

Connecticut Siting Council

APPLICATION OF HOMELAND TOWERS, LLC
AND
CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



124 AGUE SPRING ROAD
HADDAM, CONNECTICUT

DOCKET NO. _____

NOVEMBER 29, 2023

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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 northwest portion on an approximately 13.14-acre parcel at 124 Ague Spring Road in Haddam Neck, Connecticut (the “Property”). Homeland refers to this facility as the Haddam North cell site (the “Haddam North Facility”).¹ The Property is owned by Brennan and Samantha Danaher and is used for residential purposes.

The primary purpose of the Haddam North Facility is to provide Cellco customers and emergency service providers with improved wireless service along an approximately four (4) mile stretch of Route 154, as well as local roads in Haddam and Haddam Neck and southerly portions of East Hampton. The Haddam North Facility will also provide some limited capacity relief to Cellco’s existing Higganum CT facility (Alpha Sector Antennas) which are currently operating at or near its capacity limits.

Homeland plans to construct a 150-foot monopole tower within a 40’ x 70’ compound in the northwest portion of the Property. Cellco will install antennas and remote radio heads at a centerline height of 146 feet above ground level (“AGL”).

Equipment associated with the Haddam North Facility will be installed on the ground near the base of the tower within the fenced compound. Cellco’s equipment will consist of equipment and battery cabinets, and a diesel-fueled backup generator. Vehicular and utility access to the facility compound would extend from Ague Spring Road.

¹ Cellco also identifies this tower site as its Haddam 3 Facility.

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
APPLICATION OF HOMELAND TOWERS, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 124 AGUE SPRING ROAD, HADDAM, CONNECTICUT	:	DOCKET NO. ____
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	:	NOVEMBER 29, 2023

**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 Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (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 13.14-acre parcel at 124 Ague Spring Road in Haddam, Connecticut (the “Property”). This site is identified throughout the Application as the “Haddam North Facility” (a/k/a the “Haddam 3 Facility”). If approved, the Council Certificate would be issued to and held by Homeland.

The Property is owned by Brennan and Samantha Danaher and is used for residential purposes. The proposed Haddam North Facility would be in the northwest portion of the Property. At this location, Homeland would construct a 150-foot self-supporting monopole tower within a 40' x 70' facility compound (3,640 square foot leased area). Cellco would install up to twelve (12) panel-type antennas and six (6) remote radio heads ("RRHs") on a platform at the 146-foot level on the tower. Equipment associated with Cellco's antennas, including radio and battery cabinets and a diesel-fueled generator would be installed on concrete pads in the northeast portion of the fenced compound. Vehicular access to the Haddam North Facility would extend from Ague Spring Road over a portion of an existing paved driveway and a new gravel driveway extension, approximately 360 feet to the tower site. Utilities will extend from existing service along Ague Spring Road.

Included in this Application, as Attachment 1, is a site evaluation report and project plans for the proposed Haddam North 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 Haddam North 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, 2nd Floor
Danbury, CT 06810
Attention: Raymond Vergati

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

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 Haddam North 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 November 21 and November 22, 2023, in the *Courant* 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 Courant 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 Haddam North 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 policy² to ensure that all Americans would have access to broadband capability, whether wired or wireless;

² Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

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 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.³

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 Middlesex 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 Haddam North Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Haddam North Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Middlesex 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 Haddam and in the adjacent Towns of Chester, East Haddam, East Hampton and Middletown. Plots showing the extent of reliable wireless service in the area reveals significant "gaps" in wireless service, in all of Cellco's

³ FCC Declaratory Ruling WT Docket No. 08-165.

operating frequencies. Of particular concern is the approximately four (4) mile gap in reliable service along Route 154 in Haddam in all of Cellco's operating frequencies, including Cellco's 700 MHz base frequencies.⁴ (See Attachment 6).

The proposed Haddam North Facility will also provide some limited capacity relief to Cellco's existing Higganum Facility (Alpha Sector antennas) 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 150-foot self-supporting monopole tower within a 40' x 70' gravel facility compound in the northwest portion of the Property. The tower would be setback approximately 62 feet from northern property boundary; 651 feet from the eastern property boundary; 964 feet from the southern property boundary and 175 feet from the western property boundary. Cellco would install antennas and RRHs at the 146-foot level on the tower. Equipment associated with Cellco's antennas will be located near the base of the tower within a fenced compound, including radio and battery cabinets and a 50-kW diesel-fueled generator. Cellco's equipment cabinet would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The battery system and backup generator will provide backup power to Haddam North Facility if commercial power is interrupted. Once the site is operational, Cellco personnel will visit the cell site only when needed for maintenance. All systems are monitored remotely at Cellco's Mobile Telephone Switching Office ("MTSO").

3. Cellular System Equipment

The key elements of the cellular system are Cellco's two MTSOs located in Windsor and

⁴ Note that Cellco's existing gap in wireless service along Route 154 is significantly larger than four (4) miles. If approved, the Haddam North Facility would cover a four (4) mile portion of Route 154. An additional cell site would be needed to fill the remaining gaps along Route 154 and adjoining areas to the south.

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 eight (8) panel-type transmit/receive antennas consisting of four (4) model JAHH-45C-R3B; two (2) model MT6407-77A antennas; and two (2) model CCCI MBA3R-K4A antennas. Cellco will also install a total of seven (7) remote radio heads behind its antennas, two (2) HYBRIFLEX™ fiber optic antenna cables and one (1) GPS antenna. Backup power to the Haddam North Facility will be provided by an onsite battery and a 50-kW diesel-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 has determined that the proposed Haddam North Facility location satisfies this goal and will help resolve a portion of Cellco's wireless service problems in the Haddam 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 Haddam North Facility location. Cellco's existing Higganum, Higganum South, Middletown SE, Haddam, East Haddam 2, and Chester cell sites will interact with the proposed Haddam North Facility. See Attachment 6. The use of existing, non-tower structures in an area, when available are also considered as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the area.⁵

Homeland initiated its site search process and investigated a total of twelve (12) 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 146 feet at the Property would satisfy its wireless service objectives in the area. Homeland negotiated and ultimately entered into a Lease

⁵ Homeland and Cellco did consider an existing 73.5-foot lookout tower immediately south of the proposed tower site on the Property. It was determined that the existing structure is not tall enough to satisfy Cellco's wireless service objectives in the area, particularly along State Route 154 to the west of the Connecticut River.

Agreement for the use of the Property in 2018. The Site Search Summary together with the site information contained in Attachment 1 and Attachment 6 support Homeland's and Celco'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 four (4) wireless carriers, the Town and any emergency services entities interested in the site. 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 Haddam. The Haddam North 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 Haddam North 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. A Visual Assessment and Photo-Simulation Report (“Visual Report”) prepared by All-Points Technology Corporation, P.C. for the Haddam North Facility is included in Attachment 9. The Visual Report assesses the visual impact of the proposed 150-foot monopole tower on the surrounding areas and includes photographic simulations for the Council’s review and consideration.

According to the Visual Report, areas where some portion of the tower would be visible above the tree canopy (year-round) comprise approximately 432 acres or 5.37% of the two-mile radius (8,042 acre) study area. A vast majority (approximately 84.5%) of this area of year-round views is over water, on the Connecticut River. The Haddam North Facility tower will be visible through the trees from an additional 255 acres (3.17% of the two-mile radius area).

There are four (4) residences within 1,000 feet of the Haddam North Facility. The closest off-site single-family residence is located approximately 475 feet to the south at 122 Ague Spring 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 & NDDDB Compliance

According to the July 10, 2023 USFWS & NDDDB Compliance determination prepared by APT, one federally-listed threatened endangered species is known to occur in the vicinity of the Property documented as the *Northern Long-Eared Bat* (“NLEB”). For the reasons discussed in the compliance determination, Homeland submits that the proposed Haddam North Facility will not adversely affect the NLEB.

The proposed Haddam North Facility would also comply with the USFWS recommended guidelines for reducing impacts to migratory birds. Finally, no known areas of State-listed species exist on the most recent DEEP/NDDDB maps in the location of the proposed cell site. (*See Attachment 10*).

(2) Wetlands Delineation Report

As discussed in Section III.C.5.d. below, the development of the Haddam North Facility will have no direct impact on wetlands or water courses, the closest of which is located more than 500 feet to the east of the proposed Haddam North Facility compound. 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 Haddam North 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 27, 2023, the Connecticut State Historic Preservation Officer (“SHPO”) issued a determination letter for the proposed Haddam North Facility. In its letter, the SHPO found that:

- Two State Register Historic properties in the vicinity if the property would not be impacted by the proposed Haddam North Facility.
- The Applicant should conduct a Phase 1B Cultural Resources Reconnaissance Survey of the facility compound area.
- The proposed facility tower would be visible from the Haddam Center Historic District (“HCHD”), a National Register District, and the Higganum Land Historic District (“HLHD”), a State Register District, both on the west side of the Connecticut River and outside the one-half mile Area of Potential Effect (“APE”), and that such visibility constitutes an adverse effect.

In response to the SHPO’s determination, Homeland has instructed Heritage Consultants to prepare the Phase 1B Reconnaissance Survey and is working with the SHPO to develop a mitigation plan in response to its adverse effect determination. A copy of the SHPO’s October 27, 2023, letter

is included in Attachment 12.

(4) Agriculture

Farmland soils suitable for agricultural use includes land that is defined as prime or farmland of Statewide or local importance, based on soil type. It identifies the location and extent of the most suitable land for producing food, feed, fiber, forage, and oilseed crops and is available for these uses.⁶ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), no Prime Farmland Soils or Statewide Important Farmland Soils occur on the Property. (See Farmland Soils Map included in Attachment 13).

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 an RF emissions calculation for the proposed cell site utilizing a Far Field formula 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 calculation indicates that the maximum permissible exposure level for all of Cellco’s frequencies would be 1.5% the FCC’s Standard. (See Attachment 14). 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 Haddam North Facility. The operations at the proposed Haddam North Facility will not cause any significant air, water, noise or other

⁶ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the project team, the Applicant submits that the Haddam North 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 Haddam North Facility is located on an approximately 13.14-acre parcel owned by Brennan and Samantha Danaher. The Property is located in the Town’s R-2 Residential zone district and is used for residential purposes. The Property also falls within the Town’s Gateway Conservation zone.

b. Plan of Conservation and Development

The Town of Haddam’s 2016 Plan of Conservation & Development (the “Plan”), effective January 23, 2028, 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 in the R-2 Residential zone and within the Gateway Conservation zone. The proposed tower is defined as a “regulated facility”

by Section 25.2.x the Town's Zoning Regulations and may not exceed 150 feet in height, except under special circumstances.⁷ Regulated Facilities are permitted in all residential zones subject to the issuance of a Special Permit by the Planning and Zoning Commission but are not permitted in the Gateway Conservation zone. The proposed Haddam North tower site is not located on a scenic road or on a parcel within a Historic District.

d. Inland Wetland and Watercourse Regulations

The Haddam 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. The closest wetland area to the Haddam North Facility compound is approximately 463 feet to the east of the facility compound. Four (4) copies of the Haddam 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 National Flood Hazard Layer FIRMette, the proposed North Haddam Facility would be located in Flood Zone X, an area outside the 500-year flood zone. A copy of the FIRMette Map is also included in Attachment 15.

⁷ Regulated Facilities may extend to a height of up to 190 feet if the applicant demonstrates that the additional height is necessary to accommodate co-location.

6. Local Input

Section 16-50~~l~~(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On July 31, 2023, Homeland sent First Selectman Robert McGarry and Haddam Land Use Officials a copy of Homeland's Technical Report, formally commencing the ninety (90) day municipal consultation process with the Town. The Technical Report summarized Homeland's plans to establish a telecommunications facility at the Property, discuss Cellco's need for improved service in Haddam and the potential environmental effects associated with the Haddam North Facility. Four (4) copies of Homeland's Technical Report were submitted in bulk with the Council.

On October 12, 2021, at the request of the First Selectman, Homeland and Cellco hosted a Public Information Meeting ("PIM") on the proposed Haddam North Facility. Notice of the PIM was published in the Haddam-Killingworth News and was mailed to abutting property owners.

Included in Attachment 16 is a copy of Homeland's PIM Legal Notice, the PIM notice letters sent to abutting landowners and copies of the materials presented at the PIM. Eight (8) residents attended the PIM, including First Selectman McGarry. Attendees asked questions related to the construction of the proposed facility, access from town roads and visibility of the tower. Several of the attendees also emphasized the significant need for wireless service along Route 154, including areas to the South in the Tylerville area of Haddam.⁸

7. Consultations With State and Federal Officials

Attachments 10, 11, 12, 15 and 16 and Section III.C. of the Application describes consultations with state and federal officials regarding the proposed Haddam North Facility.

⁸ In late 2017 and early 2018, the need for improved wireless service along Route 154 and throughout the Town of Haddam was the subject of an on-line petition supporting the need for improved wireless service in Haddam. A copy of the on-line petition is included in Attachment 16.

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

According to the Wireless Applications, Corp. Opinion Letter included in Attachment 17, an FAA Form 7460-1 filing is not required for the proposed Haddam North Facility tower as it does not constitute hazard to air navigation. Therefore, no FAA marking or lighting of the proposed tower 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 Haddam North 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 Haddam North 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.

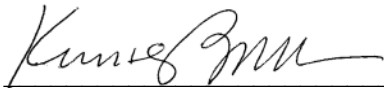
IV. CONCLUSION

Based on the facts contained in this Application, the Applicant submits that the establishment of the Haddam North Facility will not have a substantial adverse environmental effect. A public need exists for high quality reliable wireless service in the Town of Haddam and throughout southern Middlesex 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 Haddam North Facility, in particular, far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, Homeland respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Haddam North Facility.

Respectfully submitted,

HOMELAND TOWERS, LLC

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