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March 8, 2024

*Via Electronic Mail and Hand Delivery*

Melanie A. Bachman, Esq.  
Executive Director/Staff Attorney  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: **Docket No. 520 – Application of Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless 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 in Haddam, Connecticut**

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), enclosed please find the original and fifteen (15) copies of the Applicant’s Responses to Council Interrogatories (Set One) related to Docket No. 520. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia  
Enclosure

29052746-v1

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF HOMELAND TOWERS, LLC AND	:	DOCKET NO. 520
CELLCO PARTNERSHIP D/B/A VERIZON	:	
WIRELESS 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	:	MARCH 8, 2024

RESPONSES OF HOMELAND TOWERS, LLC AND  
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO  
CONNECTICUT SITING COUNCIL INTERROGATORIES (SET ONE)

On February 16, 2024, the Connecticut Siting Council (“Council”) issued Pre-hearing Interrogatories to Homeland Towers, LLC (“Homeland”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicants”), relating to Docket No. 520. Below are Applicant’s responses.

Notice

Question No. 1

Referencing Application Attachment 4, 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? Were any additional attempts made to contact those property owners?

Response

Homeland received return receipts from all abutting property owners except for John Kruger, Trustee, the owner of three adjacent parcels to the east of the Property. Notices to Mr. Kruger were returned by the Post Office marked “Unclaimed”. On December 19, 2023,

Homeland sent Mr. Kruger an additional notice, by regular mail, alerting him as to the submission of the Application.

Question No. 2

Referencing Application p. 17, have the Applicants received any comments since the Application was submitted to the Council? If so, summarize the comments and how these comments were addressed.

Response

Ray Vergati, Homeland's Regional Manager, has been in regular contact with Robert McGarry, Haddam's First Selectman about the progress and status of the Council application. The Town remains supportive of the Application recognizing the serious need for improved wireless services along Route 154 and the surrounding areas.

In addition to Mr. McGarry, Homeland heard from and spoke to Frances Dallas, the abutting owner to the northern of the Property. Ms. Dallas had questions about the Council process, whether the tower would need to be lit and require guy wires for support and if there would be any impact on property values.

Site Search

Question No. 3

Referencing Application Attachment 8 – Site Search Summary, when did Homeland and Cellco each initiate a site search? Was the site search a collaborative effort or was it conducted separately?

Response

Homeland initiated their site search in 2016. Cellco's site search appears to have been initiated in 2018 but no sites were pursued. The search effort by Homeland was initially

conducted separately from Cello's site search. In 2022 and 2023 the site search became a collaborative effort.

Question No. 4

On September 30, 2008, in Council Docket 348, Eversource and Sprint withdrew their joint application for a replacement 180-foot telecommunications facility to be located off Cove Road in Haddam. Were the sites identified in the Docket 348 application located off Cove Road considered? The record of Docket 348 may be accessed at this link:

[https://portal.ct.gov/CSC/1\\_Applications-and-Other-Pending-Matters/Applications/2\\_DocketNos200-399/Docket-348--Haddam](https://portal.ct.gov/CSC/1_Applications-and-Other-Pending-Matters/Applications/2_DocketNos200-399/Docket-348--Haddam)

Response

An existing CL&P power pole located off Cove Road (Parcel 27-015) just east of the Eversource/Sprint proposed site (Parcel 27-012A) from Docket 348 was identified. This candidate was reviewed and rejected by Cellco's RF Engineers as it did not provide adequate coverage along Route 154.

Question No. 5

Referencing Application p. 16, footnote 7, towers may extend to a height of up to 190 feet in the Gateway Conservation Zone if the applicant demonstrates the additional height is necessary to accommodate co-location. Has Homeland contacted Eversource and/or the Connecticut State Police regarding any wireless communications needs in the vicinity of the proposed site?

Response

To date, Homeland has not contacted Eversource or the Connecticut State Police regarding any wireless communication needs in the vicinity of the proposed site.

Question No. 6

Referencing Application p. 9, footnote 5, and Tab 8 Site Search Summary:

- a. What is the height of the existing light-duty lattice lookout tower? (73 and 78-foot heights are given)
- b. What is its use?
- c. Could the lookout tower be replaced with the proposed 150-foot monopole or lookout tower design facility? Explain

Response

- a. The existing look-out tower is 73.5 feet tall.
- b. The existing structure is used as a lookout tower by the property owner to take in the views/photos of the area.
- c. The lookout tower could be replaced with the 150' monopole, however, it is the owner's preference to keep the lookout tower in place as they climb it frequently.

Question No. 7

Are small cells a feasible alternative to a new tower? 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?

Response

It may be theoretically and technically possible to install a large number of small cells or Distributed Antenna System nodes in the area that could closely match the coverage footprint of

the proposed Haddam 3 Facility (macro cell). Such an approach, however, is not practically nor economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes would utilize existing infrastructure (i.e. electric distribution poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other equipment (i.e. transformers, street lights and risers) that will limit Cellco's ability to use the pole. Structural limitations of the existing poles could also limit Cellco's ability to deploy all the equipment needed to provide service in all of its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is very difficult and, in many cases, impossible, making the service even more vulnerable to storms. In areas where this existing infrastructure is not available, for example, along private roads or on private and municipal properties, property rights would need to be acquired and new poles would need to be installed. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Facility is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed facility. Individual small cell would be capable of providing service in -11- some but not all of Cellco's operating frequencies further limiting network capacity in the area around the Haddam 3 Facility.

#### Proposed Site

#### Question No. 8

Is any portion of the proposed site, including the lease area and access road, currently in productive agricultural use?

#### Response

No.

## Proposed Facility and Associated Equipment

### Question No. 9

Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?

### Response

No.

### Question No. 10

Referencing Application p. 19, how is the construction cost of the facility recovered for both Homeland Towers, LLC (Homeland) and Cellco Partnership d/b/a Verizon Wireless (Cellco)?

### Response

Homelands costs are recovered by leasing tower space to wireless carriers like Cellco. For Cellco, the costs associated with providing Cellco customers with the nation's most reliable wireless service network, including the cost for development of network infrastructure (small cells and macro-cells), are paid for by the individuals, corporations and government entities that purchase Cellco's wireless service.

### Question No. 11

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. What structural design codes apply to the tower and antenna mounts?

### Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building

Code amendments.

- National Electric Code (NFPA 70).
- 2021 International Mechanical Code, with the 2022 Connecticut State Building Code amendments.
- 2022 Connecticut State Fire Safety Code.
- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".
- Occupational Safety and Health Administration (OSHA).

Question No. 12

What is the maximum wind speed tolerance for the antenna/antenna mounts on the proposed monopole?

Response

Based on our review of various antenna specifications, the wind speed is generally listed as 150 miles per hour which exceeds the ANSI/TIAA-222-H design wind speed of 125 miles per hour specific to the proposed Facility.

Proposed Wireless Services

Question No. 13

Application Attachment 6 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 Cellco’s wireless system?

Response

Cellco’s 700 MHz frequencies act as a “base frequency” or the main coverage frequency



for its network throughout Connecticut. This frequency handles a large majority of Cellco's wireless traffic. All of Cellco's licensed frequencies (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3600 MHz, 3750 MHz) are used, however, to transmit both voice and data services. Cellco customers transfer seamlessly between Cellco's operating frequencies during handoff between cell sites. Handoff can also occur between frequencies at an individual cell site for load balancing purposes. Subject to availability at a particular cell site, frequencies can also be used together (a feature called "carrier aggregation") making more of the existing bandwidth available to a particular user.

Question No. 14

What is the signal strength for which Cellco designs its system? For in-vehicle coverage?  
For in-building coverage?

Response

Neg 85 dBm RSRP for in building coverage.

Neg 95 dBm RSRP for in vehicle coverage.

Question No. 15

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 service area.

Response

No. Antennas at a centerline height of 146 feet at the proposed tower location is the minimum necessary to provide adequate coverage along Route 154 (the primary coverage objective) in all of Cellco's operating frequencies.

Question No. 16

Can flush-mounted antennas be installed at the site to provide the required coverage?

Describe any antenna/tower modifications that would be required to achieve coverage objectives.

Response

No. Cellco's antennas need to be mounted in a side-by-side configuration to take advantage of a feature called beamforming which improves the overall capacity of an individual cell site. Flush mounting antennas at different heights would result in decreased capacity, preventing beamforming.

Question No. 17

What type of statistics/indicators does Cellco use to determine there is substandard service in this area?

Response

The clearest indicator of substandard service along Route 154 in Haddam is illustrated on Cellco's coverage plots included in the Application (Attachment 6). For example, the "Existing" 700 MHz coverage plot shows that Cellco currently maintains unreliable signal levels ( $\geq -105$  RSRP) along Route 154 from its intersection with Walkley Hill Road in the northern portion of Haddam, to the Haddam/Chester Town line to the south, a distance of approximately seven (7) miles. With the addition of the proposed Haddam 3 Facility, as depicted on the "Existing and Proposed" 700 MHz plot, Cellco's signal strength along Route 154 improves to  $\geq -85$  RSRP from the Walkley Hill Road intersection to the area near the intersection of Route 154 and Park Road, a distance of approximately 2.5 miles, and  $\geq -95$  RSRP from the Route 154/Park Road intersection to the intersection of Route 154 and Ruddy Ferry Road, an additional 1.5 miles.

In addition to this coverage mapping tool, Cellco RF Design Engineers use User Perceived Throughput (UPTP), measured in Mbps data speeds, to indicate when there are potential capacity issues in a particular area and Reference Signal Receive Power (RSRP), measured in dBm, to indicate when there are coverage issues as illustrated on the coverage plots included in the Application.

Question No. 18

Referencing Application page 7, for the Higganum Facility (Alpha Sector) what frequency is at exhaustion? Why would the capacity relief be limited?

Response

In this context, the term “limited” means “minimal”. The proposed Haddam 3 Facility will provide minimal capacity relief to its existing Higganum Facility because the area of overlapping coverage will only account for a small portion of the total traffic being served by the existing Higganum Facility. The exhausted frequency referenced for the existing Higganum Facility is 700MHz.

Question No. 19

Would the proposed facility provide wireless service to the Haddam Town Hall on Field Park Road and Haddam Volunteer Fire Department station on Route 154?

Response

Yes, according to the 700 MHz “Existing and Proposed” coverage plot in the Application (Attachment 6), the proposed Haddam 3 Facility will provide service to both the Haddam Town Hall at 30 Field Park Drive and both Haddam Volunteer Fire Departments at 439 and 1010 Saybrook Road (Route 154).

## Emergency Backup Power

### Question No. 20

What would be the run time for Cellco's proposed generator before it would need to be refueled, assuming it is running at full load under normal conditions?

### Response

According to the generator specifications included in Attachment 7 of the Application, under full load (100% generator capacity), the generator would consume 4.6 gallons of fuel per hour, which equates to 49.78 hours of operation, or just over 2 days, before refueling would be necessary.

### Question No. 21

Would the backup generator have containment measures to protect against fluid leakage?

### Response

Yes. The 250-gallon generator fuel tank is double-walled and contains leak detection alarms, which are monitored 24/7 by Cellco's cell site technicians.

### Question No. 22

How long can the battery cabinet provide power to Cellco's equipment if the backup generator failed to start?

### Response

The backup battery system is designed to keep the Cellco facility operating for up to eight (8) hours.

## Public Health and Safety

### Question No. 23

Referencing Application page 5, would the proposed facility support text-to-911 service?

Is additional equipment required for this purpose?

Response

Yes.

Question No. 24

Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 25

What measures are proposed for the site to ensure security and deter vandalism?  
(Including alarms, gates, locks, anti-climb fence design, etc.)

Response

The proposed wireless facility compound will be surrounded by an eight (8) foot tall chain link security fence and gate. The gate will be locked with access limited to the wireless carriers sharing the facility. Cellco's wireless equipment will maintain separate silent intrusion alarms which are monitored remotely. Climbing pegs on the lower portion of the tower will also be removed to deter climbing of the tower.

Question No. 26

Is the proposed facility located within a Department of Energy and Environmental Protection designated Aquifer Protection Area or within a public water supply watershed area?

Response

The proposed facility is not located within a Department of Energy and Environmental Protection designated Aquifer Protection Area or within a public water supply watershed area.

The closest Aquifer Protection Area is the John S. Roth APA located approximately 6.5 miles to the northwest of the Site in Middletown, on the west side of the Connecticut River. The closest public water supply watershed area is the High Meadow public watershed located approximately 1 mile to the southwest of the Site, on the west side of the Connecticut River.

Question No. 27

Besides the backup power source, what other facility equipment generates noise, if any? Would the noise from this equipment (non-backup power sources) comply with Department of Energy and Environmental Protection (“DEEP”) noise control standards at the property boundaries?

Response

Other than the backup generator, noise from the equipment cabinets will be produced by the equipment cooling fans and is minimal. Noise from both the battery and equipment cabinets is estimated to be 50 dBA at a distance of three (3) feet from the equipment. The nearest property line to the equipment is approximately 127 feet to the east. The maximum allowable noise emitted for developed residential districts per the DEEP noise standards is 61dBA during the day and 51 dBA during the night

Question No. 28

Is lighting required at the facility? If so, for what purpose and what type would be installed?

Response

No FAA marking, or lighting of the tower is required. Cellco will install timer-controlled LED lights above the equipment cabinets for use when and if cell site technicians need to be on site at night.

## Environmental Effects and Mitigation Measures

### Question No. 29

Referencing Application p. 13 and page 2 of the October 27, 2023 State Historic Preservation Office (SHPO) correspondence behind Tab 12, SHPO acknowledges that the Federal Communications Commission (FCC) Nationwide Programmatic Agreement (NPA) limits the area of potential effects – visual effects (APE-VE) to a 0.5-mile radius from a proposed telecommunications facility, yet identifies two National Register of Historic Places (NRHP) areas outside of the APE-VE from which the proposed facility may be visible. Paragraph 142 of the FCC NPA states, “A facility may have a visual adverse effect on a historic property only if the historic property is located within the APE.” (Emphasis added). The NPA is available at <https://docs.fcc.gov/public/attachments/FCC-04-222A1.pdf>

How does the FCC NPA apply to these areas outside of the APE-VE? Explain.

### Response

Under Appendix B of the FCC NPA, Section VI, No. 4, it states “Unless otherwise established through consultation with the SHPO/THPO, the presumed APE for visual effects for construction of new Facilities is the area from which the Tower will be visible: a. within a half mile from the tower site if the proposed tower is 200 feet or less in overall height...”. Under that same section, No. 5 states “In the event the Applicant determines, or the SHPO/THPO recommends, that an alternative APE for visual effects is necessary, the Applicant and the SHPO/THPO may mutually agree to an alternative APE.” During ongoing consultations with the CT SHPO, the Applicant has committed to working with the CT SHPO for these two resources identified outside of the FCC NPA APE-VE.

Question No. 30

Referencing Application p. 13, how far outside the FCC NPA APE-VE are the historic districts referenced on page 2 of the October 27, 2023 SHPO correspondence?

Response

The nearest views from the Higganum Landing Historic District are approximately 1.75-miles from the proposed Facility, or  $\pm 1.25$ -miles outside of the FCC NPA APE-VE. The nearest views from the Haddam Center Historic District are approximately 1 mile from the proposed Facility, or  $\pm 0.5$ -mile outside of the FCC NPA APE-VE.

Question No. 31

What type of mitigation measures could be proposed for the historic districts identified by SHPO that are outside of the FCC NPA APE-VE? Has SHPO provided any suggestions?

Response

The CT SHPO has recommended that mitigation measures might include a financial contribution to the Haddam Historical Society for a capital improvement project of some type. Homeland has been in touch with representatives from the Haddam Historical Society who have suggested that the financial contribution might be used to install an ADA compliant access ramp to the new Haddam Shad Museum. Once the final project details are provided to Homeland, proposed mitigation measures will be submitted to the CT SHPO for the agency's approval.

Question No. 32

Referencing Application p. 13, what is the status of the Phase 1B and consultations with SHPO?



### Response

By letter dated February 20, 2024, the CT SHPO concurred with the Phase 1B determination that “no additional archaeological investigations are warranted” and that the two dry laid stone walls identified outside of the project area be protected in place, included on construction maps, and marked with high visibility fencing in the field to avoid impacts during construction. A copy of the February 20, 2024, CT SHPO letter is included in Attachment 1.

### Question No. 33

What, if any, stealth tower design options would be feasible to employ at this site, such as a monopine or lookout tower? What would be the estimated cost of such stealth tower designs?

### Response

During Homeland’s consultation with the CT SHPO, stealth mitigation options were discussed as a potential means to mitigate adverse visual effects on historic districts. It was determined that painting the tower sky blue above the tree line might soften views from within the Connecticut River Gateway Commission Conservation Zone as well as views at distance in the Historical Districts west of the Connecticut River. While a final determination letter has not been received, Homeland anticipates the CT SHPO may place a recommendation of painting the tower in their final determination. The additional cost to paint the tower as described above is approximately \$9,000.

### Question No. 34

Referencing Application p. 15, how does the Connecticut River Gateway Commission interact with the Town regulation of the Gateway Conservation Zone? Explain.

### Response

The following is taken from the Connecticut River Gateway Commission’s web site.

**The Commission's purpose is stated in Connecticut law:**

“...The Connecticut River Gateway Commission shall have the object of regulating the uses of [properties within the Gateway Conservation Zone] consistent with the purposes of this chapter and promoting the protection and development [of the Conservation Zone]...by means of classification of zoning districts according to types of land usage permitted therein, land coverage, frontage, setback, design and building height and by regulating the cutting of timber, burning of undergrowth, removing soil or other earth materials and dumping or storing refuse in a manner that would detract from the natural or traditional riverway scene, provided such action shall not discourage constructive development and uses of such property...”. Section 25-102g.

The Town of Haddam established certain zoning regulations consistent with the Gateway Commission’ goals. It is important to note that The Gateway Commission was notified back in August of 2023 of Homeland’s plans to construct the proposed Haddam 3 tower site. Homeland provided the Gateway Commission Staff (Susie Beckman) with a copy of the Technical Report and the full Siting Council Application. Homeland has not received any comments from the Gateway Commission since the initial staff inquiry in August of last year.

Question No. 35

What is the distance of the proposed tower from the boundary of the Gateway Conservation Zone?

Response

The proposed tower and the subject parcel are both within the Connecticut River Gateway Conservation Zone. The eastern edge of the Gateway Zone is approximately 700 feet to the east of the Property.

Question No. 36

Submit a map of the Connecticut River Gateway Commission Conservation Zone.

Response

See Attachment 2 for a map of the Connecticut River Gateway Commission Conservation Zone.

Question No. 37

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:

- a. wetlands, watercourses and vernal pools;
- b. forest/forest edge areas;
- c. agricultural soil areas;
- d. sloping terrain;
- e. proposed stormwater control features;
- f. nearest residences;
- g. Site access and interior access road(s);
- h. tower location/compound;
- i. clearing limits/property lines;
- j. mitigation areas; and
- k. 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.

Response

*See Attachment 3.*

# **ATTACHMENT 1**

February 20, 2024

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

Subject: Phase IB, Proposed Wireless Telecommunications Facility  
124 Ague Spring Road  
Haddam, CT  
Homeland Towers, LLC  
ENV-24-0568

Dear Mr. Gaudet:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated December 2023. The proposed activities are subject to review by this office pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations. SHPO understands that the proposed undertaking includes the installation of a 150 foot tall monopole within an approximate 2,800 square foot fenced equipment compound, located in the northwestern portion of the Subject Property. The compound is to contain an equipment pad and shelter, generator on concrete pad, and additional lease spaces. Access is to be through a new gravel access road, originating from Ague Spring Road.

No previously identified archaeological sites are located within 0.5 miles of the project area. Two properties listed on the State Register of Historic Places, the Haddam Neck Congregational Church (1873), located at 408 Quarry Hill Road, and the Higganum Schoolhouse (c. 1825), located adjacent to the Church, are located within 0.5 miles of the project area; they have not been evaluated for eligibility for listing on the National Register of Historic Places. However, intervening topography and tree cover will prevent the installation from being seen from the property the majority of the time, and will not adversely impact the resources.

Phase IB of the reconnaissance survey consisted of subsurface testing of the areas determined to have moderate to high archaeological sensitivity. A total of 11 of 12 planned shovel tests were excavated successfully throughout the proposed work area; the

unexcavated shovel test fell within an area that contained a paved driveway. No cultural features or materials from either historic or prehistoric periods were identified through the survey, and therefore, this office concurs that no additional archaeological investigations are warranted.

However, two dry laid stone walls were identified just outside the project area, SW-1 and SW-2. The report recommended that they be protected in place, included on construction maps, and marked with high visibility fencing in the field so that they are not impacted during construction. This office concurs with the recommendation.

As previously stated in a letter dated October 27, 2023 (attached), the proposed project will have an adverse effect to historic resources, specifically the National Register of Historic Places-listed Haddam Center Historic District (NR# 89000012) and the State Register of Historic Places-listed Higganum Landing Historic District (listed March 25, 1987). This office requests that the Project Proponent continue consultation to resolve the adverse effect.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or [marena.wisniewski@ct.gov](mailto:marena.wisniewski@ct.gov).

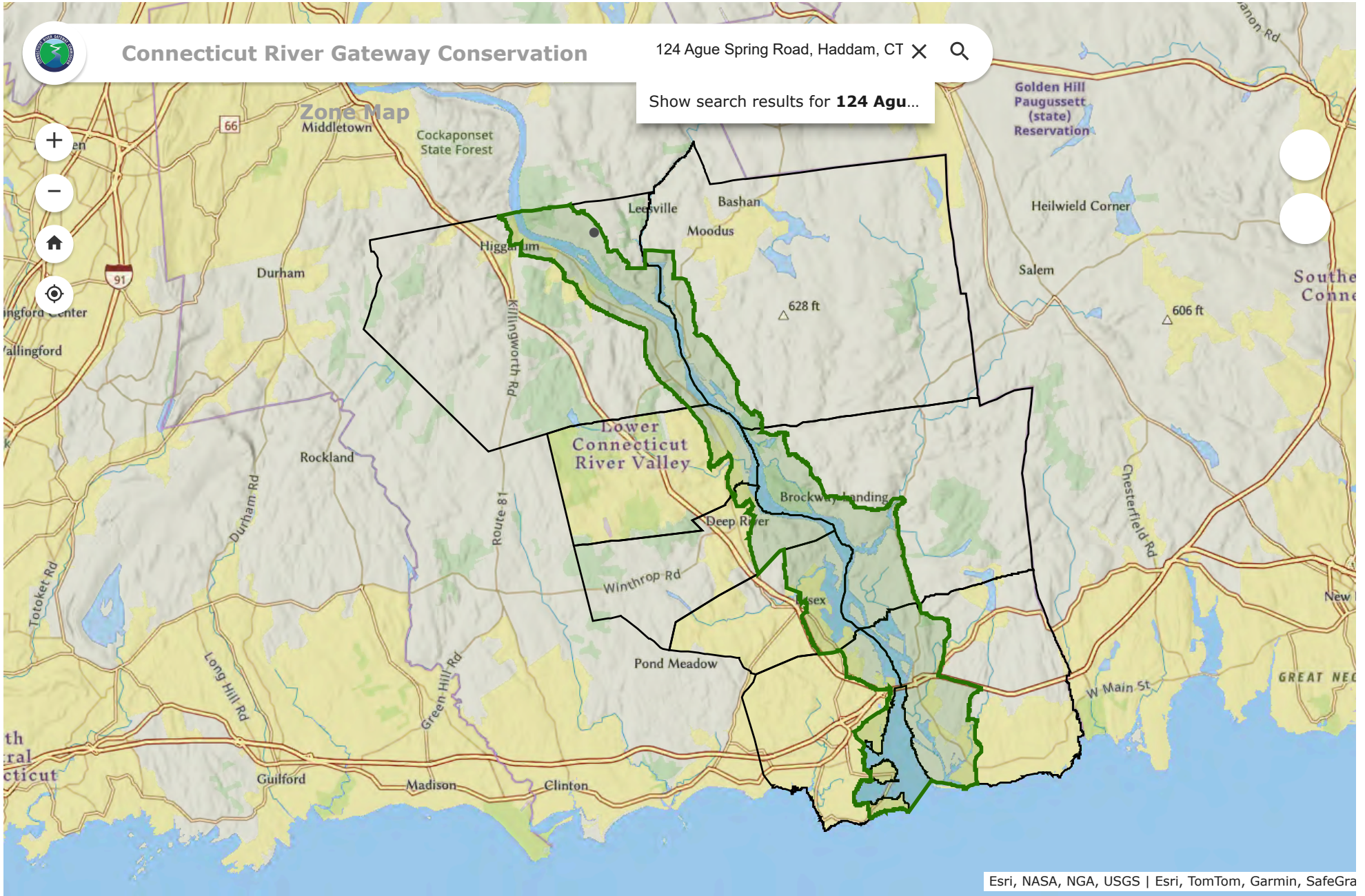
Sincerely,



Jonathan Kinney  
State Historic Preservation Officer

# **ATTACHMENT 2**





-72.206 41.551 Degrees



# **ATTACHMENT 3**

# REMOTE FIELD REVIEW



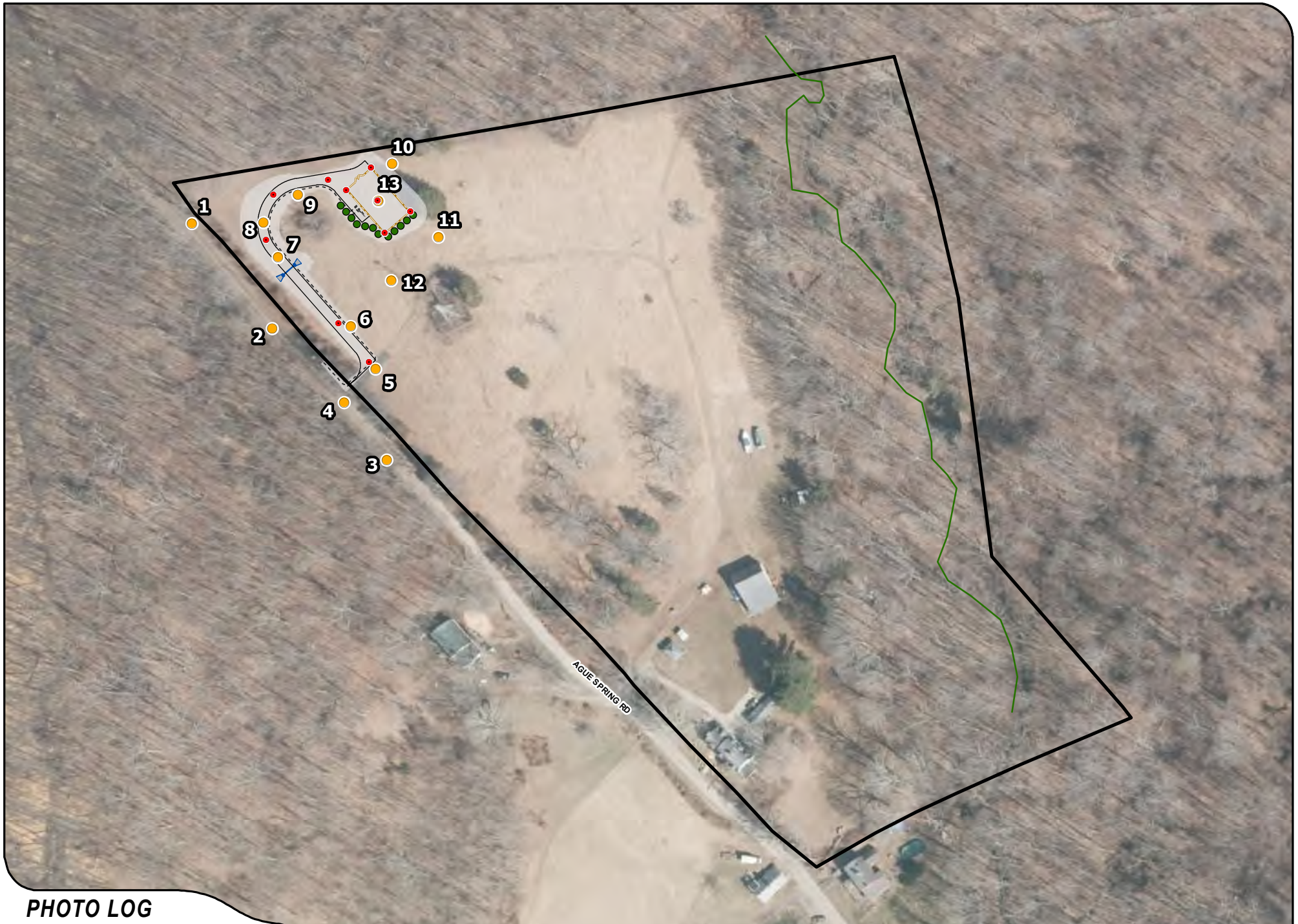
CT SITING COUNCIL DOCKET NO. 520  
RESPONSE TO INTERROGATORY 37  
HADDAM NORTH  
124 AGUE SPRING ROAD  
HADDAM, CT

PREPARED FOR:



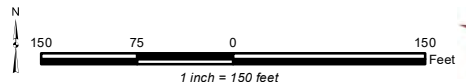
PREPARED BY:

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



## PHOTO LOG

- Photo Locations
- Photo Markers
- Subject Property
- Limit of Disturbance
- Fenced Gravel Compound
- U/G Elec. & Telco Lines
- Storm Drainage
- Storm Drainage Riprap
- Utility Equipment
- Proposed Landscape
- Wetland Boundary
- Access Drive



Proposed Telecommunication Facility  
 Haddam North  
 124 Ague Spring Road  
 Haddam, Connecticut



PHOTO

1

DESCRIPTION

**AGUE SPRING ROAD LOOKING SOUTHEAST**



PHOTO

1A

DESCRIPTION

AGUE SPRING ROAD LOOKING NORTHEAST



PHOTO

DESCRIPTION

2

AGUE SPRING ROAD LOOKING SOUTHEAST TOWARD ACCESS DRIVE ENTRANCE



PROPOSED FENCE CORNERS

PHOTO  
2A

DESCRIPTION  
AGUE SPRING ROAD LOOKING NORTHEAST



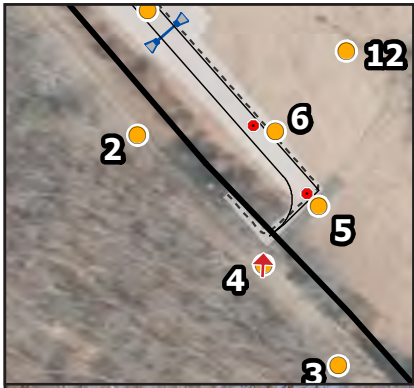


PHOTO

DESCRIPTION

3

AGUE SPRING ROAD LOOKING NORTHWEST



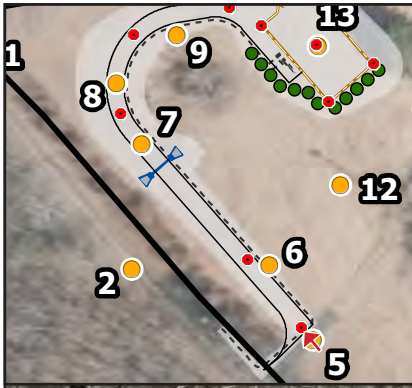
PHOTO

4

DESCRIPTION

**AGUE SPRING ROAD LOOKING NORTH**

PHOTOGRAPHED ON 2/29/2024



**PROPOSED ACCESS DRIVE**

PHOTO

DESCRIPTION

5

**ACCESS DRIVE LOOKING NORTHWEST**

PHOTOGRAPHED ON 2/09/2024



PHOTOGRAPHED ON 2/09/2024

PHOTO

DESCRIPTION

6

**PROPOSED ACCESS DRIVE LOOKING NORTHWEST**



PHOTOGRAPHED ON 2/09/2024

PHOTO

DESCRIPTION

6A

PROPOSED ACCESS DRIVE LOOKING NORTH



PHOTOGRAPHED ON 2/09/2024

PHOTO

DESCRIPTION

7

**PROPOSED ACCESS DRIVE LOOKING NORTH**



PHOTO

DESCRIPTION

8

PROPOSED ACCESS DRIVE LOOKING NORTHEAST



PHOTOGRAPHED ON 2/29/2024

PHOTO

DESCRIPTION

9

**PROPOSED ACCESS DRIVE LOOKING EAST**





PHOTOGRAPHED ON 2/09/2024

PHOTO

10

DESCRIPTION

LOOKING SOUTH



PHOTO

11

DESCRIPTION

LOOKING NORTHWEST



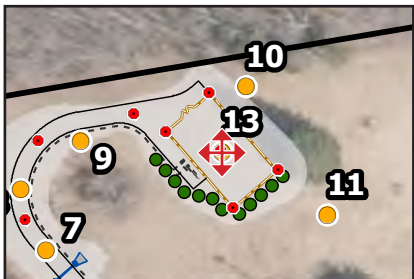
PHOTOGRAPHED ON 2/09/2024

PHOTO

12

DESCRIPTION

LOOKING NORTH



PHOTO

3

DESCRIPTION

VIEW FROM PROPOSED TOWER CENTER - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 2/09/2024