canaan for emergency communications.

The Application explains the need, purpose and benefits of the Facility and also describes the environmental impacts of the proposed Facility.

Interested parties and residents of New Canaan, Connecticut are invited to review the Application during normal business hours after April 13, 2022 when the Application is anticipated to be filed, at the following offices:

Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Claudia A. Weber, CMC
Town Clerk & Registrar of Vital Statistics
Town of New Canaan
77 Main Street, 1st Floor
P.O. Box 447
New Canaan, CT 06840

Or the offices of the undersigned. All inquiries should be addressed to the Connecticut Siting Council or to the undersigned:

Lucia Chiochio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Ave, 14th Floor
White Plains, NY 10601
(914) 761-1300



445 Hamilton Avenue, 14th Floor
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F 914 761 5372
cuddyfeder.com

Lucia Chiochio, Esq.
lchiochio@cuddyfeder.com

May 5, 2022

VIA FIRST CLASS MAIL

Aquarion Water Co of CT
Attn: Tax
600 Lindley Street
Bridgeport, CT 06606

Re: Homeland Towers, LLC (“Homeland Towers”) and New Cingular Wireless PCS, LLC
 (“AT&T”) Wireless Telecommunications Tower Facility
 New Canaan, Connecticut

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If you have any questions concerning this information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink that reads 'Lucia Chiochio'. The signature is written in a cursive, flowing style.

Lucia Chiochio

Enclosures



445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
T 914 761 1300
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cuddyfeder.com

April 7, 2022

**VIA CERTIFIED MAIL/
RETURN RECEIPT REQUESTED**

Aquarion Water CO of CT
Attn: Tax
600 Lindley Street
Bridgeport, CT 06606

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Lucia Chiochio, Esq.

Enclosure

cc: Kristen Motel, Esq., Cuddy & Feder LLP

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New Britain, CT 06051

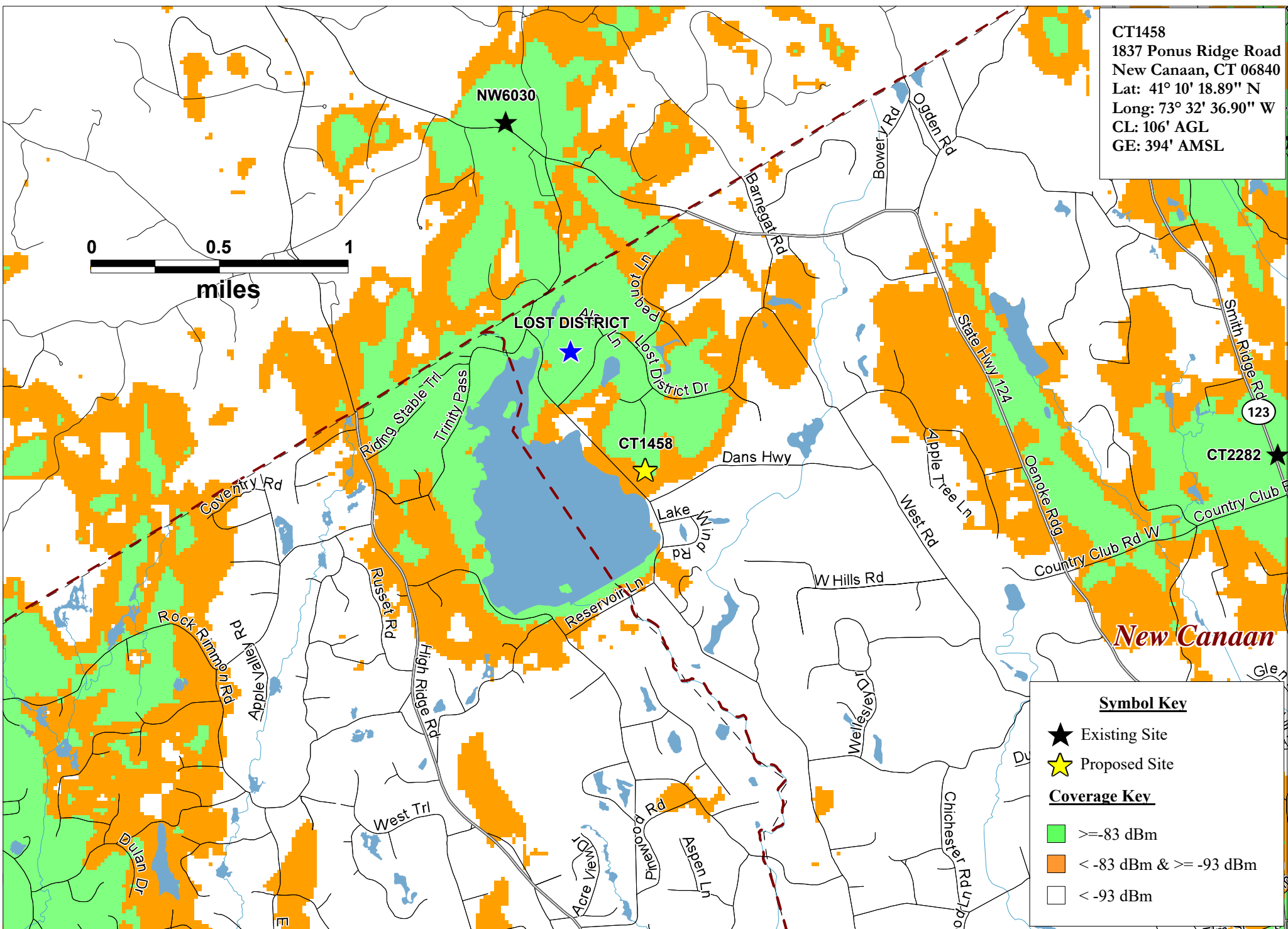
Claudia A. Weber, CMC
Town Clerk & Registrar of Vital Statistics
Town of New Canaan
77 Main Street, 1st Floor
P.O. Box 447
New Canaan, CT 06840

Or the offices of the undersigned. All inquiries should be addressed to the Connecticut Siting Council or to the undersigned:

Lucia Chiocchio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Ave, 14th Floor
White Plains, NY 10601
(914) 761-1300

ATTACHMENT 2

CT1458
 1837 Ponus Ridge Road
 New Canaan, CT 06840
 Lat: 41° 10' 18.89" N
 Long: 73° 32' 36.90" W
 CL: 106' AGL
 GE: 394' AMSL



Symbol Key

- ★ Existing Site
- ★ Proposed Site

Coverage Key

- Green: ≥ -83 dBm
- Orange: < -83 dBm & ≥ -93 dBm
- White: < -93 dBm

AT&T Existing & Alternate
 700 MHz LTE Coverage

CT1458

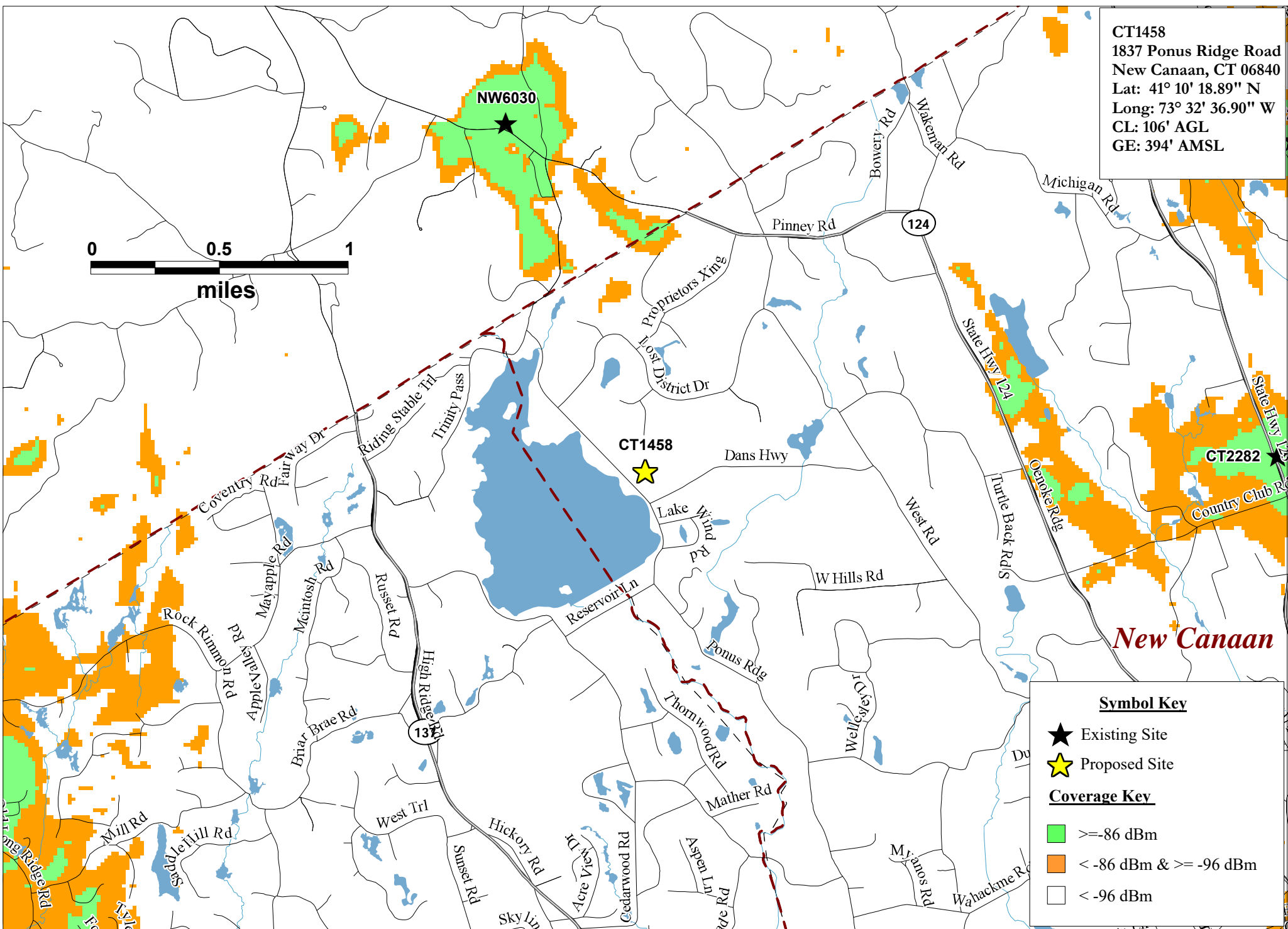
1837 Ponus Ridge Road
 New Canaan, CT 06840



PREPARED ON _____
 DATE: 01/20/2022
 REV 0

ATTACHMENT 3

CT1458
 1837 Ponus Ridge Road
 New Canaan, CT 06840
 Lat: 41° 10' 18.89" N
 Long: 73° 32' 36.90" W
 CL: 106' AGL
 GE: 394' AMSL



New Canaan

Symbol Key

- ★ Existing Site
- ★ Proposed Site

Coverage Key

- Green: ≥ -86 dBm
- Orange: < -86 dBm & ≥ -96 dBm
- White: < -96 dBm

AT&T Existing Coverage
1900 MHz LTE

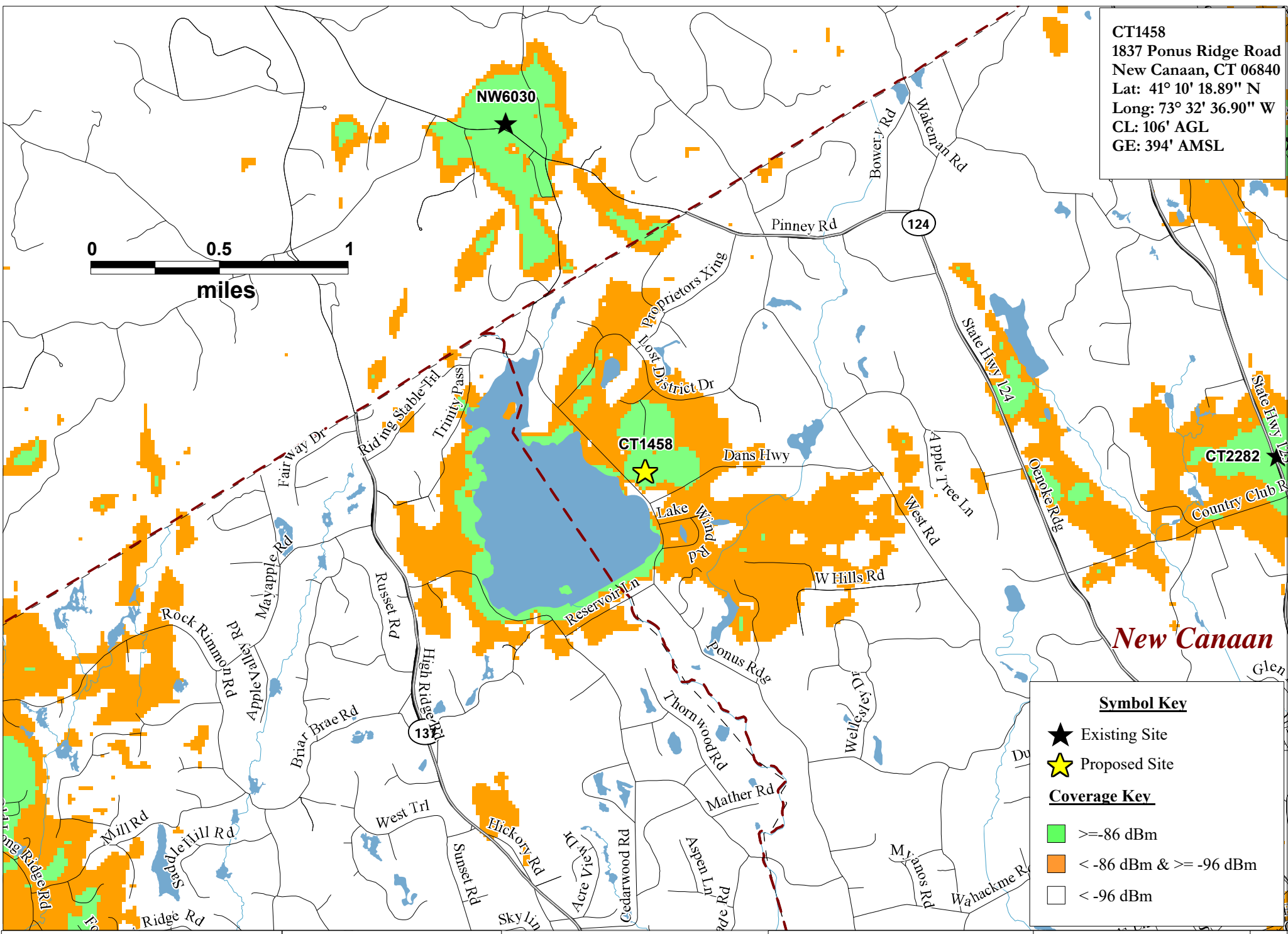
CT1458

1837 Ponus Ridge Road
New Canaan, CT 06840



PREPARED ON	
DATE: 05/17/2022	REV 0

CT1458
 1837 Ponus Ridge Road
 New Canaan, CT 06840
 Lat: 41° 10' 18.89" N
 Long: 73° 32' 36.90" W
 CL: 106' AGL
 GE: 394' AMSL



New Canaan

Symbol Key

- ★ Existing Site
- ★ Proposed Site

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

**AT&T Existing & Proposed
 1900 MHz LTE Coverage**

CT1458

**1837 Ponus Ridge Road
 New Canaan, CT 06840**



PREPARED ON _____
 DATE: 05/17/2022

REV 0

ATTACHMENT 4



Department of Economic and
Community Development

State Historic Preservation Office

May 19, 2022

Mr. Brian Gaudet
All-Points Technology Corp., PC
567 Vauxhall Street Extension, Suite 311
Waterford, CT 06385

Subject: Preliminary Archaeological Assessment and
Phase IB Archaeological Assessment
Proposed Telecommunications Facility
1837 Ponus Ridge Road
New Canaan, Connecticut
Homeland Towers, LLC
ENV-22-0752

Dear Mr. Gaudet:

The State Historic Preservation Office (SHPO) has reviewed the preliminary archaeological assessment and Phase IB Archaeological Assessment prepared by Heritage Consultants, LLC (Heritage), dated January 21, 2021 [*sic*, 2022] and April 2022, respectively, as part of the larger submittal for a proposed telecommunications facility. The proposed activities are subject to review by this office pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission (FCC) regulations. SHPO understands that the proposed undertaking includes the installation of a 110 foot tall stealth conifer tree monopole, with branches extending to 115 feet above ground level (AGL), to be located within a 50 foot by 75 foot equipment compound. The compound is to contain a gas-powered generator, ice bridge, and equipment cabinets, located in the central portion of the Subject Property, and be screened to the north and east by 8-10 foot tall coniferous trees. Outside the compound is proposed to be a transformer, multimeter center, and equipment cabinet. As part of initial construction, six panel antennas and nine remote radio units (RRUs) are proposed to be installed at a center height of approximately 106 feet AGL. Future carriers are proposed at centerline heights of 95 feet, 86 feet, and 76 feet AGL, respectively. A 12 foot tall omnidirectional antenna, for municipal use, is also proposed in future. Access is to be through a new, gravel and paved access road, originating from an existing drive from Ponus Ridge Road. Utilities are proposed to be run underground from Ponus Ridge Road to the new facility, which is to accommodate both commercial and municipal communications. The submitted reports are well-written, comprehensive, and meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

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No previously recorded archaeological sites are located within 0.5 miles of the project area. Similarly, no properties listed or formally determined to be eligible for listing on the National Register of Historic Places (NR) are located within 0.5 miles of the project area. In an effort of due diligence, one property, the Isaac Jones House (1836) at 45 Trinity Pass, Stamford, designated on the State Register of Historic Places (SR), is located within 1 mile of the project area, beyond the 0.5 mile Area of Potential Effect (APE) established in the FCC *Nationwide Programmatic Agreement Regarding The Section 106 National Historic Preservation Act Review Process* (2005). However, intervening topography, vegetation, and structures prevents the installation from being visible from the resource; therefore, it will not be impacted by the proposed undertaking.

The preliminary assessment included review of soil maps, GIS data, historical mapping, aerial photos, and pedestrian survey of the project area. Soil profiles are identified as Charlton and Chatfield complex, characterized as very deep, low sloping, well-drained soils, indicative of a moderate to high potential to retain intact archaeological deposits, if they have not been disturbed. Review of historic maps and aerials reveal that the subject property itself was left relatively undeveloped until approximately 1977, when a single family residence was constructed in the southern portion of the parcel. A pedestrian survey confirmed that the majority of the project area contained moderately sloping topography, that appears to have been undisturbed. As the subject property is also within the vicinity of the historic course of the Rippowam River, there is a moderate to high potential for prehistoric archeological deposits. As a result of the preliminary assessment, a Phase IB Archaeological Assessment was recommended.

Phase IB of the reconnaissance survey consisted of subsurface testing of areas deemed to have moderate to high archaeological sensitivity during the initial assessment, and that would be subject to ground disturbing impacts as part of the proposed undertaking. A total of 12 of 12 planned shovel tests were excavated throughout the proposed work area along the proposed access road and telecommunications facility compound. Nine of the 12 had to be terminated at the B Horizon due to large immovable rocks. No prehistoric or historic period cultural artifacts or features were identified during the survey.

As a result of the information submitted, SHPO concurs with the findings of the report that additional archeological investigations of the project area are not warranted and that no historic properties will be affected by the proposed activities. However, please be advised that if construction plans change to include previously uninvestigated/undisturbed areas, this office should be contacted for additional consultation.

State Historic Preservation Office

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Department of Economic and
Community Development

State Historic Preservation Office

This office appreciates the opportunity to review and comment upon this project. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style with a long, sweeping underline.

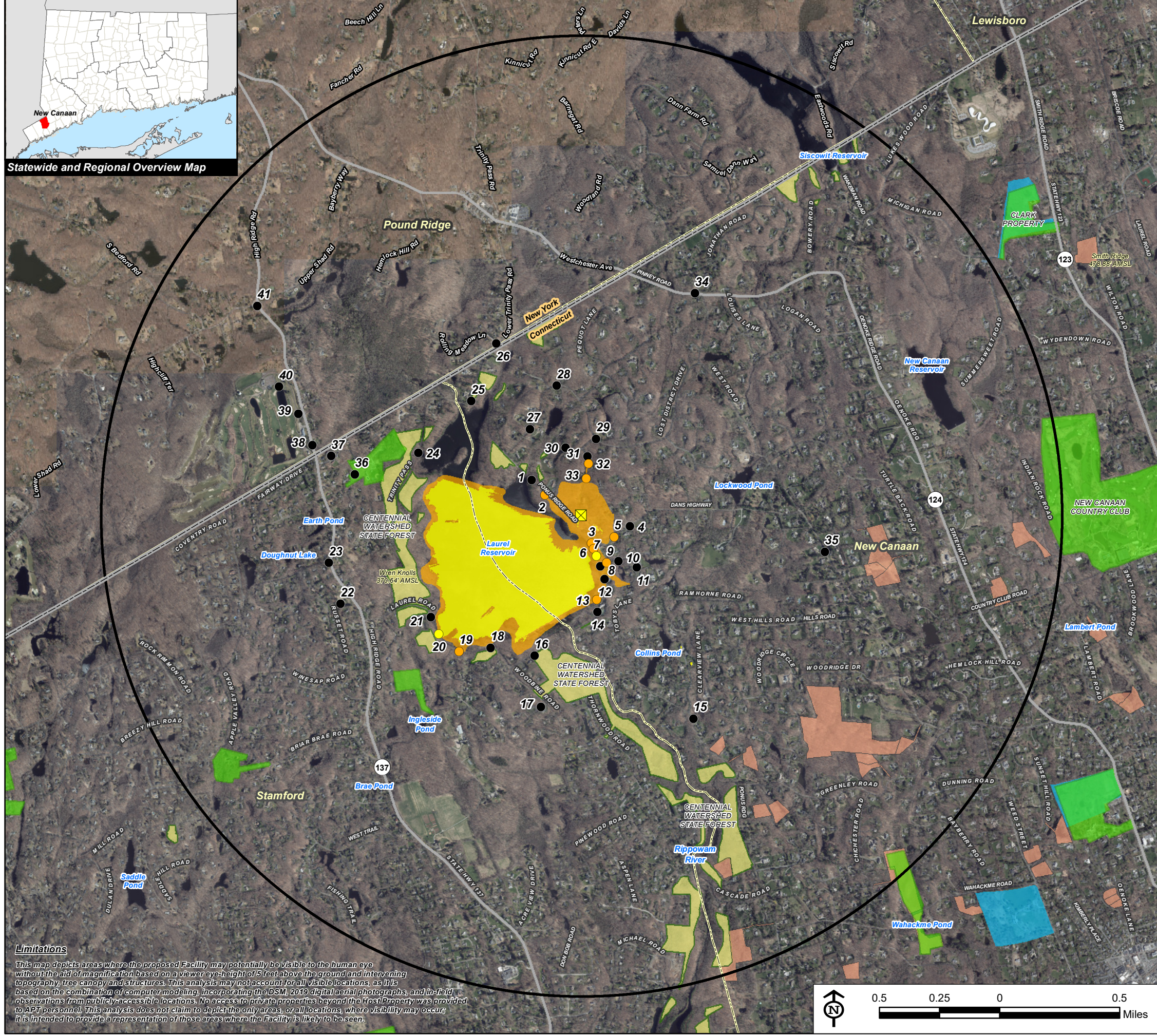
Jonathan Kinney
State Historic Preservation Officer

State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | ct.gov/historic-preservation

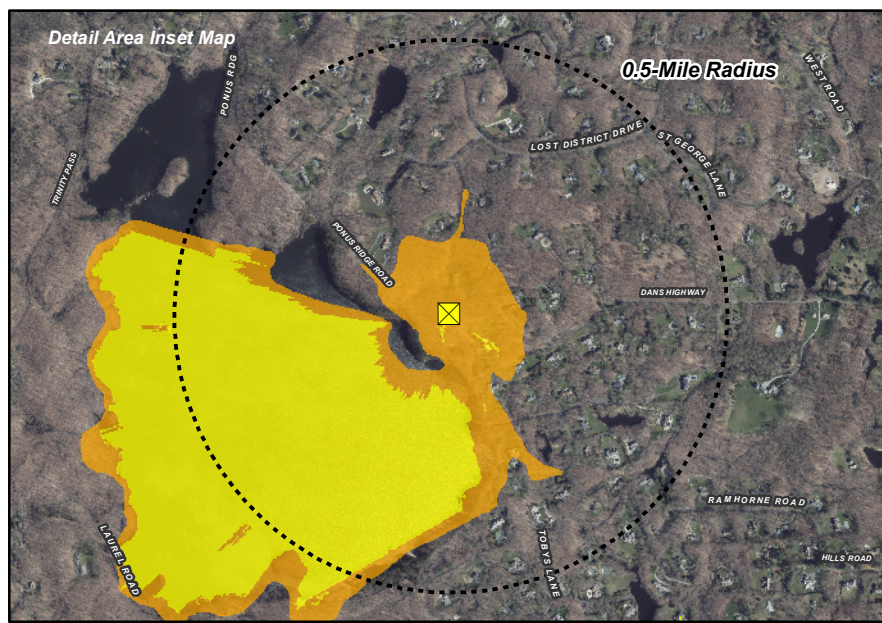
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ATTACHMENT 5



Statewide and Regional Overview Map

Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating the DSM, 2019 digital aerial photographs, and in-field observations from publicly-accessible locations. No access to private properties beyond the Host Property was provided to APT personnel. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.



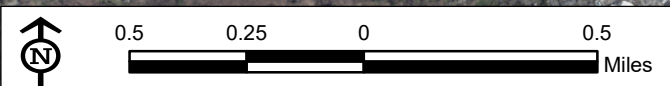
Viewshed Analysis Map
 Proposed Wireless Telecommunications Facility
 New Canaan Northwest
 1837 Ponus Ridge Road
 New Canaan, Connecticut

Proposed facility height is 115 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Map information field verified by APT on April 7, 2021
 Base Map Source: 2019 Aerial Photograph (CTECO) and 2016
 New York State GIS Clearinghouse Aerial Photograph
 Map Date: May 2022

Legend

- Proposed Site
- Study Area (2-Mile Radius)
- Visible
- Seasonal
- Not Visible
- Predicted Year-Round Visibility (198 Acres; +/- 195 acres occurs over Laurel Reservoir)
- Areas of Potential Seasonal Visibility (80 Acres)
- State Boundary
- Municipal Boundary
- Trail
- Scenic Highway
- DEEP Boat Launches
- Municipal and Private Open Space Property
- Centennial Watershed State Forest
- Protected Open Space Property**
- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:
Physical Geography / Background Data
 A digital surface model (DSM) was created from the State of Connecticut 2016 LIDAR LAS data points and the City of New York Department of Environmental Protection 2009 LIDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.
 Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)
Dedicated Open Space & Recreation Areas
 Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007); Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)
 Connecticut Forest & Parks Association, Connecticut Walk Books East & West
Other
 CTDOT Scenic Strips (based on Department of Transportation data)
Notes
 **Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.



ATTACHMENT 6

REMOTE FIELD REVIEW



CT SITING COUNCIL DOCKET NO. 509
RESPONSE TO INTERROGATORY 32
NEW CANAAN NORTHWEST
1837 PONUS RIDGE ROAD
NEW CANAAN, CT 06840

PREPARED FOR:



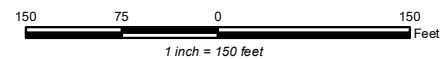
PREPARED BY:

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385



PHOTO LOG

- | | | | |
|-------------------|-------------------------|----------------------------------|-------------------------------|
| ● Photo Locations | ▭ Limits of Disturbance | - - - Underground Electric/Telco | ● Landscape Screening |
| ● Photo Marker | ▨ Stormwater Riprap | — Carrier Equipment | — Delineated Wetland Boundary |
| ▭ Host Property | ▭ Gravel Access Road | — Gate/Compound Fence | ▭ Delineated Wetland Area |
| ● Proposed Tower | ▭ Paved Access Road | — Stormwater Drainage | |





PROPOSED ACCESS DRIVE

PHOTO

1

DESCRIPTION

PONUS RIDGE ROAD LOOKING NORTH



PROPOSED/ACCESS DRIVE



PHOTOGRAPHED ON 5/20/2022

PHOTO

2

DESCRIPTION

PONUS RIDGE ROAD LOOKING EAST



NORTH



EAST



SOUTH



WEST



PHOTO

3

DESCRIPTION

VIEW FROM START OF PROPOSED ACCESS DRIVE - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 5/20/2022



PROPOSED ACCESS DRIVE

PHOTO

DESCRIPTION

4

PROPOSED ACCESS ROAD LOOKING NORTH

PHOTOGRAPHED ON 5/20/2022



PHOTOGRAPHED ON 5/20/2022

PHOTO

DESCRIPTION

5

PROPOSED ACCESS ROAD LOOKING SOUTH



PHOTO

DESCRIPTION

6

PROPOSED ACCESS ROAD LOOKING NORTHWEST



PHOTO

DESCRIPTION

7

PROPOSED ACCESS ROAD LOOKING NORTHWEST



PHOTO

DESCRIPTION

7A

PROPOSED ACCESS ROAD LOOKING SOUTHWEST



PHOTO

DESCRIPTION

8

PROPOSED ACCESS ROAD LOOKING NORTH



PHOTO

DESCRIPTION

9

PROPOSED ACCESS ROAD LOOKING NORTHEAST



PHOTOGRAPHED ON 5/20/2022

PHOTO

DESCRIPTION

9A

PROPOSED ACCESS ROAD LOOKING NORTHWEST TOWARDS WETLAND (BEYOND)



PHOTO

DESCRIPTION

10

PROPOSED ACCESS ROAD LOOKING SOUTHWEST



PHOTO

11

DESCRIPTION

LOOKING NORTHEAST



PROPOSED FENCE CORNERS

PHOTO

12

DESCRIPTION

LOOKING NORTHWEST

PHOTOGRAPHED ON 5/20/2022



PHOTO

DESCRIPTION

13

VIEW FROM SOUTHEASTERN EDGE OF PROPOSED COMPOUND LOOKING SOUTHEAST TOWARDS ADJACENT PROPERTY



PHOTO

14

DESCRIPTION

LOOKING NORTH

PHOTOGRAPHED ON 5/20/2022



PHOTO

15

DESCRIPTION

LOOKING WEST

PHOTOGRAPHED ON 5/20/2022



PHOTOGRAPHED ON 5/20/2022

PHOTO

DESCRIPTION

16

VIEW FROM NORTHERN EDGE OF PROPOSED COMPOUND LOOKING NORTH TOWARDS ADJACENT PROPERTY



PHOTOGRAPHED ON 5/20/2022

PHOTO

17

DESCRIPTION

LOOKING SOUTH



PROPOSED TOWER

PROPOSED FENCE CORNERS

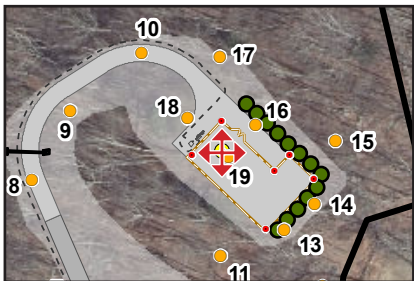


PHOTO

DESCRIPTION

18

LOOKING SOUTHEAST



PHOTO

19

DESCRIPTION

VIEW FROM PROPOSED TOWER - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 5/20/2022