

brownrudnick

THOMAS J. REGAN
direct dial: +1.860.509.6522
tregan@brownrudnick.com

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VIA US MAIL & ELECTRONIC MAIL

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

RE: DOCKET NO. 546 – Crown Castle Towers 06-2 LLC and New Cingular Wireless PCS, LLC d/b/a AT&T 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 70 Universal Drive, North Haven / Post-Hearing Letter in Lieu of Post-Hearing Brief

Dear Executive Director Bachman:

Crown Castle Towers 06-2 LLC (“Crown Castle”) and New Cingular Wireless PCS, LLC d/b/a AT&T (“AT&T”) (together, the “Applicants”) respectfully submit this letter in lieu of a post-hearing brief in support of their October 25, 2025 application for a Certificate of Environmental Compatibility and Public Need (the “Application”) to construct, maintain, and operate a 138-foot monopole wireless telecommunications facility (the “Facility”) at 70 Universal Drive in North Haven, Connecticut (the “Site”).

Need

Crown Castle presently owns, manages, maintains and operates a 120-foot telecommunications tower at 120 Universal Drive in North Haven (the “Existing Tower”). Both AT&T and T-Mobile are located on the Existing Tower, at 118 feet and 107 feet antenna centerline height respectively. The lease for the Existing Tower expires in May 2026, and the property owner is no longer interested in hosting the Existing Tower on that property. Crown Castle seeks to effectively relocate the Existing Tower approximately 800 feet to the north of the existing property on a nearby parcel located at 70 Universal Drive.

AT&T provided evidence through its radio-frequency propagation maps of both its existing and proposed coverage in this area around the Site. The proposed Facility allows AT&T to replicate its existing coverage in critical areas such as the I-91 corridor and along Route 17 (Middletown Avenue), Quinnipiac Avenue, Montowese Avenue, McDermott Road (Medtronic

Covidien Medical Manufacturer) as well as surrounding roads (see chart below). To meet its design threshold for coverage, AT&T requires a 120-foot antenna centerline height at the proposed Facility.

Street Name	Distance (mi)
I 91	0.52
US Hwy 5	0.68
Hartford Tpke	0.15
State Hwy 17	0.1
Quinnipiac Ave	1.87
Middletown Ave	1.19
Fitch St	0.7
Park Rd	0.2
Ridge Rd	0.2
Skiff St	0.11
Providence St	0.08
Cross St	0.07
N Frontage Rd	0.01

AT&T will deploy FirstNet services from the proposed Facility, providing prioritized, preemptive wireless services for our first responders. Both the Town of North Haven and the Town of Hamden (the “Municipalities”) are FirstNet customers. The proposed Facility will also support text to 911 and will comply with E911 requirements. Likewise, the proposed Facility will comply with the Warning, Alert and Response Network Act of 2006.

Procedural Background

On July 22, 2025, the Applicants sent notice of their intent to file this Application to the Municipalities (the Town of Hamden is within 2,500 feet of the proposed Facility) commencing the 90-day municipal consultation period. The Applicants met with officials from both Municipalities and neither had comments or suggestions on the Application. In a letter dated September 26, 2026, the Town of North Haven voiced its support for the proposed Facility.

The Applicants filed the Application on October 25, 2025. Notice of the filing of the Application was sent via certified mail to abutters, federal, state, and local officials and agencies. Notice of the filing of the Application was also published in the New Haven Register on October 24 and 27, 2025. One abutter notice (Sunoco LLC) was returned undeliverable; the Applicants resent that notice by regular mail to multiple addresses. The Council deemed the Application complete on November 13, 2025, and closed the evidentiary record on February 3, 2026. March 5, 2026, was set as the deadline for public comments and post-hearing filings, and the Applicants consented to extend the decision deadline to September 23, 2026.

Site Selection

Crown Castle initiated a site search in September 2022 when the 120 Universal Drive lease was uncertain of renewing. In June 2023 Crown Castle learned the Existing Tower would likely need to be decommissioned. To preserve AT&T's existing coverage in the area, Crown Castle created a search ring that emphasized parcels in the commercial industrial zoning district adjacent to the Existing Tower. The 80-foot tower at 90/100 Industrial Drive (where Cellco Partnership d/b/a Verizon Wireless ("Cellco") is currently located) is unable to be modified or upgraded so was not considered as an option. Cellco previously sought to locate on the Existing Tower which could not structurally accommodate the requested collocation. No existing towers, transmission structures, or buildings were both available and feasible.

Crown Castle then contacted multiple property owners near the Existing Tower, but owners declined or were unresponsive. Once a lease was secured for 70 Universal Drive—approximately 800 feet north of the existing tower—the site search concluded. The Applicants are committed to working with the existing property owner to maintain the Existing Tower on a month-to-month basis to ensure on-air continuity for AT&T and T-Mobile during transition from the Existing Tower to the proposed Facility.

Proposed Site & Facility

The Site (Assessor's Map 011, Lot 002) is \pm 6 acres, located in a light industrial zone and has a retail building on it with a paved parking area. The Site is located between railroad tracks and I-91. The proposed Facility lies in the southern portion of the parcel adjacent to the existing paved parking area at \sim 19 feet AMSL. The compound will be approximately 4,900 square feet with an 8-foot chain link security fence and locked gate. Access will utilize the existing parking area with a short (\sim 200-foot) gravel drive to the compound.

The 138-foot monopole will support at least three carriers and can be built to accommodate a 20-foot extension. AT&T will install nine panel antennas, nine RRHs, and two surge arrestors on a platform at the 120-foot antenna centerline height, with an equipment cabinet, battery cabinet, and a 20-kW propane-fueled backup power generator at the base. A 500-gallon propane tank on concrete pad will also be installed for the generator. Utilities will extend underground from a proposed 35-foot utility pole. No water or sewer connections are required.

The closest publicly accessible area (the parking lot) is approximately 35 feet from the tower base; the closest property line is \sim 109 feet and active railroad tracks are \sim 130 feet away. There are six single-family residences within 1,000 feet, the nearest being \pm 635 feet east at 32 Nettleton Avenue. Interstate 91 separates the residences from the proposed Facility.

Consistent with state policy emphasizing continuity following storm events, AT&T will install a 20-kW propane-fueled backup power generator and a 500-gallon propane tank, providing approximately 112 hours of runtime at full load, with 3–4 hours of battery backup. The generator will be exercised remotely for 30 minutes once per week during daytime. Propane fuel was selected in consideration of adjacent wetlands.

Environmental Impacts

The proposed Facility will not result in significant or substantial environmental effect. The effective relocation of the proposed Facility to a parcel only 800 feet to the north means the proposed Facility will continue to be in an industrial area as well as a previously cleared area. As with the Existing Tower, the proposed 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 proposed Facility will be via existing public ways and no tree removal is required for the compound, access, or utility segment.

The proposed Facility lies within Flood Zone X, is outside aquifer protection areas and does not contain prime or statewide important farmland soils. The nearest wetlands are approximately 51 feet southeast of the compound fence; there are no direct wetland impacts. 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.

The Department of Energy and Environmental Protection's Natural Diversity Database determination (May 13, 2025, No. 202504184) identified no known extant populations of federal or state listed species within the project area.

Visual & Historic Considerations

Photo simulations illustrate that the visibility of the proposed Facility will be minimal and, based on the visibility of the Existing Tower, will have little impact on the area. Much of the year-round visibility occurs over the Quinnipiac River, its associated marshes, and undeveloped land to the west and southwest. Where the proposed Facility is visible from neighborhoods, it would be backdropped in most instances by wooded heights of land, and the monopole would not be silhouetted against the sky. The proposed Facility will also be visible from a small section of the East Rock Park Historic District, ±1.92 miles east-northeast, where a similar background will make it difficult to spot with the naked eye. Minimal views of the proposed Facility reach residential areas to the east.

The State Historic Preservation Office determined that no historic properties would be affected.

Conclusion

The evidence and record demonstrate that the proposed Facility has been carefully sited to maintain continuity of AT&T's service while minimizing the environmental and visual effects associated with a new facility. The record further demonstrates that AT&T will have a significant deficit in service once its Existing Tower is decommissioned. The proposed Facility at the Site will not only meet AT&T's coverage needs, but it will also allow Cellco and T-Mobile to fulfill their coverage requirements in this area by allowing for their collocation at the proposed Facility.

For these reasons, the Applicants respectfully request that the Council approve their Application for a 138-foot monopole facility at 70 Universal Drive, North Haven, Connecticut, subject to customary conditions and D&M Plan approval.

Regards,

BROWN RUDNICK LLP



Thomas J. Regan