



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

February 16, 2024

Kenneth C. Baldwin, Esq.  
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RE **DOCKET NO. 520** – Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 124 Ague Spring Road, Haddam, Connecticut. **Council Interrogatories to Joint Applicants.**

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 8, 2024.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the March 8, 2024 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman  
Executive Director

Service List dated November 29, 2024

**Docket No. 520**  
**124 Ague Spring Road, Haddam, Connecticut**

**Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless**  
**Pre-Hearing Interrogatories**  
**Set One**

**Notice**

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?
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.

**Site Search**

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?
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)
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?
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
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?

### **Proposed Site**

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

### **Proposed Facility and Associated Equipment**

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

### **Proposed Wireless Services**

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?
14. What is the signal strength for which Cellco designs its system? For in-vehicle coverage? For in-building coverage?
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.
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.
17. What type of statistics/indicators does Cellco use to determine there is substandard service in this area?
18. Referencing Application page 7, for the Higganum Facility (Alpha Sector) what frequency is at exhaustion? Why would the capacity relief be limited?
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?

### **Emergency Backup Power**

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

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

### **Public Health and Safety**

23. Referencing Application page 5, would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
24. Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?
25. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
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?
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 noise control standards at the property boundaries?
28. Is lighting required at the facility? If so, for what purpose and what type would be installed?

### **Environmental Effects and Mitigation Measures**

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 .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.
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?
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?
32. Referencing Application p. 13, what is the status of the Phase 1B and consultations with SHPO?
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?
34. Referencing Application p. 15, how does the Connecticut River Gateway Commission interact with the Town regulation of the Gateway Conservation Zone? Explain.

35. What is the distance of the proposed tower from the boundary of the Gateway Conservation Zone?
36. Submit a map of the Connecticut River Gateway Commission Conservation Zone.
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 photograph 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.