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September 5, 2025

Via Electronic and U.S. Mail

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

Re: **Docket No. 536 – Tarpon Towers III, 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 and associated equipment located at 78 Goshen East Street, Norfolk, Connecticut**

Letter in Lieu of Post Hearing Brief

Dear Attorney Bachman:

On behalf of Tarpon Towers III, LLC (“Tarpon”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively 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 new wireless telecommunications facility in Norfolk, Connecticut.

On April 17, 2025, Tarpon and Cellco filed an application with the Connecticut Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Norfolk South Facility” or “Facility”) in the westerly portion of a 40.8-acre parcel at 78 Goshen East Street in Norfolk, Connecticut (the “Property”). The Property is owned by Paul Chapinsky Sr. (the “Property Owner”) and is used for residential purposes. The proposed Norfolk South Facility would provide Cellco customers and emergency service providers with improved wireless services throughout significant portions of southern Norfolk and northern Goshen Connecticut (an approximately 46.6 square mile area).

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Facility Description

In accordance with its Land Lease Agreement with the Property Owner, Tarpon proposes to construct, own and maintain a 186-foot-tall lattice tower within a 73' x 73' facility compound in the westerly portion of the Property. Access to the Facility compound would extend from Estey Road over a new gravel access driveway to the tower site a distance of approximately 940 feet.

Cellco's antennas and remote radio heads would be installed at a centerline height of 180 feet above ground level. Cellco's radio equipment, a backup battery cabinet, a 50-kW propane fueled back-up generator and a 1,000-gallon propane fuel tank would be installed on concrete pads in the Facility compound.

Public Need

The unrefuted evidence in the Docket No. 536 record reveals that there are significant gaps in wireless service, particularly in Cellco's 700 MHz "base frequencies," and that there is a significant need for improved wireless service in, southern portions of Norfolk and northern portions of Goshen. The Town's First Selectman Matthew T. Riiska, speaking at the Applicant's public information meeting on March 6, 2025, also shared that the Town has experienced a significant emergency service communications problem over the years, in south Norfolk.

Currently, Cellco provides wireless service in Norfolk from its existing macro cell facilities in Norfolk, and in the surrounding towns of Goshen, Colebrook, Winchester, and Torrington. These existing facilities currently provide some wireless service in Norfolk but significant gaps in service remain around the proposed Norfolk South Facility. The proposed Norfolk South Facility has been designed to provide enhanced wireless service (primary coverage) to an approximately 48.6 square mile area, including significant portions of southern Norfolk and northern Goshen, including portions of Route 272, Route 263, and local roads in the area around the Property. The Norfolk South Facility will also provide for some limited capacity relief to Cellco's surrounding cell sites. and will allow Cellco to provide more reliable service in the area overall.

Nature of Probable Environmental Impacts

The record also contains ample evidence to support a finding by the Council that the Norfolk South 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 Norfolk South Facility will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not impact migratory

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birds; will not adversely impact prime farmland soils; will not have any direct or secondary impacts on any wetlands or watercourses; will not impact historic or cultural resources; 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 evidence to the contrary exists in the Docket No. 536 record.

The proposed 186-foot tower will maintain adequate setbacks from adjacent property boundaries (approximately 249 feet to the west; approximately 201 feet to the south; approximately 207 feet to the north; and approximately 2,068 feet to the east). The closest residence to the tower site is approximately 680 feet to the southwest, a residential parcel at 179 Estey Road. The Applicant explored and responded to Council questions about relocating the tower to the north and/or east on the Property. However, moving the tower to the suggested alternative locations on the Property would require significantly more tree clearing, a longer access driveway over much more challenging terrain, and a taller tower in order to meet Cellco's coverage objectives.

Visual Impacts

Generally speaking, the primary impact of any telecommunications facility is visual. The overall area where some portion of the proposed Norfolk South Facility tower may be visible year-round (above the tree line), is conservatively estimated to be approximately 60 acres. Seasonal views, through intervening trees and branches, are anticipated to occur within an area of approximately 109 additional acres. Combined visibility is predicted to be only 2.0% of the 8,042-acre study area. Due to distance, intervening topography, and existing vegetation, the Norfolk South Facility will not be visible from the Amos Baldwin House or any open space properties or trails and will have limited seasonal visibility from the nearest residences. The Applicant respectfully submits, that the overall visual impacts of the 186-foot tower at the Property will be insignificant.

That said, the Applicant explored and responded to Council questions about certain alternative tower designs and locations on the Property that might reduce the overall visual effect of the proposed 186-foot tower. A monopole-type tower design is unlikely to provide benefits on visibility and would also present certain logistical challenges and, potentially increased impacts to the surrounding area during installation. Adjusting the location of the tower on the Property is also unlikely to provide significant benefits on visibility. The alternative tower locations on the Property discussed have lower elevations, which would require a taller tower to meet Cellco's coverage objectives. A taller tower might also require FAA lighting and marking, which would make the tower more visible. At the current proposed height, FAA marking, and lighting is not required. The Applicant respectfully submits that the proposed location appropriately balances visibility impacts with other important environmental effects.

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Local Input

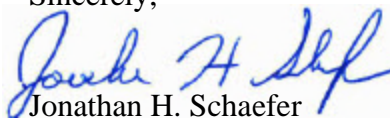
In accordance with Section 16-50l(e) of the Connecticut General Statutes, the Applicant commenced the ninety (90) day municipal consultation process for the proposed Norfolk South Facility on January 2, 2025. Matthew T. Riiska, Norfolk's First Selectman, Christopher Schaut, Chair of the Norfolk Planning and Zoning Commission ("PZC"), and Hartley Mead, Chair of the Norfolk Inland Wetlands Agency ("IWA") all received a copy of a Technical Report, containing information on the Applicant's plans to establish a telecommunications facility at the Property, the Council's review and approval process, and the municipality's role in that process. The Applicant received a request from Town officials in Norfolk to host a Public Information Meeting ("PIM"), which the Applicant did on March 26, 2025. Following the PIM, the Applicant explored alternative sites both on and off the Property, and conducted a second balloon float at the proposed tower site, at the request of those members of the public at the PIM. The Town and the general public were notified of the second balloon float in advance.

In addition, in accordance with Section 16-50l(b) of the General Statutes, full copies of the Application package were sent to the numerous municipal officials including the First Selectman, Town Clerk, Zoning Enforcement Officer, Chair of the PZC, and Chair of the IWA. Neither Tarpon nor Cellco received any comments or communications from the Town or members of the public after submission of the Application.

Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Norfolk South Facility and that the improved service from the proposed tower will provide a significant benefit to the Norfolk and Goshen communities and emergency service providers in the area. The record also demonstrates that the environmental impacts associated with the proposed Norfolk South Facility would not be substantial and that any impacts are outweighed by the benefits the Facility will offer to the public.

Sincerely,



Jonathan H. Schaefer