

From: Stephen Longobardi
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Date: 9/24/2025

To:
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 530 – Request for Reconsideration Regarding Verizon Wireless Tower
Response to the finding of fact

Dear Members of the Connecticut Siting Council:

We, Stephen and Cindy Longobardi respectfully submit this letter to request reconsideration of certain findings in Docket No. 530 related to the proposed Verizon wireless facility. Specifically, we wish to address the Council's determination that modifications or collocation on nearby existing towers [Petition 1616 and the Transfer Station Tower] were not adequate to supply the requested coverage, and to request that the Council consider whether certain conditions could be imposed to align the project with **CGS §16-50g's** policy against unnecessary tower proliferation.

Our prior brief submitted in this docket outlined several technical, structural, and locational factors suggesting that modifications to nearby towers, Petition 1616 and the Transfer Station Tower, may be possible and could adequately address Verizon's coverage needs without the need for constructing a new tower.

It is our understanding that Cellco Partnership [d/b/a Verizon Wireless] has already been approved to modify the tower known as Petition 1616. We respectfully request that the Council, in its capacity wait until the modifications on Petition 1616 are completed prior to approval on the creation of any new towers with respect to **CGS §16-50g's** policy against unnecessary tower proliferation. Further, since it is in Cellco Partnership's [d/b/a Verizon Wireless] future plan of construction we also respectfully request that the Council require modification of the tower known as the Transfer Station as well, prior to approving the creation of any new towers with respect to **CGS §16-50g's** policy against unnecessary tower proliferation. It is our hope that with both those towers modified and active, there may not be a need for the construction of a new tower in order to obtain the level of coverage Verizon Wireless is trying to accomplish.

We would also like to take this opportunity to respectfully dispute some of the points in the finding of facts presented by the Siting Council, particularly in the '*Visibility*' section, beginning on page 23 of the Siting Council's memo. The memo states that Homeland Towers "used a combination of predictive computer models, field reconnaissance and a review of various data sources to evaluate the visibility of the proposed facility" [page 23, paragraph 213]. The memo

goes on to state that “a viewshed map was created using GIS software and publicly available State of Connecticut 2016 LiDar LAS data to create a 3-dimensional digital surface model of the surface area. Tower coordinates and height were added with an observer offset of 6-feet to simulate human-eye level. The viewshed map would pinpoint field reconnaissance targets. An in-field was then performed from publicly accessible locations in the surrounding area to determine where the proposed tower would be visible” [page 23-24, paragraphs 214-215].

The Siting Council’s memo goes on to acknowledge that, in spite of Homeland Towers conducting this test, they did not use a visual receptor, a crane or a balloon test. We’d like to reiterate from our memo that “the LiDar-based visibility map on page 11 of the Saratoga report shows substantial visibility on the west side of Bashan Lake, yet no photos were taken from that side” [page 3, section B of our memo]. We would like to further reiterate that the photos from the balloon test I conducted, contradicts the Siting Council’s finding that the tower will have “minimal visual impact”, given that the 273 acres of Bashan Lake alone would have visibility of the tower. Further, we’d like to respectfully state that, given the facts stated above, the fact that homeland towers did not conduct a balloon or crane test, and the photographs they took were taken in areas that **do not have clear views of the tower, according to Homeland Tower’s own visibility maps, and homeland ignored the areas that do have clear views, a finding that the visual impact is not “of unacceptable magnitude”** would be nothing less than **an arbitrary and capricious finding of fact** on behalf of this Siting Council. By accepting Homeland Towers Viewshed Analysis, without a proper visual receptor, the Council is setting a precedence for all future applications. Considering that, it is our opinion that it is not in the best interest of the council to allow the building of a tower without a proper visual analysis, at a minimum.

Furthermore, we respectfully request the Siting Council revisit its finding of fact regarding the disturbance of the wetlands, which provides **access to the entrance of the site**. In regard to Wetland 1, the Siting council states that the proposed facility (new tower) will not impact Wetland 1 as the surrounding area was “previously disturbed”. We understand that Homeland Tower will maintain a 5-foot buffer zone to mitigate any further disturbance as they use Wetland 1 as their access zone to build the proposed facility. It is our opinion that Wetland1 being already disturbed, means that the Siting Council should apply more scrutiny and stipulations to any further proposed disturbing of the area, in the spirit of **CGS §16-50g**.

In light of these points, we further request that the Council re-examine the evidence we presented regarding the feasibility of utilizing or modifying Petition 1616 and the Transfer Station towers, perform an actual drive test after the two modifications are complete and active before approving new construction. **The Council should consider stipulating in the Certificate of Environmental Compatibility and Public Need that Verizon must complete these modifications prior to construction of the new tower, in order to fully uphold the legislature’s intent in CGS §16-50g to minimize unnecessary tower proliferation.**

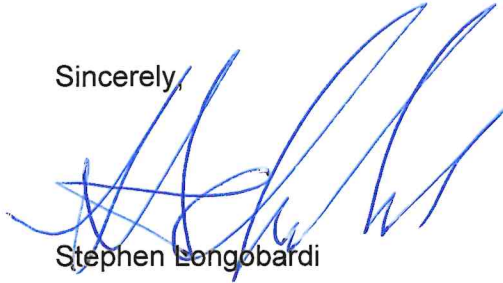
This request is not intended to delay the provision of reliable wireless service. Rather, it is made in the spirit of ensuring statutory compliance and balancing the public need for service with the legislative mandate to minimize redundant structures. By requiring feasible

modifications before allowing new construction, the Council can both uphold public interest and give full effect to the policies embodied in **CGS §16-50g**.

We appreciate the Council's careful review of all parties' evidence and arguments, and we respectfully submit this request for reconsideration to ensure that the decision in this docket fully aligns with the statutory mandate to prevent unnecessary proliferation of wireless towers.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephen Longobardi', is written over the printed name. The signature is stylized with large, sweeping loops.

Stephen Longobardi