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January 14, 2026

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. 538 - 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 1022 Trumbull Highway, Lebanon, 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 1022 Trumbull Highway in Lebanon, Connecticut (the “Property”).

The Application

On May 2, 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 at the Property (the “Facility”). The Facility would be located in the easterly portion of a 42-acre parcel at 1022 Trumbull Highway in Lebanon, Connecticut (the “Property”). The Property is owned by Theodore Carl Richard, Jr and Karen K. Buffkin (the “Property Owners”). The Facility would provide Cellco customers and emergency service providers in the area with improved wireless service along portions of State Route 87 (Trumbull Highway), Rote 32 and Route 207, as well as other local roads in the Towns of Lebanon and Franklin, Connecticut. The evidence and expert testing in the record confirms that Cellco service in this area, particularly along Routes 87, 32 and 207, is currently either unreliable or non-existent.

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Site Search

Celco identified and evaluated a total of thirty-one (31) alternative candidate parcels in its site search process for the Facility. Celco determined that a tower, with antennas, at a height of 145 feet above ground level would satisfy its wireless service objectives in the area. The Towers entered into a lease agreement with the Property Owners for use of the Property in July of 2024. In addition to the thirty-one alternate parcels in the area, the Applicant, at the request of the Council, investigated an alternative tower location on the Property, approximately 240 north of the proposed tower location. Both tower locations on the Property are discussed below.

Facility Description

In accordance with its Option and Lease Agreement with the Property Owners, the Applicant proposes to construct, own and maintain a 150-foot-tall monopole tower within a 50' x 50' facility compound (100' x 100' leased area) in the easterly portion of the Property. The proposed tower location is adjacent to an existing active agriculture field and is approximately 220 feet from the southernly Property boundary, 1,865 feet from Route 87 to the west, 556 feet from the northernly Property boundary and 960 feet from the easterly Property boundary (the “Proposed Tower Location”).

During the course of the Council proceeding, the Applicant was asked to investigate an alternative tower location on the Property, approximately 240 feet north of the Proposed Tower Location (the “Alternate Tower Location”). The Alternate Tower Location is approximately 460 feet from the southernly Property boundary, 2,114 feet from Route 87 to the west, 328 feet from the northerly boundary and 764 feet to the easterly Property boundary.

Vehicular access to either the Proposed Tower Location or the Alternate Tower Location would extend from Trumbull Highway (Route 87) along a portion of an existing gravel driveway, extending to the north of the Property Owner’s residence, then connecting to an existing farm road to the east of the Property Owner’s home, extending along an existing wetland crossing and then over a new gravel driveway extending around the open agriculture field. The access drive to the Alternate Tower Location would extend along the same route before turning north to the Alternate Tower Location. Minor upgrades to the existing gravel farm-road would be made in the area where it extends through a narrow wetland area. Utilities would extend from existing service along Trumbull Highway along the southern Property boundary, within a 10-foot wide easement, before reconnecting with the gravel driveway (farm road) to the east of the Property Owner’s residence and would then extend within the access easement to either alternate cell site location.

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Cellco would 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 within 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. During the Council proceedings the Lebanon First Selectman contacted the Applicant asking to reserve space on the tower for the Town's emergency service antennas.

Parties and Intervenors

The Council granted party status in Docket No. 538 to Cythia Arons, an abutting property owner to the south, at 1038 Trumbull Highway and the Grouped 988 Trumbull Highway residents, Phillip Griffin and Lesley Varzegi,¹ the abutting property owners to the north at 988 Trumbull Highway. The Council also granted Intervenor status to Gregory and Natalie Roy, the owners of property at 1044 Trumbull Highway. The Roys are not an abutting property owner but received a courtesy notice from the Applicant when the Application was filed with the Council. The Roys and Ms. Arons participated in the Docket No. 538 application process and evidentiary hearing.

Public Need

The unrefuted evidence in the Docket No. 538 record reveals that intermittent gaps in wireless service totaling 4.0 miles along Route 87; 4.3 miles along Route 207; and 3.7 miles along Route 32 in Cellco's 700 MHz "base frequencies", exist today in Lebanon and Franklin. These gaps cannot be filled by service from Cellco's surrounding cell sites in Lebanon and Franklin. Service from the proposed Lebanon 2 Facility will fill these existing service gaps and provide some limited capacity relief to Cellco's Lebanon Center facility and Prides Corner Nursery facility during summer months.

Nature of Probable Environmental Impacts

The record contains ample unrefuted evidence to support a finding by the Council that a telecommunications facility at either the Proposed Tower Location or the Alternate Tower Location would not have a significant adverse impact on the environment at the Property or in the surrounding area. The Applicant has presented evidence that the location and development of the Lebanon 2 Facility will not adversely impact federal or State listed, threatened or endangered

¹ The Grouped 988 Trumbull Highway residents did not participate in the Docket No. 538 proceeding and were removed from the service list by the Council.

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species or State species of special concern; will not impact migratory birds; will not adversely impact prime farmland soils; 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. 538 record.

Development of the Proposed Tower Location would require land disturbance of 45,426 square feet and the removal of sixteen (16) trees larger than 6" or greater diameter of breast height ("dbh"). Development of the Alternate Tower Location would require land disturbance of 74,56 square feet and the removal of sixteen (16) trees larger than 6" or greater dbh. Only seven (7) trees would need to be removed for the utility access easement along the southern Property boundary. Wetland impacts would be identical for the Proposed Tower Location and Alternate Tower Location. Wetland and vernal pool protection measures have been incorporated into the project plans and will allow the Applicant to minimize or eliminate adverse impacts.

State Historic Preservation Office Determination

According to a February 14, 2025 Preliminary Historic Resources Evaluation, no National Register of Historic Places resources are located within one-half mile of the Facility. If the Lebanon 2 Facility is approved, The Towers would make its formal submission to the State Historic Preservation Officer to confirm this preliminary determination.

Visual Impacts

Generally speaking, the primary impact of any telecommunications facility is visual. The overall area where some portions of the Proposed Tower Location may be visible year-round (above the tree line), is conservatively estimated to be approximately 359 acres (4.5% of the 8,042-acre, two-mile radius study area) and would occur primarily over cultivated agricultural fields to the northwest and southeast of the Property. Seasonal views, through intervening trees are anticipated to occur within an area of approximately 420 additional acres, for a total of 9.7% of the 8,042-acre, two-mile study area. A tower at the Proposed Tower Location would have limited visibility from the Lebanon Historic District, located more than a mile to the northwest.

The overall area where some portions of a tower at the Alternate Tower Location may be visible year-round (above the tree line), is conservatively estimated to be approximately 381 acres (4.7% of the 8,042-acre, two-mile radius study area) and would occur primarily over surrounding agricultural fields to the northwest and southeast of the Property. Seasonal views, through intervening trees and branches are anticipated to occur within an area of approximately 343 additional acres, for a total of 9.0% of the 8,042-acre, two-mile study area. A tower at the proposed Alternative Tower Location will also have limited visibility from the Lebanon Historic District.

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The Applicant respectfully submits that, overall, the Alternate Tower Location would have a more substantial visual impact on the area than the Proposed Tower Location.

Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Lebanon 2 Facility, that the improved service from the proposed tower will significantly benefit people in the Lebanon and Franklin Communities. The record also clearly demonstrates that the environmental impacts from the Facility at either the Proposed Tower Location or the Alternate Tower Location would be limited and outweighed by the significant benefits that would be enjoyed by the public.

The record in this matter further demonstrates that there are no significant benefits to relocating the tower from the Proposed Tower Location to the Alternate Tower Location. Visual impacts at either location are comparable. Total land disturbance and tree removal requirements are both slightly higher for the Alternate Tower Location.

For all of these reasons, The Towers respectfully requests that the Council approve the Docket No. 538 Application with the Facility at the Proposed Tower Location. If however, the Council prefers the Alternate Tower Location, the Applicant would comply with such requirement.

Sincerely,



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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