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EXECUTIVE SUMMARY

Crown Castle Towers 06-2 LLC and its affiliates (“Crown Castle”) and New Cingular Wireless PCS, LLC d/b/a AT&T (“AT&T”, collectively the “Applicants”) respectfully submit this application with supporting documents and evidence (the “Application”) to the Connecticut Siting Council (the “Council”) for the issuance of a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction, maintenance and operation of a wireless telecommunications facility (the “Facility”) at 70 Universal Drive in North Haven, Connecticut (the “Site”). The Facility will allow AT&T, T-Mobile and Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) to maintain wireless communications services in the area near the Site.

Crown Castle presently owns, manages, maintains and operates a telecommunication tower located at 120 Universal Drive (the “Existing Tower”). Crown Castle’s lease with the owner of the parcel containing the Existing Tower is expiring on or about May 31, 2026, and the property owner is no longer interested in hosting the Existing Tower on that property. Through this Application, Crown Castle seeks to effectively relocate the Existing Tower from 120 Universal Drive to 70 Universal Drive (the “Proposed Tower”), in North Haven, Connecticut (the “Site”)¹. The Proposed Tower location is on an abutting parcel of land approximately 800’ north of the location of the Existing Tower. Crown Castle will remove the Existing Tower once the Proposed Tower is constructed, and the wireless carriers are operating and providing wireless communication services from the Proposed Tower. This project sequencing will provide continuity of critical wireless communication services in the area near the Site, including FirstNet services, as depicted on the coverage maps submitted with the Application.

The Proposed Tower and AT&T’s collocation will allow AT&T to maintain its enhanced, state-of-the-art wireless communication services, including 5G and FirstNet services, for its customers in the coverage area. The Towns of North Haven and Hamden are both FirstNet customers. Crown Castle notes that T-Mobile is also collocated on the Existing Tower. AT&T, T-Mobile and Verizon Wireless each executed a Letter Agreement and Confirmation of Commitment with Crown Castle to collocate on the Proposed Tower if constructed.

¹ With respect to the exhibits attached to the Application, Crown Castle identifies the Site as Site ID# 832281 and AT&T as CT1498.

The Site is approximately 6.0 acres in size and is located at 70 Universal Drive, North Haven, Connecticut. The Site has a ground elevation of approximately 19' above mean sea level. The Site is located in the Light Industrial (IL30) Zoning District. Abutting areas to the north, south and east of the Site are also in the IL30 Zoning District with areas to the west in the General Industrial (IG-80) Zoning District. The Proposed Tower and associated fenced compound (the "Facility") will be located on the south side of the Site. The Site currently contains retail and restaurant uses. A railroad yard, railroad tracks and Interstate 91 are to the west of the Site. Existing land uses within ¼ miles of the Site include commercial properties to the north and south, residential and commercial to the east, and railroad and industrial properties and conservation land to the west.

The Proposed Tower will be located within the proposed fence compound area of approximately 4,900 square feet. Access to the compound will be through an existing paved parking area to the proposed gravel compound, approximately 200' in length. Utilities will be underground from an existing utility pole. Crown Castle notes that no trees need to be removed.

Agreement filed as **Attachment 2**. If the Council approves the Application, Crown Castle Towers 06-2 LLC would hold the Certificate.

B. The Applicants

Crown Castle owns, operates and leases more than 40,000 cell towers across every major U.S. market. This nationwide portfolio of communications infrastructure connects cities and communities to essential data, technology and wireless service - bringing information, ideas and innovations to the people and businesses that need them. For more information on Crown Castle, please visit www.crowncastle.com. Crown Castle Towers 06 2 LLC, a Delaware limited liability company, is located at 2000 Corporate Drive, Canonsburg, PA 15317.

AT&T is licensed by the Federal Communications Commission (“FCC”) to provide wireless communications services and operate a wireless telecommunications system in the State of Connecticut within the meaning of Section 16-50i(a)(6) of the CGS. As the Council knows, AT&T has significant experience in providing wireless communications services to the public. AT&T, one of the country’s largest communications companies, and its affiliates have built and operate tens of thousands of wireless communications facilities across the United States, including within the State of Connecticut. New Cingular Wireless PCS, LLC is a wholly owned subsidiary of AT&T Inc., a publicly held, multi-billion-dollar Fortune 100 company with approximately 140,990 employees worldwide as of December 31, 2024. New Cingular Wireless PCS, LLC, a Delaware limited liability company, is located at 1025 Lenox Park Blvd. NE, Atlanta, GA 30319.

Any communications regarding the Application should be sent to legal counsel for the Applicants:

Brown Rudnick LLP
185 Asylum Street
Hartford CT 06103
860.509.6500

Attn: Thomas J. Regan; tregan@brownrudnick.com
Edward D. Pare, Jr.; epare@brownrudnick.com

C. Application Fee

The total estimated construction cost for the Facility will be less than \$5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations, an application fee of \$1,250 is submitted with the Application.

II. PRE-APPLICATION PROCESS

On July 22, 2025 Crown Castle sent a notice of intent to file this Application to Michael J. Freda, North Haven's First Selectman, Laura Magaraci, Zoning Enforcement Officer and Frank H. Bumstead, Chair of the North Haven Inland Wetlands Commission and Sue Dannenhoffer, Chair of the North Haven Conservation Commission. Because the Site is within 2,500 feet of the Hamden Town boundary, notice was also sent to Hamden Town Officials including Lauren Garrett, Mayor, Eugene Livshits, Town Planner, Planning & Zoning Department and Jonathan T. Clapp, Chair, Hamden Inland Wetlands Commission. That notice included a cover letter with site plan, radio frequency analysis report with coverage maps and a visual assessment. The filing of this notice commenced the ninety (90) day municipal consultation process. The cover letter summarized the Applicant's plans to establish a telecommunications facility at the Site, discussed the need to maintain wireless services in the area and the potential environmental effects associated with the Facility.

On August 12, 2025, legal counsel for Applicants met in person with the North Haven Zoning Enforcement Officer and the North Haven Town Engineer. Project engineers from APT (the company that created the visual assessment and prepared the plans) participated in the meeting via Zoom. The meeting was productive, all questions were answered, and the Town of North Haven had no comments to the Proposed Facility. In a letter dated September 26, 2025, the Town of North Haven acknowledged that Applicants have completed the municipal consultation process and they support the Proposed Facility in order to maintain wireless telecommunications services

in the area near the Site. Town of North Haven's letter of support are a sample notice letter are both is included as **Attachment 3**.

On October 6, 2025, legal counsel for Applicants met with the Hamden Town Planner via Zoom. The meeting was productive, all questions were answered, and the Town of Hamden had no comments to the Proposed Facility.

On October 24th and 27th, 2025 the Applicants' notice of intent to file this Application was published in the New Haven Register. A copy of the published notice is included as **Attachment 4**. Crown Castle will forward the Affidavit of Publication as soon as it is available.

III. PROPOSED FACILITY

A. History of Existing Tower

Crown Castle owns the Existing Tower and leases space to AT&T and T-Mobile which provide critical wireless telecommunications services from the Existing Tower. The Existing Tower was approved by the Town of North Haven Planning and Zoning Commission on November 20, 2000; see **Attachment 5**. While the Existing Tower was not approved by the Council at the time of construction, the Council has approved numerous applications for tower sharing and modifications to the Existing Tower (see, for example, TS-Sprint-101-011010, TS-T-Mobile-101-050922, EM-T-Mobile-101-151019; EM-AT&T-101160217; and EM-Sprint-101-14032 included at **Attachment 6**). The Existing Tower is 120' above ground level ("AGL") and the Proposed Tower, in order to provide for required antenna separation for the collocating wireless carriers, including Verizon Wireless, is proposed at 138' AGL. The Existing Tower is shown in Photo 1 contained in the submitted Visual Assessment Report referenced below (**Attachment 11**).

B. Proposed Facility

1. The Site

The Site is approximately 6.0 acres in size and is located at 70 Universal Drive, North Haven, Connecticut (Assessor's Map 011, Lot 002; Deed Reference Volume 553, Page 635; USGS 7.5 quadrangle for Branford, Connecticut). The Site is located in the Light Industrial (IL30) Zoning District. Abutting areas to the north, south and east of the Site are also in the IL30 Zoning District with areas to the west in the General Industrial (IG-80) Zoning District. The Proposed Tower and associated fenced compound (the "Facility") will be located on the south side of the Site. The Site is currently used for retail and restaurant uses, all as depicted on the plans submitted with this Application (the "Plans," see **Attachment 7**).

The Site slopes from a high point at the center of the compound area and decreases in elevation to the north and south. The Site contains wetlands approximately 51' southeast of the Facility. The Facility will have no direct impact on wetlands. Crown Castle will comply with the Connecticut Guidelines for Soil Erosion and Control and employ best management practices (i.e., silt fencing and other erosion controls) so that construction and operation of the Facility will minimize any secondary and indirect impacts on wetlands. According to FEMA Flood Insurance Rate Map (Map Number 09009C0451K), the Site is located in Flood Zone X (see floodplain map at **Attachment 8**). Existing land uses within ¼ miles of the Site include commercial properties to the north and south, residential and commercial to the east, and railroad and industrial properties to the west. As noted on the site maps submitted as **Attachment 1**, there is a large area of conservation land, the Quinnipiac River Marsh Wildlife Area to the west providing a significant buffer from developed areas in the Town of Hamden.

The Proposed Tower will be located within the proposed fence compound area of approximately 4,900 square feet. The ground elevation of the Site is approximately 19' above

mean sea level. Access to the compound will be through an existing paved parking area to the proposed gravel compound, approximately 200' in total length. The total area of disturbance is approximately 9,000 square feet. Site improvements entail approximately 125 cubic yards of net excavation for construction of the fenced compound and vehicle turnaround area. Approximately 100 cubic yards of clean, broken stone will be required for the compound and the turn around area. The utility trench for the proposed underground utilities will require exaction of approximately 50 cubic yards of material to backfill the trench. Crown Castle notes that no trees need to be removed; see Tree Inventory Report from All-Points Technology Corporation, P.C. ("APT") included as **Attachment 9**.

The Site and municipal boundaries are shown on the Site Location Map prepared by APT and included as **Attachment 1**. The Site is located within flood Zone X, is not within an aquifer protection area and does not contain prime or statewide important farmland soils as depicted on the Environmental Resources map prepared by APT and included as **Attachment 10**. Lastly, the Facility is not located within 50' of wetlands or within a coastal boundary area, also depicted on the Environmental Resources map prepared by APT and included as **Attachment 10**.

a. Proximity to Residences

APT determined that there are only six (6) residences within 1,000' of the compound with the closest residence approximately 635' to the east located at 32 Nettleton Avenue (Map 11, Lot 004). Interstate 91 separates the residential buildings from the Site.

Crown Castle 70 Universal Drive North Haven, CT 1000' RESIDENTIAL BUILDING LIST			
PARCEL ID	STREET ADDRESS	BUILDING TYPE	DISTANCE FROM COMPOUND* (ft+/-)
011-004	32 Nettleton Ave.	Single Family	635'
011-005	30 Nettleton Ave.	Single Family	694'
011-006	26 Nettleton Ave.	Single Family	798'
011-007	22 Nettleton Ave.	Single Family	925'
011-012	28 Sellot St.	Single Family	908'
011-048	7 Cody La.	Single Family	959'
*Information gathered from North Haven GIS & CTECO Ortho Aerial Images			

b. Proximity to Schools/Commercial Day Care Centers

As noted in the Visual Assessment Report prepared by APT (see **Attachment 11**), no schools or commercial day care centers are located within 250 feet of the Site. The closest school is Ferrara Elementary School located approximately 1.1 miles to the southeast at 22 Maynard Road in East Haven. The closest commercial child day care center is Building Blocks Early Learning Center in Hamden located approximately 1.7 miles to the west at 40 London Drive.

2. Crown Castle

As the Council knows, Crown Castle owns, operates and manages wireless communications infrastructure and leases/licenses space to carriers of wireless communications services licensed by the Federal Communications Commission (“FCC”).

The galvanized gray tower will be set back approximately 932’ from the northern, 109’ from the eastern, 244’ from the southern, and 76’ from the western property boundaries of the Site. The compound will be set back approximately 900’ from the northern, 69’ from the eastern, 200’ from the southern, and 40’ from the western property boundaries of the Site.

If the Facility is approved, Crown Castle anticipates commencing construction in the first quarter of 2026 with completion during the second quarter of 2026. The Proposed Tower will be 138' AGL with a galvanized gray finish. The Proposed Tower will be designed with a "yield point" incorporated at 69' AGL. The Proposed Tower is approximately 250' from the existing commercial building located on the Site. The Proposed Tower and compound are designed to support colocation for at least three (3) wireless carriers. The Facility will be surrounded by an eight-foot (8') chain link fence with a twelve foot (12') wide gate. Utilities will be installed underground from a proposed utility pole. Three (3) existing parking spaces on the Site will be restriped with "No Parking" to provide adequate parking for the carrier maintenance visits. Notice to the FAA is not required for the proposed modifications as demonstrated in **Attachment 12**. The Site and Proposed Tower are not accessible to the public.

Crown Castle anticipates its approximate cost for the Facility will be:

Description:	Cost:
Site Acquisition	\$ 12,000
Design/Due diligence/zoning	\$176,000
Construction:	<u>\$492,000</u>
Total:	<u>\$680,000</u>

The Facility, antennas, equipment and mounts are likewise depicted on the Plans and will comply with the following applicable safety standards and codes:

- 2021 International Building Code.
- 2020 National Electric Code (NFPA 70).
- 2021 International Mechanical Code.
- 2022 Connecticut State Fire Prevention Code.
- Connecticut State Fire Safety Code (NPFA 101).
- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".
- Occupational Safety and Health Administration (OSHA).

3. AT&T

AT&T is licensed by the FCC to provide wireless services in this area of the State of Connecticut (see list of AT&T's licenses attached as **Attachment 13**). AT&T is currently collocated on and operating from the Existing Tower at an antenna centerline height of 121' AGL and will collocate on the Proposed Tower if approved. AT&T will collocate its antennas at 120' antenna centerline height AGL on the Proposed Tower. AT&T will also install related amplifiers, cables, fiber and other associated antenna equipment, including, without limitation, remote radio heads, and surge arrestors on the Proposed Tower. AT&T plans to collocate its associated electronic equipment in a walk-up-cabinet with GPS antenna as well as an emergency backup power propane-fueled generator, and other appurtenances, on an equipment pad and propane tank on a concrete pad as depicted on the Plans. AT&T's equipment will not generate significant noise which will comply with applicable noise requirements, noting that the emergency backup power generator is exempt from the noise requirements.

AT&T's will use a Polar Power, Inc., 20Kw liquified propane gas fired DC generator, Model #V020PFB360TEB with vertical enclosure with a 500-gallon propane tank on a 4' x 10' concrete pad. The generator is alarmed back to the AT&T's Network Operations Center for dispatch/action. See **Attachment 14** for the generator specifications. The generator typically exercises once a week for approximately 30 minutes which will be scheduled during daytime hours and will otherwise operate during power outages to support continuity of telecommunications services. Based on estimated fuel consumption and reasonably assuming a maximum of 400 gallons of propane in the tank, while operating at full loading the generator should provide electrical power to the Facility for approximately 112 hours (4.5 days) before refueling is required. AT&T's proposed facility will also have battery backup power which will provide initial backup power for approximately three to four hours.

Once all required approvals are obtained, AT&T's installation of its equipment will take approximately three (3) to four (4) weeks and will be constructed during normal business hours.

Construction is scheduled to commence in the second quarter of 2026. AT&T estimates its cost for the installation is:

Description:	Cost
Equipment/Materials	\$114,000
Construction	\$179,000
Integration & Optimization	<u>\$ 15,300</u>
Total:	<u>\$308,300</u>

IV. SITE SELECTION AND TOWER SHARING

A. Site Selection

In light of the expiration of the lease agreement for the Existing Tower, Crown Castle began a review of other properties in the area near the Site to maintain the critical wireless communication services in the area. The search was limited to the area in the vicinity of the Existing Tower and in the commercial industrial zoning districts. Based on that review, Crown Castle determined there were no existing structures in the area near the Existing Tower which could accommodate the wireless carriers currently operating from the Existing Tower. See Existing Adjacent Towers map prepared by APT and submitted as **Attachment 15**. The search effort focused on properties located in the immediate area surrounding the parcel containing the Existing Tower. The parcels near the Existing Tower parcel are commercial/industrial parcels in between the CSX railway and I-91. Most of the parcels are partially developed. Crown Castle approached the owner of the Site who was interested and entered into a lease agreement with Crown Castle. The Site allows the wireless carriers to substantially replicate their coverage to maintain critical wireless services in the area. The Proposed Tower is only approximately 800'

north from the Existing Tower. Additionally, Crown Castle expects that Verizon Wireless, not collocated on the Existing Tower, will collocate on the Proposed Tower. This project is effectively a “drop and swap,” 800’ away albeit on a different parcel of land.

B. Tower Sharing

The Proposed Tower will also allow for collocation of at least the three (3) carriers which have expressed a commitment to collocate on the Proposed Tower. Of course, Crown Castle would seek additional collocators for the Proposed Tower, which is its primary business model.

V. STATEMENT OF NEED AND BENEFITS

A. Federal Policy and Law

As the Council has previously found, 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, encourages technical innovations and fosters lower prices for telecommunications services 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. The Act substantially increases public access to wireless services by removing barriers to provide competition and enhancing wireless connectivity. 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. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emissions and interference issues by establishing regulations, guidelines and requirements in these areas. Pursuant to its FCC licenses, AT&T has constructed and currently

operates a wireless communications network throughout Connecticut. 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 promoting 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 site security, public safety and citizen activated emergency response capabilities. These public goals and responsibilities imposed on wireless service providers can only be satisfied if AT&T 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 policy 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. 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. According to published reports, wireless usage continues to grow exponentially. A Center for Disease Control study conducted by the National Center for Health Statistics issued in June 2024, found that for the second six months of 2023, 76% of adults (or about 197 million) and 87% of children (nearly 63 million), live in households that did not have a landline phone but did

have at least one wireless phone. Additionally, according to published reports, over 240 million or over 80% of all 911 calls are made over wireless devices. Today, wireless communications and the infrastructure to support same are required to assist with public safety needs.

B. Need for Proposed Facility

Crown Castle presently owns, manages, maintains and operates a telecommunication tower located at 120 Universal Drive (the “Existing Tower”) in North Haven. Crown Castle’s lease with the owner of the parcel containing the Existing Tower is expiring on or about May 31, 2026, and the property owner is no longer interested in hosting the Existing Tower on that property. Through this Application, Crown Castle seeks to effectively relocate the Existing Tower to 70 Universal Drive in North Haven. The Proposed Tower location is approximately 800’ north of the location of the Existing Tower, albeit on a different parcel of land. Crown Castle will remove the Existing Tower once the Proposed Tower is constructed, and the wireless carriers are operating and providing wireless communication services from the Proposed Tower. This project sequencing will provide continuity of critical wireless communication services in the area near the Site as depicted on the coverage maps submitted with the Application.

Pursuant to an Option and Ground Lease Agreement between the Owner of the Site and Crown Castle, Crown Castle is authorized to submit this Application. The Proposed Tower and AT&T’s collocation will allow AT&T to maintain its enhanced, state-of-the-art wireless communication services, including 5G and FirstNet services, for its customers in the coverage area. We note that the Town of North Haven and the Town of Hamden are both FirstNet customers. Crown Castle notes that T-Mobile is also collocated on the Existing Tower. AT&T, T-Mobile and Verizon Wireless have each executed a Letter Agreement and Confirmation of Commitment with Crown Castle to collocate on the Proposed Tower if constructed.

AT&T has provided radio frequency coverage maps included in the Radio Frequency Analysis Report prepared by C Squared Systems, see **Attachment 16**, which depict AT&T's existing coverage from the Existing Tower. Due to the proximity to the Existing Tower, the Proposed Tower will provide comparable coverage allowing AT&T to maintain continuity of wireless communication services.

AT&T provides digital voice and data services using 4th Generation (4G) services over LTE technology in the 700 MHz, 850 MHz, 1900 MHz, 2100 MHz and 2300 MHz frequency bands as allocated by the FCC. AT&T's 5th Generation (5G) services are also being rolled out on available frequencies in the 850 MHz, 1900 MHz, 2100 MHz and 2300 MHz bands. AT&T's data networks are used by mobile devices for fast web browsing, media streaming and other applications that require broadband connections. AT&T will also deploy FirstNet services from this Facility, providing prioritized, preemptive wireless services for our first responders. The coverage maps illustrate the need to maintain reliable wireless communication services to this area of North Haven in light of the removal of the Existing Tower.

AT&T's Facility will support text to 911 and will comply with E911 requirements. Likewise, AT&T's facility will comply with the Warning, Alert and Response Network Act of 2006.

C. Technological Alternatives

Pursuant to its FCC licenses, AT&T is authorized to provide wireless telecommunications services throughout the State of Connecticut. AT&T submits that there are no equally effective technological alternatives that would allow AT&T to provide its wireless service to the area than those described in this Application. In fact, AT&T's network and equipment represents state-of-the-art technology offering high-quality wireless service. Small cell wireless facilities would not

be a practical or feasible means of maintaining the existing coverage provided from the Existing Tower and would not allow for collocation for T-Mobile and Verizon Wireless.

VI. ENVIRONMENTAL COMPATIBILITY

The Proposed Tower will not result in significant or substantial environmental effect. The Proposed Tower will be an effective relocation of the Existing Tower approximately 800' north, albeit on a different parcel of land. The owner of the parcel hosting the Existing Tower will not renew the expiring lease agreement, so Crown Castle has leased space at the Site for a tower replacement. The photo simulations illustrate that the visibility will be minimal and based on the visibility of the Existing Tower, will have little impact on the area. The Site is located in an industrial zoning district between railroad tracks and Interstate 91. The Facility will not produce unreasonable noise, smoke, odor, waste or significant amounts of traffic. Moreover, the Facility will be unmanned and will not require water or sewer services. Access to the Site will be via existing public ways.

A. Physical Environmental Effects

The Proposed Tower with AT&T's wireless facility will not result in any significant physical and environmental change to the Site. The installation of the Facility on the Site will not require any tree removal because the area proposed for the Proposed Tower is cleared. APT was retained by Crown Castle to analyze the physical and environmental effects of the Facility. APT notes that the closest wetland is located approximately 51' southeast of the proposed compound. The total area of disturbance is approximately 9,000 square feet. Improvements to the Site entails approximately 125 cubic yards of net excavation for the construction of the compound. Approximately 100 cubic yards of clean broken stone fill will be installed for the compound area. The trench for underground utilities from the exiting utility pole to the compound will excavate

approximately 50 cubic yards of material that will be used to backfill the utility trench. The Facility will be accessed from an existing public way and through the existing paved lot.

1. Wetlands

APT provided the enclosed Wetland Inspection report, see **Attachment 17**. The Site contains wetlands approximately 51' southeast of the Facility. The Facility will have no direct impact on wetlands. Crown Castle will comply with the Connecticut Guidelines for Soil Erosion and Control and employ best management practices (i.e., silt fencing and other erosion controls) so that construction and operation of the Facility will minimize any secondary and indirect impacts on wetlands.

2. Visual Effects

APT completed an assessment to evaluate the potential visual effects of the proposed Facility from within a two-miles radius of the Site (the "Study Area"). See Visual Assessment Report included as **Attachment 11** as noted above. APT completed in-field verification activities on February 7, 2025, consisting of a crane test, vehicular and pedestrian reconnaissance and photo-documentation. The crane was positioned at the Site with its boom extended to a height of 138' AGL, directly above the center of the Proposed Tower with a brightly colored (red) 4-foot diameter ballon at the location of the Proposed Tower. The Study Area included the neighboring municipalities of East Haven to the southeast, New Haven to the south and Hamden to the west. As noted above, no schools or commercial day care centers are located within 250 feet of the Site. The closest school is Ferrara Elementary School located approximately 1.1 miles to the southeast at 22 Maynard Road in East Haven. The closest commercial child day care center is Building Blocks Early Learning Center in Hamden located approximately 1.7 miles to the west at 40 London Drive. The Facility will not be visible from either location.

The Visual Assessment Report concludes that the majority of year-round visibility occurs over the Quinnipiac River, its associated marshes, and undeveloped land to the west and southwest of the Site. Views of the Facility are limited to locations along major roadways (photo locations 1-3, 5, and 29), within industrial zoned properties (photo locations 30-32), and at select locations within residential neighborhoods to the west overlooking the Quinnipiac River Marsh. In these neighborhoods, the Facility would be backdropped in most instances by wooded heights of land, and the monopole would not be silhouetted against the sky (photo locations 8, and 10-11). The Facility will also be visible from a small section of the East Rock Park Historic District (photo location 13), approximately 1.92 miles east-northeast, where a similar background will make it difficult to spot with the naked eye. Minimal views of the Facility reach residential areas to the east of the Site (photo locations 24 and 25). As noted above, the Existing Tower, which is located approximately 800' south of the Proposed Tower location, will be removed thereby reducing visibility of wireless infrastructure in the area.

3. Radio Frequency Emissions

The power density levels for AT&T's proposed Facility are calculated not to exceed 3.54% of the federally permitted emission standards for the public. Please refer to the Radio Frequency Emissions analysis prepared by C Squared Systems and submitted as **Attachment 18**. The total radio frequency power density will comply with the standards adopted by the Connecticut Department of Environmental Protection and the Maximum Permissible Exposure limits of the FCC.

4. Airspace Safety Analysis & Compliance Report

As noted above, included as **Attachment 12** is an Airspace Safety Analysis & Compliance report concluding that the Proposed Tower will not require notice to the FAA or the FCC and that marking and lighting is not required.

B. State and Federal Agencies

1. USFWS and NDDB Compliance

APT performed an evaluation with respect to possible federally- and state-listed, Endangered, Threatened, or Special Concern species and consulted with the U.S. Fish and Wildlife Service (“USFWS”) and the Connecticut Department of Energy and Environmental Protection. As noted in the USFWS & NDDB Compliance report submitted as **Attachment 19**, the proposed Facility is not anticipated to adversely impact any Federal or State Threatened, Endangered or species of Special Concern. Likewise, on behalf of Crown Castle, Martin Environmental Solutions Inc. completed the FCC National Environmental Policy Act (“NEPA”) Screening Report, a summary of which (the “Report”) is included at **Attachment 20** concluding that there is no evidence that an Environmental Assessment pursuant to NEPA is required for the Facility. The full NEPA report is submitted as a bulk filing (**Attachment 25**).

2. Historic Resources Determination

APT completed an independent review of relevant files to determine if any listed sites, or sites eligible for listing are located proximate to the Site and concluded that no listed sites are located within one-half mile of the Site (“APE”). One state register-listed resource is located within the APE, with another located approximately .75 mile from the Site. APT’s initial screening indicates the Facility will not have a direct effect on historic/cultural resources, see **Attachment 21**. Likewise, pursuant to the Report, the State Historic Preservation Officer for the State of Connecticut, Department of Economic and Community Development in a letter dated May 19, 2025, concurred with the findings in the Report that “no historic properties will be affected” by the Facility; see **Attachment 22**.

3. Avian Resources Evaluation

APT completed an evaluation and report to document the Facility's proximity to avian resources areas and its compliance with recommended guidelines of the U.S. Fish and Wildlife Service for minimizing the potential for telecommunications tower to impact bird species. That report is included as **Attachment 23** and concludes there is no likely adverse impact to migratory bird species which would result from the Facility and would comply with the USFWS tower design, siting, construction, operation and maintenance recommended best practices for minimizing the potential impact to bird species.

C. Other Environmental Factors

The Facility is unmanned and after construction, generates minimal traffic, typically once or twice a month for maintenance visits by the wireless carriers over existing public ways. The Facility does not generate any odor, smoke or significant noise. The Facility does not generate waste or sewerage or other environmental impacts hazardous to human health. The Facility will comply with all applicable federal, state and local laws, regulations, codes and requirements.

VII. 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 Site is approximately six (6) acres and is located in the Light Industrial (IL30) Zoning District. The Site currently contains retail and restaurant uses. A railroad yard, railroad tracks marshlands are to the west of the Site and Interstate 91 is to the east of the Site. Existing land uses

within ¼ miles of the Site include commercial properties to the north and south, residential and commercial to the east (separated by Interstate 91), and railroad and industrial properties to the west.

B. Plan of Conservation and Development

The Town of North Haven’s 2017 Plan of Conservation & Development (the “Plan”), does not reference wireless communications, wireless infrastructure or communications infrastructure. A copy of the Plan has been bulk filed (**Attachment 26**)².

C. Zoning Regulations

According to the Town’s Zoning Map, the Site is in the Light Industrial (IL30) Zoning District. The regulations pertaining to telecommunications antennas and towers in North Haven are found in Section 8.2 of the North Haven Zoning Regulations. These regulations establish guidelines for siting and location of telecommunications facilities. The goals of Section 8.2 are to: (1) protect residential areas and land uses from potential adverse impacts of towers and antennas; (2) encourage the location of towers in non-residential areas; (3) minimize the total number of towers throughout the community; (4) strongly encourage the joint use of new and existing tower sites as a primary option rather than construction of additional single-use towers; (5) encourage users of towers and antennas to locate them, to the extent possible, in areas where the adverse impact on the community is minimal; (6) encourage users of towers and antennas to configure them in a way that minimizes the adverse visual impact of the towers and antennas through careful design, siting, landscape screening, and innovative camouflaging techniques; (7) enhance the ability of the providers of telecommunications services to provide such services to the

² The North Haven Plan of Conservation and Development 2017-2027 can be found online here: <https://cms4files.revize.com/townofnorthhaven/Document%20Center/Government/Town%20Departments/Land%20Use/PCD20170817WebQuality.pdf>

community quickly, effectively, and efficiently; (8) consider the public health and safety of communication towers; and (9) avoid potential damage to adjacent properties from tower failure through engineering and careful siting of tower structures. In furtherance of these goals, due consideration shall be given to the Plan of Development of the Town of North Haven, its zoning map, existing land uses, and environmentally sensitive areas in approving sites for the location of towers and antennas. The Facility is designed to satisfy these stated goals. Pursuant to Section 8.2.6, the Facility would require a “special use permit”. A copy of the Zoning Regulations and Amendments has been bulk filed (**Attachment 27**)³.

D. Inland Wetland and Watercourses Regulations

The Regulations for the Protection and Preservation of the Inland Wetlands and Watercourses of the Town of North Haven (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. Furthermore, Regulated Activity includes any clearing, grubbing, filling, grading, paving, excavating, constructing, depositing or removal of material and discharging of stormwater on the land within fifty (50) feet measured horizontally from the boundary of any wetland or watercourse. The closest wetland area to the Facility is approximately fifty-one (51) feet to the south of the fence compound. 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 Applicants will employ appropriate construction best management practices to ensure that no pollutants would be discharged to any

³ The North Haven Zoning Regulations can be found online here: [https://www.northhaven-ct.gov/government/town_departments/departments_\(e_-_1\)/land_use/zoning_regulations.php](https://www.northhaven-ct.gov/government/town_departments/departments_(e_-_1)/land_use/zoning_regulations.php)

nearby watercourse or wetland areas or to area groundwater during the construction process. As noted above the Facility would be located in Flood Zone X. A copy of the Wetlands Regulations has been bulk filed (**Attachment 28**)⁴.

VIII. CONSULTATIONS WITH STATE AND FEDERAL AGENCIES

As noted above, Crown Castle has consulted with the FCC, USFWS, Connecticut DEEP, and Connecticut SHPO.

IX. ESTIMATED COST AND SCHEDULE

A. Overall Costs

Crown Castle anticipates its approximate cost for the Facility will be:

<i>Description:</i>	<i>Cost:</i>
Site Acquisition	\$ 12,000
Design/Due diligence/zoning	\$176,000
Construction:	<u>\$492,000</u>
Total	<u>\$680,000</u>

AT&T estimates its approximate costs for its installation will be:

<i>Description:</i>	<i>Cost</i>
Equipment/Materials	\$114,000
Construction	\$179,000
Integration & Optimization	<u>\$ 15,300</u>
Total:	<u>\$308,300</u>

Crown Castle will recover its costs through rental income from collocating tenants. AT&T will recover its costs as part of its business operations and services provided to its customers.

⁴ The North Haven Wetlands Regulations can be found online here:
<https://cms4files.revize.com/townofnorthhaven/Document%20Center/Government/Town%20Departments/Inland%20Wetlands/Inland%20Wetland%20Regs.pdf>

B. Overall Schedule

Site preparation and engineering would begin following approval of a Development and Maintenance Plan (the “D&M”) by the Council. Crown Castle will file the D&M plan shortly after Council approval of the Application. Crown Castle anticipates that construction would commence and be completed in the second quarter of 2026. AT&T anticipates collocating on the Proposed Tower as soon as constructed and will take approximately three (3) to four (4) weeks.

X. PROOF OF SERVICE

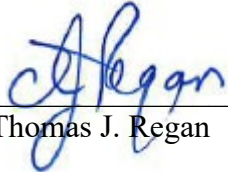
Included as **Attachment 24** is a Certificate of Service indicating that the entities required per Conn. Gen. Stat. § 16-50/ received a copy of the Application. In addition, included as **Attachment 24** is a Certificate of Service indicating each abutting landowner received notice of the filing of this application via certified mail. Also included as part of **Attachment 24** is a sample notice letter and abutters map.

XI. CONCLUSION

Based on the facts and evidence submitted with this Application, Applicants respectfully assert that the Facility will not result in any significant adverse environmental effects. Public need exists to maintain high quality and reliable wireless services in North Haven pursuant to the Act. Applicants assert that the need to maintain high quality and reliable wireless services, including FirstNet and other public safety services, far outweigh any potential environmental effects resulting from the installation of the proposed replacement telecommunications Facility. After consultation, the Town of North Haven supports the Proposed Facility.

For the foregoing reasons, Applicants respectfully request that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need and issue an order approving Applicants’ proposed Facility accordingly.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "T. Regan", is positioned above a horizontal line.

Thomas J. Regan