

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND
NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR
A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE, AND OPERATION
OF A TELECOMMUNICATIONS FACILITY AT 183
SOUNDVIEW LANE,
TOWN OF NEW CANAAN, CONNECTICUT

DOCKET NO. 487

July 20, 2020

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T
LATE-FILED EXHIBITS

Homeland Towers, LLC and AT&T (the “Applicants”) respectfully submit the following late-filed exhibits and information in response to the Connecticut Siting Council’s request at the July 9, 2020 evidentiary hearing for the above-referenced proceeding:

- a) Provide a copy of the Site Location Map behind Tab 4 of the Application with the Wiley, Sweeney and Sosnick properties labeled.

Please see the Site Location Map in Attachment 1 with the Wiley, Sweeney and Sosnick properties labeled.

- b) Provide a copy of the Site Location Map behind Tab 4 of the Application with the projected tower visibility areas identified for the Wiley, Sweeney and Sosnick properties, as applicable.

Please see the Site Location Map in Attachment 2 which includes projected tower visibility for the Wiley, Sweeney and Sosnick properties.

- c) Provide the ground elevation of the Wiley residence as compared to the ground elevation of the proposed tower.

The ground elevation of the Wiley residence is 465± AMSL and the ground elevation of the proposed tower is 502.3± AMSL. Please see the topographic map included in Attachment 3.

- d) Provide a copy of the survey of Town of New Canaan residents regarding wireless towers.

A copy of the “Town of New Canaan Cell Phone Survey” is included in Attachment 4.

- e) Provide a copy of the agreement between Homeland Towers LLC and the Town of New Canaan regarding the responsibility for costs related to possible pipe damage in or around the proposed access drive.

Please see the Homeland Letter to the Town of New Canaan included in Attachment 5.

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council and the service list below with one hard copy sent to the Connecticut Siting Council, in accordance with Connecticut Siting Council directives.

July 20, 2020



Lucia Chiochio
Cuddy & Feder LLP
445 Hamilton Ave, 14th Floor
White Plains, NY 10601
(914)-761-1300
Attorneys for the Applicants

Soundview Neighbors Group

Hugh C. Wiley
Judith R. Wiley
173 Soundview Lane
New Canaan, CT 06840
(203) 984-5156
wileyhugh@gmail.com

John W. Cannavino, Esq.
Cummings & Lockwood LLC
6 Landmark Square
Stamford, CT 06901
(203) 351-4447
jcannavino@cl-law.com

Joseph E. Sweeney
Kathleen A. Sweeney
155 Soundview Lane
New Canaan, CT 06840
(203) 858-3148
JoeNewCanaan@gmail.com

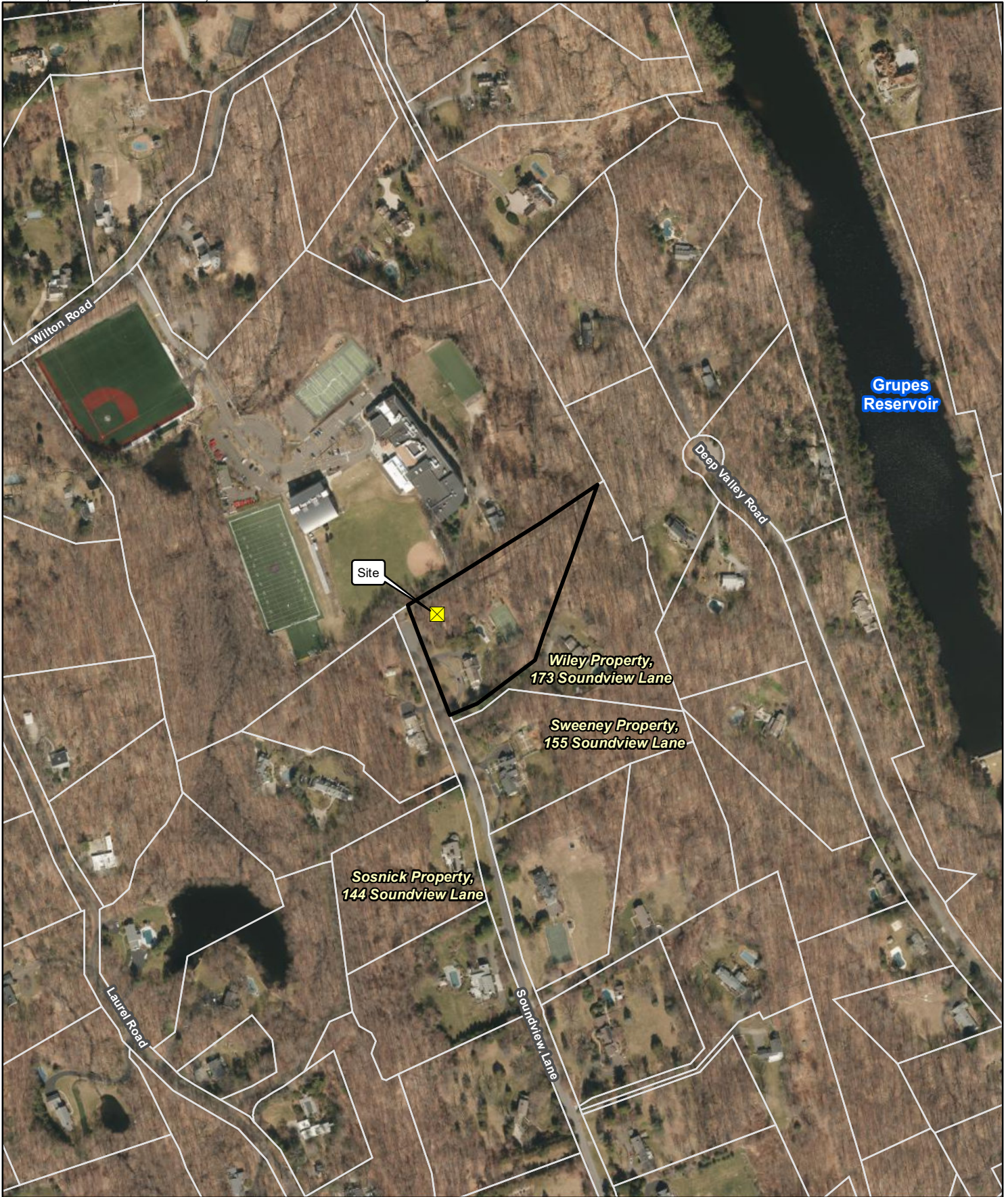
Steven Sosnick
Miriam H. Sosnick
144 Soundview Lane
New Canaan, CT 06840
(203) 972-6993
mssosnick@att.net

St. Luke's School/St. Luke's Foundation, Inc.




Christopher Rosow, Member,
St. Luke's Board of Trustees
Julia Gabriele, Associate Head of
School and Chief Financial Officer
St. Luke's School/St. Luke's
Foundation, Inc.
377 North Wilton Road
New Canaan, CT 06820
gabrielej@stlukesct.org
Christopher.rosow@gmail.com

cc: Raymond Vergati; Manuel Vicente; Harry Carey; Brian Leyden

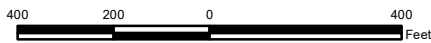
ATTACHMENT 1



Legend

-  Site
-  Subject Property
-  Approximate Parcel Boundary (CTDEEP GIS)

Map Notes:
 Base Map Source: 2016 CT ECO Imagery
 Map Scale: 1 inch = 400 feet
 Map Date: July 2020

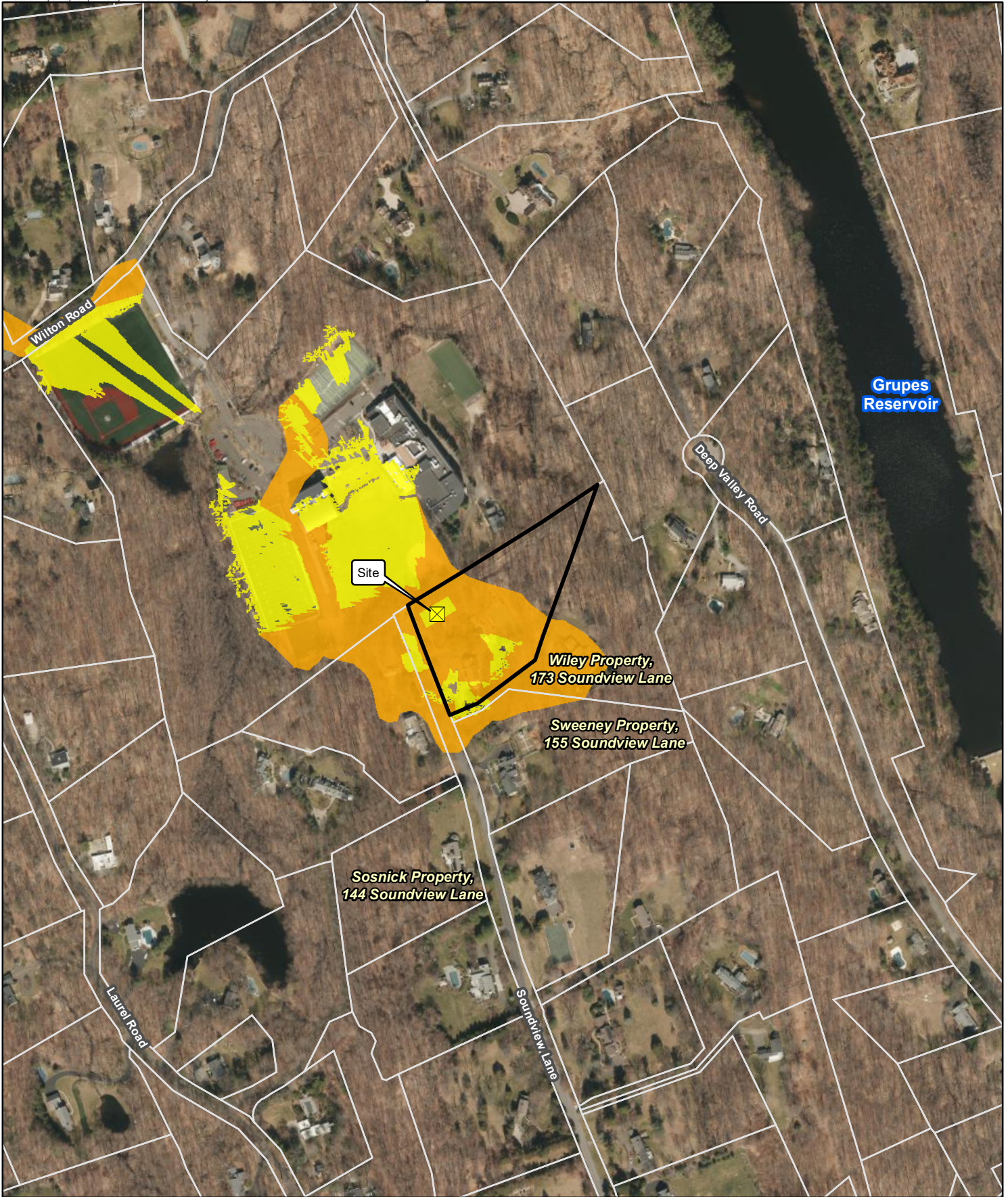


Site Location Map with Select Adjacent Properties Identified




Proposed Wireless
 Telecommunications Facility
 CT027-New Canaan Northeast
 183 Soundview Lane
 New Canaan, Connecticut



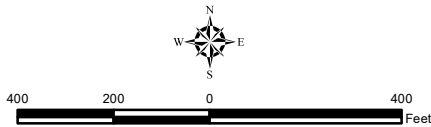
ATTACHMENT 2



Legend

-  Site
-  Predicted Year-Round Visibility
-  Areas of Potential Seasonal Visibility
-  Subject Property
-  Approximate Parcel Boundary (CTDEEP GIS)

Map Notes:
 Base Map Source: 2016 CT ECO Imagery
 Map Scale: 1 inch = 400 feet
 Map Date: July 2020







Site Location Map with Year-Round and Seasonal Visibility

Proposed Wireless
 Telecommunications Facility
 CT027-New Canaan Northeast
 183 Soundview Lane
 New Canaan, Connecticut

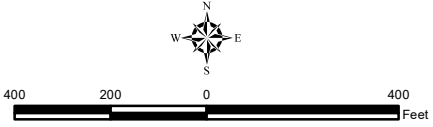


ATTACHMENT 3



- Legend**
-  Site
 -  5-foot Contour Line
 -  Subject Property
 -  Approximate Parcel Boundary (CTDEEP GIS)

Map Notes:
 Base Map Source: 2016 CT ECO Imagery; 2016 CT ECO LIDAR
 5' Contours
 Map Scale: 1 inch = 400 feet
 Map Date: July 2020



Site Location Map with Topographic Contours
 Proposed Wireless Telecommunications Facility
 CT027-New Canaan Northeast
 183 Soundview Lane
 New Canaan, Connecticut



ATTACHMENT 4

New Canaan Cell Phone Survey

Results Through October 25, 2012

Do you use cell phones within New Canaan on a regular basis?

Yes	95%
No	5%

459 Respondents

What Street Do You Live On?

Residents from 175 streets responded to the survey.

There are about 340 streets in New Canaan.

453 Respondents

How Many Cell Phones Does Your Family Use Within New Canaan?

Respondents reported an average of three cell phones per family.

458 Respondents

Please Indicate Which Wireless Service(s) You Use

AT&T 275
Verizon 234
T-Mobile 49
Sprint 29
Others 14

459 Respondents

Totals to more than 459 because of multiple responses from respondents

Where in New Canaan Does Your Cell Phone Work Best?

Downtown 401

South 116

East 23

North 13

West 9

423 Respondents

Totals to more than 423 because of multiple responses from respondents

Where in New Canaan Does Your Cell Phone Get Poor or No Service?

North 287

East 186

West 176

South 79

Downtown 7

399 Respondents

Totals to more than 399 because of multiple responses from respondents

Have You Ever Made a Call in New Canaan Which Was Not Completed or Dropped?

Yes 94%

No 6%

456 Respondents

Have You Ever Made a Call in New Canaan in an Emergency Situation (Police, Fire, Ambulance) Which Was Not Completed or Dropped?

Yes 12%

No 88%

436 Respondents

If You Have Ever Made a Call in New Canaan in an Emergency Situation (Police, Fire, Ambulance) Which Was Not Completed or Dropped.....

What Was The Emergency?

Power Lines/Trees Down

Accident

Fire

Medical

Other

436 Respondents

Do You Support Building More Cell Towers in New Canaan?

Yes 91%

No 9%

450 Respondents

Do You Support Building More Cell Towers in New Canaan?

Comments:

Within Reason, Considering Location and Aesthetics
Absolutely, More the Better, Vital
Time to Join the 21st Century
Emergency Service Concerns
Not in My Back Yard
In My Back Yard
Towers are Awful or Ugly

Do You Think Cell Phone Service in New Canaan Is Acceptable the Way It Is and No Further Service Improvements or Towers Are Necessary?

No 90%
Yes 10%

452 Respondents

Do You Think Cell Phone Service in New Canaan is Acceptable the Way It Is and No Further Service Improvements of Towers Are Necessary?

Comments:

Service is a disaster, lousy, a joke, totally unacceptable.

Need to provide coverage to entire town for emergency services.

Real estate values are affected by poor service.

We're in the 21st century, not the Dark Ages...total coverage is expected today.

Worst service in Fairfield County; third-world countries have better service.

I support a tower on public land in northern New Canaan.

ATTACHMENT 5



HOMELAND TOWERS

June 30, 2020

VIA Certified Mail

Kevin Moynihan, First Selectman

Town of New Canaan Connecticut

77 Main St., 1st Floor

New Canaan, CT 06840

Re: 20' Wide Drainage Easement Located at 183 Soundview Lane, New Canaan, CT 06840 (the "Property")

Dear First Selectman Moynihan:

Reference is made to that certain Option and Ground Lease Agreement dated as of December 13, 2017, as amended by that certain First Amendment to Option and Ground Lease Agreement dated as of April 15, 2019 (collectively, the "Lease") by and between **HOMELAND TOWERS, LLC**, a New York limited liability company, as lessee ("Lessee") and **KEITH S. RICHEY and MARINA O. RICHEY**, as lessor, ("Lessor"). Pursuant to the Lease, Lessor leases to Lessee a portion of the above-referenced Property described as the "Lease and Compound Area" and depicted on the Site Plan attached hereto as Exhibit A (the "Site Plan"). A portion of the Property is also encumbered by a nonexclusive 20' wide drainage easement granted to the Town of New Canaan (the "Town") and evidenced by that certain Right of Way in favor of the Town recorded December 31, 1969 in Book 203, Page 267 of the Fairfield County Records (the "Drainage Easement").

Pursuant to the Drainage Easement, the Town operates and maintains a 15" reinforced concrete pipe with an estimated bottom of pipe located approximately 8-9' below grade (the "Drainage Pipe") within the boundaries of the Drainage Easement as depicted on the Site Plan. As a precondition to granting approval for Lessee's construction and operation of a telecommunications facility on the Property under the Lease, the Town requires that Lessee agree to repair any damage to the Drainage Pipe which is directly located below Lessee's 12' wide gravel access drive (as depicted on the Site Plan, the "Access Drive") and directly caused by Lessee's construction and operation of such facility. Lessee has agreed to repair such damage subject to the terms and conditions stated in this letter. Lessee shall not be responsible for any damage to sections of the Drainage Pipe that are not located below the Access Drive.

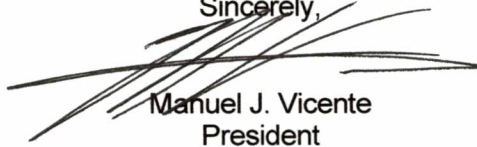
The Town and Lessee (hereinafter the "Parties") agree that the current structural condition of the Drainage Pipe is satisfactory and detailed in that certain ONEVAC, LLC Inspection Report dated January 30, 2020, a copy of which is attached hereto as Exhibit B. The Parties further agree that Lessee shall be responsible for the repair of any damage done to the Drainage Pipe which is directly located below the Access Drive and that is directly caused by the negligence or willful misconduct of Lessee or its agents, licensee, invitees or contractors in the construction, maintenance or operation of the telecommunications facilities.



HOMELAND TOWERS

The terms and conditions in this letter shall be binding upon the successors and assigns of Lessee under the Lease.

Sincerely,



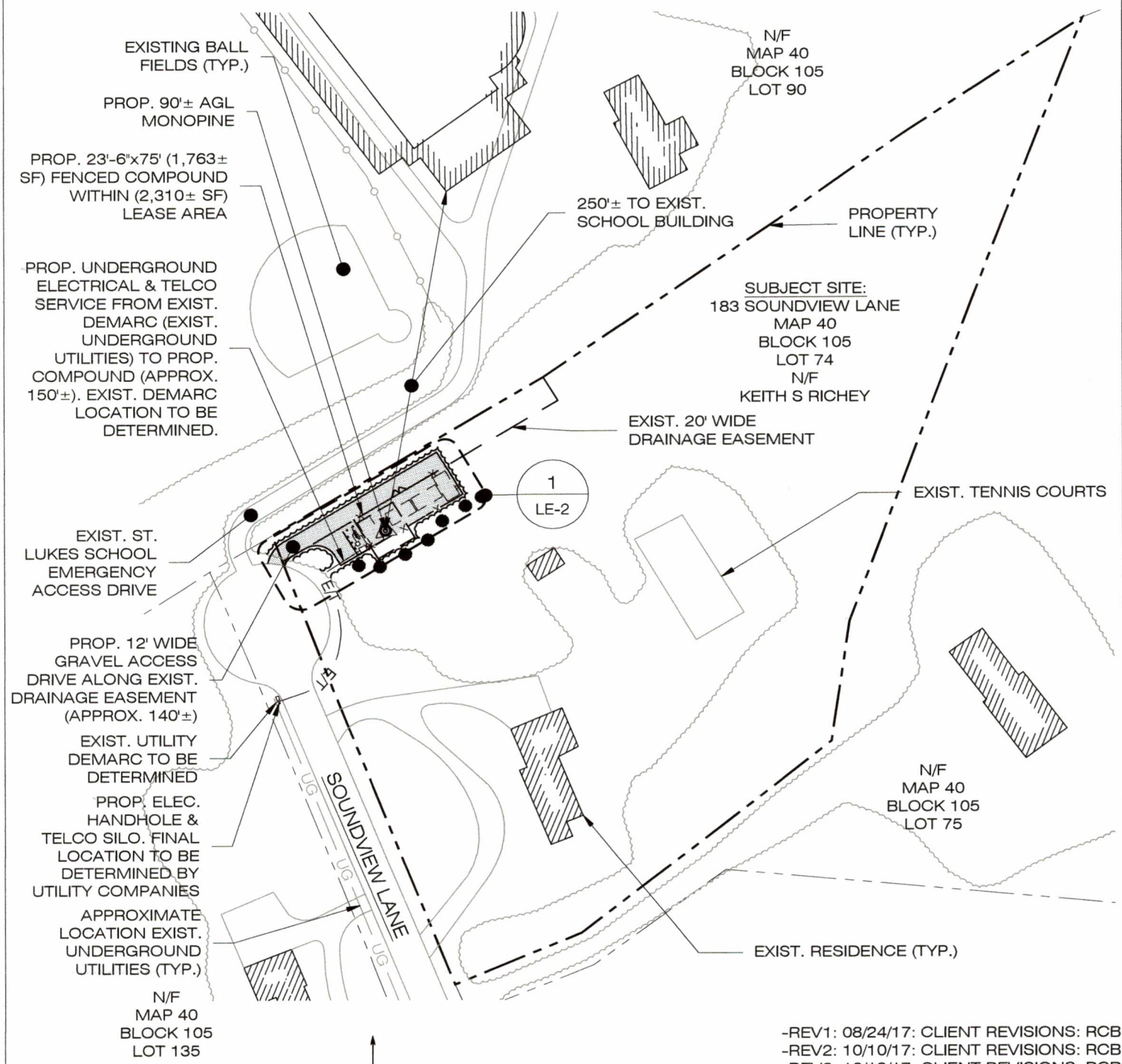
Manuel J. Vicente
President



HOMELAND TOWERS

Exhibit A
Site Plan

See attached



1 SITE PLAN
LE-1 SCALE: 1" = 100'-0"

- REV1: 08/24/17: CLIENT REVISIONS: RCB
- REV2: 10/10/17: CLIENT REVISIONS: RCB
- REV3: 10/13/17: CLIENT REVISIONS: RCB
- REV4: 10/18/17: CLIENT REVISIONS: RCB
- REV5: 11/16/17: CLIENT REVISIONS: RCB
- REV6: 12/11/17: CLIENT REVISIONS: RCB

NOTE: EXACT LOCATION AND ORIENTATION OF PROPOSED LEASE AREA PENDING SITE SURVEY & FURTHER ENGINEERING REVIEW AND ANALYSIS. PROPOSED UTILITY ROUTING AND R.O.W. EXTENTS TO BE DETERMINED BY LOCAL UTILITY PROVIDERS.



HOMELAND TOWERS

Exhibit B
Inspection Report

See attached

SEVERITY

- CRITICAL
- MODERATE
- AVERAGE
- MINOR
- SEVERE

OneVac Sewer & Drain
 38 Deacon Hill Road
 Street : Stamford, CT
 Tel: 1-800-807-3418
 Mobile: 1-203-964-7784
 Email: david.wilburn@onevac.com

Inspection Report

Date: 1/30/2020	Job # :	Weather :	Operator : David Wilburn	Section # : 1	Section name :
Present :	Vehicle :	Camera :	Preset :	Cleaned : no	Rate :

Street 1 : Soundview La	Map # 1 :	From MH : Cb 1
Street 2 :	Map # 2 :	To MH : Culvert
City : New Canaan	VCR # :	Section length : 202.10 ft
Insp. method :	Media # :	Joint length :

Reason of inspection : gen. condition control	Pipe shape : round
Section type : storm water	Pipe size : 15 inch
Area :	Pipe material : RCP
	Lining :

Remarks :

1:518	Position	Observation	MPEG	Photo	Rate
	Cb 1				
	3.00	inspection begins at upstream manhole / Cb 1	00:00:01	1_1_1_30012020_12 1044_A.JPG	
	20.60	service connection, at 12 o'clock / 20' Out Fr Cb 1 Dp 6' 7"	00:02:17	1_1_2_30012020_12 1406_A.JPG	
	45.85	service connection, at 12 o'clock / 45' Out Fr Cb 1 Dp 8' 1"	00:03:13	1_1_3_30012020_12 1544_A.JPG	
	70.30	service connection, at 12 o'clock / 70' Out Fr Cb 1 Dp 7' 10"	00:04:05	1_1_4_30012020_12 1729_A.JPG	
	90.75	service connection, at 12 o'clock / 90' Out Fr Cb 1 Dp 7' 4"	00:04:46	1_1_5_30012020_12 1906_A.JPG	
	110.85	service connection, at 12 o'clock / 110' Out Fr Cb 1 Dp 7' 9"	00:05:25	1_1_6_30012020_12 2038_A.JPG	
	130.70	service connection, at 12 o'clock / 130' Out Fr Cb 1 Dp 7' 3"	00:06:07	1_1_7_30012020_12 2202_A.JPG	
	151.30	service connection, at 12 o'clock / 150' Out Fr Cb 1 Dp 6' 5"	00:06:48	1_1_8_30012020_12 2329_A.JPG	
	171.70	service connection, at 12 o'clock / 170' Out Fr Cb 1 Dp 5'	00:07:27	1_1_9_30012020_12 2507_A.JPG	
	202.10	inspection ends at downstream manhole / 200' Out Fr Cb 1 End Of Inspection Culvert	00:08:24	1_1_10_30012020_1 22704_A.JPG	
	Culvert				

ONEVAC, LLC
RESIDENTIAL / MUNICIPAL / COMMERCIAL / INDUSTRIAL

HUNDREDS OF PROBLEMS... ENDLESS SOLUTIONS... ONEVAC

1-800-807-3418

SEVERITY
LIGHT
MODERATE
AVERAGE
HEAVY
SEVERE

Inspection Pictures

City : New Canaan	Street : Soundview La	Date : 1/30/2020	Section # : 1	Section name :
-----------------------------	---------------------------------	----------------------------	-------------------------	----------------



Photo: 1_1_1_30012020_121044_A.JPG, 00:00:01
inspection begins at upstream manhole / Cb 1



Photo: 1_1_2_30012020_121406_A.JPG, 00:02:17
service connection, at 12 o'clock / 20' Out Fr Cb 1 Dp 6' 7"

ONEVAC, LLC
 RESIDENTIAL - MUNICIPAL - COMMERCIAL - INDUSTRIAL

HUNDREDS OF PROBLEMS - ENDLESS SOLUTIONS - ONEVAC

1-800-807-3418

SEVERITY
 LIGHT
 MODERATE
 AVERAGE
 HEAVY
 SEVERE

OneVac Sewer & Drain
 38 Deacon Hill Road
 Stamford, CT
 Tel: 1-800-807-3418
 Mobile: 1-203-964-7784
 Email: david.wilburn@onevac.com

Inspection Pictures

City : New Canaan	Street : Soundview La	Date : 1/30/2020	Section # : 1	Section name :
-----------------------------	---------------------------------	----------------------------	-------------------------	----------------

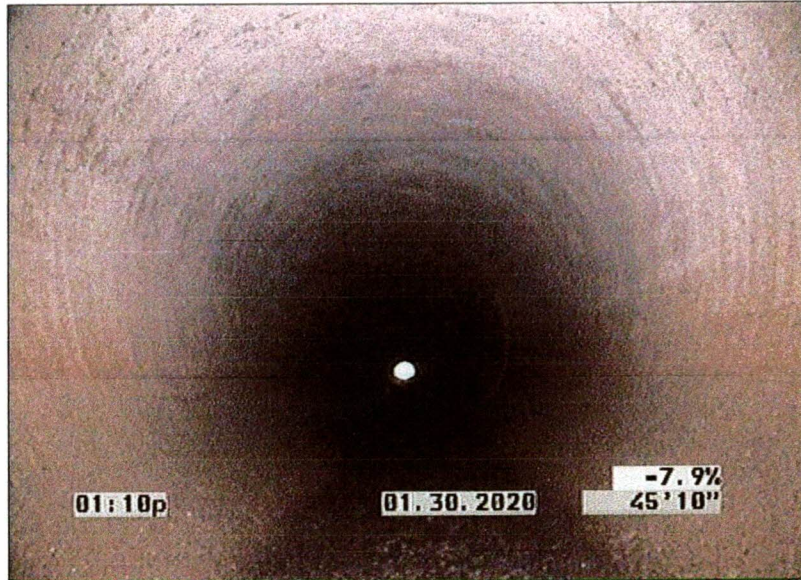


Photo: 1_1_3_30012020_121544_A.JPG, 00:03:13
 service connection, at 12 o'clock / 45' Out Fr Cb 1 Dp 8' 1"

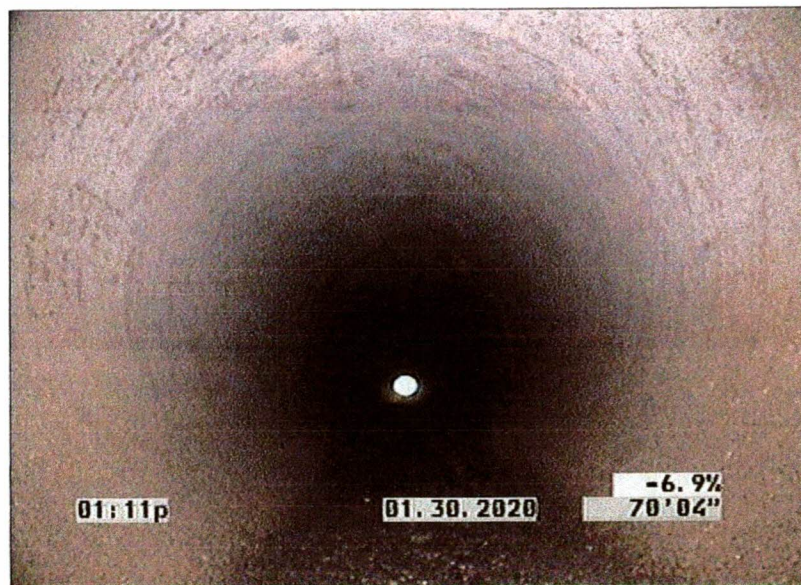


Photo: 1_1_4_30012020_121729_A.JPG, 00:04:05
 service connection, at 12 o'clock / 70' Out Fr Cb 1 Dp 7' 10"

ONEVAC, LLC
RESIDENTIAL • MUNICIPAL • COMMERCIAL • INDUSTRIAL

HUNDREDS OF PROBLEMS... ENDLESS SOLUTIONS... ONEVAC

1-800-837-3418

SEVERITY
LIGHT
MODERATE
AVERAGE
HEAVY
SEVERE

OneVac Sewer & Drain
38 Deacon Hill Road
Stamford, CT
Tel: 1-800-807-3418
Mobile: 1-203-964-7784
Email: david.wilburn@onevac.com

Inspection Pictures

City : New Canaan	Street : Soundview La	Date : 1/30/2020	Section # : 1	Section name :
-----------------------------	---------------------------------	----------------------------	-------------------------	----------------

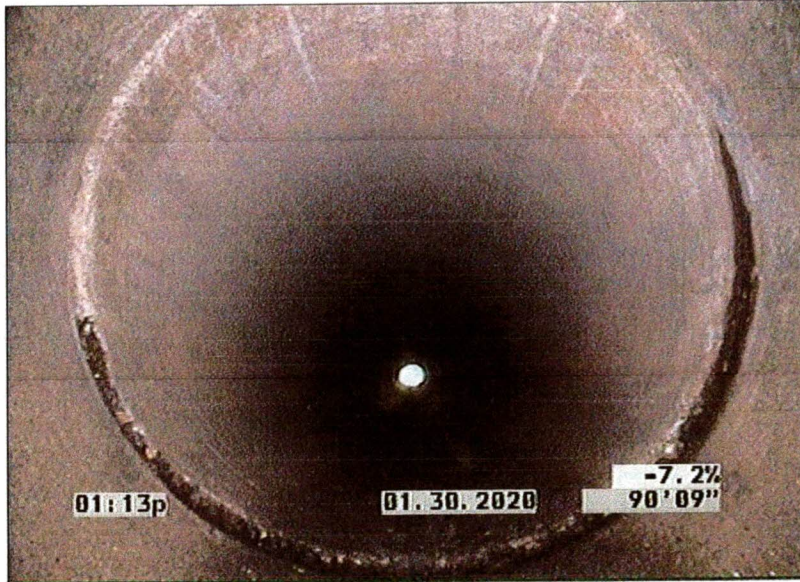


Photo: 1_1_5_30012020_121906_A.JPG, 00:04:46
service connection, at 12 o'clock / 90' Out Fr Cb 1 Dp 7' 4"



Photo: 1_1_6_30012020_122038_A.JPG, 00:05:25
service connection, at 12 o'clock / 110' Out Fr Cb 1 Dp 7' 9"

ONEVAC, LLC
 RESIDENTIAL - MUNICIPAL - COMMERCIAL - INDUSTRIAL
 HUNDREDS OF PROBLEMS - ENDLESS SOLUTIONS - ONEVAC
 1-800-807-3418

SEVERITY
 LIGHT
 MODERATE
 AVERAGE
 POOR
 SEVERE

OneVac Sewer & Drain
 38 Deacon Hill Road
 Stamford, CT
 Tel: 1-800-807-3418
 Mobile: 1-203-964-7784
 Email: david.wilburn@onevac.com

Inspection Pictures

City : New Canaan	Street : Soundview La	Date : 1/30/2020	Section # : 1	Section name :
-----------------------------	---------------------------------	----------------------------	-------------------------	----------------

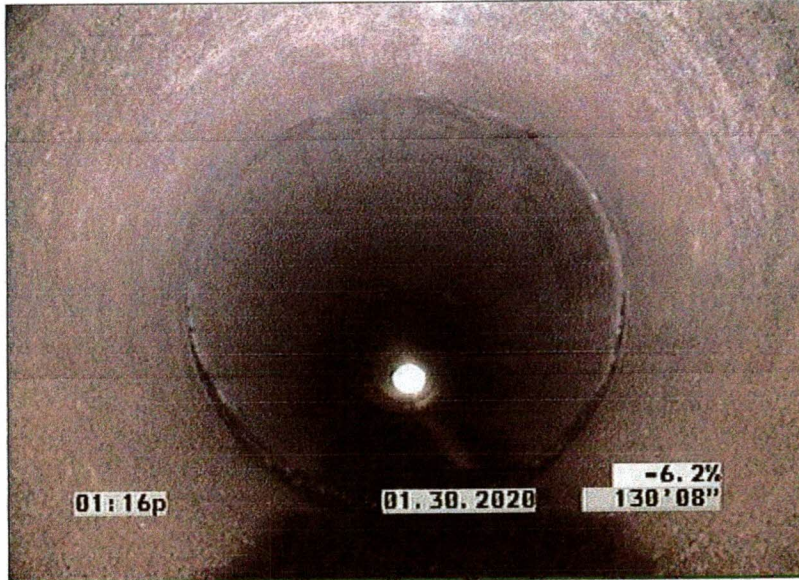


Photo: 1_1_7_30012020_122202_A.JPG, 00:06:07
 service connection, at 12 o'clock / 130' Out Fr Cb 1 Dp 7' 3"



Photo: 1_1_8_30012020_122329_A.JPG, 00:06:48
 service connection, at 12 o'clock / 150' Out Fr Cb 1 Dp 6' 5"

ONEVAC, LLC
 RESIDENTIAL - MUNICIPAL - COMMERCIAL - INDUSTRIAL
 HUNDREDS OF PROBLEMS... ENDLESS SOLUTIONS... ONEVAC
 1-800-807-3418

SEVERITY
 LIGHT
 MODERATE
 AVERAGE
 HEAVY
 SEVERE

OneVac Sewer & Drain
 38 Deacon Hill Road
 Stamford, CT
 Tel: 1-800-807-3418
 Mobile: 1-203-964-7784
 Email: david.wilburn@onevac.com

Inspection Pictures

City : New Canaan	Street : Soundview La	Date : 1/30/2020	Section # : 1	Section name :
-----------------------------	---------------------------------	----------------------------	-------------------------	----------------

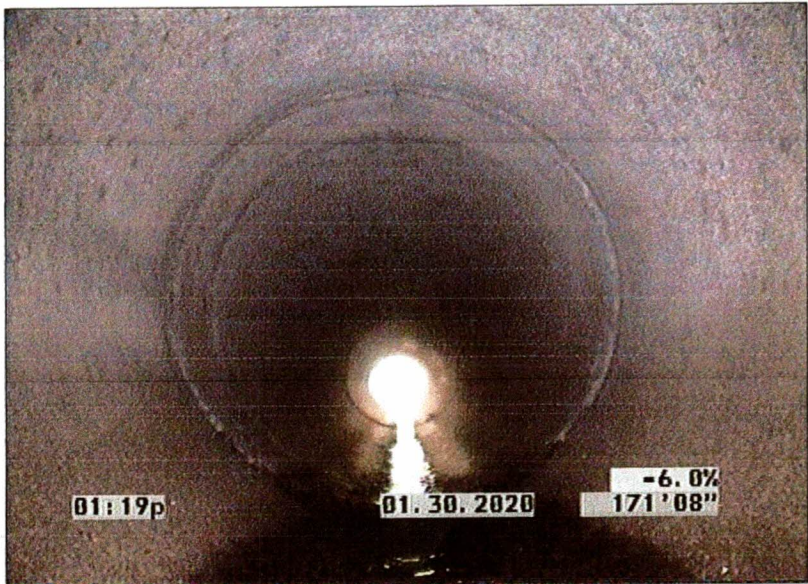


Photo: 1_1_9_30012020_122507_A.JPG, 00:07:27
 service connection, at 12 o'clock / 170' Out Fr Cb 1 Dp 5'



Photo: 1_1_10_30012020_122704_A.JPG, 00:08:24
 inspection ends at downstream manhole / 200' Out Fr Cb 1 End Of Inspection
 Culvert