

Connecticut Siting Council

APPLICATION OF:

THE TOWERS, LLC



**WOODSTOCK 2
835 ROUTE 169
WOODSTOCK, CONNECTICUT**

DOCKET NO. _____

APRIL 7, 2025

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EXECUTIVE SUMMARY

The Towers LLC (“The Towers”), a joint venture between Vertical Bridge REIT, LLC (“VBR”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”), proposes to construct a telecommunications tower and related facility in the northerly portion on an approximately 55.1-acre parcel at 835 Route 169 in Woodstock, Connecticut (the “Property”). Cellco refers to this facility as its Woodstock 2 CT cell site (the “Woodstock 2 Facility”). The Property is owned by Mark W. Reynolds and is used in part, for commercial and agricultural purposes.

The primary purpose of the Woodstock 2 Facility is to provide Cellco customers and emergency service providers with improved wireless service primarily along portions of Route 169, and other local roads in the area around the Property. The Woodstock 2 Facility will also provide some limited capacity relief to Cellco’s existing Coatney Hill and Woodstock Relo cell sites. To address Cellco’s needs for service improvements, The Towers plans to construct a 150-foot monopole tower within a 50’ x 50’ fenced compound (100’ x 100’ leased area) in the north-central portion of the Property. Cellco will install antennas and remote radio heads at the top of the tower, at a centerline height of 145 feet above ground level (“AGL”).

Equipment associated with the Woodstock 2 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 access to the Woodstock 2 Facility would extend from Route 169 over a portion of an existing farm road to the tower site. Utility service would also extend from existing service along Route 169.

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
APPLICATION OF THE TOWERS III, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 835 ROUTE 169, WOODSTOCK, CONNECTICUT	:	DOCKET NO. ____
	:	
	:	APRIL 7, 2025

**APPLICATION FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (collectively, the “Application”) is submitted by The Towers LLC (“The Towers”), a joint venture between Vertical Bridge REIT, LLC (“VBR”) and 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 55.1-acre parcel at 835 Route 169 in Woodstock, Connecticut (the “Property”). This site is identified throughout the Application as Cellco’s “Woodstock 2

Facility”. If approved by the Council, the Certificate would be issued to and held by The Towers.

The Property is owned by Mark W. Reynolds and is used for commercial (The Christmas Barn) and agricultural purposes. The proposed Woodstock 2 Facility would be located in the north-central portion of the Property. At this location, The Towers would construct a 150-foot self-supporting monopole tower within a 50’ x 50’ facility compound and 100’ x 100’ leased area. Cellco would install nine (9) panel-type antennas and six (6) remote radio heads (“RRHs”) on an antenna platform at the 145-foot level on the tower. Equipment associated with Cellco’s antennas, including radio and battery cabinets, and a 50-kW diesel-fueled generator would be installed on concrete pads in the facility compound. Vehicular access to the Woodstock 2 Facility would extend from Route 169 over an existing farm road, a distance of approximately 930 feet to the facility compound. Utilities will extend from existing service along Route 169.

Included in this Application, as Attachment 1, is a site evaluation report and project plans for the proposed Woodstock 2 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

The Towers is a Delaware limited liability company and a joint venture between VBR and Cellco. If approved by the Council, The Towers would hold the Certificate for the Woodstock 2 Facility and would be responsible for the construction, maintenance and operation of the tower site.

VBR is a Delaware limited liability company with offices at 750 Park of Commerce Drive, Boca Raton, Florida 33787. VBR is the largest private owner and operator of wireless communications infrastructure in the United States.

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 facilities and 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:

The Towers, LLC c/o
Vertical Bridge REIT, LLC
750 Park of Commerce Drive
Boca Raton, Florida 33787
Attention: Brian Paul

Cellco Partnership d/b/a Verizon Wireless
20 Alexander Drive
Wallingford, CT 06492
Attention: Elizabeth Glidden

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP
One State Street
Hartford, CT 06103
(860) 275-8200
Attention: Kenneth C. Baldwin, Esq.

C. Application Fee

The estimated total construction cost for the Woodstock 2 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 16-50I(b)

Copies of this Application have been sent to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50I(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 the Applicant's intent to submit this Application was published on April 3, 2025 and April 4, 2025 in the *Norwich Bulletin* pursuant to C.G.S. Section 16-50I(b). A copy of the legal notice is included as Attachment 3. An Affidavit of Publication from the *Norwich Bulletin* will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of the Applicant'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 16-50I(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 Woodstock 2 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 The

Towers site 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 policy¹ to ensure that all Americans would have access to broadband capability, whether wired or wireless; 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.²

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 Windham 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 Woodstock 2 Facility would not enlarge Cellco's authorized service area.

¹ Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

² FCC Declaratory Ruling WT Docket No. 08-165.

B. Public Need and System Design

1. Need for the Woodstock 2 Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Windham County, Cellco holds FCC Licenses to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz, 2100 MHz and 3700 MHz (5G) 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.

The Woodstock 2 Facility is designed primarily as a coverage site. Currently, Cellco provides wireless service in Woodstock today from its existing macro-cells identified as, Woodstock North, East Woodstock, Quinebaug, Coatney Hill, Woodstock Relo, Woodstock NW, and Woodstock Valley. Cellco also maintains three (3) small cell facilities at the Woodstock Fairgrounds. Plots showing existing wireless service in the area are included in Attachment 6. The proposed Woodstock 2 Facility has been designed to provide coverage along portions of Route 169, Roseland Hill Road and other local roads, as well as the area surrounding the Property. The proposed Woodstock 2 Facility will also provide capacity relief to Cellco's existing Coatney Hill and Woodstock Relo cell sites.

2. Cell Site Information

As mentioned above, The Towers intends to construct a 150-foot self-supporting monopole tower within a 50-foot x 50-foot facility compound in the southernly portion of the Property. The tower would be setback approximately 520 feet from northern Property boundary; approximately 881 feet from the eastern Property boundary; approximately 1,074 feet from the southern Property boundary and approximately 863 feet from the western Property boundary.

Cellco would install antennas and RRHs on a platform at the 145-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 the Woodstock 2 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 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 nine (9) panel-type transmit/receive antennas consisting of six (6) model JAAH-65B-R3B; three (3) model MT6413-77A antennas. Cellco will also install a total of six (6) remote radio heads behind its antennas, two (2) HYBRIFLEX™ fiber optic antenna cables and one (1) GPS antenna. Backup power to the Woodstock 2 Facility will be provided by an onsite battery cabinet 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. Cellco has determined that the proposed Woodstock 2 Facility location satisfies this goal and will help resolve a portion of Cellco's wireless service (capacity) problems in northeast Woodstock.

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, Cellco 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 three (3) existing macro-cell wireless facilities and three (3) small cell facilities (Woodstock Fairgrounds) within approximately four (4) miles of the proposed Woodstock 2 Facility. Cellco's existing Coatney Hill, Woodstock Relo, Woodstock Fairgrounds and East Woodstock cell sites will all interact, in some fashion, with the proposed Woodstock 2

Facility.³ 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. In this instance, no existing non-tower structures of suitable height exist in the area.

Cellco and The Towers conducted a site search and investigated a total of twenty-six (26) possible candidates, for the reasons described in the Site Search Summary. (See Attachment 8). Cellco determined that an antenna centerline height of 145 feet at the Property would satisfy its wireless service objectives in the area. The Towers negotiated and ultimately entered into a Lease Agreement for the use of the Property in 2024. The Site Search Summary together with the site information contained in Attachment 1 and Attachment 6 support the Towers' position that the site selected represents the most feasible alternative of the sites investigated.

2. Tower Sharing

The Towers and Cellco would design the proposed tower and compound to be shared by additional 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 Woodstock. The Woodstock 2 Facility would be a part of a communications system that addresses the public need

³ The Towers is also currently pursuing necessary approvals for the installation of a tower at 90 Route 171 in southeast Woodstock.

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 Woodstock 2 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.

To assess these impacts, a Visual Assessment for the Woodstock 2 Facility was prepared by All-Points Technology Corporation, P.C. and is included in Attachment 9. The Visual Assessment assesses the overall 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 Assessment year-round views of the monopole is predicted to cover a total of approximately 198 acres, 2.5% of the two-mile radius study area (8,042 acres) and would occur over surrounding cultivated fields, along portions of Route 169 and other surrounding roads. Seasonal visibility, when leaves are off the trees, is predicted to cover a total of 450 acres (5.6% of the 8,4042-study area). A majority of the visibility will occur within 0.5 miles of the tower site. The proposed tower would not be visible from the Woodstock Historic District.

There are six (6) residences within 1,000 feet of the Woodstock 2 Facility. The closest off-site single-family residence is located approximately 250 feet to the west at 815 Route 169, owned by Mark W. Reynolds, also the owner of the Property. The Woodstock 2 Facility is not located within 250 of any building containing a school or commercial day care facility.

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, Cellco and The Towers, 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 November 22, 2024, USFWS & NDDDB Compliance determination prepared by APT, no federally listed threatened or endangered species are known to occur on or in the vicinity of the Property. Similarly, 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 Woodstock 2 Facility will have no direct impact on wetlands or water courses, the closest of which is located approximately 117 feet to the northwest of the proposed Woodstock 2 Facility tower site. The Towers 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 Woodstock 2 Facility will minimize the occurrences of secondary and indirect wetland impacts. A copy of the Wetlands Inspection Report is included in Attachment 11.

(3) State Historic Preservation Officer

According to a Preliminary Historic Resources Evaluation prepared by APT for the Woodstock 2 Facility there are no historic or cultural resources located within one-half mile of the proposed Woodstock 2 Facility. A copy of the Preliminary Historic Resources Evaluation is included in Attachment 12. As a part of its obligation to comply with the Nation Environmental Policy Act (NEPA) Cellco will be submitting the required documentation to the State Historic

Preservation Office (SHPO) if the facility is approved by the Council.

(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.⁴ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), part of the proposed Woodstock 2 Facility compound is located on Prime Farmland Soils. Portions of the proposed access driveway currently extends through both Prime Farmland and Statewide Important Farmland. (See Farmland Soils Map, included in Attachment 13).

c. Far Field RF Exposure Calculation

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 5.2% the FCC’s Standard. (See Attachment 14). Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations.

⁴ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

d. Other Environmental Issues

No sanitary facilities are required for the Woodstock 2 Facility. The operations at the proposed Woodstock 2 Facility will not cause any significant air, water, noise or other environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the project team, the Applicant submits that the Woodstock 2 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 October 2024, 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 Woodstock 2 Facility is located on an approximately 55.1-acre parcel owned by Mark W. Reynolds. The Property is located in the Town’s Community district and is used for commercial (The Christmas Barn) and agricultural purposes.

b. Plan of Conservation and Development

The Town of Woodstock’s 2015 Plan of Conservation & Development (the “Plan”), 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 Community district. Article II of the Town's Zoning Regulations defines a "Wireless Telecommunication Facility" as "the equipment and structures involved in receiving or transmitting electromagnetic waves associated with wireless telecommunication services". Wireless Telecommunication Facilities are permitted in the Community District subject to the issuance of a Special Permit by the Planning and Zoning Commission ("PZC").

d. Inland Wetland and Watercourse Regulations

The Woodstock Inland Wetlands and Watercourses Regulations (the "Wetland 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 Woodstock 2 Facility tower is approximately 117 feet to the northwest. Four (4) copies of the Woodstock IWW 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.

The proposed Woodstock 2 Facility would be located in Zone X, an area outside the 500-year flood zone. A copy of the FEMA Flood Map is also included in Attachment 15.

6. Local Input

Section 16-50l(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On December 4, 2024, The Towers sent a Technical Report regarding the proposed facility to Chandler Paquette, Woodstock's First Selectman, Jeffrey Marcotte, Chair of the Woodstock Planning and Zoning Commission, and William Rewinski, Chair of the Woodstock Inland Wetlands Commission ("IWC"). The filing of this Technical Information commenced the ninety (90) day municipal consultation process. The Technical Report summarized the Applicant's plans to establish a telecommunications facility at the Property, discuss Cellco's need for improved service in Woodstock and the potential environmental effects associated with the Woodstock 2 Facility. Four (4) copies of the Technical Report were submitted in bulk with the Council. On February 20, 2025, the Woodstock Planning and Zoning Commission hosted a Public Information Meeting ("PIM"). Notice of the PIM was published in the Norwich Bulletin and was mailed to abutting landowners. During the PIM, The Towers and Cellco representatives presented information on the proposed tower site and answered questions from the PZC and the public. A copy of the PIM presentation materials and written comments received from the PZC are included in Attachment 16.

7. Consultations With State and Federal Officials

Attachments 10, 11, 12, 13 and 15 and Section III.C. of the Application describes consultations with state and federal officials regarding the proposed Woodstock 2 Facility.

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 Federal Airways & Airspace Summary Report included in Attachment 17, no notice is not required for the proposed Woodstock 2 Facility tower and the tower would 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.(1) above.

(2) Bureau of Air Management

Under normal operating conditions, Cellco’s equipment at the Woodstock 2 Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a propane-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 Woodstock 2 Facility is \$640,000. This estimate includes:

The Towers, LLC

(1)	Tower and foundation costs of approximately	\$150,000
(2)	Site development costs of approximately	120,000
(3)	Utility and Facility installation costs of approximately	70,000
	Subtotal – The Towers, LLC	340,000

Cellco Partnership d/b/a Verizon Wireless

(1)	Cell site radio equipment costs of approximately	\$115,000
(2)	Antenna and coax costs of approximately	75,000
(3)	Power systems costs of approximately	50,000
(4)	Equipment Costs of approximately	60,000
	Subtotal – Cellco Partnership d/b/a Verizon Wireless	300,000

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 Woodstock 2 Facility will not have a substantial adverse environmental effect. A public need exists for high quality reliable wireless service in central Woodstock, 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 Woodstock 2 Facility, in particular, far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, The Towers, LLC respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Woodstock 2 Facility.

Respectfully submitted,

THE TOWERS, LLC AND CELLCO
PARTNERSHIP D/B/A VERIZON
WIRELESS

By:  _____

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