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October 9, 2025

Via Federal Express and Electronic Mail

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

Re: **Docket No. 535 - The Towers, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 835 Norwich Worcester Turnpike (Route 169), Woodstock, Connecticut.**

Letter in Lieu of Post Hearing Brief

Dear Attorney Bachman:

On behalf of The Towers, LLC (“The Towers” or the “Applicant”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced application for the construction, operation and maintenance of a wireless telecommunications facility at 835 Route 169 in Woodstock, Connecticut.

On April 7, 2025, The Towers filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Woodstock 2 Facility” or “Facility”) in the northerly portion of a 55.1-acre parcel at 825 Route 169 in Woodstock, Connecticut (the “Property”). The Property is owned by Mark W. Reynolds (the “Property Owner”). The proposed Woodstock 2 Facility would provide Cellco customers and emergency service providers with improved wireless services along Route 169, Child Hill Road, Drugg Hill Road and Hibbard/Woodstock Road, as well as other local roads in Woodstock. Cellco service in this area, particularly along Route 169, is currently either unreliable or non-existent.

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Facility Description

In accordance with its Option and Lease Agreement with the Property Owner, The Towers proposes to construct, own and maintain a 150-foot-tall monopole tower within a 50' x 50' facility compound in the northerly portion of the Property. Vehicular access to the Facility would extend from Route 169 along a portion of an existing farm road on the Property, then over a new gravel driveway extending to the Facility compound. Utilities would extend from existing service along Route 169 within the limits of the twelve-foot-wide gravel access driveway to avoid impacting mature trees and existing stone walls on the Property.

Cellco proposes to install antennas and remote radio heads on an antenna platform at a centerline height of 145 feet above ground level. Cellco's radio equipment, a backup battery cabinet and a 50-kW diesel fueled back-up generator would be installed on a concrete pad in the westerly portion of the facility compound. The proposed tower and facility compound would be capable of supporting antennas and related equipment for additional wireless carriers, the Town and emergency service providers, if a need exists.

Public Need

The unrefuted evidence in the Docket No. 535 record reveals that intermittent gaps in wireless service totaling 2.14 miles along Route 169, 1.3 miles along Child Hill Road, 2.4 miles along Roseland Park Road, 2.0 miles along Dugg Hill Road and 1.3 miles along Hibbard/Woodstock Road in Cellco's 700 MHz "base frequencies", exist in Woodstock today. These gaps cannot be filled by service from Cellco's existing cell sites in Woodstock and the surrounding area. In addition, Cellco's existing Putnam facility is currently operating in exhaust in its 700 MHz, 850 MHz and 1900 MHz frequencies. Service from the proposed Woodstock 2 Facility will not only fill the existing service gaps but will help relieve this capacity problems at the Putnam cell site.

Finally, coverage from Cellco's proposed Woodstock 2 facility will overlap with coverage from the proposed Woodstock South facility (Docket No. 534)¹ allowing wireless service to hand-off-maintaining the continuity of service in the area between these two new facilities.

Nature of Probable Environmental Impacts

The record contains ample unrefuted evidence to support a finding by the Council that the Woodstock 2 Facility would not have a significant adverse impact on the environment at the Property or the surrounding area. The Applicant has presented evidence that the location and development of the Woodstock 2 Facility will not adversely impact federal or State listed,

¹ The Council approved Docket No. 534 on September 18, 2025.

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threatened or endangered species or State species of special concern; will not impact migratory birds; will not adversely impact prime farmland soils; will not have any direct impact on any wetlands or watercourses near the facility; will not be considered to be an obstruction or hazard to air navigation and, therefore, will not require any FAA marking or lighting; and will operate well within safety limits established by the FCC for radio frequency emissions. No credible evidence to the contrary exists in the Docket No. 535 record.

State Historic Preservation Office Determination

According to a February 18, 2025 Preliminary Historic Resources Evaluation, no National Register of Historic Places resources are located within one-half mile of the Facility. If the Woodstock 2 Facility is approved, The Towers would make its formal submission to the State Historic Preservation Officer to confirm this finding.

Visual Impacts

Generally speaking, the primary impact of any telecommunications facility is visual. The overall area where some portions of the proposed Woodstock 2 Facility tower may be visible year-round (above the tree line), is conservatively estimated to be approximately 198 acres (2.5% of the 8,042-acre, two-mile radius study area) and would occur primarily over surrounding agricultural fields along portions of Route 169 and surrounding roads. Seasonal views, through intervening trees and branches are anticipated to occur within an area of approximately 450 additional acres, for a total of 5.6% of the 8,042-acre, two-mile study area. The proposed tower will not be visible from the Woodstock Historic District. Therefore, The Towers respectfully submits that the proposed Woodstock 2 Facility will not have a substantial visual effect on the Woodstock community.

Public Input

Section 16-50l(g) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On December 4, 2024 The Towers commenced the ninety (90) day municipal consultation process. First Selectman Chandler Paquette received a copy of the technical information summarizing plans to establish a telecommunications facility at the Property. The Town's Planning and Zoning Commission ("PZC") hosted a Public Information Meeting ("PIM") on the proposed tower site on February 20, 2025. Notice of the PIM was published in the Norwich Bulletin and was sent to all abutting landowners. The Applicant's team of professionals responded to questions from the PZC, the Town's Zoning Officer, the Conservation Commission and members of the general public. The Town of Woodstock did not seek intervenor or party status in this proceeding.

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Party and Intervenor

Prior to July 31, 2025, no individual, group or organization asked to participate in this docket as a party or intervenor. Mere hours before the commencement of the evidentiary hearing on this docket, Paska Nayden, a resident of the Town of Easton, Connecticut, asked for and, over the Applicant's objection, was granted Intervenor status. Ms. Nayden is not an abutting landowner, nor does she own property anywhere in the Town of Woodstock. Ms. Nayden's claims that the Woodstock 2 Facility is not needed and that its construction will result in significant impacts on the environment are wholly inconsistent with the verified exhibits, reports and testimony included in the record of this proceeding. No independent evidence, documents or information was submitted to support Ms. Nayden's claims.

Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Woodstock 2 Facility, that the improved service from the proposed tower will significantly benefit the Woodstock Community, and that the environmental impacts from the proposed Facility would be limited and outweighed by the significant benefits that would be enjoyed by the public.

For all of these reasons, The Towers respectfully requests that the Council approve the Docket No. 535 Application.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin", written in a cursive style.

Kenneth C. Baldwin

CERTIFICATION OF SERVICE

I hereby certify that a copy of the forgoing was sent electronically to the following:

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c/o 44 Jesse Lee Drive
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October 9, 2025

Date



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